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Deputy County Attorney
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ATTORNEYS FOR PLAINTIFF

IN THE JUSTICE COURT OF THE STATE OF MONTANA
IN AND FOR THE COUNTY OF MISSOULA
BEFORE, Marie A Andersen, JUSTICE OF THE PEACE

STATE OF MONTANA,

Plaintiff,

-VS-

SHANE WILL,

Defendant,

Department No. 1
Cause No. CR 2017-344

COMPLAINT

SUZY BOYLAN, Deputy County Attorney, deposes and says that on or about the 13th day of January, 2017, in Missoula County, the Defendant committed the offenses of

COUNT I: PRIVACY IN COMMUNICATIONS - 1ST OFFENSE, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(a), punishable by 6 months MCDF and/or \$500 fine; COUNT II: PRIVACY IN COMMUNICATIONS - 2ND OFFENSE, a Misdemeanor, in violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(b), punishable by 1 year MCDF and/or \$1,000 fine; COUNT III: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT IV: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-

1 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT V: PRIVACY IN
2 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
3 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
4 \$10,000 fine; COUNT VI: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
5 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
6 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT VII: PRIVACY IN
7 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
8 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
9 \$10,000 fine; COUNT VIII: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
10 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
11 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT IX: PRIVACY IN
12 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
13 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
14 \$10,000 fine; COUNT X: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
15 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
16 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XI: PRIVACY IN
17 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
18 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
19 \$10,000 fine; COUNT XII: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
20 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
21 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XIII: PRIVACY IN
22 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
23 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
24 \$10,000 fine; COUNT XIV: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
25 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
26 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XV: PRIVACY IN
27 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
28 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or

1 \$10,000 fine; COUNT XIV: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
2 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
3 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XV: PRIVACY IN
4 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
5 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
6 \$10,000 fine; COUNT XVI: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
7 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
8 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XVII: PRIVACY IN
9 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
10 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
11 \$10,000 fine; COUNT XVIII: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
12 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
13 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XIX: PRIVACY IN
14 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
15 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
16 \$10,000 fine; COUNT XX: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
17 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
18 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXI: PRIVACY IN
19 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
20 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
21 \$10,000 fine; COUNT XXII: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
22 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
23 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXIII: PRIVACY IN
24 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
25 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
26 \$10,000 fine; COUNT XXIV: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
27 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
28 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXV: PRIVACY IN

1 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
2 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
3 \$10,000 fine; COUNT XXIV: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
4 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
5 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXV: PRIVACY IN
6 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
7 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
8 \$10,000 fine; COUNT XXVI: PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT
9 OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-8-
10 213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXVII: PRIVACY IN
11 COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in violation of
12 Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or
13 \$10,000 fine; COUNT XXVIII: PRIVACY IN COMMUNICATIONS - 3RD OR
14 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
15 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXIX:
16 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
17 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
18 MSP and/or \$10,000 fine; COUNT XXX: PRIVACY IN COMMUNICATIONS - 3RD OR
19 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
20 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXXI:
21 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
22 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
23 MSP and/or \$10,000 fine; COUNT XXXII: PRIVACY IN COMMUNICATIONS - 3RD OR

1 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
2 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXXIII:

3 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
4 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
5 MSP and/or \$10,000 fine; COUNT XXXIV: PRIVACY IN COMMUNICATIONS - 3RD OR

6 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
7 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXXV:

8 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
9 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
10 MSP and/or \$10,000 fine; COUNT XXXVI: PRIVACY IN COMMUNICATIONS - 3RD OR

11 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
12 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXXVII:

13 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
14 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
15 MSP and/or \$10,000 fine; COUNT XXXVIII: PRIVACY IN COMMUNICATIONS - 3RD OR

16 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
17 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XXXIX:

18 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
19 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
20 MSP and/or \$10,000 fine; COUNT XL: PRIVACY IN COMMUNICATIONS - 3RD OR

21 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
22 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XLI:

23 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
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violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
MSP and/or \$10,000 fine; COUNT XLII: PRIVACY IN COMMUNICATIONS - 3RD OR
SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XLIII:
PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
MSP and/or \$10,000 fine; COUNT XLIV: PRIVACY IN COMMUNICATIONS - 3RD OR
SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XLV:
PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
MSP and/or \$10,000 fine; COUNT XLVI: PRIVACY IN COMMUNICATIONS - 3RD OR
SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XLVII:
PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
MSP and/or \$10,000 fine; COUNT XLVIII: PRIVACY IN COMMUNICATIONS - 3RD OR
SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT XLIX:
PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
MSP and/or \$10,000 fine; COUNT L: PRIVACY IN COMMUNICATIONS - 3RD OR
SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code

1 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LI:

2 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
3 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
4 MSP and/or \$10,000 fine; COUNT LII: PRIVACY IN COMMUNICATIONS - 3RD OR

5 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
6 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LIII:

7 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
8 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
9 MSP and/or \$10,000 fine; COUNT LIV: PRIVACY IN COMMUNICATIONS - 3RD OR

10 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
11 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LV:

12 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
13 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
14 MSP and/or \$10,000 fine; COUNT LVI: PRIVACY IN COMMUNICATIONS - 3RD OR

15 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
16 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LVII:

17 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
18 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
19 MSP and/or \$10,000 fine; COUNT LVIII: PRIVACY IN COMMUNICATIONS - 3RD OR

20 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
21 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LIX:

22 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
23 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
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1 MSP and/or \$10,000 fine; COUNT LX: PRIVACY IN COMMUNICATIONS - 3RD OR
2 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
3 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LXI:
4 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
5 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
6 MSP and/or \$10,000 fine; COUNT LXII: PRIVACY IN COMMUNICATIONS - 3RD OR
7 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
8 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LXIII:
9 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
10 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
11 MSP and/or \$10,000 fine; COUNT LXIV: PRIVACY IN COMMUNICATIONS - 3RD OR
12 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
13 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LXV:
14 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
15 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
16 MSP and/or \$10,000 fine; COUNT LXVI: PRIVACY IN COMMUNICATIONS - 3RD OR
17 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
18 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LXVII:
19 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
20 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
21 MSP and/or \$10,000 fine; COUNT LXVIII: PRIVACY IN COMMUNICATIONS - 3RD OR
22 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
23 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LXIX:
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1 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
2 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
3 MSP and/or \$10,000 fine; COUNT LXX: PRIVACY IN COMMUNICATIONS - 3RD OR
4 SUBSEQUENT OFFENSE, a Felony, in violation of Montana law, namely: Mont. Code
5 Ann. 45-8-213(1)(c), punishable by 5 years MSP and/or \$10,000 fine; COUNT LXXI:
6 PRIVACY IN COMMUNICATIONS - 3RD OR SUBSEQUENT OFFENSE, a Felony, in
7 violation of Montana law, namely: Mont. Code Ann. 45-8-213(1)(c), punishable by 5 years
8 MSP and/or \$10,000 fine.
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11 The facts constituting the offense are:

12 COUNT I: On or about the 13th day of January, 2017, the above-named
13 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
14 harass, annoy, or offend, communicated with Jane by telephone or electronic mail and
15 used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
16 threatened to inflict injury or physical harm to the person or property of the person.
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18 COUNT II: On or about the 16th day of February, 2017, the above-named
19 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
20 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
21 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
22 threatened to inflict injury or physical harm to the person or property of the person.
23

24 COUNT III: On or about the 16th day of February, 2017, the above-named
25 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
26 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
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1 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
2 threatened to inflict injury or physical harm to the person or property of the person.

3 COUNT IV: On or about the 16th day of February, 2017, the above-named
4 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
5 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
6 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
7 threatened to inflict injury or physical harm to the person or property of the person.
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9 COUNT V: On or about the 16th day of February, 2017, the above-named
10 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
11 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
12 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
13 threatened to inflict injury or physical harm to the person or property of the person.
14

15 COUNT VI: On or about the 16th day of February, 2017, the above-named
16 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
17 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
18 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
19 threatened to inflict injury or physical harm to the person or property of the person.
20

21 COUNT VII: On or about the 17th day of February, 2017, the above-named
22 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
23 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
24 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
25 threatened to inflict injury or physical harm to the person or property of the person.
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1 COUNT VIII: On or about the 18th day of February, 2017, the above-named
2 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
3 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
4 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
5 threatened to inflict injury or physical harm to the person or property of the person.
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7 COUNT IX: On or about the 18th day of February, 2017, the above-named
8 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
9 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
10 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
11 threatened to inflict injury or physical harm to the person or property of the person.
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13 COUNT X: On or about the 18th day of February, 2017, the above-named
14 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
15 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
16 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
17 threatened to inflict injury or physical harm to the person or property of the person.
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19 COUNT XI: On or about the 20th day of February, 2017, the above-named
20 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
21 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
22 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
23 threatened to inflict injury or physical harm to the person or property of the person.
24

25 COUNT XII: On or about the 20th day of February, 2017, the above-named
26 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
27 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
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1 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
2 threatened to inflict injury or physical harm to the person or property of the person.

3 COUNT XIII: On or about the 20th day of February, 2017, the above-named
4 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
5 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
6 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
7 threatened to inflict injury or physical harm to the person or property of the person.
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9 COUNT XIV: On or about the 21st day of February, 2017, the above-named
10 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
11 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
12 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
13 threatened to inflict injury or physical harm to the person or property of the person.
14

15 COUNT XV: On or about the 22nd day of February, 2017, the above-named
16 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
17 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
18 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
19 threatened to inflict injury or physical harm to the person or property of the person.
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21 COUNT XVI: On or about the 23rd day of February, 2017, the above-named
22 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
23 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
24 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
25 threatened to inflict injury or physical harm to the person or property of the person.
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1 COUNT XVII: On or about the 23rd day of February, 2017, the above-named
2 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
3 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
4 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
5 threatened to inflict injury or physical harm to the person or property of the person.
6

7 COUNT XVIII: On or about the 23rd day of February, 2017, the above-named
8 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
9 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
10 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
11 threatened to inflict injury or physical harm to the person or property of the person.
12

13 COUNT XIX: On or about the 23rd day of February, 2017, the above-named
14 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
15 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
16 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
17 threatened to inflict injury or physical harm to the person or property of the person.
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19 COUNT XX: On or about the 24th day of February, 2017, the above-named
20 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
21 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
22 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
23 threatened to inflict injury or physical harm to the person or property of the person.
24

25 COUNT XXI: On or about the 25th day of February, 2017, the above-named
26 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
27 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
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1 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
2 threatened to inflict injury or physical harm to the person or property of the person.

3 COUNT XXII: On or about the 26th day of February, 2017, the above-named
4 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
5 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
6 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
7 threatened to inflict injury or physical harm to the person or property of the person.
8

9 COUNT XXIII: On or about the 3rd day of March, 2017, the above-named
10 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
11 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
12 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
13 threatened to inflict injury or physical harm to the person or property of the person.
14

15 COUNT XXIV: On or about the 4th day of March, 2017, the above-named
16 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
17 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
18 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
19 threatened to inflict injury or physical harm to the person or property of the person.
20

21 COUNT XXV: On or about the 5th day of March, 2017, the above-named
22 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
23 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
24 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
25 threatened to inflict injury or physical harm to the person or property of the person.
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28

1 COUNT XXVI: On or about the 5th day of March, 2017, the above-named
2 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
3 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
4 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
5 threatened to inflict injury or physical harm to the person or property of the person.
6

7 COUNT XXVII: On or about the 5th day of March, 2017, the above-named
8 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
9 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
10 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
11 threatened to inflict injury or physical harm to the person or property of the person.
12

13 COUNT XXVIII: On or about the 5th day of March, 2017, the above-named
14 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
15 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
16 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
17 threatened to inflict injury or physical harm to the person or property of the person.
18

19 COUNT XXIX: On or about the 5th day of March, 2017, the above-named
20 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
21 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
22 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
23 threatened to inflict injury or physical harm to the person or property of the person.
24

25 COUNT XXX: On or about the 6th day of March, 2017, the above-named
26 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
27 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
28

1 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
2 threatened to inflict injury or physical harm to the person or property of the person.

3 COUNT XXXI: On or about the 6th day of March, 2017, the above-named
4 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
5 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
6 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
7 threatened to inflict injury or physical harm to the person or property of the person.
8

9 COUNT XXXII: On or about the 6th day of March, 2017, the above-named
10 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
11 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
12 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
13 threatened to inflict injury or physical harm to the person or property of the person.
14

15 COUNT XXXIII: On or about the 6th day of March, 2017, the above-named
16 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
17 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
18 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
19 threatened to inflict injury or physical harm to the person or property of the person.
20

21 COUNT XXXIV: On or about the 6th day of March, 2017, the above-named
22 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
23 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
24 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
25 threatened to inflict injury or physical harm to the person or property of the person.
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1 COUNT XXXV: On or about the 6th day of March, 2017, the above-named
2 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
3 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
4 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
5 threatened to inflict injury or physical harm to the person or property of the person.
6

7 COUNT XXXVI: On or about the 8th day of March, 2017, the above-named
8 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
9 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
10 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
11 threatened to inflict injury or physical harm to the person or property of the person.
12

13 COUNT XXXVII: On or about the 9th day of March, 2017, the above-named
14 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
15 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
16 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
17 threatened to inflict injury or physical harm to the person or property of the person.
18

19 COUNT XXXVIII: On or about the 12th day of March, 2017, the above-named
20 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
21 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
22 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
23 threatened to inflict injury or physical harm to the person or property of the person.
24

25 COUNT XXXIX: On or about the 14th day of March, 2017, the above-named
26 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
27 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
28

1 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
2 threatened to inflict injury or physical harm to the person or property of the person.

3 COUNT XL: On or about the 12th day of March, 2017, the above-named
4 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
5 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
6 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
7 threatened to inflict injury or physical harm to the person or property of the person.
8

9 COUNT XLI: On or about the 14th day of March, 2017, the above-named
10 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
11 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
12 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
13 threatened to inflict injury or physical harm to the person or property of the person.
14

15 COUNT XLII: On or about the 15th day of March, 2017, the above-named
16 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
17 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
18 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
19 threatened to inflict injury or physical harm to the person or property of the person.
20

21 COUNT XLIII: On or about the 15th day of March, 2017, the above-named
22 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
23 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
24 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
25 threatened to inflict injury or physical harm to the person or property of the person.
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28

1 COUNT XLIV: On or about the 19th day of March, 2017, the above-named
2 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
3 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
4 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
5 threatened to inflict injury or physical harm to the person or property of the person.
6

7 COUNT XLV: On or about the 19th day of March, 2017, the above-named
8 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
9 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
10 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
11 threatened to inflict injury or physical harm to the person or property of the person.
12

13 COUNT XLVI: On or about the 19th day of March, 2017, the above-named
14 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
15 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
16 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
17 threatened to inflict injury or physical harm to the person or property of the person.
18

19 COUNT XLVII: On or about the 19th day of March, 2017, the above-named
20 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
21 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
22 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
23 threatened to inflict injury or physical harm to the person or property of the person.
24

25 COUNT XLVIII: On or about the 19th day of March, 2017, the above-named
26 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
27 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
28

1 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
2 threatened to inflict injury or physical harm to the person or property of the person.

3 COUNT XLIX: On or about the 19th day of March, 2017, the above-named
4 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
5 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
6 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
7 threatened to inflict injury or physical harm to the person or property of the person.
8

9 COUNT L: On or about the 19th day of March, 2017, the above-named
10 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
11 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
12 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
13 threatened to inflict injury or physical harm to the person or property of the person.
14

15 COUNT LI: On or about the 20th day of March, 2017, the above-named
16 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
17 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
18 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
19 threatened to inflict injury or physical harm to the person or property of the person.
20

21 COUNT LII: On or about the 23rd day of March, 2017, the above-named
22 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
23 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
24 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
25 threatened to inflict injury or physical harm to the person or property of the person.
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1 COUNT LIII: On or about the 24th day of March, 2017, the above-named
2 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
3 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
4 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
5 threatened to inflict injury or physical harm to the person or property of the person.
6

7 COUNT LIV: On or about the 24th day of March, 2017, the above-named
8 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
9 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
10 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
11 threatened to inflict injury or physical harm to the person or property of the person.
12

13 COUNT LV: On or about the 25th day of March, 2017, the above-named
14 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
15 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
16 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
17 threatened to inflict injury or physical harm to the person or property of the person.
18

19 COUNT LVI: On or about the 25th day of March, 2017, the above-named
20 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
21 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
22 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
23 threatened to inflict injury or physical harm to the person or property of the person.
24

25 COUNT LVII: On or about the 25th day of March, 2017, the above-named
26 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
27 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
28

1 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
2 threatened to inflict injury or physical harm to the person or property of the person.

3 COUNT LVIII: On or about the 25th day of March, 2017, the above-named
4 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
5 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
6 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
7 threatened to inflict injury or physical harm to the person or property of the person.
8

9 COUNT LIX: On or about the 27th day of March, 2017, the above-named
10 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
11 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
12 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
13 threatened to inflict injury or physical harm to the person or property of the person.
14

15 COUNT LX: On or about the 27th day of March, 2017, the above-named
16 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
17 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
18 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
19 threatened to inflict injury or physical harm to the person or property of the person.
20

21 COUNT LXI: On or about the 28th day of March, 2017, the above-named
22 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
23 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
24 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
25 threatened to inflict injury or physical harm to the person or property of the person.
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28

1 COUNT LXII: On or about the 28th day of March, 2017, the above-named
2 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
3 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
4 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
5 threatened to inflict injury or physical harm to the person or property of the person.
6

7 COUNT LXIII: On or about the 28th day of March, 2017, the above-named
8 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
9 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
10 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
11 threatened to inflict injury or physical harm to the person or property of the person.
12

13 COUNT LXIV: On or about the 28th day of March, 2017, the above-named
14 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
15 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
16 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
17 threatened to inflict injury or physical harm to the person or property of the person.
18

19 COUNT LXV: On or about the 28th day of March, 2017, the above-named
20 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
21 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
22 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
23 threatened to inflict injury or physical harm to the person or property of the person.
24

25 COUNT LXVI: On or about the 28th day of March, 2017, the above-named
26 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
27 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
28

1 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
2 threatened to inflict injury or physical harm to the person or property of the person.

3 COUNT LXVII: On or about the 28th day of March, 2017, the above-named
4 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
5 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
6 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
7 threatened to inflict injury or physical harm to the person or property of the person.
8

9 COUNT LXVIII: On or about the 28th day of March, 2017, the above-named
10 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
11 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
12 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
13 threatened to inflict injury or physical harm to the person or property of the person.
14

15 COUNT LXIX: On or about the 28th day of March, 2017, the above-named
16 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
17 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
18 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
19 threatened to inflict injury or physical harm to the person or property of the person.
20

21 COUNT LXX: On or about the 28th day of March, 2017, the above-named
22 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
23 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
24 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
25 threatened to inflict injury or physical harm to the person or property of the person.
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1 COUNT LXXI: On or about the 28th day of March, 2017, the above-named
2 Defendant knowingly or purposely and with the purpose to terrify, intimidate, threaten,
3 harass, annoy, or offend, communicated with Jane Doe by telephone or electronic mail
4 and used obscene, lewd, or profane language, suggested a lewd or lascivious act, or
5 threatened to inflict injury or physical harm to the person or property of the person.
6

7 DATED this 31st day of March, 2017.

8 
9 SUZY BOYLAN
10 Deputy County Attorney

11 Subscribed and sworn to before me this ____ day of March, 2017.
12

13 JUSTICE OF THE PEACE
14

15 COMPLAINT 17-828
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SUZY BOYLAN
Deputy County Attorney
KIRSTEN H. PABST
Missoula County Attorney
Missoula County Courthouse
Missoula, Montana 59802
(406) 258-4737
ATTORNEYS FOR PLAINTIFF

IN THE JUSTICE COURT OF THE STATE OF MONTANA
IN AND FOR THE COUNTY OF MISSOULA
BEFORE, Marie A Andersen, JUSTICE OF THE PEACE

STATE OF MONTANA,

Plaintiff,

-VS-

SHANE WILL,

Defendant,

Department No. ¹
Cause No. CR-2017-344

AFFIDAVIT OF PROBABLE CAUSE

STATE OF MONTANA)
 : ss
County of Missoula)

SUZY BOYLAN, Deputy County Attorney, Montana, being first duly sworn upon
oath, deposes and says:

I have read the official law enforcement reports regarding the investigation of
SHANE WILL for allegedly committing the offense(s) set forth in the complaint and based
upon the information contained in the reports, if true, believe probable cause exists to
justify charging the above-named defendant as specified in the accompanying complaint.

On or about March 28, 2017, Jane Doe reported to the Missoula Police
Department that the above-named Defendant has been harassing her for several years.
Jane Doe has only met Defendant in person a few times, but has received many

1 messages from Defendant through Facebook Messenger. Many of the messages were
2 harassing, obscene, and/or threatening. Jane Doe eventually began receiving
3 messages from Defendant telling her he knows where she lives. Jane Doe moved away
4 from Missoula for a time and then moved back. Defendant's messages have escalated
5 since she returned. Jane Doe tried to ignore his messages and occasionally responded
6 in order to try to keep things friendly, but when Defendant's messages started including
7 threats to and about her co-workers, Jane Doe made a report to the Missoula Police
8 Department. One of Jane Doe's co-workers previously made a report to law
9 enforcement after receiving messages from Defendant about raping and assaulting
10 Jane Doe.
11

12
13 Jane Doe was interviewed and provided approximately 80 pages of messages
14 from Defendant dating to January of 2017. The Missoula Police Department is in the
15 process of obtaining all of the messages Defendant sent to Jane Doe. The investigation
16 is continuing and may lead to additional charges.
17

18 The messages Defendant sent to Jane Doe through Facebook Messenger came
19 from an account under a movie character's name. However, the content of some of the
20 messages makes it clear that the messages are from Defendant.
21

22 Jane Doe responded only occasionally to the messages. She told Defendant
23 several times to stop talking to her that way. She told him at least once to stop
24 contacting her, but he did not.

25 Jane Doe reports that the messages have made her feel threatened and afraid.
26 She also reported paying for a membership at a second gym after discovering the
27
28

1 Defendant went to the same gym she did. She reported that she sleeps with a weapon
2 and has taken security measures at her home.

3 The messages (some in whole and some in part) include:
4

5
6 Count I (1/13/17): "quit actin like a nigger dumb bitch"

7
8 Count II: (2/16/17): "...I might just get a thing of protien [sic] from my friend...I
9 buy my sexual enhancers and big penis pills there for
10 hardcore power fucking"

11
12 Count III (2/16/17): "i think I mighta seen your son when I was ridin my bike by
13 russel park when I just moved in there...I dont know why
14 your [sic] so scared about me around kids...."

15
16 Count IV (2/16/17): "...uhhh ya look at my hard nipples take me on vacation and
17 ill let u titty fuck me...."

18
19 Count V (2/16/17): "i am going to kill some mother fuckers one day u know that
20 lol [laugh out loud]
21 get a nice long range sniper with a silencer lol [laugh out
22 loud]...."

23
24 Count VI (2/16/17): "i got \$20 come over hear and put that ass on me ma"

25
26 Count VII (2/17/17): "i hate you but I wanna fuck u so hard
27 hate fuck
28 u wanna hate fuck? "

1 Count VIII (2/18/17):

"...I bought supps otherwise I was gonna get some food with
u but u hate me cause you're a stupid mudshark wigger
tattoos arists fucker faggot hear some nig blasters some
college kid in the ramps last night haha my friend saw it...."

6 Count IX (2/18/17):

"i wanna fuck your pussy"

8 Count X (2/1/17):

"like just because im nto drinking selling crack or smoking
drugs and throwing money doenst mean i dont like sex or
should be having sex with bitches on my level get what im
saying
your retarded if u think different
ill smack the shit outta if u disagree
ill pimp slap the shit outta u if think that only people with
money drugs and alcohol should be fuckin u know what ill
beat the hell outta us if that's what u think
cause anyone that thinks that needs there other fuckin ass
kicked like how hard is it to be straight sober and find a
match based on looks
to many faggots inn Missoula
pshhh i kill people do something about it
its like get straight clean sober find a real physical match
then take your money alcohol and drugs and burn them it
like get with someone on your physical appearance level
when you base your match on money alcohol and drugs u
will have nothing but regrets

1 kill yourself theres no way in fuck ide wake up the next day
2 not wanting to kill myself knowing that I fooled with a fat ugly
3 old pig ide seriously just wnana kill myself
4 lol [laugh out loud] there is nothing u can do about it ill take
5 down anyone that even trys to step up to me"
6

7 Count XI (2/20/17): "what r u doing u lame noob that knows nothing can u even
8 afford a phone [phone number] or get at me no this facebook
9 that u blocked me on u stupid fuckin tattooed wigger"
10

11 Count XII (2/20/17): "ill come over and smoke crack in front of your kids
12 u fuckin materialistic whore"
13

14 Count XIII (2/2017): "who do u wanna fuck? who are fucking?"
15

16 Count XIV (2/21/17): "vagina twat pussy let me see your boobs show me your ass
17 come over and suck my dick then fuck it"
18

19 Count XV (2/22/17): "check your Instagram messages
20 smd [suck my dick] bitch"
21

22 Count XVI (2/23/17): "...i need 100 assholes to fuck all with just my 1 cock....
23 u have no training you will lose I will fucking destroy you
24 i got a bomb strapped to my chest bitch
25 and im threatening everyone in the court room
26 do what I say or we all die
27
28

1 ya I got a bomb strapped to my chest im threatning
2 thousands at once that 1 fine times 10,000 that's lifes in
3 prison all just for threatening people multiple times
4 1 ticket for each tim i threaten someone
5 if your gonna dime it up 1000 times u mine as well just kill
6 people and steal there shit u stupid fuckin retard just armed
7 robbed u stupid fucking bitch...
8 u know how many times ive been shot at u know how many
9 times the cops have kicked in my door bitch your retarded I
10 kill mother fuckers...
11 fuckin pos [piece of shit] wont be the first time ive left a room
12 of 20 people dead and walked out
13 fuckin mudshark ratchet ass bitch...."

14
15 Count XVII (2/23/17): " try your credit card try your bank account delete hacked kill
16 yourself. i don't even have a bank account why have one
17 when i can hack anyones i want hows your phone
18 workin...?"

19
20 Count VIII (2/23/17): "...u wouldn't last 2min in my world bitch"

21
22 Count VIX (2/23/17): "...look sexually I like u a lot and am attracted to u life is just
23 lie not everything is a bed of roses all the time
24 your fucking beautiful and u know what ide never turn down
25 your love cause any man that would is a fool
26 if u ever need someone to love ide try to be there for u asap
27 but I mean its not like u do or maybe u do idk [I don't know]
28

1 if u wanna fuck lets fuck cause I do I wanna fuck u lol [laugh
2 out loud]
3 its because im in love with u i love you"
4

5 Count XX (2/24/17): "...I bought more computer parts to hack your shit from
6 outside...and fuck u digitally bitch lmao [laughing my ass
7 off]...."
8

9 Count XXI (2/25/17): "...will u come over and suck my dick? check your Instagram
10 wanna touch it wanna suck wanna put your hands all over
11 me want me to kiss u all over your body
12 let me fuck your tits"
13

14 Count XXII (2/26/17): "how are u still alive
15 there is no way u dont piss off anyone els more then me
16 like some has had to attempt killing u by now
17 like there has to be someone that hates u more then i do"
18

19 Count XXIII (3/3/17): "im doubling up tomorrow twice the power and taking u down
20 bitch believe me u already don't stand a chance but not that
21 im doubling up your really gonnabe fuck"
22

23 Count XXIV (3/4/17): "...want my addres
24 i promis iw otn try to fuck u or anything"
25

26 Count XXV (3/5/17): "kick your ass bitch
27 kcik the shit outta u"
28

Count XXVI (3/5/17):

"ill trade ya something for your glock

if ya still got ti

is it s a 3rd or 4th gen?

i had a 3rd gen

ill sell u a holster for it

a hoag

gonna need some ammo for that its gonna be kinda useless

unless its chambered with the safety off

trash

u know if u wanna sell it

lemme know

u would put a gun in my hands...

u would

fuck u doing bish who the fuck u think u are"

Count XXVII (3/5/17):

"lemme guess working sunday to tell everyone to have a

nice blue Monday u fcukin e tard

e traded dumb bitch voer hear"

Count XXVII (3/5/17):

"u fucking slutty prostitute whore"

Count XXIX (3/5/17):

"...want it up the butt?

...why dont u take a pic of your anus then put it on ebay

...fucking pathetic pos [piece of shit]

u deserve a bullet in the head nothing more

...u deserve a bullet to the brain"

Count XXX (3/6/17):

"[Jane Doe] I fuckin hate u I only like ur ass and tits sexualy
ide Fuck ur brains out everything else I hate
Just unhappiness in satisfaction and hating life in general
obviously
Skrewdriver shank a cop in his jugular and steal all his shit
White power
Every nark is gonna get shanked to death skrewdriver
I fucking hate narks specially ones that commit worse crimes
then the shit they nark on people 4 gonna kill them all swear
to god
I'm gonna stab the Fuck out of every nark I come into
contact with"

Count XXXI (3/6/17):

"Sex feels good we should have lots of it
Only with u thow no one els"

Count XXXII (3/5/17):

"It's like bitch if u want to Fuck just say u wanna Fuck
And I'll Fuck u
Bitches actin like u gotta work a steady job for 5 ears get
married by mansion range rover then go on a cruise ship an
finally u will get laid it's like I been fuckin since 12 for free
what r u a virgin cuz u gonna be if that's what u think lol
[laugh out loud]
[Jane Doe] the truth o you being a slutty prostitute whore is
just the truth not meanness slut
...ur so hot with those ass titties ide still Fuck u I'll Fuck u
right now
No condom fill it twat with jiz and give you my cancer"

Count XXXIII (3/6/17):

“...so your single and sleep alone a women as beautiful as
you shouldn’t im single and I sleep alone 2 but if yu wanna
change that
if u ever need someone to love ill love u
u know if your single and dont wannabe or u just dont wanna
sleep alone or are horny and wanna have sex I can be there
for u
and ya it is free sex love only takes a man and a women
nothing more lol [laugh out loud]

Count XXXIV (3/6/17):

“...bull shit u fucking whore
...u don't know shot you're a fuckin retard
why don't u wuit sucking dick....
if you don't im gonna stab the fuck outta u
if u nark ill shank the shit outta u bitch
and after i stab smeone in front of his or her face 100 times
there gonna do what about it?
after I just drop kick and punch 10 people I the face in a row
your gonna do what about it
throw u in the mosh pit and stomp your face in
ive had enough of the narking anyone that narks will be
getting stuck with a sharp object
multiple times
repeated violent stabbing
lmao [laughing my ass off]”

Count XXXV (3/6/17): "fucking bitch
u idiot!
mean ass cunt
wanna get slapped in the face with a dick?"

Count XXXVI (3/8/17): "...some sheriff been knocking at my door the past 2 days
my ex found out where i lived on saterday
she filed a restraining order on me and was at my house
p[arty saterday
that motherfucker better not come knocking on my door
everyday
I might be smoking blunt singing I shot the sheriff tomorrow
....swear to fuckin god ill kill someone weak ass nark bitches
pig tool gangraping trick
bombbombbombobmbobmbobombombbomBOMB lol
[laugh out loud]
it's your fucking fault u stupid fucking whore....
u piece of fucking shit...
im gonna have to kill u is the right thing to do"

Count XXXVII (3/9/17): "u want a massage?...."

Count XXXVIII (3/12/17): "r u back in vegas
I just got outta jail
let me see your phone I'm calling the cops
narks galore
why u aint put no money on my books bitch fuck u
get your ass in lock down bitch now...."

Count XXXIX (3/14/17): "im gonna have to call reinforcements miss if u do not
comply with statute 19111213
just stay right there and wait for my other pigs to get hear
and help me gangrape u"

Count XL (3/14/17): "i promise ill be nice 2 u"

Count XLI (3/14/17): "[Jane Doe] i wannabe really nice to u this is stupid just add
my other facebook
ya really nice
so nice I wannabe so nice lol [laugh out loud]

Count XLII (3/15/17): "...u wannabe choked wile I see how far i can shuv my cock
up in u is that what u like lol [laugh out loud]"

Count XLIII (3/15/17): "got love have no warrants and being able to nark again got
its great watchi just call the cops now every rich faggot n
probation with drugs goers to jail and only get s \$25 canteen
a week
haha faggot nigger heroin addict wanna fight bitch ill kill u....
im gonna kill people"

Count XLIV (3/19/17): "hey how hard of a pound do u think your ass can take?
would u like if i just laid u face down and went as hard as i
could on it? u think u could handle that? u think our pussy
would just explode cum all over my dick? would u like that u

1 want me to just smash the fuck outta your ass as hard as I
2 can?
3 u think u can handle as hard as i can go?
4 how much booty you got? ide make your hole body shake
5 ide be fucking so u hard your body would like to go into a
6 coma
7 u wanna let me ill prove it to u
8 ya u like it really really fuckin hard
9 u think u got a booty that can take my wrath?"
10
11 Count XLV (3/19/17): "do u have any money can i have some?"
12
13 Count XLVI (3/19/17): "...i see u are online faggot
14 bitch
15 fucking pussy
16
17 Count XLVII (3/19/17): "i wasnt mean u know u like being bent over and your ass
18 gone off one that's not mean u like it"
19
20 Count XLVII (3/19/17): "...do u wanna lay in bed and watch a movie i promise i wont
21 try to fuck u"
22
23 Count XLIX (3/19/17): "let me come over I promise I wont do anything to u with my
24 penis"
25
26 Count L (3/20/17): "why u such a bad slut?
27 u are the worst slut in town
28 wanna shoot it up whore?"

1 give me your fuckin gun your useless with ti"

2
3 Count LI (3/2017):

"u aint gonna do shit with it u faggot ass nigger bitch
4 break your neck break your leg
5 fat nigger faggot fucker moraless prostitute lemon party bitch
6 with no integrity
7 shoot it u pussy give me your glock and full clip ill do it
8 is there a cop or sheriff in there give me your gun ill od it
9 ill pop his ass give me your gun
10 gimme your fuckin gun
11 ill show you what that un u have was made for
12 fucking give it to me
13 if u don't give me that gun your gonna get attacked
14 im gonna break your fuckin neck and steal it from u
15 then im gonna shoot every cop u know with it"

16
17 Count LII (3/23/17):

"[Jane Doe] i think u might be deeply disturbed and fucked in
18 the head...."

19
20 Count LIII (3/24/17):

"d bag is that a peace sign your throwing up or twat licking
21 i cant tell must be assuming u want your pussy licked or
22 something perv"

23
24 Count LIV (3/24/17):

"u want kisses on your vagina?"

25
26 Count LV (3/25/17):

"im gonna fuckin pound u so hard. can u jack me off with
27 your mouth I have to many callus's on my hands from lifting
28 and they will fuck up my dick"

Count LVI (3/25/17): "mine as well do it before i go back to jail or end up dead lol
[laugh out loud] enjoy well u can"

Count LVII (3/25/17): "ya lets fuck before I lose gains get older die or go bake to
jail"

Count LVIII (3/25/17): "im gonna kill u"

Count LIX (3/27/17): "ohhhh ya come hear baby i wanna be really nice to u
so nice i wan love sex fuck u everyday
1on1's only and only with u
thats all I want
ill treat you so good
sooo soooo good baby i am so nice 2 u"

Count LX (3/27/17): "...got a job interview tomorrow give me your money
give me all your money bitch
...fuck u
...ill fucking kill u all seriously fuck u
...ill fucking murder u
...I hate u bitch u deserve death"

Count LXI (3/28/17): "Since your so smart and know what I want and got all the
hook ups why don't I give me a job that can afford to fuck a
prostitute like u every night haha some people are so felt
bad for and handled it all when they don't deserves shit but a
fucking bullet to the head....

1 I fuckin fuckin kill people bitch fuck u"

2
3 Count LXII (3/28/17):

"...ill fuckin kill u shank your trashed ass dead

4 then fuckin rob u....

5 ima just start whippin knives around at people"

6
7 Count LXIII (3/28/17):

"...u need to be fucking stabbed bitch your a fucking pos

8 [piece of shit]

9i don't have kids I dont have money nothing worth shit i

10 cant afford a bitch i have nothing to live for ill shoot it the

11 fuck up like life is nothing

12 give me your fucking fun u got a glock u know what it was

13 made for give it to me ill show u what it was made for

14 killing people that's what it was made for

15 u go get me the job that suits u and can afford u bitch just

16 show me what one ya a felt bad for trust funded fucking

17 faggot bitch that job nigger fucking spic cunt bitch ass throw

18 shit in a bag fake ass bullshit other fucker wanna have a gun

19 fight

20 ready to get your hole vehicle shot the fuck up when u get

21 get with work

22 wanna get sniped

23 wanna get shot in the fuckin back and robbed?

24 wanan get stabbed ohh ya i love it i love getting stabbed put

25 it in me harder deeper faster"

26
27 Count LXIV (3/28/17):

"...you all deserve to be shot the fuck up

28 your gonna die bitch!"

1
2 Count LXV (3/28/17): "im gonna hit u on the streets at 200mph in my car with a full
3 roll cage"

4 Count LXVI (3/28/17): "your gonna die in the crash and im gonna survive"

5
6 Count LXVII (3/28/17): "im gonna fuckin t bone u and walk away like go ahead
7 throw it away i got another one in my garage"

8
9 Count LXVIII (3/28/17): "...no hesitation just bang bang bang
10 now how you gonan get a fuckin check when your boss is
11 fuckin dead
12 break the water pipe to the fire hydrants then set it on fire so
13 they cant put it out
14 ...do u seriously wanna fucking die? are u
15 stupid as fuck
16 ...im gonna put an end to it im gonna kill us
17 paralyze u
18 u will never dance again
19 gonna give u a t4 spine fracture...."

20
21 Count LXIX (3/28/17): "ill whip a shuriken [a Japanese throwing weapon] at your
22 fuckin neck
23 hit u in jugular from across the room with a shuriken...."

24
25 Count LXX (3/28/17): "honestly no lie my true opinion i do think your like sexiest
26 women in town the tats and maybe some of the other dude u
27 get with just for there money ruin it but all in all i still think
28 you would be really fun to fuck

1 ...ide still fuck u thow...."

2
3 Count LXXI (3/28/17): "wanna have sex before i get old fat ugly lose gains or end
4 up in prison or die something or before u do?
5 Ill wake up tomorrow and realize my life is fucked
6 do u love me do u wanna love me?
7 i wanna love u lol [laugh out loud]
8

9 Defendant was arrested and interviewed by detectives. He denied sending
10 messages to Jane Doe and claimed that he had seen "over four" fake Facebook profiles
11 claiming to be him after first saying there were two. He admitted having a Facebook
12 page under his own name. When asked how he knew Jane Doe, he gave a long pause
13 before replying, "I don't know" and "no idea."
14

15
16 
17 SUZY BOYLAN
18 Deputy County Attorney

19 SUBSCRIBED AND SWORN TO before me this ____ day of March, 2017.
20

21
22 JUSTICE OF THE PEACE
23
24
25
26
27
28

ORDER

Upon reading the foregoing Affidavit, the Court finds that there is probable cause to believe the above-named Defendant committed the crimes charged.

DATED this _____ day of _____, 2017 at _____ a.m./p.m.

JUSTICE OF THE PEACE