

Michael Ellinghouse (19-27501)
DEPUTY YELLOWSTONE COUNTY ATTORNEY
P.O. Box 35025
Room 701, Courthouse
Billings, Montana 59107-5025
Telephone: 406/256-2870
Attorney For Plaintiff

IN THE JUSTICE COURT OF RECORD OF BILLINGS, YELLOWSTONE COUNTY, MONTANA

STATE OF MONTANA,
Plaintiff,

vs.

ZACHARY STANLEY KNOWSHISGUN,
Defendant.

CAUSE NO. CR2019-

JUDGE JEANNE WALKER

COMPLAINT

The undersigned Deputy County Attorney of Yellowstone County, Montana, states: before the filing of this Complaint, the above-named Defendant, in Yellowstone County, Montana, on or about June 19, 2019, committed the offenses of:

COUNT I: CRIMINAL ENDANGERMENT (FELONY)

(Punishable by imprisonment for a term of up to ten years, a fine of up to \$50,000, or both)

The alleged facts constituting the offense are:

That the Defendant, ZACHARY STANLEY KNOWSHISGUN (born July 1993), knowingly engaged in conduct that caused a substantial risk of death or serious bodily injury to another, to wit: the Defendant knowingly rammed his vehicle head-on three times into a vehicle being operated by S.S. (born October 1987), causing substantial risk of serious bodily injury or death to S.S., on or near Division Street, in Billings, Yellowstone County, Montana; all of which is contrary to Section 45-5-207, Montana Code Annotated, and against the peace and dignity of the State of Montana.

COUNT II: RESISTING ARREST (MISDEMEANOR)

(Punishable by up to 6 months in jail and/or a fine not to exceed \$500)

The alleged facts constituting the offense are:

That the Defendant, ZACHARY STANLEY KNOWSHISGUN (born July 1993), knowingly prevented or attempted to prevent a peace officer from effecting an arrest by using any means that create a risk of causing

Dated June 20, 2019.

By:

STATE OF MONTANA)

SS:

The undersigned, being first duly sworn or affirmed on his oath, deposes and says: That he is qualified and acting on behalf of the Yellowstone County Attorney, and that he has read the foregoing Complaint and attached Affidavit, knows the contents thereof and the matters, facts, and things therein stated are true of his knowledge, except those things stated on information and belief, and that as to those he believes it to be true.

By:

Michael Ellinghouse
Deputy County Attorney in and for
Yellowstone County, Montana

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IN THE JUSTICE COURT OF RECORD OF BILLINGS, YELLOWSTONE COUNTY, MONTANA

STATE OF MONTANA, Plaintiff, vs. ZACHARY STANLEY KNOWSHISGUN, Defendant.	CAUSE NO. CR2019- JUDGE JEANNE WALKER AFFIDAVIT IN SUPPORT OF COMPLAINT
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The undersigned Deputy County Attorney of Yellowstone County, Montana, duly sworn or affirmed on his oath that the information below was provided by sworn law enforcement officers during their investigation as documented evidence in support of the complaint filed in this matter and reviewed to ensure by information and belief that the above-mentioned Defendant, in Yellowstone County, Montana, on or about June 19, 2019, committed the offenses of:

COUNT I: CRIMINAL ENDANGERMENT (FELONY)
COUNT II: RESISTING ARREST (MISDEMEANOR)

The Court is informed that the Billings Police Department (BPD) investigation revealed the following:

On or about June 19, 2019, at approximately 3:48pm, officers were dispatched to numerous reports of a white vehicle intentionally ramming a Fed-Ex delivery truck at the intersection of Division Street and Lewis Avenue, in Billings, Yellowstone County, Montana. Officer Puckett and Sergeant Reid were first to respond and were informed by dispatch that the suspect was leaving the scene on foot. Officer Puckett located several people following a male that matched the suspect's description. The people began waving at Officer Puckett and pointing at the man indicating he was the suspect.

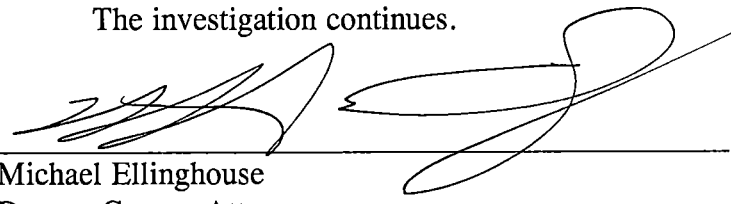
Officer Puckett activated her emergency lights to stop the male, but he looked at the patrol vehicle then began running toward an alley. Officer Puckett and Sergeant Reid gave chase and were able to get the male stopped and on the ground in the alley. The male immediately began struggling and fighting to keep his arms and hands free from the officers despite their verbal commands. The officers were eventually able to secure the male in handcuffs and return him to the scene.

Officer Ross arrived on scene and made contact with the driver of the Fed-Ex truck, S.S. (born October 1987). S.S. said she had just delivered a package and was waiting in the parking lot of a business for an opportunity to pull out onto Division Street. S.S. said as she was waiting, a male driving a white passenger car swerved across traffic and rammed into the front of her delivery truck. S.S. was stunned by the collision, and initially thought it was an accident, but the male then backed up and rammed head-on into her again. S.S., terrified, began backing up her delivery truck to get out of the way, when the male backed up and rammed into her head-on for a third time. At this point, S.S. said she "locked up" out of fear. S.S. said the male got out of the vehicle, stared at her, and began walking toward her delivery vehicle. S.S. could see a knife strapped to the male's hip. S.S. said she was terrified of what the male was going to do, but he continued walking past her vehicle and away from the scene.

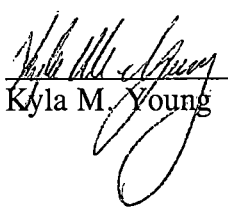
Officers obtained statements from numerous witnesses to the incident, all of which corroborated S.S.'s account of an unprovoked attack. One witness provided a cell phone video of the tail end of the incident. Officers observed and photographed severe front end damage to the white passenger car driven by the male, which was left in the middle of Division Street. The male refused to identify himself and was transported to the Yellowstone County Detention Facility (YCDF).

At YCDF, jail staff and officers were able to identify the male driver as ZACHARY STANLEY KNOWSHISGUN (born July 1993), the Defendant herein.

The investigation continues.


Michael Ellinghouse
Deputy County Attorney
Yellowstone County, Montana

This instrument was signed and sworn to before me on June 20, 2019, by Michael Ellinghouse.


Kyla M. Young



KYLA M. YOUNG
NOTARY PUBLIC for the
State of Montana
Residing at Billings, Montana
My Commission Expires
May 05, 2020