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APR 27 2017
Justice Court

1 BRIAN LOWNEY
2 Deputy County Attorney
3 KIRSTEN H. PABST
4 Missoula County Attorney
5 Missoula County Courthouse
6 Missoula, Montana 59802
7 (406) 258-4737
8 ATTORNEYS FOR PLAINTIFF

9 IN THE JUSTICE COURT OF THE STATE OF MONTANA
10 IN AND FOR THE COUNTY OF MISSOULA
11 BEFORE, Landee N. Holloway, JUSTICE OF THE PEACE

12 STATE OF MONTANA,
13
14 Plaintiff,
15
16 -VS-
17
18 RANDALL JAMES
19 EVERYBODYTALKSABOUT,
20
21 Defendant,

22 Department No. 2
23 Cause No. CR-2017-467

24 **COMPLAINT**

25 BRIAN LOWNEY, Deputy County Attorney, deposes and says that on or between
26 the 21st day of April, 2017, and the 24th day of April, 2017, in Missoula County, the
27 Defendant committed the offenses of COUNT I: SEXUAL INTERCOURSE WITHOUT
28 CONSENT, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-503,
punishable by not less than 2-4 years or more than 100 years or life MSP and \$50,000
fine; COUNT II: AGGRAVATED ASSAULT - REASONABLE APPREHENSION, a Felony,
in violation of Montana law, namely: Mont. Code Ann. 45-5-202, punishable by 20 years
MSP and \$50,000 fine; COUNT III: CRIMINAL POSSESSION OF DANGEROUS DRUGS
WITH INTENT TO DISTRIBUTE - FELONY, a Felony, in violation of Montana law, namely:
Mont. Code Ann. 45-9-103, punishable by 20 years MSP and/or \$50,000 fine.

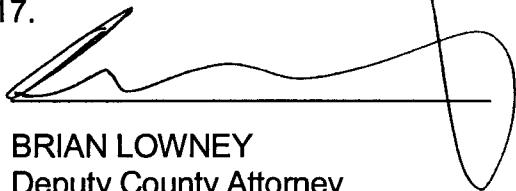
The facts constituting the offense are:

1 COUNT I: On or between the 21st day of April, 2017, and the 24th day of April,
2 2017, the above-named Defendant knowingly had sexual intercourse with Jane Doe
3 without consent.
4

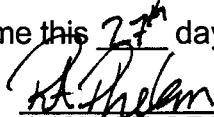
5 COUNT II: on or between the 21st day of April, 2017, and the 24th day of April,
6 2017, the above-named Defendant purposely or knowingly, with the use of physical
7 force or contact, caused reasonable apprehension of serious bodily injury or death in
8 Jane Doe.
9

10 COUNT III: on or between the 21st day of April, 2017, and the 24th day of April,
11 2017, the above-named Defendant knowingly possessed a dangerous drug, as defined
12 in 50-32-101, with intent to distribute.
13

14 DATED this 27th day of April, 2017.

15 
16 BRIAN LOWNEY
17 Deputy County Attorney

18 Subscribed and sworn to before me this 27th day of April, 2017.

19 
20 JUSTICE OF THE PEACE

21 COMPLAINT 17-1055
22 CONNIE BRUECKNER, Missoula City Police Dept
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IN AND FOR THE COUNTY OF MISSOULA
BEFORE, Landee N. Holloway, JUSTICE OF THE PEACE

10 STATE OF MONTANA,
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12 Plaintiff,
13
14 -VS-
15
16 RANDALL JAMES
17 EVERYBODYTALKSABOUT,
18
19 Defendant

Department No. 2
Cause No. CR-2017-467
AFFIDAVIT OF PROBABLE CAUSE

16 STATE OF MONTANA)
17 : ss
18 County of Missoula)

19 BRIAN LOWNEY, Deputy County Attorney, Montana, being first duly sworn upon
20 oath, deposes and says:

21 I have read the official law enforcement reports regarding the investigation of
22 RANDALL JAMES EVERYBODYTALKSABOUT for allegedly committing the offense(s)
23 set forth in the complaint and based upon the information contained in the reports, if true,
24 believe probable cause exists to justify charging the above-named defendant as specified
25 in the accompanying complaint.
26

27 On April 24, 2017, Missoula Police Department officers were called to a local
28 hospital on a report of an assault. Officers contacted Jane Doe, who reported that the


1 Defendant had sexually and physically assaulted her over the course of the past several
2 days in Missoula County, MT.

3
4 Doe indicated that the Defendant first contacted her on April 21, 2017, when he
5 picked her up in a vehicle after he was released from the Missoula County Detention
6 Facility. The Defendant was upset with Doe when he first saw her, as he believed his
7 detention on April 21, 2017, was a result of Doe's actions. As such, the Defendant
8 struck Doe in the face with his fist. The Defendant then drove Doe to a hotel, where
9 they got a room.
10

11 While at the hotel, the Defendant began to further abuse Doe. The Defendant
12 strangled Doe into unconsciousness multiple times in the room's bathtub and pistol-
13 whipped her with a firearm, causing injury. Doe indicated that the Defendant also had a
14 substantial quantity of methamphetamine, which he forced her to ingest in an effort to
15 keep her "high". Doe indicated that when she refused to ingest the methamphetamine,
16 the Defendant would forcibly insert amounts of the methamphetamine into her vaginal
17 and anal cavities with his finger. Doe indicated that the Defendant moved her to a
18 different hotel the next day, but that the abuse continued in the same manner, including
19 the Defendant hitting her, strangling her into unconsciousness multiple times and
20 forcibly inserting methamphetamine into her orifices. Doe indicated that when she
21 expressed her nonconsent to the methamphetamine use, the Defendant would wait until
22 she was asleep to insert the drug. Doe described the Defendant's behavior as
23 extremely volatile, going from violent and abuse in one moment to apologetic the next.
24 Doe was able to leave the room with help from a friend on April 24, 2017, at which point
25 she went to the hospital.
26
27
28

1 Officers observed multiple bruises on Doe's body, including a substantial black
2 eye. Doe indicated that when the Defendant was strangling her, she believed she was
3 going to die.
4

5 The Defendant was arrested on an unrelated matter on April 24, 2017. While in
6 custody at the Missoula County Detention Facility, his condition began to deteriorate.
7 The Defendant was transported to a local hospital for treatment. While at the hospital, a
8 blue bag containing what appeared to be methamphetamine fell out of the Defendant's
9 rectum. The Defendant's probation officer indicated that the Defendant had recently
10 tested positive for methamphetamine on April 19, 2017. The total weight of the bag was
11 66.7 grams.
12

13
14 
15 BRIAN LOWNEY
16 Deputy County Attorney


17 SUBSCRIBED AND SWORN TO before me this 27th day of April, 2017.

18 
19 JUSTICE OF THE PEACE, *Pro Tem*
20

21 ORDER
22

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

25 DATED this 27th day of April, 2017 at 1:25 a.m. (p.m.)
26

27 
28 JUSTICE OF THE PEACE, *Pro Tem*