



On or about September 17, 2020, at approximately 8:00 a.m., BPD Officer Hillier responded to the Ben Steele Middle School's bus parking lot, located at 5640 Grand Ave. regarding multiple complaints from students regarding their bus driver.

Officer Hillier made contact with Ben Steele Middle School Principal, Joe Halligan. Mr. Halligan was greeting students in the bus parking lot. Mr. Halligan advised Officer Hillier that he had received multiple complaints from parents that their children had called them while on a school bus. The children had informed their parents that the bus driver was falling asleep while driving, slumping over the steering wheel, driving over curbs, drove into yards and was overall acting "weird." Officer Hillier and Mr. Halligan were informed that the school bus involved with these complaints was Bus 71.

Bus 71 arrived and stopped in the bus parking lot. As students exited the bus, Officer Hillier noted that they looked surprised, scared, and shocked. Roughly eight to ten students immediately approached Mr. Halligan and began speaking all at the same time. Mr. Halligan and Officer Hillier pulled one of the students aside to figure out what was going on. Officer Hillier spoke to a juvenile female who informed Officer Hillier that the bus driver was making strange movements and slumping over the wheel as if he were falling asleep. The juvenile also told law enforcement that the bus driver was driving erratically, to include: driving over several curbs; drifting towards the edge of the roadway multiple times; and driving off the street into a yard. Additionally, she stated that numerous children on the bus called their parents to report the bus driver's actions.

Officer Hillier approached Bus 71 and found the bus driver standing up by the driver's seat. Officer Hillier identified the bus driver as KEITH ADAM JONES (born in May 1974), the Defendant herein. Officer Hillier observed that the Defendant's speech was slurred and difficult to understand. Officer Hillier requested that the Defendant exit the school bus. As Officer Hillier spoke with the Defendant, he observed that the Defendant appeared tired, kept rubbing his eyes and was constantly making jerky body movements.

Officer Tanis arrived on scene. Officer Hillier requested a Drug Recognition Expert (DRE) meet him at the DUI Center for further testing. Officer Hillier conducted a pat down search prior to placing the Defendant in his patrol vehicle to transport him to the Yellowstone County Detention Facility (YCDF) DUI Center. During this search, Officer Tanis observed that the Defendant could not maintain his balance and his speech was slurred. Officer Hillier located a vile in the Defendant's front left pocket. The vile contained a brownish tinted liquid. Officer Hillier asked what was in the vile and the Defendant responded "pee." Officer Hillier further inquired why the Defendant would be carrying around a vile of pee. The Defendant advised that he was scheduled for a random drug test that day and he would use the pee in the vile to pass the drug test. The Defendant admitted to using marijuana.

At the DUI Center, Officer Ihde and Yellowstone County Sheriff's Deputy Newell were waiting for the Defendant. Deputy Newell is a DRE. Officer Ihde observed that the Defendant had mumbled speech, was swaying, appeared drowsy and was making jerky movements. Based on Officer Ihde's training and experience, he believed that the Defendant was impaired by a stimulant. Officer Ihde read the Defendant the Montana Implied Consent Advisory. The Defendant consented to a breath and blood sample. The Defendant's breath sample was negative for alcohol. A blood sample was taken from the Defendant by a nurse at YCDF. The blood samples were secured and sent to the Montana State Crime Laboratory for analysis.

The Defendant was then released to Deputy Newell for DRE processing. Deputy Newell observed the Defendant exhibited signs of impairment caused by CNS Depressants, CNS Stimulants, and Cannabis.

The investigation continues.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: September 18, 2020

/s/ Hallie Bishop  
Deputy County Attorney