

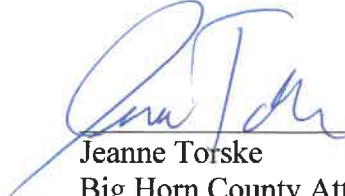
1. I am the public prosecutor representing the State of Montana, in Big Horn County, and am responsible for reviewing allegations and prosecuting criminal offenses in the District Court of Big Horn County.
2. I have reviewed reports submitted by the investigating officers. These reports pertain to the events hereinafter described, and on the basis of the same, the Affiant makes the allegations hereinafter set forth.
3. I have reviewed Division of Criminal Investigation File No. MC 20-01-07 and Big Horn County Sheriff's Report No. 20-00011.
4. Upon review of the reports and associated evidence, and upon such information and belief, I present to this Court the following facts known to the State of Montana:
5. On December 31, 2019, J.B. dropped Minor Doe (16 years of age) off at a New Year's Eve party, in Billings, Montana. J.B. watched Minor Doe approach, knock at the door, and enter the residence. J.B. did not return to the residence until approximately 2:00 p.m. on January 1, 2020, looking for Minor Doe.
6. The investigation documented that a house party took place on December 31, 2019, in Billings, Montana, while Minor Doe was present. Defendant, **Robert Alvin Morning-Bromley, III.**, also attended the party.
7. Starting on New Year's Eve, December 31, 2019, and continuing into mid-day on January 1, 2020, it was determined by investigators that Defendant, Minor Doe, Adult Doe, and others continually consumed extensive amounts of alcohol.
8. On January 1, 2020, both Minor and Adult Doe caught a ride from Billings, Montana, to Hardin, Montana, in a van driven by Defendant. Other individuals in the van include W.O., S.O., and S.N.
9. Defendant detailed in an interview that he was having mechanical water pump related issues with the van, causing him to stop and start again at different locations along eastbound Interstate 90 during the trip to Hardin.
10. Upon reaching the eastbound rest area, located in Big Horn County, Montana, and outside the exterior boundaries of the Crow Indian Reservation, Defendant's vehicle stopped running and the Defendant breached the closed gate to the rest area.
11. At the rest area, both Does got out of the van.
12. Defendant was aware that both Does had been drinking a bottle of Black Velvet while traveling and were highly intoxicated.

13. Once Defendant got the vehicle running, he verbally communicated to both Minor and Adult to get back into the van because once he got it running, he had to keep it running and get moving.
14. Neither Doe listened to Defendant's instructions to get back in the vehicle and the Defendant departed without them.
15. Neither Doe was dressed appropriately for the weather. Adult Doe did not have shoes on.
16. At that time, Defendant was aware that both Does were intoxicated.
17. At that time, the outside temperatures averaged below 50 degrees.
18. Defendant called his mother, E.H., who was traveling behind him in a separate vehicle and asked her to pick up both Does at the rest area. It was estimated that E.H. was about 15 minutes behind Defendant.
19. E.H arrived at the rest area and found only Adult Doe there to be picked up. At that time Adult Doe told E.H. that Minor Doe ran into the field south of the rest area, across the fence, and towards the hills.
20. E.H. honked the horn at the rest area and receiving no response from Minor Doe drove off. At the time E.H. did not know the identity of Minor Doe.
21. Once E.H. arrived in Hardin, she located Defendant who claimed he did not know who the girls were stating that they were "(b)eing little bitches and wouldn't get in."
22. Defendant did not contact the police or other authorities telling anyone Minor Doe had been left at the rest area.
23. Dispatch reports show that E.H. called the Sheriff's office at 6:17 p.m. on January 1, 2020.
24. There is no record of Defendant ever calling or reporting to law enforcement that Minor Doe was missing.
25. Minor Doe died and her body was discovered on January 20th, 2020, approximately 1.5 miles southwest from the rest area where she was last seen.
26. Dr. Kurtzman performed an autopsy on Minor Doe's body. He determined that hypothermia was the cause of her death.
27. Defendant's actions created a substantial risk of death or serious bodily injury to both does because Defendant knew that: (1) outside temperatures were cold enough to harm a

person who was not appropriately dressed for the weather; (2) neither Doe were appropriately dressed for the weather; and (3) both Does were intoxicated.

WHEREFORE, Affiant requests this Court issue an order granting leave to file a Criminal Information.

Dated this 26th day of December 2024.


Jeanne Torske
Big Horn County Attorney

On this 26th day of December 2024, before me, the undersigned, a Notary Public for the State of Montana, personally appeared Wyatt Glade, known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me he executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal the day and year in this Certificate first above written.



