

JASON MARKS
Chief Deputy County Attorney
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Missoula County Courthouse
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ATTORNEYS FOR PLAINTIFF

IN THE JUSTICE COURT OF THE STATE OF MONTANA
IN AND FOR THE COUNTY OF MISSOULA

STATE OF MONTANA,

Plaintiff,

Department No.
Cause No.

-VS-

COMPLAINT

JOHNATHAN ALBERT BERTSCH,
Defendant,

JASON MARKS, Chief Deputy County Attorney, deposes and says that on or about the 14th day of March, 2019, in Missoula County, the Defendant committed the offenses of COUNT I: DELIBERATE HOMICIDE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-102[1], punishable by life imprisonment, or not less than 10 or more than 100 years MSP; COUNT II: ATTEMPTED DELIBERATE HOMICIDE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-102[1] and 45-4-103, punishable by life imprisonment, or not less than 10 or more than 100 years MSP; COUNT III: ATTEMPTED DELIBERATE HOMICIDE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-102[1] and 45-4-103, punishable by life imprisonment, or not less than 10 or more than 100 years MSP; COUNT IV: ATTEMPTED DELIBERATE HOMICIDE, a Felony, in violation of Montana law, namely: Mont. Code Ann. 45-5-102[1]

1 and 45-4-103, punishable by life imprisonment, or not less than 10 or more than 100 years
2 MSP.

3 The facts constituting the offense are:

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5 COUNT I: On or about the 14th day of March, 2019, the above-named
6 Defendant purposely or knowingly caused the death of Shelley Hayes.

7 COUNT II: On or about the 14th day of March, 2019, with the purpose that the
8 offense of Deliberate Homicide be committed, the above-named Defendant shot Julie
9 Blanchard.
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11 COUNT III: On or about the 14th day of March, 2019, with the purpose that the
12 offense of Deliberate Homicide be committed, the above-named Defendant shot Casey
13 Blanchard.

14 COUNT IV: On or about the 15th day of March, 2019, with the purpose that the
15 offense of Deliberate Homicide be committed, the above-named Defendant shot
16 Trooper Wade Palmer.
17

18 DATED this 15th day of March, 2019.

19 /s/ Jason Marks
20 JASON MARKS
21 Chief Deputy County Attorney
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23

24 COMPLAINT 19-714

25 45-5-102[1] ~ Deliberate Homicide
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