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CLERK OF DISTRICT COURT  
2019 APR 26 PM 3:23

FILED  
BY                       
DEPUTY *Ca*

8 IN THE DISTRICT COURT OF THE ELEVENTH JUDICIAL DISTRICT OF THE  
9 STATE OF MONTANA, IN AND FOR THE COUNTY OF FLATHEAD

10 STATE OF MONTANA, )  
11 Plaintiff, )  
12 vs. )  
13 JARED ALLEN PARSONS, )  
14 Defendant )

Case No.: *DC. 19. 144A*  
MOTION FOR LEAVE TO  
FILE AN INFORMATION

**AMY EDDY**

15  
16 Pursuant to Section 46-11-201, the State hereby moves for leave  
17 to file an Information charging the Defendant with the offense of  
18 VEHICULAR HOMICIDE WHILE UNDER THE INFLUENCE, a Felony. In support  
19 of this motion, the State has attached for this Court's review an  
20 affidavit setting forth the facts which establish probable cause to  
21 believe that the Defendant has committed the offense as alleged.  
22

23  
24 Dated this 26<sup>th</sup> day of April, 2019.

25 Office of the County Attorney  
26 (Flathead County Attorney

27 By: /s/ Travis R. Ahner  
28 Deputy

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9 IN THE DISTRICT COURT OF THE ELEVENTH JUDICIAL DISTRICT OF THE  
STATE OF MONTANA, IN AND FOR THE COUNTY OF FLATHEAD

10 STATE OF MONTANA, ) Case No. :  
11 Plaintiff, )  
12 vs. ) AFFIDAVIT IN SUPPORT OF  
13 JARED ALLEN PARSONS, ) MOTION FOR LEAVE TO  
14 Defendant ) FILE AN INFORMATION  
15 )

**AMY EDDY**

16 Travis R. Ahner is the County Attorney for Flathead County  
17 Montana. As such he is empowered to initiate and prosecute persons  
18 charged with crimes committed in the State of Montana and to initiate  
19 such prosecutions by Information filed in District Court.  
20

21 Pursuant to Section 46-11-201, MCA, Travis R. Ahner seeks leave  
22 to file an information charging the Defendant with the offense of  
23 VEHICULAR HOMICIDE WHILE UNDER THE INFLUENCE, a Felony. More  
24 specifically, those charges would allege the following:  
25

26 The Defendant, JARED ALLEN PARSONS, on or about April 26, 2019,  
27 in Flathead County, Montana, negligently caused the death of  
28 another human being while operating a vehicle in violation of §  
61-8-401, § 61-8-406, or § 61-8-411, contrary to § 45-5-106(1),  
MCA, and punishable under the provisions of § 45-5-106(3), MCA,  
by a term in the state prison for a maximum of thirty years

1 and/or by a maximum fine of \$50,000. Imposition of a sentence  
2 under this provision may not be deferred.

3 As reported by Trooper Jerril Ren and Trooper Eric Thoreson  
4 of the Montana Highway Patrol, the facts establishing  
5 probable cause to believe that the Defendant has committed  
6 the foregoing offenses are as follows:

7 1. On April 26, 2019, Trooper Jerril Ren and Trooper Eric  
8 Thoreson with the Montana Highway Patrol responded to a  
9 report of a vehicle crashing into a house on Spring Creek  
10 Drive in Flathead County. Trooper Thoreson was dispatched  
11 to the crash at approximately 2:16 a.m. Trooper Thoreson  
12 subsequently learned that a Dodge pickup had crashed  
13 through a sign, some bushes, and into a house and had  
14 struck and killed a fifteen year old female, E.H.  
15 (11/23/03). Trooper Thoreson's initial examination of the  
16 scene was consistent with the reported crash and cause of  
17 death.

18 2. Trooper Thoreson located two males near the crash  
19 scene. One male was identified as the female victim's  
20 father. As Trooper Thoreson pulled up the father was  
21 getting up off of the other male, who was identified as  
22 JARED ALLEN PARSONS. The father stated that PARSONS had  
23 driven into his house. The father stated that he had  
24 pulled PARSONS out of his vehicle and PARSONS took off  
25 running.

26 3. Trooper Ren smelled the strong odor of an alcoholic  
27 beverage coming from PARSONS. Trooper Ren noted that  
28 PARSONS had a hard time maintaining his balance and  
stumbled when he walked. Trooper Ren stated that PARSONS  
had slurred and confused speech. Trooper Ren described  
PARSONS as appearing extremely intoxicated. Trooper  
Thoreson made similar observations with regard to PARSONS.  
PARSONS refused to participate in field sobriety tests and,  
after being read the implied consent advisory, refused to  
provide a blood sample.

4. The pickup had crashed into the house to approximately  
the driver's door. Trooper Thoreson confirmed that the  
vehicle that had crashed into the house was registered to  
PARSONS.

5 I declare under penalty of perjury that the foregoing is true  
and correct to the best of my knowledge and belief.

1 Dated this 26<sup>th</sup> day of April, 2019.

2 Office of the County Attorney  
3 Flathead County Attorney

4 By: /s/ Travis R. Ahner  
5 Deputy

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