

MATT JENNINGS
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 RECORD OF MISSOULA COUNTY,
STATE OF MONTANA

STATE OF MONTANA, Plaintiff, -vs- JARED ROBERT KUNTZ, Defendant.	Department No. Cause No. COMPLAINT
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MATT JENNINGS, Deputy County Attorney, deposes and says that on or about April 10th, 2020, in Missoula County, the Defendant committed the offenses of:

COUNT I: AGGRAVATED ASSAULT - BODILY INJURY, a Felony, in violation of § 45-5-202, MCA, punishable by 20 years MSP and \$50,000 fine;

COUNT II: ASSAULT ON A MINOR, a Felony, in violation of § 45-5-212, MCA, punishable by 5 years MSP and/or \$50,000 fine;

COUNT III: AGGRAVATED ASSAULT - REASONABLE

APPREHENSION, a Felony, in violation of § 45-5-202, MCA, punishable by 20 years MSP and \$50,000 fine; and

COUNT IV: ASSAULT WITH WEAPON, a Felony, in violation of § 45-5-213, MCA, punishable by 20 years MSP and/or \$50,000 fine.

The facts constituting the offense are:

COUNT I: On or about April 10th, 2020, Defendant purposely or knowingly caused serious bodily injury to Jennifer Gress.

COUNT II: On or about April 10th, 2020, Defendant purposely or knowingly caused reasonable apprehension of bodily injury in J.G. and at the time of the offense, J.G. was under 14 years of age and the Defendant was 18 years of age or older.

COUNT III: On or about April 10th, 2020, Defendant purposely or knowingly, with the use of physical force or contact, caused reasonable apprehension of serious bodily injury or death in Carl Blotsky.

COUNT IV: On or about April 10th, 2020, Defendant purposely or knowingly caused bodily injury to Stephen Blotsky with a weapon, to wit: Defendant attached victim with a rock, hitting him in the back and injuring him.

DATED this 12th day of April, 2020.

/s/ Matt Jennings
MATT JENNINGS
Deputy County Attorney

COMPLAINT 20-987

TYLER TROWBRIDGE, Missoula City Police Dept
Samuel Leyba, Missoula City Police Dept
45-5-202 ~ Aggravated Assault - Bodily Injury

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IN THE JUSTICE COURT OF RECORD OF MISSOULA COUNTY,
STATE OF MONTANA

STATE OF MONTANA, Plaintiff, -vs- JARED ROBERT KUNTZ, Defendant.	Dept. Cause No. AFFIDAVIT OF PROBABLE CAUSE
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STATE OF MONTANA)
 : ss
County of Missoula)

MATT JENNINGS, Deputy County Attorney, Montana, being first duly sworn upon oath, deposes and says:

I have read the law enforcement reports regarding the investigation of JARED ROBERT KUNTZ for allegedly committing the offenses of:

COUNT I: AGGRAVATED ASSAULT - BODILY INJURY, a felony, in violation of § 45-5-202, MCA;

COUNT II: ASSAULT ON A MINOR – REASONABLE APPREHENSION, a Felony, in violation of § 45-5-212, MCA;

COUNT III: AGGRAVATED ASSAULT - REASONABLE APPREHENSION, a felony, in violation of § 45-5-202, MCA;

COUNT IV: ASSAULT WITH WEAPON, a felony, in violation of § 45-5-213, MCA.

I believe that the facts as set forth in the law enforcement reports, if true, constitute sufficient probable cause to justify the filing of the charges.

Those facts are as follows:

FIRST INCIDENT

On April 10, 2020 at approximately 1430 hours, University of Montana Police Officers were dispatched to the “M” Trailhead off the University of Montana campus in the City of Missoula, for a report of an assault and/or accident on the trail.

On arrival, UMPD Officer Brodie met with a male hiker by the name Eric Donovan who was tending to 13-year-old J.G. at the bottom of the trail. Donovan stated that he was near the bottom of the trail and he heard some yelling higher up on the trail. J.G. came running down the hill and he saw a larger male farther up the trail who appeared to be punching something on the ground. That male then appeared to run farther up Mt.

Sentinel and out of sight.

J.G. was upset and told Donovan words to the effect that J.G.'s mother, Jennifer Gress, had been attacked by some male and that when J.G. turned to see why his mother was screaming, the male then started to chase him. J.G. was frightened and ran down the mountain.

J.G. told Officer Brodie the same story. He and his mother had hiked up the "M" trail via the switch backed, zig-zag trail, then were coming down the ridge trail to the North of the "M." He was 30-40 yards ahead of his mother and heard her screaming. He turned back and started back up the trail to where his mother was and as he got close enough to see where she was at, J.G. saw an adult male standing over her "with blood on his hands." The blood really scared J.G. and when the adult male suspect saw him, the male began to chase after him. J.G. turned and ran as fast as he could down the hill. He heard the male yell at him words to the effect, "Yeah, you better run kid!" At the bottom he encountered Donovan and his wife.

J.G. described the suspect male as being a white, adult male between 30-40 years of age. J.G. said the male was wearing a black long sleeve shirt of some kind with white lettering on it. He said the male was wearing pants rather than shorts but he could not remember the color.

While this was going on, Fire and Medical Crews had climbed up the mountain to where Jennifer had been assaulted and were tending to her. It took them almost an hour to get her stabilized and onto a stretcher and then manipulate her down the mountain to a waiting ambulance. Jennifer's husband and J.G.'s father responded to the scene.

Officer Brodie observed that Jennifer had serious injuries to the left side of her face. She acknowledged her husband when he spoke to her, but she was otherwise barely conscious.

At St. Patrick Hospital, Officer Brodie observed that J.G. was clearly in shock about what happened to his mother and subsequently being chased by the suspect male on the mountain.

Meanwhile, a black shirt was located on the mountain by another hiker after the assault incident had occurred. J.G. confirmed by looking at a photo of the shirt that it appeared to be the same one the suspect male he saw had been wearing.

Jennifer had some fractures to the left side of her skull and her left eye was swollen shut.

SECOND INCIDENT

Also on April 10, 2020 at approximately 1635 hours, officers were dispatched back onto Mount Sentinel following a report of two hikers who got assaulted by a naked male suspect above the "M."

Officer Brodie hiked to near the top of Mount Sentinel to the scene and met with a Forest Service Officer and two Missoula City Police Officers who had driven a vehicle up the Crazy Canyon road up the back side of Mount Sentinel and hiked downward a quarter mile from the windsock area at the top.

The Forest Service Officer was standing over a completely naked, handcuffed adult male lying on his back near the trail. The naked male had at least two stab wounds. The male had dried blood on his hands and on his left side but was conscious and breathing and talking. The naked suspect male provided his name as Defendant Jared Kuntz. Multiple people assisted in getting Defendant on a stretcher and brought to a Life Flight helicopter that was able to land on the mountain above them.

Other officers contacted two male victims and some other people in the vicinity. The male victims were brothers, Carl Blotsky and Stephen Blotsky. Carl explain that he and his brother, Stephan had earlier climbed up the north trail from the Kim Williams trail in the Hellgate Canyon to get to the top of Mount Sentinel. They were both aware of the earlier assault that had

occurred below the 'M' because they spoke to Officers before they started their hike and they were also aware of the UM Timely Warning that had gone out.

Carl explained that they were walking down from the top of the mountain when they saw a "naked" guy creeping out from some bushes. They immediately thought this might be the suspect from the earlier assault but before they could react, the male sprung out of the bushes with a rock in his hands and charged at them. Carl and his brother tried to run away, but he caught up with them, threw the rock and attacked them with a stick. At some point, Carl got knocked to the ground and struck the back of his head on a rock and/or the suspect hit him. Carl and his brother were afraid for their lives and the suspect male would not stop attacking them. Carl then pulled out a buck knife he had been carrying in a scabbard on his belt and he struck out and stabbed the suspect male with it. The male kept fighting and chasing them even after Carl had stabbed and/or cut him with his knife. Carl and Stephen ran uphill and called 911 on a cell phone.

Later, Carl told UMPD Detective Moore that when Defendant approached them, he had demanded clothes. He was completely naked holding his genitals. Carl said at first, he and his brother were like, "Hey,

get away from us.” Carl said the male climbed over some rocks and started walking towards them. Carl said he had a 5” knife at the ready because they had been warned that there was somebody around. He said the knife had previously been in his backpack. Carl said he took the knife and unsheathed it and he yelled at the male, “Don’t come close to us, get away from us!” Carl said the male kept walking toward them slowly and Carl couldn’t remember what he said, but he said some “other stuff...I need clothes.” Carl said the male bent over and grabbed a pretty big rock, like a “fist sized rock” and started coming at them pretty fast, but not a full sprint. Carl said he and his brother ran downhill for about twenty yards, he said that “their first instinct was to run away from this guy.” Carl said he looked behind and the guys was “kind of hauling butt chasing us.” He said the male was chasing them and kind of gaining on them and it was “insane because he was barefoot.” Carl said he didn’t want this guy tacking him with his back turned to him and that is why he turned and faced him. He said he was holding his knife in his right hand when he turned around and “stood his ground.” Also, Carl said the way the male was staggering toward them like a “zombie” was odd but then he ran fast toward them. Carl said he turned around and prepared himself and the male threw the rock and hit his brother in the back and that is how his brother got the laceration on his

back. Carl said the male tackled him and they rolled on the ground for about ten yards downhill. Carl hit his head “pretty good.” As this was happening, Carl was trying to stab the male in the abdominal area and he “thinks he got him pretty good.” Carl said they got up and the male lunged at Stephen and “this is where things kind of get fuzzy.” Carl said the male was “doing some stuff with my brother” and then he turned around and came at him again and Carl stabbed him again.

Carl said at that point he and his brother were in the same grouping so he said, “Run!” He said they ran uphill and the male was still chasing them after being stabbed two or three times. Carl said the male chased them for another twenty yards and the male started slowing down. Carl said he turned around and the male limped off the righthand side of the ridgeline and disappeared. Carl said he and his brother were screaming, “Help, help, help!” He said they ran uphill trying to get as much distance as they could from the guy.

Carl had lacerations on his right and left knees and shins and a laceration on the back of his head. His head was wrapped in gauze. Carl said he got the “gash” on the back of his head from when the male tackled him and they were rolling on the ground. He said as they were rolling on the ground, he saw stars for a bit but didn’t go unconscious.

Stephen provided a statement to Detective Moore consistent with that of his brother in all substantive respects. Stephen added that when the Defendant threw a rock at them, it hit him in the back causing injury. While the Defendant was attacking Carl, Stephen grabbed a tree branch and struck the male with the tree branch. While Stephen and Carl were running away, Stephen threw his shirt at the male and told the male to get away from them. Stephen advised that his back is pretty uncomfortable. Detective Moore asked Stephen what was one thing that stuck out to him the most that he can't shake. Stephen advised the look in the male's eye. Stephen stated, "He had that look like he wanted to fucking kill us." Stephen confirmed that this is what was going through his mind that the male wanted to kill them. Stephen confirmed that he was in fear for his life.

DATED this 12th day of April, 2020.

/s/ Matt Jennings
MATT JENNINGS
Deputy County Attorney

SUBSCRIBED AND SWORN TO before me, a Justice of the Peace, in and for the State of Montana, County of Missoula.

Electronically Signed By:
Hon. Judge Landee Holloway
Mon, Apr 13 2020 10:31:40 AM

Department No.
Missoula County Justice Court
Missoula County Courthouse
200 W. Broadway
Missoula MT 59802
(406) 258-3474

IN THE JUSTICE COURT OF RECORD OF MISSOULA COUNTY,
STATE OF MONTANA

STATE OF MONTANA, Plaintiff, -vs- JARED ROBERT KUNTZ, Defendant.	Dept. Cause No. ORDER OF PROBABLE CAUSE
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The Court has reviewed the Affidavit of Probable Cause filed by the State and finds that there is probable cause to believe the Defendant committed charged offense(s).

Electronically Signed and Dated Below.

April 12, 2020 at 1:45 p.m.

Electronically Signed By:
Hon. Judge Landee Holloway
Mon, Apr 13 2020 10:31:40 AM