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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION**

TERI LEA EVENSON-CHILDS, )  
DANIEL O'TOOLE, RICHARD )  
CHURCHILL, and KEITH LEONARD, )  
individually and on behalf of all others )  
similarly situated, )  
Plaintiffs, )

v. )

Case. No. CV 21-89-  
M-DLC-KLD

RAVALLI COUNTY; STEPHEN )  
HOLTON, in his official capacity as )  
RAVALLI COUNTY SHERIFF; )  
JENNIFER RAY, in her official capacity as )  
RAVALLI COUNTY JUSTICE OF THE )  
PEACE; JIM BAILEY, in his official )  
capacity as RAVALLI COUNTY JUSTICE )  
OF THE PEACE; HOWARD RECHT, in )  
his official capacity as DISTRICT JUDGE )  
FOR THE 21ST JUDICIAL DISTRICT; )  
and JENNIFER LINT, in her official )  
capacity as DISTRICT JUDGE FOR THE )  
21ST JUDICIAL DISTRICT, )  
Defendants. )

**PLAINTIFFS' MOTION  
FOR CLASS  
CERTIFICATION**

\_\_\_\_\_ )

Pursuant to Fed. R. Civ. P. 23, Plaintiffs Teri Lea Evenson-Childs, Daniel O'Toole, Richard Churchill, and Keith Leonard hereby respectfully move this Court to issue an Order certifying the following classes:

1. Main Damages Class — All persons (within the statute of limitations) who are or have been: accused of a crime in Ravalli County, Montana, arrested, incarcerated, placed on the Jail Diversion Program, and charged pretrial fees without having been convicted for the crime for which the Jail Diversion Program was ordered.

2. Indigent Damages Subclass — All indigent persons (within the statute of limitations) who are or have been: accused of a crime in Ravalli County, Montana, arrested, incarcerated, placed on the Jail Diversion Program, and charged pretrial fees without having been convicted for the crime for which the Jail Diversion Program was ordered.

3. Main Injunctive (and Declaratory) Class — All persons who are or will be: accused of a crime in Ravalli County, Montana, arrested, incarcerated, placed on the Jail Diversion Program, and charged pretrial fees without having been convicted for the crime for which the Jail Diversion Program was ordered.

4. Indigent Injunctive (and Declaratory) Subclass — All indigent persons who are or will be: accused of a crime in Ravalli County, Montana, arrested, incarcerated,

placed on the Jail Diversion Program, and charged pretrial fees without having been convicted for the crime for which the Jail Diversion Program was ordered.

In support of this Motion, Plaintiffs rely upon the enclosed Memorandum and accompanying exhibits. Counsel for Defendants were contacted about this motion and are opposed. L.R. 7.1(c)(1).

By: /s/ Phil Telfeyan

Phil Telfeyan  
Natasha Baker  
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By: /s/ Constance Van Kley

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 2022, I electronically filed the above document with the Clerk of the Court using the ECF System, which will provide electronic copies to the counsel of record.

/s/ Constance Van Kley  
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OF THE PEACE; HOWARD RECHT, in )  
his official capacity as DISTRICT JUDGE )  
FOR THE 21ST JUDICIAL DISTRICT; )  
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21ST JUDICIAL DISTRICT, )

Defendants. )

Case. No. CV 21-89-  
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**PLAINTIFFS’  
MEMORANDUM  
IN SUPPORT OF  
MOTION FOR  
CLASS CERTIFICATION**

CLASS ACTION  
JURY DEMANDED

\_\_\_\_\_ )

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Exhibit 32.....Account Ledger for Plaintiff Churchill (RC 0216–18)

## **I. Introduction**

Through its “Jail Diversion Program,” Defendant Ravalli County extracts money from essentially everyone it arrests — even though arrestees remain legally innocent. Fees are imposed and collected without consideration of arrestees’ ability to pay. To carry out Ravalli County’s policies, officers must do everything they can to induce payment, including threatening supervisees with arrest and carrying out those threats. Plaintiffs ask the Court to grant their motion for class certification to put an end to Defendants’ unlawful fee collection scheme and to redress past harms, so that no one else will face its unlawful demands.

Class action litigation is the only reasonable vehicle to remedy Defendants’ unlawful fee collection scheme. The hundreds of individuals the scheme impacts lack the resources to hire their own lawyers to bring individual claims. Providing an economical alternative for aggrieved individuals who lack the ability to bring individual cases is a primary purpose of the class action device. *See Amchem Prods., Inc. v. Windsor*, 521 U.S. 591, 617 (1997). Even if potential class members could afford to try these cases individually, the courts would be clogged with hundreds of suits, redundant discovery, and repeated adjudication of many similar controversies. Such waste of judicial resources is unnecessary given the predominance of common questions presented in this case. Class action certification is not only appropriate, but also necessary.



## **II. Factual Background: Defendants’ Documents and Declarations from Supervisees Show That Defendants Impose Fees and Threaten Reincarceration for Non-Payment as a Matter of Policy**

Defendants’ records show, and the declarations of Jail Diversion Program supervisees confirm, that Defendants engage in several practices — imposing and collecting pretrial fees without inquiry into arrestees’ ability to pay, conditioning release upon payment, and threatening pretrial supervisees with arrest to induce payment — in a largely uniform manner. Because these practices are a matter of policy, class action treatment is appropriate.

Declarations from Named Plaintiffs and dozens of other Jail Diversion Program supervisees (together, the “Program Supervisee Declarations”),<sup>1</sup> demonstrate Defendants’ categorical failure to assess arrestees’ ability to pay pretrial fees at every pretrial stage, from the bond hearing at which pretrial conditions are imposed through the end of an individual’s pretrial supervision. *See, e.g.*, Doc. 41-2, Declaration of Teri Lea Evenson-Childs ¶¶ 3–5; Doc. 41-4, Declaration of Daniel O’Toole ¶¶ 4–6, 29 (at ¶ 29: “At no point has Pre-Trial Supervision asked me if I can pay these fees.”); Doc. 41-5, Declaration of Richard Churchill ¶¶ 4–7, 14 (at ¶ 14: “I can’t afford these fees and no one asked me if I could afford” them); Doc. 41-6, Declaration of Keith Leonard ¶¶ 4, 13 (same); Doc. 41-11, Declaration of

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<sup>1</sup> Some Program Supervisee Declarations were previously filed (Docs. 41-2 to 41-20, 41-24 to 41-25); the rest are attached as exhibits to this memorandum (Exs. 1–17).

Matthew Turner ¶¶ 12 (same); Ex. 13, Declaration of Lawrence Jakub ¶ 5 (the judge “didn’t ask me if I could afford the [Jail Diversion] program, even though I qualified for a public defender”); Ex. 12, Declaration of Charles Post ¶ 8 (same).<sup>2</sup>

As a matter of policy, Defendants condition release on upfront payment of Jail Diversion Program fees. *See, e.g.*, Doc. 41-21, Sample Alcohol Ankle Monitor Contract (requiring initials as to the provision, “I understand if I am incarcerated and still affiliated with Jail Diversion services, I could be held responsible for payments due and *remain incarcerated prior to release until those payments are paid in full.*”) (emphasis added); Ex. 18, Jail Diversion Program Notes Regarding Plaintiff O’Toole (RC 0719–20) (noting on January 7, 2021 that Mr. O’Toole “[m]ust pay past due [fees] to be put on [the Jail Diversion Program] *before* bonding out”; noting on April 19, 2021 that he must pay \$2,805 to be released) (emphasis added); O’Toole Decl. ¶¶ 6, 18–21; Evenson-Childs Decl. ¶ 5; Churchill Decl. ¶¶ 7, 18–20; Pfau Decl. ¶¶ 7–9; Turner Decl. ¶¶ 7–8; Doc. 41-14, Declaration of Roger Sellers ¶ 6; Doc. 41-9, Declaration of Zachary Hadley ¶¶ 15, 17; Doc. 41-13, Declaration of Joseph

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<sup>2</sup> Defendants claim that judges lower bond amounts so that arrestees can afford Jail Diversion Program fees, characterizing this consideration as an assessment of arrestees’ ability to pay Program fees. *See, e.g.*, Doc. 49-1 at ¶ 5. Even assuming this claim is true, the practice could not be fairly characterized as an assessment of arrestees’ ability to pay Program fees. An arrestee’s ability to pay Program fees cannot be adequately assessed at the bond hearing; in contrast to a bond amount, which is known, the total amount to be charged in Program fees is unknown at the time of the bond hearing because enrollment in the Program is indefinite and Program fees are not within judges’ control. *See, e.g.*, Doc. 49-1 at ¶ 4.

Heinzman ¶ 5; Ex. 15, Declaration of Billy Martin ¶ 15; Ex. 4, Declaration of Tiva Merson ¶ 6; Jakub Decl. ¶ 8.

Also as a matter of official policy, Defendants threaten arrestees with reincarceration to induce payment, regardless of ability to pay. *See, e.g.*, Ex. 19, Email from Program Administrator Ellsworth to Program Officers (RC 0104) (“If the client is unable to pay it in full, *please send me a list of those clients so that I can send out violations and ask[] for their removal.* We have to remember that things are tight and when a client does not pay it risk[s] our division.”) (March 29, 2020) (emphasis added); Ex. 20, Email from Program Lieutenant Colgan to Program Officers (RC 0932) (“If an Offender falls behind on payments (can’t afford it, etc.) . . . we will be removing them from the device they are assigned . . . (and sending [a Report of Violation])”) (Nov. 12, 2021); Ex. 21, Email from Lieutenant Colgan to Program Officers (RC 0983) (“Bottom line: *You can’t pay for the UAs, you don’t get UAed and the violation goes out*”) (Nov. 10, 2021); Ex. 22, Email from Lieutenant Colgan to Program Officers (RC 0938) (notifying Program officers of new contract language for alcohol monitoring: “I understand failure to maintain payments will result in the removal from [Continuous Alcohol Monitoring] services and could result in a warrant for my arrest.”) (December 21, 2021); Ex. 23, Sample Conditions of Release Order (RC 0970–72) at 3 (warning that failure to “pay for supervision and/or testing fees as directed by Jail Diversion . . . may result in

Defendant’s immediate arrest and imposition of a higher bail amount.”); Ex. 24, Email from Lieutenant Colgan to Program Officers (RC 0963) (“Offender must pay the ‘past’ equipment dues before we will assign another device. [Payment must be made in advance] or we will turn the machine off and classify them as non-compliant. In regards to the GPS, same procedure, but we have the Offender report to Jail Diversion and we take the GPS off and PTS arrest them for non-compliance.”) (February 3, 2022). A handwritten note from a Jail Diversion Program staff member on the Program’s daily sign-in sheet for alcohol monitoring puts the matter simply: “No money/No blow.” Ex. 25, Sign-In Sheet for Jail Diversion Program Alcohol Monitoring (the 24/7 Program) (RC 1896) (Jan. 25, 2022).

The Jail Diversion Program’s policy of threatening Program supervisees to induce payment of fees is confirmed by supervisees’ experiences. *See, e.g.*, Doc. 41-24, Declaration of Harold Springer ¶ 12 (describing a sign on the Jail Diversion Program office warning supervisees that “if you didn’t have the money to blow, you can’t blow, and that’s a violation, which means you can go to jail”); Ex. 16, Declaration of Tyler LaRue (“I was told I was going to have to pay for my blows each time I blew, and that I couldn’t blow if I was in the negative, and if I didn’t blow, I would go back to jail”); Doc. 41-12, Declaration of Desiree Evans ¶ 11 (“If I couldn’t pay or fell behind on my payments, my pre-trial supervision officer threatened to revoke me and send me back to jail”); Merson Decl. ¶ 6 (“Jail

Diversion officers told me . . . if I stopped paying the fees, they would put out a warrant for my arrest and I would be sent back to jail”); Jakub Decl. ¶ 17 (“Officer Stokes told me that I’m not allowed to UA if I don’t have the money to pay for it. If I don’t UA, I go back to jail, as had happened to me before”); Doc. 41-8, Declaration of Kamila Johnson ¶ 13 (“Officer Fisher has told me that if I don’t pay, I will be violated and be sent back to jail. Just this week, Officer Fisher told me that if I don’t pay the \$55 fee for my next drug test, I will be arrested.”); Hadley Decl. ¶ 17 (“I was arrested and taken to jail because I was one week late in making my payment” of Jail Diversion Program fees); Heinzman Decl. ¶ 8 (“I was told I had to pay whatever fees I allegedly owed or else I would go back to jail”); Doc. 41-18, Declaration of Holly Sutton ¶ 14 (“I did not have money to pay for the UA. Pre-Trial Supervision told me that if I did not find the money, I would be violated and sent back to jail”); Ex. 10, Declaration of Tracy Pfau Feb. 2022 ¶ 15 (“I have been repeatedly threatened with being kicked out of the Jail Diversion Program because I can’t afford my [alcohol] tests. When I go to test, I’ve been told that I need to start paying or I’m going to be dropped from the program and it would be a violation. Violation means I could go to jail.”); Churchill Decl. ¶ 18 (“I have been arrested twice since being on pre-trial supervision because I can’t afford these pre-trial fees”).

These policies — requiring pretrial fees regardless of ability to pay, conditioning release on payment, and using the threat of incarceration to induce payment — apply to all Program supervisees.

### **III. Plaintiffs' Proposed Classes and Claims for Relief**

Plaintiffs seek to certify four separate classes under Federal Rule of Civil Procedure 23. Plaintiffs expect significant overlap between members of the four proposed classes, but separate certification is appropriate given the differences between the claims made by each class and the forms of relief sought.

1. Main Damages Class — All persons (within the statute of limitations) who are or have been: accused of a crime in Ravalli County, Montana, arrested, incarcerated, placed on the Jail Diversion Program, and charged pretrial fees without having been convicted for the crime for which the Jail Diversion Program was ordered.

2. Indigent Damages Subclass — All indigent persons (within the statute of limitations) who are or have been: accused of a crime in Ravalli County, Montana, arrested, incarcerated, placed on the Jail Diversion Program, and charged pretrial fees without having been convicted for the crime for which the Jail Diversion Program was ordered.

3. Main Injunctive Class — All persons who are or will be: accused of a crime in Ravalli County, Montana, arrested, incarcerated, placed on the Jail Diversion

Program, and charged pretrial fees without having been convicted for the crime for which the Jail Diversion Program was ordered.<sup>3</sup>

4. Indigent Injunctive Subclass — All indigent persons who are or will be: accused of a crime in Ravalli County, Montana, arrested, incarcerated, placed on the Jail Diversion Program, and charged pretrial fees without having been convicted for the crime for which the Jail Diversion Program was ordered.<sup>4</sup>

The Main Damages Class and the Indigent Damages Subclass are together referred to as the “Damages Classes.” The Main Injunctive Class and the Indigent Injunctive Subclass are together referred to as the “Injunctive Classes.”

Plaintiffs bring the following nine legal claims (Doc. 34 at ¶¶ 109–166, 192–223):

1. Defendants deprive pretrial arrestees of property without due process (Count One);
2. Jail Diversion Program fees are a form of arbitrary bail and violate due process (Count Two);
3. Defendant Ravalli County’s policy of requiring unhoused individuals to pay a deposit before release criminalizes the status of homelessness and violates the Eighth Amendment (Count Three);
4. Defendants’ refusal to consider ability to pay pretrial fees violates due process (Count Four);

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<sup>3</sup> In addition to claims for injunctive relief, the Main Injunctive Class also brings claims for declaratory relief. “Main Injunctive Class” is used as a shorthand.

<sup>4</sup> In addition to claims for injunctive relief, the Indigent Injunctive Subclass also brings claims for declaratory relief. “Indigent Injunctive Subclass” is used as a shorthand.

5. Defendant Ravalli County’s policy of threatening reincarceration to induce payment violates due process (Count Five);
6. Defendants’ refusal to consider arrestees’ ability to pay pretrial fees violates the federal Equal Protection Clause (Count Six);
7. Defendants’ refusal to consider arrestees’ ability to pay pretrial fees is a form of wealth-based and status-based discrimination that violates the Equal Protection Clause of the Montana Constitution (Count Seven);
8. Defendant Ravalli County’s policy of detaining pretrial arrestees beyond their release date and conditioning release on payment of pretrial fees amounts to false imprisonment (Count Eight); and
9. Defendant Ravalli County, through the Jail Diversion Program, violates due process by coercing pretrial arrestees into signing unconscionable contracts “agreeing” to further criminal liability as a condition of release (Count Nine).

The Main Damages Class seeks damages under Counts One, Two, Five, and Eight. The Indigent Damages Class seeks damages under Counts Four, Six, and Seven. The Main Injunctive Class seeks injunctive and declaratory relief under Counts One, Two, Five, Eight, and Nine. The Indigent Injunctive Class seeks injunctive and declaratory relief under Counts Three, Four, Six, and Seven.

All Named Plaintiffs — Teri Lea Evenson-Childs, Daniel O’Toole, Richard Churchill, and Keith Leonard — are appropriate representatives for all four classes. All Named Plaintiffs may adequately represent the Main Damages Class because all have been charged Jail Diversion Program fees without a conviction and seek damages in the form of returned fees. Because they are indigent, all Named Plaintiffs are also appropriate representatives of the Indigent Damages Subclass. Evenson



Childs Decl. ¶ 12; O’Toole Decl. ¶ 26; Churchill Decl. ¶ 9; Leonard Decl. ¶ 2. All Named Plaintiffs are appropriate representatives for the Main Injunctive Class because they have been arrested and placed on the Jail Diversion Program and may seek injunctive and declaratory relief against Defendants’ unlawful practices. And, being indigent, all Named Plaintiffs also appropriately represent the Indigent Injunctive Subclass.

**IV. Plaintiffs’ Proposed Classes Challenging Defendants’ Fee Collection Scheme Satisfy the Requirements of Rules 23(a), 23(b)(2) and 23(b)(3)**

This Court should certify Plaintiffs’ proposed classes because (A) each proposed class satisfies the requirements of Rule 23(a); (B) the Injunctive Classes satisfy the requirements of Rule 23(b)(2); and (C) the Damages Classes satisfy the requirements of Rule 23(b)(3). *See Amchem Prods., Inc. v. Windsor*, 521 U.S. 591, 613–14 (1997) (listing factors for class certification under Rule 23).

**A. In Challenging Defendants’ Class-Wide Policy of Pretrial Fee Collection, Plaintiffs Satisfy the Requirements of Rule 23(a)**

This Court should certify Plaintiffs’ proposed classes under Rule 23(a) because (i) the classes are so numerous that joinder is impracticable; (ii) claims within each class raise common questions of law and fact; (iii) Named Plaintiffs’ claims are typical of the claims of each class; and (iv) Named Plaintiffs and class counsel will fairly and adequately protect the interests of each class. *See Ellis v.*

*Costco Wholesale Corp.*, 657 F.3d 970, 980 (9th Cir. 2011) (citing Fed. R. Civ. P. 23(a)(1)–(4)).

**i. Each Numbering in the Hundreds, the Proposed Classes Satisfy the Rule 23(a)(1) Numerosity Requirement**

All of Plaintiffs’ proposed classes are “so numerous that joinder of all members is impracticable.” Fed. R. Civ. P. 23(a)(1).

By comprising individuals who are being or have been charged Jail Diversion Program fees, the Main Damages Class is sufficiently numerous such that joinder of all members is impracticable. Hundreds of individuals have been subject to Jail Diversion Program fees within the statute of limitations period and are therefore members of the Main Damages Class. *See* Ex. 26, Jail Diversion Program List (RC 1961–74) (showing 805 case entries for the Jail Diversion Program for the years 2018–2022); Ex. 27, Email from Administrator Ellsworth to Sheriff Holton (RC 0119–21) (reporting Program case load of 135 individuals in May 2020) (May 1, 2020); Ex. 28, Email from Administrator Ellsworth to Sheriff Holton (RC 0136) (July 2020 Program case load of 164 individuals) (July 1, 2020); Ex. 29, Email from Administrator Ellsworth to Sheriff Holton (RC 0150) (September 2020 Program case load of 194 individuals) (September 1, 2020). With hundreds of class members, the Main Damages Class clearly satisfies the numerosity requirement. *See Rannis v. Recchia*, 380 F. App’x 646, 651 (9th Cir. 2010) (“In general, courts find the numerosity requirement satisfied when a class includes at least 40 members.”).

Similarly, because most members of the Main Damages Class are indigent, the Indigent Damages Subclass is sufficiently numerous. Declarations from 35 individuals detail experiences of being charged Jail Diversion Program fees. *See* Program Supervisee Declarations. Of those 35 individuals, 29 are indigent. Ex. 30, Declaration of Natasha Baker ¶ 4. The Main Damages Class numbers in the hundreds, and with an indigency rate of approximately 83% (based on the sample from Program Supervisee Declarations), the Indigent Damages Subclass consists of hundreds of individuals, therefore satisfying numerosity.<sup>5</sup> *See West v. Cal. Servs. Bureau, Inc.*, 323 F.R.D. 295, 303 (N.D. Cal. 2017) (explaining that courts may make reasonable inferences to determine numerosity).

The Main Injunctive Class and the Indigent Injunctive Subclass number in the hundreds and therefore satisfy Rule 23(a)(1). At any given time, roughly 200–300 individuals pay Jail Diversion Program fees. Ex. 31, Email from Lieutenant Colgan to Sheriff Holton (RC 0884) (describing the Program as a “constant revolving door”; noting that while the Program previously was “steady [at] around 220” monthly supervisees, it since had increased to 293 monthly supervisees) (August 18, 2021). Absent a change in Defendants’ policy, hundreds more individuals will be placed on

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<sup>5</sup> *See also* Montana Office of State Public Defender, *2020 Annual Report* at 5, available at [https://publicdefender.mt.gov/\\_docs/LegislativeMaterials/OPD2020AnnualReport.pdf](https://publicdefender.mt.gov/_docs/LegislativeMaterials/OPD2020AnnualReport.pdf) (noting that an estimated 80% of people accused of crimes in the United States are appointed attorneys by the court).

the Jail Diversion Program and charged pretrial fees. The Main Injunctive Class therefore comprises hundreds of members, satisfying numerosity. Given the estimated indigency rate of 83% among Jail Diversion Program supervisees, the Indigent Injunctive Subclass is likewise sufficiently numerous. *See Sueoka v. United States*, 101 F. App'x 649, 653 (9th Cir. 2004) (explaining that, in the context of injunctive and declaratory relief, the numerosity requirement is “relaxed” and plaintiffs may draw inferences from the evidence to estimate the number of unknown and future members).

**ii. Subject to Class-Wide Fee Collection Policies and Threats of Reincarceration Before Trial, the Proposed Classes Satisfy the Rule 23(a)(2) Commonality Requirement**

The proposed classes satisfy the commonality requirement because each class raises many common factual and legal questions. *See Ellis*, 657 F.3d at 979 (citing Fed. R. Civ. P. 23(a)(2)). Common questions of fact center around the Jail Diversion Program policies and raise common legal questions as to the policies' constitutionality.

The Main Damages Class's claims are replete with common factual questions, which will “generate common answers apt to drive the resolution of the litigation.” *Abdullah v. U.S. Sec. Assocs., Inc.*, 731 F.3d 952, 957 (9th Cir. 2013) (quoting *Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338, 350 (2011)). Important factual questions common to all members include, but are not limited to: whether Defendant Justice

Court Judges and Defendant District Court Judges (“Defendant Judges”) impose conditions requiring Jail Diversion Program enrollment; whether Jail Diversion Program fees are imposed without a conviction; whether Jail Diversion Program fees are set by Program officers and not by judges; and whether Jail Diversion Program officers threaten supervisees with jail time to induce payment of fees. Plaintiffs offer evidence that Defendants engage in the challenged conduct as a matter of policy. *See supra* Section II. Factual findings about Defendants’ policies will therefore apply to all putative members of the Main Damages Class because all have been subject to these policies.

The Main Damages Class’s claims involves several common legal questions that, once resolved, will be answered for the entire class “in one stroke.” *See Stockwell v. City & Cty. of San Francisco*, 749 F.3d 1101, 1112 (9th Cir. 2014) (quoting *Dukes*, 564 U.S. at 350)). For example, whether the charging and collection of Program fees without a conviction constitutes a deprivation of property in violation of the Due Process Clause presents a common question of law as to all Main Damages Class members because all have been subject to the Program fees. Whether Defendant Ravalli County’s policy of threatening supervisees with reincarceration to induce payment violates due process likewise presents a common question of law, as all putative members have been subject to Defendants’ threats. *See supra* Section II.

Similarly, the Indigent Damages Subclass raises factual and legal questions common to all members. To begin, whether Defendant Ravalli County charges Program fees without considering supervisees' ability to pay is a factual question that applies to all members of the Indigent Damages Class because all have been subject to fees. Whether Defendant Ravalli County's failure to consider an arrestee's ability to pay for pretrial fees violates indigent arrestees' Equal Protection and Due Process rights likewise present legal questions common to all Indigent Damages Class members.

Finally, the forward-looking challenge to Defendants' fee collection scheme brought by the Main Injunctive Class presents numerous common questions of fact and law. Commonality arises out of Defendants' imposition of excessive pretrial fees without a conviction and Defendants' threats of jail time for nonpayment — *as matters of policy*. *See supra* Section II. All that varies between class members is the length of supervision, the amount of fees, and the wording of Defendants' threats, but the central features of the Jail Diversion Program are policy matters that apply to all supervisees, thereby raising common questions of fact and law. Common questions stem from the common policies; for example, whether Jail Diversion Program officers threaten supervisees with reincarceration to induce payment is a common factual question, and whether this practice violates due process is a common legal question. *See Dukes*, 564 U.S. at 350 (centering commonality

determination on the “capacity of a class-wide proceeding to generate common answers apt to drive the resolution of the litigation”).

Similarly, the Indigent Injunctive Subclass’s claims raise multiple common factual and legal questions. Defendants charge and collect pretrial fees without considering arrestees’ ability to pay, and Plaintiffs argue that this practice violates arrestees’ rights under the Due Process Clause and the Equal Protection Clause. The Court’s factual findings and legal holdings regarding these issues will apply to all Indigent Injunctive Subclass members, as all are indigent and subject to pretrial fees, and all seek the same remedies.

**iii. The Proposed Class Action Satisfies the Rule 23(a)(3) Typicality Requirement Because Named Plaintiffs’ Claims Are Largely Identical to the Claims of the Class**

Named Plaintiffs are typical class and subclass members because each has been subjected to the Jail Diversion Program’s fee collection and threats of reincarceration. They have “suffered the same injuries as absent class members, as a result of the same conduct by the [D]efendant[s].” *In re Diamond Foods, Inc., Sec. Litig.*, 281 F.R.D. 405, 408 (N.D. Cal. 2012). Under Rule 23(a)’s “permissive standards, representative claims are typical if they are reasonably co-extensive with those of absent class members; they need not be substantially identical.” *Parsons v. Ryan*, 754 F.3d 657, 685 (9th Cir. 2014) (internal citation omitted). Named Plaintiffs’ claims are largely identical to the class claims and satisfy typicality.

Like all members of the Damages Classes, each Named Plaintiff has faced harm traceable to Defendants' pretrial fee collection scheme, and each brings damages claims to redress those harms. Named Plaintiffs and all putative class members were charged pretrial fees without consideration of ability to pay and were threatened with jail for nonpayment. As a result, Named Plaintiffs and all putative Main Damages Class members bring the same legal claims against Defendants. Further, as indigent individuals, Named Plaintiffs bring claims identical to putative members of the Indigent Damages Subclass. Named Plaintiffs' claims are therefore typical of the claims of both Damages Classes.

All members of the Main Injunctive Class, Named Plaintiffs and absent members alike, bring a common set of legal claims and seek a single declaration and a single injunction to prevent future conduct; Named Plaintiffs therefore share identical claims with the absent members of the Injunctive Class. By definition, all members of the Main Injunctive Class (Named Plaintiffs and absent class members alike) are or will be subjected to Defendants' fee collection scheme; all bring the same set of legal claims to put an end to Defendants' unconstitutional practices. Relatedly, as indigent individuals, Named Plaintiffs bring claims for injunctive relief in connection with their indigence and therefore share identical claims with the absent members of the Indigent Injunctive Subclass.



**iv. Because Named Plaintiffs and Their Counsel Are Prepared to Advocate for Class Members’ Rights Vigorously and Without Compromise, the Proposed Class Action Satisfies the Rule 23(a)(4) Adequacy Requirement**

Class certification is proper because Named Plaintiffs and class counsel will “fairly and adequately protect the interests of the class” — here, the four proposed classes. *Ellis*, 657 F.3d at 985 (citing Fed. R. Civ. P. 23(a)(4)). They satisfy the central concerns of the adequacy analysis: (a) Named Plaintiffs lack conflicts of interests with other class members; (b) Named Plaintiffs are well-prepared to competently fulfill their duties to the class; and (c) class counsel are well-prepared to vigorously prosecute the action. *See id.*

**a. Named Plaintiffs’ Interests Are Aligned with Absent Class Members**

Named Plaintiffs have no conflicts of interests with the absent class members. First, there are no known conflicts of interests between Named Plaintiffs and other class members. Baker Decl. ¶ 5. Second, conflicts of interests are unlikely to arise between the Named Plaintiffs and the absent class members. By definition, all members of all classes: (1) have been subjected to Defendants’ fee collection scheme; and/or (2) will be subjected to Defendants’ fee collection scheme. Named Plaintiffs’ interests are therefore aligned with absent class members’ interests in seeking damages relief in the form of returned fees to redress past harms of the fee collection scheme and/or injunctive relief to prevent the scheme’s future harms. *See*

*Amchem Prods., Inc. v. Windsor*, 521 U.S. 591, 594-595 (1997) (“Representatives must be part of the class and possess the same interest and suffer the same injury as the class members.”). Notably, “[m]inor conflicts alone will not defeat a party’s claim to class certification: the conflict must be a fundamental one going to the specific issues in controversy.” *Valley Drug Co. v. Geneva Pharmaceuticals, Inc.*, 350 F.3d 1181, 1189 (11th Cir. 2003) (internal citation omitted).

As to the Damages Classes, no fundamental conflicts of interest between Named Plaintiffs and the absent class members exist. Courts routinely find a lack of conflicts of interests for adequacy purposes where, as here, class members seek damages based on shared theories of liability. *See, e.g., Alexander v. JBC Legal Group, P.C.*, 237 F.R.D. 628, 631 (D. Mont. 2006) (no conflicts of interest in Fair Debt Collection Practices Act class action); *Nevarez v. Forty Niners Football Co., LLC*, 326 F.R.D. 562, 581–83 (N.D. Cal. 2018) (no conflicts of interest in disability discrimination class action). By contrast, courts have found fundamental conflicts of interest where the economic objectives or the proposed legal arguments of some class members are adverse to those of other members. *See Pickett v. Iowa Beef Processors*, 209 F.3d 1276 (11th Cir. 2000) (reversing class certification where the proposed class included individuals who alleged to have been harmed by contracts and others who had benefitted from those same contracts); *Hughes v. WinCo Foods*, No. 11–00644, 2012 WL 34483, at \*7 (C. D. Cal. Jan 4, 2012) (holding that a

subordinate was not an adequate representative of a supervisor). In this case, the objectives and the legal claims of the Named Plaintiffs and the absent members of the Damages are directly aligned because all bring legal claims challenging the same aspects of Defendants' pretrial fee collection scheme. No conflicts of interest presenting any barrier to a finding of adequacy exist.

As to Plaintiffs' claims for injunctive relief, fundamental conflicts of interest will not arise. By definition, all class members of the Injunctive Classes — Named Plaintiffs and absent class members alike — will be subjected to Defendants' fee collection scheme, and they seek to put an end to the scheme. If the Named Plaintiffs prevail on their claim that Defendants' imposition of pretrial fees without regard to ability to pay violates due process, they will be entitled to declaratory and injunctive relief, which would only be to the benefit of the absent class members. Similarly, if Named Plaintiffs prevail on their claim that the fee collection scheme violates the federal and/or state Equal Protection clause, that holding will benefit all members of the Indigent Injunctive Subclass. Therefore, no conflicts of interest exist.

**b. Named Plaintiffs Are Prepared to Fulfill Their Duties to the Proposed Classes**

The Named Plaintiffs are prepared to vigorously prosecute this action and fulfill their duties to the proposed classes. All four Named Plaintiffs, indigent and struggling under the demands of Defendants' fee collection scheme, have an interest in joining with others to seek damages for past harms and declaratory and injunctive

relief to prevent ongoing and future harm. Each is committed to this action and has worked with counsel to provide declarations and consult with counsel in this case. Baker Decl. ¶ 6. They are therefore well-suited to the task of prosecuting this action.

**c. Class Counsel Are Experienced and Prepared to Vigorously Advocate for Class Members' Rights**

As experienced attorneys, class counsel is well-suited to the task of vigorously advocating for the interests of the proposed classes. Plaintiffs are represented by attorneys from Equal Justice Under Law and Upper Seven Law. Equal Justice Under Law attorneys have experience in litigating complex civil rights matters in federal court, particularly with regards to wealth-based discrimination. Baker Decl. ¶ 7. Upper Seven Law attorneys have experience in litigating complex class action matters and have knowledge of federal court processes, particularly in the District of Montana. *Id.* at ¶ 8. Class counsel have extensive knowledge of the relevant constitutional and statutory law, as well as county practices. *Id.* at ¶ 10. Class counsel have gathered testimony from Jail Diversion Program supervisees and developed relationships with individuals victimized by Defendants' practices, gaining a deep understanding of how Defendants' fee collection scheme works and how it affects class members. *Id.* at ¶ 9; *see also* Program Supervisee Declarations. Counsel will fairly and adequately protect the interests of class members.

**B. Faced with Defendants’ Class-Wide Policy of Fee Collection and Unlawful Pretrial Detention, the Proposed Injunctive Classes Satisfy the Requirements of Rule 23(b)(2)**

Certification under Rule 23(b)(2) is warranted for the Injunctive Classes because “the part[ies] opposing the class ha[ve] acted or refused to act on grounds that apply generally to the class,” and “final injunctive relief or corresponding declaratory relief is appropriate respecting the class as a whole.” Fed. R. Civ. P. 23(b)(2). Here, Defendants “have acted or refused to act” — collecting pretrial fees without considering ability to pay and threatening jail time for nonpayment of fees — “on grounds that apply generally to the class” — carrying out the Jail Diversion Program as a matter of policy, in a manner affecting all class members. *Id.* Rule 23(b)(2) applies in precisely these circumstances because “a single injunction or declaratory judgment would provide relief to each member of the class” and the injunction warranted is of an “indivisible nature.” *Parsons*, 754 F.3d at 687–88 (quoting *Dukes*, 564 U.S. at 360).

In this case, members of the Main Declaratory Injunctive Class bring common legal claims and seek a single, indivisible declaration and injunction: an order declaring Defendants’ fee collection scheme unlawful and preventing its continued implementation. The relief sought applies generally to all members of the Main Injunctive Class, as all members by definition will be subject to the challenged conduct. Resolution of the declaratory and injunctive claims will not require any

individualized determinations. The same is true for the Indigent Injunctive Class, which seeks a single, indivisible declaration and injunction, common to all members, as relief for its common set of claims.

Courts routinely certify classes that meet Rule 23(a) requirements and seek only declaratory or injunctive relief under Rule 23(b)(2). *See, e.g., Parsons*, 754 F.3d at 686-90 (class and subclass of incarcerated persons seeking injunctive relief against policies allegedly creating unconstitutional conditions of confinement); *Rodriguez v. Hayes*, 591 F.3d 1105, 1111, 1125-26 (9th Cir. 2010) (class of immigrant detainees seeking injunction to require individual bond hearings); *B.K. ex rel. Tinsley v. Snyder*, 922 F.3d 957, 970-73 (9th Cir. 2019) (general class and related subclass seeking injunctive relief against child welfare agencies' practices). The Injunctive Classes seek indivisible injunctions and corresponding declaratory relief and therefore merit certification under Rule 23(b)(2).

**C. Faced with Defendants' Class-Wide Fee Collection Scheme, Plaintiffs' Proposed Damages Classes Meet the Requirements of Rule 23(b)(3)**

Class certification for the Main Damages Class and the Indigent Damages Class is warranted under Fed. R. Civ. P. 23(b)(3) because (i) “questions of law or fact common to the members of the class[es] predominate over any questions affecting only individual members,” and (ii) “a class action is superior to other

available methods for the fair and efficient adjudication of the controversy.” Fed. R. Civ. P. 23(b)(3).

**i. Common Questions Regarding the Operation of Defendants’ Fee Collection Scheme Predominate Over Individual Questions of Damages**

Common questions raised by the Damages Classes predominate over individual questions. Common questions exist “where ‘the same evidence will suffice for each member to make a prima facie showing or the issue is susceptible to generalized, class-wide proof.’” *Ruiz Torres v. Mercer Canyons Inc.*, 835 F.3d 1125, 1134 (9th Cir. 2016) (quoting *Tyson Foods v. Bouaphakeo*, 136 S.Ct. 1036, 1045 (2016)). The factual questions in this case are “susceptible to class-wide proof,” *id.*, because Defendants’ challenged practices are policies applicable to all supervisees. *See supra* Section II. Accordingly, common questions about how the Jail Diversion Program operates, as opposed to individual questions about how particular individuals experience the harms of the Program, “present a significant aspect of the case and they can be resolved for all members of the class in a single adjudication.” *Butler v. Unified Life Ins. Co.*, No. CV 17-50-BLG-SPW, 2019 WL 4752360, at \*2 (D. Mont. Sept. 30, 2019) (citing *In re Hyundai and Kia Fuel Economy Litig.*, 926 F.3d 539, 557 (9th Cir. 2019)).

In this case, individual questions — those where “members of a proposed class will need to present evidence that varies from member to member,” *Ruiz*

*Torres*, 835 F.3d 1125 at 1134 (quoting *Bouaphakeo*, 136 S.Ct. at 1045) — concern only damage calculations and therefore “cannot defeat certification” under the predominance inquiry. *Just Film, Inc. v. Buono*, 847 F.3d 1108, 1120 (9th Cir. 2017) (quoting *Yokoyama v. Midland Nat’l Life Ins. Co.*, 594 F.3d 1087, 1094 (9th Cir. 2010)). The members of the Damages Classes seek damages only in the form of returned fees. Therefore, damage awards can be calculated through a manageable formula by reviewing Defendants’ records to determine the amount in fees collected from each class member during the relevant period. *See Leyva v. Medline Indus. Inc.*, 716 F.3d 510, 514 (9th Cir. 2013) (finding predominance where damages could be calculated based on the wages each employee lost due to defendant’s unlawful practices); *see also Jimenez v. Allstate Ins. Co.*, 765 F.3d 1161, 1168 (9th Cir. 2014) (finding predominance where damages could be calculated based on manageable formula consistent with class members’ shared theory of liability). Defendants maintain records relevant to the damages calculations process. *See, e.g.*, Ex. 32, Account Ledger for Plaintiff Churchill (RC 0216–18) (Jail Diversion Program fees account ledger for Plaintiff Churchill, showing date-stamped charges and payments).

Plaintiffs’ above-outlined theory of predominance applies to both the Main Damages Class and the Indigent Damages Class. Given that both classes seek damages awards only in the form of returned fees, the two classes share a common set of evidence regarding Defendants’ fee collection scheme.



**ii. Class Action Litigation Is the Superior Means for Adjudicating Defendants' Class-Wide Fee Collection Scheme**

Class action litigation is the superior method of adjudicating the Damages Classes' claims given the relatively small size of the proposed class members' individual monetary recovery and the class-wide nature of Defendants' fee collection scheme. Even if every class member were to be awarded in damages the full amount they paid to Defendants in pretrial fees, these individual damages would generally fall in the low-to-mid thousands. *See, e.g.*, Ex. 2, Declaration of Lewis Somerlot, Jr. ¶ 3 (approximately \$2,000); Ex. 7, Declaration of Justin Warila ¶ 9 (approximately \$2,500); Evans Decl. ¶ 12 (approximately \$4,000); Hadley Decl. ¶ 13 (approximately \$4,000); Doc. 41-3, Declaration of Teri Lea Evenson-Childs Sept. 2021 ¶ 5 (approximately \$6,000); Ex. 3, Declaration of Derrik Riebling ¶ 12 (approximately \$7,000).

While these individual amounts are heavily burdensome to putative class members who are struggling to gain stability after arrest, they are simply too small to incentivize a private attorney to litigate individual claims. The instant case demonstrates that the claims brought by putative class members require a substantial investment of time and effort. In individual cases, the putative class members would be at a marked disadvantage to the opposing parties, particularly because class members are impacted by the criminal justice system. They may be either incarcerated or struggling to meet the onerous demands of the Jail Diversion

Program. And they may be reasonably concerned about retaliation. Given the class members' disadvantages and their relatively small individual monetary recoveries, certification will "vindicat[e] . . . the rights of groups of people who individually would be without effective strength to bring their opponents into court at all[,]" furthering the "very purpose of Rule 23(b)(3)." *Briseno v. ConAgra Foods, Inc.*, 844 F.3d 1121, 1129 (9th Cir. 2017) (quoting *Amchem Prods.*, 521 U.S. at 617).

Plaintiffs will offer a common body of evidence showing the class-wide impact of Defendants' challenged practices. *See supra* Section II. Class action litigation is superior to individual adjudication because it is efficient and will conserve judicial resources. *See, e.g., Levy*, 716 F.3d at 514 (noting the efficiency of a class action in the context of a wage and hour case); *see also* Fed. R. Civ. P. 1. Class certification for the Damages Classes under Rule 23(b)(3) is warranted.

## **V. Conclusion**

Plaintiffs respectfully request that this Court grant their Motion for Class Certification.

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DATED this 8th day of April, 2022.

Respectfully submitted,

By: /s/ Phil Telfeyan

Phil Telfeyan  
Natasha Baker  
Equal Justice Under Law

By: /s/ Constance Van Kley

Constance Van Kley  
Rylee Sommers-Flanagan  
Upper Seven Law

*Attorneys for Plaintiffs*

## **WORD COUNT CERTIFICATION**

Per Local Rule 7.1(d)(2)(E), I hereby certify that this memorandum in support of Plaintiffs' motion for class certification is composed of 6,495 words, excluding caption, certificate of compliance, table of contents and authorities, exhibit list, and certificate of service, as counted by Microsoft Word's word count feature.

/s/ Constance Van Kley  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 2022, I electronically filed the above document with the Clerk of the Court using the ECF System, which will provide electronic copies to the counsel of record.

/s/ Constance Van Kley  
Attorney for Plaintiffs

# **EXHIBIT 1**

## **DECLARATION OF TRISTIN DAVIS**

### DECLARATION OF TRISTIN DAVIS

I, Tristin Davis, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been on pre-trial supervision in Ravalli County for several months. I pay my fees and comply with pre-trial supervision even though I haven't been convicted of anything and despite the enormous financial and mental toll being on pre-trial supervision takes on me.
3. In May 2021, I was arrested and charged with a DUI.
4. I posted bail before my first court hearing. My bail was set at around \$1,000 and a friend of mine hired Lucky Bail Bond to post my bail, which cost about \$180. I later paid my friend back.
5. When I went to court for my arraignment, I did not have an attorney with me. The judge said that I needed to take a breathalyzer test in person twice a week ("blow") and to take a drug test (UA) twice a month. She said that the blows were \$2 each and the UA would cost about \$35 per test. I also had to pay a \$105/month supervision fee. She did not ask if I could afford these fees. She said that if I missed a payment or missed a test that I would go back to jail. She told me that the fees were mandatory.
6. In an average month, I am charged \$16/month for blows (\$2 each twice a week), \$70/month for UAs (\$35 each twice a month) and \$105/month for supervision fees, totaling about \$190/month in pre-trial fees.
7. To get to and from the twice-weekly blows, I also have to pay for gas and get rides to and from my home in Missoula to Hamilton, which costs about \$100–120 per week.
8. I cannot afford these fees and the gas to get to and from my tests, yet no one has asked me if I can afford these fees and Pre-Trial Supervision threatens to send me back to jail if I don't pay.
9. Over the summer, there was a note on Pre-Trial Supervision Office's door that said that if you don't have the money to blow, it's a violation, which means you can go back to jail.
10. On another occasion around the same time, I went in for a blow and I didn't have the money. One of the supervisors, Chris, told me that if I didn't pay, it was a violation. I borrowed money from a friend and paid the fee because I didn't want to go back to jail.
11. I mow lawns for my brother and my income fluctuates depending on how much work is available. I work about 30 hours/week making \$14–15/hour. My rent is \$200/month, I

spend about \$150/month on food, about \$70/month in utilities, and have a \$75/month payment related to car repairs.

12. I have fallen behind on my other bills because pre-trial fees have to be paid first. I do not want to go back to jail so I pay my pre-trial fees before everything else, even if it means I fall behind on my other bills.
13. Being on pre-trial supervision makes it very difficult to make plans and I have had to cut back on my work hours to comply with pre-trial supervision. Five days a week, I have to call in to see if I have to blow that day. If I do, I have to be at Pre-Trial Supervision's office in Hamilton that same day. On the days I have to go into Hamilton to blow, I don't work when I otherwise would. For my UAs, my pre-trial officer calls me if I have to test and I have to show up the same day to test. I cannot miss these tests or else I go back to jail.
14. In the roughly five months that I have been on pre-trial supervision, I haven't had a single dirty test. Yet I have yet to go back to court and I don't know how much longer I am going to have to be on pre-trial supervision and paying these fees I can't afford.
15. Being on pre-trial supervision is very stressful and I feel like my life is on hold. I am being punished even though I haven't been convicted of anything and even though I've fully complied with pre-trial conditions for months.

I declare under penalty of perjury that the statements above are true and correct. Executed on

October 7, 2021, in Missoula, Montana.



Tristin Davis



**EXHIBIT 2**

**DECLARATION OF  
LEWIS SOMERLOT, JR.**

## DECLARATION OF LEWIS SOMERLOT, JR.

I, Lewis Somerlot, Jr., state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been on pre-trial supervision since May 2020. I took a plea deal in October 2021, but because I have yet to be sentenced, I remain subject to pre-trial supervision and pre-trial fees.
3. During the 18 months that I was on pre-trial supervision before taking a plea, I paid close to two thousand dollars in pre-trial fees without a conviction and even though I qualified for a public defender.
4. In April 2020, I went to jail after turning myself in on a warrant for my arrest. When I went to court for my arraignment, Justice of the Peace Jennifer Ray set bond at \$10,000.
5. I hired Lucky Bail Bonds to post my bond. I had to pay Lucky Bail Bonds \$1,000, which I paid for through money I had received through my divorce from my ex-wife. Without that money, I would have stayed in jail because I could not afford the full bail amount.
6. The next week I returned to court and my case was now before Judge Recht. Judge Recht ordered me to be on pre-trial supervision. Judge Recht did not tell me how much pre-trial supervision would cost.
7. I was told that my supervision fees would be \$105/month by the sheriff's office (Pre-Trial Supervision). The sheriff's office did not ask me about my ability to pay. My understanding was that, if I didn't pay, it could mean a warrant out for my arrest.
8. To pay my fees, I call the sheriff's office and pay with a debit card. I am charged a 3% transaction fee for paying with a debit card over the phone, which I prefer to do because I work sixty miles away, leave early in the morning, and typically don't get back until after the Sheriff's office closes, and with the transaction fee, my supervision fees come out to \$108.15/month total.
9. For the \$108.15 that I pay each month I receive no services. The only thing that supervision consists of is phone calls, and then later text messages, every two weeks from my pre-trial supervision officer to confirm that my employment, address, and phone number have not changed.
10. So far, I have paid close to two thousand dollars in pre-trial fees.
11. The pre-trial supervision requirements cause me anxiety because the times that my pre-trial supervision officer called me for my check-ins would randomly change and conflict with my work schedule. Sometimes when I would try to call, Pre-Trial Supervision would require me to call back later, which would get in the way of my work. Sometimes I

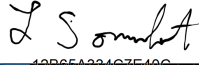
was busy and out of cell service at the times Pre-Trial Supervision changed my required phone calls to. I was afraid of what could happen if I missed a phone call, because I understood that any mistake could result in a warrant for my arrest.

12. I took a plea deal in October 2021. There was no discussion about getting credit for the thousands of dollars that I had paid in pre-trial supervision fees.

13. Even though I took a plea deal in October 2021, I am still required to pay \$105/month in supervision fees until my sentencing, which is currently scheduled for December 2021.

I declare under penalty of perjury that the statements above are true and correct. Executed on

11/5/2021 in Hamilton, Montana.

DocuSigned by:  
  
12B65A33467E40C...

Lewis Somerlot, Jr.

# **EXHIBIT 3**

## **DECLARATION OF DERRIK RIEBLING**

### **DECLARATION OF DERRIK RIEBLING**

I, Derrik Riebling, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I was on pre-trial supervision from April 2019 to December 2019.
3. During the nine months that I was on pre-trial supervision, I paid close to seven thousand dollars in pre-trial fees without a conviction and even though I qualified for a public defender. Those thousands of dollars could have gone to support my children, but instead, we ended up losing our housing because I couldn't afford rent and pre-trial fees.
4. In April of 2019, I was arrested for assault. When I went to court for my arraignment, Justice of the Peace Jennifer Ray set bond at \$1,000.
5. I hired Lucky Bail Bonds to post my bond. I had to pay Lucky Bail Bonds \$100.
6. Justice of the Peace Jennifer Ray ordered that I be on pre-trial supervision and alcohol and drug monitoring, even though my charge was not alcohol-related, I had no history of alcohol-related charges, and I was not required to breathalyze at the time of my arrest or in court. Justice of the Peace Ray also did not tell me how much supervision and monitoring would cost or ask about my ability to pay.
7. At first, the court wanted me to do breathalyzer "blows" twice a day, but I told the court it would be impossible for me to do that because I had to hold down a job and was a single father to two young children. The court then changed the requirements to twice a week urinalysis testing.
8. I had to agree to some form of testing, or the court would not have allowed me to bond out.
9. I did not know how much the testing would cost until I went to the Jail Diversion office after bonding out and they told me about the costs.
10. To my recollection, no one ever asked me about my ability to pay these fees.
11. I was told by the Jail Diversion office that my supervision fee would be \$250 a month, and that the twice a week urinalysis testing would cost \$65 each time, or \$520 per month. In total, I was charged \$770/month in pre-trial fees.
12. During the time that I was on pre-trial supervision, I paid close to seven thousand dollars in pre-trial fees.

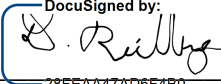
13. I was told by Justice of the Peace Ray, and by the Jail Diversion office, that if I missed a test I could be sent back to jail, and if I had a positive test I would be sent back to jail. I also understood that I had to pay my pre-trial fees as a condition of my release.
14. In the many months that I was on pre-trial supervision, I never had a positive urinalysis test.
15. At one point, my lawyer petitioned for me to be taken off the testing requirements, but the court denied the request.
16. During the time that I was paying for pre-trial supervision and drug testing fees, I was a single parent to two young children.
17. In the very beginning of my pre-trial supervision, I had no income because I had been laid off and my unemployment ran out soon after I was arrested.
18. Once I managed to get a job, I did not have enough money to pay pre-trial fees and the rest of my family's expenses.
19. During that time, my typical wages were around \$10 an hour. The rent on my apartment was \$650 a month, which I could not afford alongside pre-trial fees and supporting my children.
20. Even though I had to drug test twice a week, my tests were random for a portion of the time that I was on pre-trial conditions. I had to call in every morning to see if I had to test that day. This was disruptive to caring for my children and for my work schedule because I did not know when I would have to test. This pre-trial condition meant that I could not travel to my worksites with everyone else, but instead I had to use my own transportation.
21. When I worked in Thompson Falls, Montana, which was a four-hour drive from Hamilton, where I had to test, I had a set-testing schedule on Mondays and Fridays. The only way I could make the Friday testing was to drive down on Thursday afternoon, not to return until Friday. This meant I had to skip work on Friday and lose out on an entire day's worth of wages every week. To make Monday tests, I also had to miss work. Every Monday, I would arrive at work late after driving back from Hamilton.
22. I spent nine months losing out on work and time with my children to drug test in Hamilton, despite never once having a positive drug test.
23. Because of the expense of pre-trial fees and the work that I was losing to comply with pre-trial conditions, I ended up losing the apartment that my children and I were living in at the time.
24. I was able to buy a mobile home from my boss to keep a roof over our heads, but if I had not been able to do that, we would not have had a place to live.

25. To afford this mobile home, I was on a plan with my boss where payments would come out of each of my paychecks.

26. After I was convicted, I was fined approximately \$1,400, far less than what I had paid for in pre-trial fees. I asked my attorney about getting credit for the pre-trial fees I paid, and my attorney thought that might be possible, but I did not end up getting any credit.

I declare under penalty of perjury that the statements above are true and correct. Executed on

11/12/2021, in Darby, Montana.

DocuSigned by:  
  
28FEAA47AD6F4B0...  
Derrick Riebling

# **EXHIBIT 4**

## **DECLARATION OF TIVA MERSON**



### **DECLARATION OF TIVA MERSON**

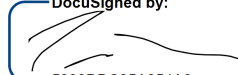
I, TIVA MERSON, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I was in the Jail Diversion Program in Ravalli County from November 2018 through April 2019, and I am now in the program again as of September 2021 for the same case. Although I have yet to be convicted of anything and I am indigent and was appointed a public defender, I have been forced to pay thousands of dollars in pre-trial fees that I cannot afford.
3. I was arrested and jailed in November 2018 on drug charges.
4. When I went to court for my arraignment, the judge set bail at \$25,000, assigned me to the Jail Diversion Program, and required that I be on a drug patch and pre-trial supervision. The judge did not mention anything about cost.
5. I hired Lucky Bail Bonds to post my bail, and my deposit was \$2,500. I was able to pay the amount with my savings.
6. Even though the judge had ordered my release and I had posted my bail, Jail Diversion officers refused to release me until I had signed a contract and paid hundreds of dollars in pre-trial fees. The contract stated that I would have to pay a \$345 activation fee for the drug patch and that I would have to pay \$80 every 11 days to replace the drug patch. The contract also stated that I had to pay \$55 per month in supervision fees. The Jail Diversion officers told me that I had to pay the fees to be released and that if I stopped paying the fees, they would put out a warrant for my arrest and I would be sent back to jail. I wasn't asked if I could afford the fees. I paid \$345 in fees to be released from jail, which I paid for with my savings.
7. For about the first three months after I was released from jail, I was on the drug patch and had to pay approximately \$240 per month for the drug patch. I also had to pay \$55 per month in supervision fees, totaling about \$295 per month in pre-trial fees.
8. In early 2019, Judge Lint switched me to weekly urinary analysis drug tests (UAs) and weekly visits with a doctor specializing in chemical dependence. Judge Lint told me that I was switched to UAs instead of the drug patch because all of the drug patches were clean. I had not once tested positive for drugs in the months that I had been in the Jail Diversion Program, yet I now had to pay for weekly drug tests and doctor visits. The weekly UAs cost \$50 each, and the doctor cost \$150 per visit, totaling \$200 per week, or about \$800 per month in pre-trial fees.

9. After I was switched to the weekly UAs and doctor visits, I could no longer afford my basic expenses. At the time, I was working full-time as a Personal Care Assistant (PCA) for an assisted living facility in Hamilton. I made about \$10.25 per hour. My monthly take home pay was about \$1,500. My pre-trial fees (\$800/month) plus my rent (\$700/month) consumed my entire income alone, leaving nothing left over for utilities, food, gas, my cell phone, and other necessary expenses. I fell behind on my rent so that I would have enough money to eat, electricity in my home, and gas to get to and from my job.
10. A few weeks after being switched to the UAs, I was arrested after a prosecutor claimed they discovered that an old drug patch of mine was dirty—even though the judge had switched me to UAs precisely because my drug patches were all clean. At my hearing, the judge set bail at \$25,000 and told me that once I bailed out, the incident would be a “moot point.” The judge also told me that my Jail Diversion Program requirements would remain the same.
11. To post bail, I used the last of my savings to pay part of the deposit to Lucky Bail Bonds. I could not afford the full \$2,500 deposit, so Lucky Bail Bonds placed me on a payment program to pay the remainder of the deposit. I was able to pay off the deposit in April 2019 after receiving my tax return.
12. Once again, although I had posted bail, Jail Diversion officers required me to sign paperwork before releasing me.
13. I decided to leave the county in April 2019, even though I was still in the Jail Diversion Program, because I could no longer afford to pay rent and so I moved out to avoid being evicted. I also moved away out of fear of being arrested again by Jail Diversion even if I did nothing wrong. I knew that if I was arrested again, I would not be able to pay bail, and I was worried that I would lose my children.
14. I returned to the county in August 2021. I started working again as a PCA at the same assisted living facility in Hamilton where I worked before.
15. I called emergency services for a resident at the facility in September 2021, and the police arrested me upon learning who I was because my case in Ravalli County was still open.
16. In court, the judge set bail at \$25,000 and told me that that I would have to do two random UAs per week. The judge did not mention the cost of the UAs nor ask me if I could afford to pay for them.
17. I hired Lucky Bail Bonds to post my bail, but I was again not able to pay the entire \$2,500 deposit. I still owe Lucky about \$1,000, and I try and pay about \$100 per month towards that debt.

18. I was released from jail without signing a new contract. The next day, Jail Diversion contacted me and told me that I had to return to the jail to sign new paperwork. I was threatened with arrest if I did not return.
19. When I arrived at the jail, I signed a new contract with the Jail Diversion Program that stated that I must pay \$55 per month in supervision fees, and I must do two UAs per week at random times. To schedule the UAs, I must call in five days per week and rearrange my schedule, which is particularly difficult with my work schedule and with two kids. The UAs cost \$10 each, so I am now required to pay approximately \$135 per month in pre-trial fees.
20. At no point during the course of my case have I been able to afford pre-trial fees, but no one has asked me if I could afford them.
21. I recently got a new job with a cleaning company, where my take home pay is about \$1,500 per month. My rent is \$675, and I try to pay at least \$100 per month towards my \$1,000 debt with Lucky Bail Bonds, debt I incurred while in the Jail Diversion Program. My bills also include \$150 per month in electricity, \$250 per month for a storage unit, \$250 per month for my family's cell phones, and \$70 per month for car insurance. For months now, I have fallen behind on my bills because of the financial burden of pre-trial fees.
22. I paid my fees and continue to pay my fees as best I can out of fear of going back to jail. I know I won't be able to afford bail if I am sent back to jail, so I do what I can to pay my fees, even though I cannot afford them.
23. As a result of the constant threat of incarceration that comes with being in the Jail Diversion Program, my anxiety has been through the roof.
24. My case began nearly three years ago and yet I am still in the Jail Diversion Program. I have paid approximately \$2,000 in pre-trial fees and gone back to jail even though I have yet to be convicted of anything. I am even in debt for a bail bond I paid as a result of my case. I am doing my best to provide for myself and my children, but being in the Jail Diversion Program makes it very difficult.

I declare under penalty of perjury that the statements above are true and correct. Executed on  
11/29/2021 in Hamilton, Montana.

DocuSigned by:  
  
5993DDC35A854A6...

Tiva Merson

# **EXHIBIT 5**

## **DECLARATION OF JOHN KRAMER**

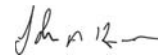
### DECLARATION OF JOHN KRAMER

I, John Kramer, state and declare as follows:

1. I am over the age of 18, and I am a resident of Clark County, Nevada.
2. I was in the Jail Diversion Program from June 2017 until July 2018 even though my case was ultimately dropped. I lost my career as a long-haul truck driver and fell behind on my mortgage as a result of this program, ultimately leading to my house being foreclosed.
3. On Memorial Day 2017, I was falsely arrested and charged with a DUI. My license was taken from me.
4. My arraignment was before Justice of the Peace Ray. She set my bail at \$1,000 and said I was going to have to do alcohol monitoring. She didn't say anything about how much it was going to cost or ask me if I could afford it. My license was suspended and my travel was restricted.
5. The court clerk then handed me a piece of paper that had two options on it. For the alcohol monitoring, I could either use a breathalyzer device and blow into three times a day every day, which was going to cost about \$450/month, or blow in-person two times a day every day, at \$2/blow, or about \$120/month. I picked the second option because it was the cheaper option. I had to sign a contract for it and understood that if I didn't comply with the alcohol monitoring, I was going back to jail.
6. I told the judge and the clerk that I was not going to be able to keep my job and comply with this program, but their answer was essentially that this was the way things were.
7. I hired a lawyer and after a few weeks, he was able to get my license reinstated but my career as a long-haul truck driver was over. To do the twice-a-day blows, I had to show up between 7am and 9am and then again between 5pm and 7pm every day, seven days a week, at the Jail Diversion office. There was no way for me to keep my job and appear every day, twice a day, to blow. I also wasn't allowed to leave the area, so that was another reason I couldn't take on long-haul assignments anymore. In addition, because I now had a pending criminal case, no truck driving company would hire me.
8. I made good money as a truck driver, but I had to quit my job because of the Jail Diversion Program. I made about \$3,400/month as a truck driver, but after I had to quit my job to comply with the Jail Diversion Program, I lived off of social security for several months until I could find other work.
9. During the several months that I was living off of social security, my income was about \$1,600/month. I owned my home and had two mortgages on it, totaling about \$1,300/month. My mortgage and pre-trial fees alone consumed almost all of my income.

10. Eventually, I was able to find a job working for a feed company doing tasks such as delivering hay and spreading fertilizer, but I made significantly less money than I had as a truck driver. In this job, I made \$15/hour.
11. I fell behind on my mortgage in my attempt to keep up with my other bills and pre-trial fees. Because of the debt I accumulated during the year plus I was in the Jail Diversion Program, my house was eventually foreclosed and I've had to move out of state to live with my sister in Nevada.
12. Every time I went to blow, I had to pay on the spot. They don't let you blow if you don't have the money, and if you don't blow, it's a violation and you can go back to jail that very same day.
13. I had to do twice-a-day blows for over a year and not once did I have a hot blow. I asked my lawyer if there was anything I could do about that, and he said there was nothing I could do. I would just have to keep blowing until my case resolved.
14. At one point, the Jail Diversion Program introduced a new alcohol monitoring option that involved a small breathalyzer device I could carry with me. I went to court and asked the court clerk if I could switch to it, and she said no. I asked my lawyer about it, and he said if the court clerk said no, then there was nothing else that could be done.
15. The financial toll of the Jail Diversion Program also meant that eventually I could no longer afford to pay for my attorney, so he dropped me. By that point, I had already paid him over a thousand dollars.
16. I started representing myself and shortly thereafter, I got the court to dismiss my case in July 2018.
17. In total, I paid approximately \$1,680 in pre-trial fees for the fourteenth months that I was in the Jail Diversion Program. I was innocent and never blew hot, yet I never got any reimbursement for the fees I paid. I am still working on rebuilding my life after the devastation that this program caused. I am in my 70s and would like to retire, but I do not have the financial means to do so because of the downward spiral caused by the Jail Diversion Program.

I declare under penalty of perjury that the statements above are true and correct. Executed on  
12 / 06 / 2021, in Las Vegas, Nevada.



John Kramer

# **EXHIBIT 6**

## **DECLARATION OF AARON OLBRICHT**

### DECLARATION OF AARON OLBRICHT

I, Aaron Olbricht, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I was in the Jail Diversion Program from January 2021 until July 2021, when my case was dropped. Jail Diversion Program fees drained me of my savings, all while I was innocent.
3. In January 2021, I was arrested and charged with a DUI, even though I was innocent.
4. At my arraignment before Judge Ray, which was by video conference from the jail, she set bail at \$10,000. She said I could not consume alcohol or go to bars. I couldn't leave the county and I was going to have to use a breathalyzer device that I would have to blow into 3 times a day, seven days a week. She said it was going to cost me about \$400/month for the breathalyzer plus about \$50/month for supervision.
5. I hired Lucky Bail Bonds to get out of jail, but Jail Diversion Program Officer Shane Fisher would not release me until I had paid the first month of pre-trial fees, which was about \$450. She also made me sign a contract before releasing me.
6. The supervision that I received was checking in with my Jail Diversion Program Officer Michelle Stokes by phone about once a month.
7. I was employed while on the Jail Diversion Program and I was able to keep up with paying my fees, but it was tight, and between the fees and having to hire a lawyer to represent me, I drained my savings.
8. I also had to live with the constant worry of going back to jail because I knew that if I missed a blow, blew hot (positive alcohol test), or didn't pay, I was going back to jail.
9. I went back to jail in June 2021 because of blowing hot. I posted bail before my hearing and had to pay \$2,000 to the bondsman because my bail was set at \$20,000, which I could not afford.
10. At my court hearing, which was before Judge Recht, he said that he doesn't usually have hearings after someone has bailed out, so since I had already bailed out, he was going to let the issue go. My impression was that, since I had paid bail, there was nothing else he cared about.
11. My case was dismissed in July 2021.
12. After my case was dismissed, I went to the jail to turn in my breathalyzer device to Officer Fisher. She said that I owed the Jail Diversion Program money and that if I didn't pay, I



couldn't get off the program, even though my case had been dismissed. I had to pay \$360 right then and there to get off the program.

13. I paid thousands of dollars in pre-trial fees, but I was not reimbursed for anything I paid, even though my case was dismissed. I felt that I was treated as guilty until proven innocent.

I declare under penalty of perjury that the statements above are true and correct. Executed on

12 / 07 / 2021, in Ravalli county, Montana.



Aaron Olbricht

# **EXHIBIT 7**

## **DECLARATION OF JUSTIN WARILA**

## DECLARATION OF JUSTIN WARILA

I, JUSTIN WARILA, state and declare as follows:

1. I am over the age of 18, and I am a resident of Missoula County.
2. I was in the Jail Diversion Program in Ravalli County from July 2019 through February 2020. Although I was indigent and appointed a public defender, I was forced to pay thousands of dollars in pre-trial fees.
3. I was arrested in July 2019 on DUI charges.
4. At my arraignment, Judge Ray set bail, assigned me to the Jail Diversion Program, and required that I do alcohol monitoring. She told me I could be on a breathalyzer or an alcohol ankle monitor; I chose the breathalyzer because it was cheaper. Judge Ray said that the breathalyzer would cost \$275/month. She did not ask if I could afford the fees, even though I qualified for a public defender.
5. Judge Ray set bail at about \$2,500. I could not pay that amount, so a family member paid for me.
6. Even though the court had ordered my release from jail and I had posted my bail, the Jail Diversion officers would not release me until I had signed a contract for the breathalyzer and had paid \$375 in activation fees for the breathalyzer, which was more than the monthly fee for the breathalyzer. I was able to pay the \$375 from my savings, but if I hadn't been able to pay, I would have stayed in jail.
7. Each month, I had to pay \$275 for the breathalyzer. I had to blow into it twice a day, seven days a week, including at work. If I missed a "blow," I had to go to the Jail Diversion Office in Hamilton that same day and pay \$35 for a urinary analysis drug test (UA).
8. I paid my pre-trial fees because I was afraid of going back to jail, even though it meant scraping by. While in the Jail Diversion Program, I worked for Montana Fabrication Works and my income was about \$2,000/month. After paying rent (\$700), utilities (\$200), and pre-trial fees (\$275/month), I struggled to pay for other essentials such as food, gas, health care, and critical car repairs during the winter months.
9. During the approximately 8 months that I was in the Jail Diversion Program, I paid about \$2,500 in pre-trial fees.
10. At no point were any services offered to me to help me, such as classes, treatment, or counseling. All that the court system and Jail Diversion Program offered was alcohol testing, which I had to pay for under threat of being sent back to jail.

11. In February 2020, I pled guilty and was sentenced to 30 days in jail plus one year of probation. I was not given any credit for the thousands of dollars in pre-trial fees I had paid. I also paid far less in probation fees than I did while in the Jail Diversion Program. While on probation, I paid \$55 per month in supervision fees, as compared to \$275 per month in pre-trial fees.

I declare under penalty of perjury that the statements above are true and correct. Executed on  
12 / 20 / 2021 in Florence, Montana.



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Justin Warila

# **EXHIBIT 8**

## **DECLARATION OF SUMMER BOLAND**

## DECLARATION OF SUMMER BOLAND

I, Summer Boland, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been in the Jail Diversion Program since December 2021 and it has taken a serious financial and emotional toll on my daughter and me.
3. In December 2021, I was arrested and taken to jail after an argument with my then-boyfriend in his home.
4. At my arraignment, which was by video conference from the jail, Justice of the Peace Ray set my bail at \$500. I ended up hiring a bondsman, Lucky Bail Bonds, to cover my bail.
5. Also at my arraignment, the judge required that I be on alcohol monitoring, even though my charges were not alcohol-related, I was not breathalyzed at the time of my arrest, and when I was breathalyzed at the jail, the test showed no alcohol in my bloodstream. Despite all of that, the judge said I was a “threat to society” and required alcohol monitoring because I had had one case from five years before when I was arrested in a bar after confronting a man who was stalking me. I was not breathalyzed then either.
6. Judge Ray said nothing about alcohol monitoring costing anything, nor did she ask me about my ability to pay.
7. When I went back to my cell after the arraignment, and before I was released, Jail Diversion Program Officer Shane Fisher told me I had three options for alcohol monitoring and told me the cost of each. Officer Fisher did not ask me about my ability to pay. Officer Fisher also said that I was on supervision and would have to pay supervision fees. Judge Ray had not mentioned anything about supervision or supervision fees, so this came as news to me.
8. The day after I was released, I went to the Jail Diversion Program office, and I chose the alcohol ankle monitor because I thought, at the time, that it would be the best option for my work schedule. I had to sign a contract for it and pay the fees. The ankle monitor costs \$9/day, or approximately \$270/month. I had out-of-state work travel shortly after I was released from jail, and I had to pay \$156 in ankle monitor fees upfront before I could travel. If I lost the machine, I would have had to pay close to \$1,200 to replace it.
9. I am also charged \$55/month in supervision fees.
10. While I was on the alcohol ankle monitor, I was charged approximately \$325/month (\$270/month in ankle monitor fees and \$55/month in supervision fees).
11. I had to return early from my business trip because I was also required to come to the court house twice a week to upload the data from my ankle monitor.

12. When I returned from my business trip, I decided to switch to the breathalyzer device because the ankle monitor was not working for me. I had to sign a new contract agreeing to the program conditions, including paying the fees. The breathalyzer costs \$9/day plus a \$75 set up fee. I had to pay \$270 that same day to get started.
13. I am still charged the \$55/month supervision fee, so my monthly Jail Diversion Program fees remain approximately \$325/month (\$270/month for the breathalyzer and \$55/month in supervision fees).
14. For the breathalyzer, I have to blow into the device every day, seven days a week, at 9am, 3pm, and 9pm.
15. The financial toll of these fees is significant. I qualified for a public defender yet I was never asked if I could afford Jail Diversion Program fees.
16. I have been self-employed for many years and have worked as a realtor and a professional farrier. Unfortunately, this case came at a time when I have been struggling financially. I have not had any income as a realtor since May 2021, and my work as a professional farrier only brings in a few hundred dollars per month.
17. My only consistent source of income right now is financial support from my mother, who is also in real estate and I have been assisting with her business. She supports me with about \$3,000/month, which immediately goes to cover my bills, including an approximately \$2,500/month mortgage payment and \$900/month in car payments (which cover my truck and horse trailer). Those bills alone consume my income, and do not include insurance, utilities, food, gas, cell phone, and other expenses.
18. I am a single mom of a teenage daughter and I have had to sell my belongings and hers to keep up with Jail Diversion Program fees. I sold my daughter's horse and my saddle. I fear what else we'll have to sell to keep up, but I'm doing my best because I don't want to go back to jail.
19. Besides the financial toll of these fees, it's been really hard on my daughter and me emotionally. Because I had to be in town to upload my ankle monitor data, I missed one of my daughter's horse races — the first race I've ever missed. I was part of a dart league, but I've had to quit that because the league meets in a bar and I can't be in bars. When I was wearing the ankle monitor, I had to be sure my clothing covered it to not embarrass my daughter or me. I had to be mindful of all of the restrictions with the ankle monitor, like not being able to take a bath because you can't submerge the device in water. Now that I'm on the breathalyzer, I have to plan my days around blowing into it at precise times, three times a day. I have not been sleeping well and am anxious.

20. My ex-boyfriend has asked that the charges be dropped, yet I have no idea when my case will be over. In the meantime, I feel deflated, trapped, and no longer in control of my future. Being on the Jail Diversion Program is insulting and humiliating. I am not a threat to society. I am a hardworking mom whose life has been destabilized by this program.

I declare under penalty of perjury that the statements above are true and correct. Executed on

01 / 11 / 2022, in Corvallis, Montana.

*Summer Boland*

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Summer Boland



# **EXHIBIT 9**

## **DECLARATION OF KEN THURMAN**

### DECLARATION OF KEN THURMAN

I, Ken Thurman, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been in the Jail Diversion Program since October 2021. Being in this program has taken a financial and mental toll on me. I am a disabled veteran and I struggle with mental health issues, which have gotten worse because of this program.
3. In October 2021, I was arrested and taken to jail because of words I exchanged with another man outside of a bar after he insulted a female friend of mine.
4. My arraignment was by video in the jail and it was before Justice of the Peace Bailey. He set my bail at \$5,000, assigned me to the Jail Diversion Program, and required me to do alcohol monitoring. The judge didn't say anything about the cost of alcohol monitoring and he didn't ask me about my ability to pay for alcohol monitoring, even though I qualified for a public defender.
5. When I called Lucky Bonds to post my bail, the bondsman said that he was told that I was going to have to pay for an alcohol ankle monitor before I could be released and that it would cost me \$370 for the monitor. I had enough money to pay the bail deposit to Lucky Bonds, but I did not have enough money to pay both my bail and the alcohol ankle monitor.
6. I was in jail for 11 days because I couldn't afford the fees for the alcohol ankle monitor.
7. I became suicidal during my jail stay because the jail deprived me of my medication for 8 days. I take medication to help me with PTSD I have from my time in the military, and thus being without it for several days in a row has a huge impact on my mental health.
8. I was eventually bailed out by friends. I did not have to pay the alcohol ankle monitor fee, despite what I had been told earlier. Jail Diversion Officer Ronny Jessup told me that I did not need an alcohol ankle monitor because I wasn't charged with a DUI. He gave me a few choices for alcohol monitoring and I picked once-a-week drug testing (UAs).
9. However, before Officer Jessup would release me from the jail, I had to sign a contract about the drug testing. They would not release me from the jail unless I signed it.
10. Officer Jessup told me that the drug tests were \$35/each. He also told me that if I didn't pay, I would go back to jail.
11. In December 2021, when I went to one of my weekly drug tests, Officer Jessup told me that I was \$50 behind in pre-trial fees and that I had to pay that same day. I was confused, because I have to pay my fees before I can drug test and I had paid every week. He told me

that in addition to the drug test fees, I also had to pay \$25 per month in supervision fees, which was at a discounted rate because I'm a veteran. This was the first time I had heard of this supervision fee. He told me that it was in the contract I signed at the jail, but that had not been my understanding. I thought I only had to pay for drug testing. I had to come up with \$85 that day (\$50 for supervision fees and \$35 for the drug test) or I was going to be in violation of the Jail Diversion Program.

12. So, since I have to drug test every week and each test is \$35, and I also have to pay \$25/month in supervision fees, I have to pay approximately \$165/month in pre-trial fees, plus the gas to get to and from my tests.
13. I pay my pre-trial fees with a credit card and I am charged additional fees to pay that way.
14. At one point, my case was switched to Judge Recht, and I asked Judge Recht if I could do my drug testing at Western Montana Mental Health, because the Veterans Administration (VA) would cover the costs of my tests there, but Judge Recht said no.
15. Instead, I have to keep paying \$35 every week to pay for a drug test at the sheriff's office.
16. My only source of income is veterans' disability benefits. Having to pay pre-trial fees has put me behind on paying my bills and I can't afford to hire an attorney to represent me on my case. I cut back on food as a result of these fees.
17. All of my drug tests have been clean, yet I remain subject to testing.
18. I have taken it upon myself to attend Alcoholics Anonymous meetings and to see a counselor because the court system and the Jail Diversion Program have not offered me any help, such as classes, treatment, or counseling. All they have is drug testing, which I have to pay for under threat of being sent back to jail.
19. I was going to college to become a peer support counselor for other veterans, but because of this whole situation, I have put those plans on hold until my case resolves.
20. This whole system takes away my dignity. I don't need incarceration. I need help. I know many disabled veterans like myself who need help but aren't getting it. I am trying to get help from the veterans treatment court in Missoula, but that court does not exist in Ravalli County.

I declare under penalty of perjury that the statements above are true and correct. Executed on

12 / 11 / 2021, in Hamilton, Montana.

*Kenneth Thurman*

Ken Thurman

# **EXHIBIT 10**

**DECLARATION OF TRACY PFAU  
FEB. 2022**

**DECLARATION OF TRACY PFAU - FEBRUARY 2022**

I, Tracy Pfau, state and declare as follows:

1. I am over the age of 18, and I am a resident of Montana.
2. I have been in Ravalli County's Jail Diversion Program since May 2021. Twice a day, every day, seven days a week since May 2021, I have had to appear in person to take a breathalyzer test in Hamilton and pay for each test, which costs \$2, or about \$120/month. I am also charged \$55/month in supervision fees, so I am charged about \$175/month.
3. I can't afford these fees and I have been jailed because I can't afford these fees.
4. I haven't been able to consistently pay for my breathalyzer tests since August or September 2021.
5. September 2021 was a really difficult month for me. My father died and I also got very sick. I was given no time off from the Jail Diversion Program to grieve my father's death, to deal with his funeral arrangements, or to get over my own illness.
6. The whole situation caused me so much stress that I stopped testing, and I was arrested on October 1st and taken to jail because of my missed tests.
7. I was jailed from October 1st until mid-November 2021.
8. Because I went to jail, I lost my job as a janitor.
9. Since I got out of jail in November 2021, I have been living with my sister and brother-in-law in Darby. Otherwise I would be homeless. I had been living out of my van before going to jail.
10. To get to my tests, I have to drive about 17 miles each way from Darby to Hamilton. I can't afford to drive back and forth between my morning and evening blows, so I usually get to Hamilton at about 6am, blow, then spend the day in Hamilton until I blow in the evening around 5pm, then I drive home to Darby.
11. During the day, I spend most of my time in the library applying for jobs. I haven't been able to find steady work since leaving jail in November 2021.
12. I have to spend about \$40/week in gas to get to and from my tests. On a few occasions, I've run out of gas on the way, and I've had to walk the rest of the way to get to my tests so I don't get violated.

13. I have to test even if the weather is really bad. There have been some serious winter storms lately and it's taken me up to 45 minutes to drive from Darby to Hamilton. The roads are really bad and dangerous to drive on, but the Jail Diversion Program still makes me show up. I'm putting my life at risk every time I drive in bad weather to get to the Jail Diversion Program office, but I don't have a choice because if I don't show up, I go back to jail.
14. Because until very recently I hadn't found work and because I'm having to spend so much time commuting for my tests and money on gas, I haven't been able to consistently pay for my tests.
15. Starting in December 2021, I have been repeatedly threatened with being kicked out of the Jail Diversion Program because I can't afford my tests. When I go to test, I've been told that I need to start paying or I'm going to be dropped from the program and it would be a violation. Violations mean I could go to jail. I tell them I'm doing my best, and I pay when I can, but it doesn't seem to matter.
16. On Monday, January 10, 2022, when I went to blow, I was arrested and taken to jail for allegedly blowing hot. I also picked up a new criminal case, one count of criminal contempt for allegedly violating the conditions of the Jail Diversion Program by blowing hot.
17. Because I was jailed, I missed a job interview I had scheduled for Tuesday, January 11, 2022.
18. I went to court on Tuesday, January 11, 2022, and the judge ordered me released on my own recognizance (no bail). The judge also said I would now be on the SCRAM alcohol ankle monitor, which is more expensive than the 2/day blows.
19. Despite the judge's order to release me, I was held at the jail. Jail Diversion Program staff told me I was going to have to pay a deposit for the SCRAM alcohol ankle monitor before I could be released, which is more than \$300. I told them I couldn't afford it, but they detained me anyway and I spent Tuesday night incarcerated.
20. I ended up staying longer in jail because I could not afford Jail Diversion Program fees.
21. On Wednesday, January 12, 2022, I talked to my public defender, who then spoke to the Jail Diversion Program staff. Jail Diversion Program Officer Ronny Jessup told me I was going to continue doing the 2/day blows, not the SCRAM alcohol ankle monitor. He also said I needed to pay what I could when I could. I told him I did pay whenever I could. I was finally released on Wednesday evening.
22. I was released early enough to still have to blow Wednesday evening. I didn't have the money to pay for my test and the sheriff deputy administering the tests told me I couldn't



blow if I couldn't pay. If I don't test, that's a violation and I can go back to jail, as I had already done before.

23. My brother-in-law picked me up Wednesday evening and he fortunately had \$10 to spare that he gave me to cover a few tests. So, I went back into the office to pay and test. When I went back in, I saw on the sign-in sheet (which I have to sign every time I test) that the officer had made a handwritten note next to my name that said, "failure to pay - violation." I told her I had the money and crossed out the note. She said she would update their computer records.
24. When I went to blow at the courthouse on Thursday evening (where testing happens during the week), January 13, 2022, I was told by Jordan, one of the sheriff's deputies for the Jail Diversion Program, that I couldn't blow because I didn't have the money, even though I had paid \$10 just the night before. I was told that the money I paid was applied to money I owed previously. I told her I didn't have any money on me, and she refused to let me blow.
25. I live in constant fear of going back to jail because I can't afford Jail Diversion Program fees.
26. I just started a new job, but I don't have enough money to cover my tests or my basic needs. When I don't have the money to pay for my tests, the Jail Diversion Program officers refuse to let me test. I'm afraid of losing my job because of going back to jail because I can't keep up with Jail Diversion Program fees.
27. I am open to getting treatment, but my public defender has been the only person who has been helping me with that. I am supposed to have an assessment in Missoula to figure out if in-patient or out-patient treatment is right for me, but I fear not being able to afford the gas to get to and from Missoula.
28. The Jail Diversion Program jails me instead of helping me. Since I've been on the program, I've been back to jail multiple times, my case keeps getting extended, and I keep getting charged fees I can't afford — all while I haven't been convicted of anything.

I declare under penalty of perjury that the statements above are true and correct. Executed on

2-4-2022, in Hamlet, Montana.



Tracy Pfau

# **EXHIBIT 11**

**DECLARATION OF BONNIE JEAN  
THURMAN**



## DECLARATION OF BONNIE JEAN THURMAN

I, Bonnie Jean Thurman, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I was in the Jail Diversion Program from December 2019 through February 2020, and I have been either in jail or on probation ever since. I continue to be subject to the same conditions and supervised by the same officers as I was when in the Jail Diversion Program, and it has taken an enormous financial, physical, and emotional toll on my life.
3. In November 2019, I was arrested and charged with a DUI.
4. I hired Lucky Bail Bonds and bonded out before my first court hearing. I had to pay around \$200.
5. In December 2019, at my first hearing, Justice of the Peace Jennifer Ray put me on alcohol monitoring for the DUI charge and random drug testing (UAs) for medication that I was lawfully prescribed. She didn't mention anything about cost, and she didn't ask me if I could pay for it, even though I qualified for a public defender.
6. After the court hearing, I went to the Jail Diversion Program office for the alcohol monitoring and UAs. I had to sign contracts. I was put on a SCRAM alcohol ankle monitor. This was the first I learned that I was going to have to pay for the ankle monitor. Officer Keegan Rothie told me that it would cost \$300/month plus \$25/month for supervision fees. I told Officer Rothie that I didn't have the money, but he said I had to find it. He gave me two days to come up with \$325 to cover the first month of fees, and he called me several times during those two days to confirm that I would bring the money.
7. At the time, I was working at a grocery store, and I had to get an advance on my paycheck to be able to pay the \$325 in Jail Diversion Program fees in two days. If my employer hadn't been flexible and given me the advance, I don't know what I would have done.
8. I also had to borrow money from my employer to cover the cost of my first UA (\$35) because I didn't have the money.
9. Between the SCRAM monitor (\$300/month), supervision fees (\$25/month), and the drug testing (\$35/each, which was once/week on random days), I was charged about \$465/month, which I couldn't afford.
10. With the SCRAM monitor, I had to go to the Jail Diversion Program office three times a week to download the data from the device. Because the program required me to do this on Mondays, Wednesdays, and Fridays during business hours, I had to use my half-hour lunch break from my job to race over to their office and get it done. If my UA happened to fall on a

day different from the days I had to go in to download my monitor data, I had to go to the Jail Diversion Program four times in one week.

11. In January 2020, I asked Jail Diversion Program Officer Christina Ellsworth if I could do my drug testing at the Western Montana Addiction Center because I have Medicaid, and drug testing is free at the Center if you have Medicaid or Medicare. At the Center, you can also do the testing in private, whereas with the Jail Diversion Program, you have to pee in front of one of the officers; with the Jail Diversion Program, an officer comes into the bathroom stall with you and watches you pee. Officer Ellsworth said no, that I could not test at the Center.
12. I was in the Jail Diversion Program from December 2019 through February 2020.
13. I was sentenced in February 2020. Judge Ray sentenced me to 59 days in jail and one year of probation. I was petrified because I had never spent that kind of time in jail.
14. After about 15–20 days in jail, I was released in March 2020 because of the COVID-19 pandemic. I had a hearing before I was released, and Judge Ray said that I was going to have use a remote breathalyzer device, be on house arrest, and wear a GPS ankle monitor. Once again, Judge Ray didn't mention the cost of these conditions, but because of my experience with the Jail Diversion Program, I knew it was going to cost a lot. I told Judge Ray that if I'm on house arrest, I won't be able to work so I won't be able to pay my fees, but she just said I had to discuss it with 24/7, which is the alcohol monitoring program that is the same for people in the Jail Diversion Program as well as for people on probation.
15. Even though Judge Ray ordered my release, I still wasn't allowed to go home. Officer Rothie said I had to pay \$450 to get out of jail, which would cover the first month of fees for my new set of conditions.
16. I stayed in jail for an extra day until my mother was able to come and pay the fees to buy my freedom.
17. When I was finally released, I was sent home with a remote breathalyzer device, which cost \$300/month. I also had to pay for a GPS ankle monitor, so in total I was charged about \$450/month in fees. I had to be on these conditions for about 40 days to serve out the rest of my 59-day sentence.
18. Because I was on house arrest, I couldn't work. I couldn't afford my fees nor pay my bills. I live with my partner and my mother, and they did their best to cover expenses during that time. All I could contribute was less than \$200/month in food stamps. I asked Officer Ellsworth if I could get a ride to the food bank to get food for my family and me, but she refused. She said somebody else in the household could do it.
19. While on house arrest, even to go to a doctor's appointment, I had to get advanced approval and call when I got to the doctor's office.

20. In May 2020, Officer Rothie called me and said I needed to come into the office to check on my equipment. But when I arrived, I was arrested.
21. When I later had a court hearing (which happened while I was still incarcerated), Judge Ray said that I was arrested and jailed for “blowing hot,” meaning I tested positive for alcohol. At that same hearing, Judge Ray said that I was going to have to stay in jail for the balance of my probation.
22. I was in jail from May 2020 until early July 2020.
23. In early July 2020, I was sent to treatment for a little over a month. Judge Ray told me I had to go straight from the jail to the treatment center, even though all I had with me in terms of personal belongings were the clothes I was arrested in. She said that if I was late in arriving to the treatment center, I would be arrested.
24. I was in treatment from July–August 2020.
25. The morning after I got home from treatment in August 2020, I showed up at 9am at the 24/7 office. Officer Ellsworth told me I already had a violation because I was supposed to blow (do an alcohol test) that morning between 6am and 8am. I said that no one had explained that to me, but she didn’t care. She told me I had to do a UA instead and pay for it, at a cost of \$35.
26. I was now required to go in person, twice a day, seven days a week to do alcohol tests. It’s the same office where the Jail Diversion Program office is, administered by the same people.
27. I had to pay for my tests in advance and each test cost \$2, or \$4/day, or roughly \$120/month. If you don’t pay, they won’t let you test. Not paying and not testing are considered violations and you can go to jail for violations, just as I had before.
28. On one occasion in August 2020, I blew hot, and so Judge Ray switched me back to the SCRAM alcohol ankle monitor, which costs \$300/month, plus \$25 for supervision fees.
29. At the time, I found employment working as a caretaker for an elderly woman twice a week for \$15/hour, 12-hour shifts. For the few months I had this job, I was making about \$1,440/month pre-tax. The SCRAM monitor fees were more than 20% of my pre-tax income.
30. In October 2020, I had knee surgery for a full knee replacement. I took six weeks off of work for the surgery and recovery. I went back to work after that, but was only able to work for two weeks before losing that job because unfortunately, the woman I had been caring for passed away. I was unemployed for late December 2020–January 2021, so I couldn’t keep up with my fees.

31. Because of the surgery, I also couldn't wear the SCRAM ankle monitor, so I was switched to the handheld breathalyzer device, which I had to blow into 4 times a day, every day, seven days a week. It cost \$325/month.
32. In December 2020 and January 2021, I had two violations.
33. On February 2, 2021, I was arrested at my house and taken to jail.
34. I didn't have court until February 16, 2021, and Judge Ray sentenced me to 200 days in jail, with 49 days suspended, plus six months of probation. I told her I was still recovering from knee surgery and was going to physical therapy, but she sentenced me to jail anyway. I also told her that I had just started a new job and I would lose the job if I stayed in jail, but she sentenced me to jail anyway.
35. I was in jail for about 7 months from February–September 2021. This was my third time going to jail since my initial arrest in November 2019.
36. While in jail, I didn't have access to physical therapy, and it caused permanent damage to my knee.
37. In May 2021, while I was at the jail, I also ended up in the hospital because the jail food was so bad that it aggravated an ulcer in my stomach.
38. While in jail, I also developed other negative health conditions that I am still dealing with this to this day.
39. Jail also did not provide me with treatment and/or counseling. At most, one counselor would come by once a week for 10 minutes.
40. Even though I had served my time, to be released in September 2021, Officer Shane Fisher said I couldn't be released until I paid fees I allegedly owed plus one month in advance for the remote breathalyzer device, which added up to about \$2,000. I didn't have the money and Officer Fisher didn't ask me if I could afford it. She said my partner was going to have to come down to the jail and pay my fees before she would release me. My partner paid my fees out of his savings so that I could get out of jail.
41. Since I got out in September 2021, I have had to blow into the breathalyzer device four times a day, every day, seven days a week, at 6am, 11am, 4pm, and 8pm. If I don't blow, it's a violation, and I can go back to jail.
42. I also have to pay for the breathalyzer device, which cost \$325/month until January 2022, when it was lowered to \$295/month.

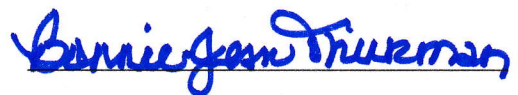
43. Officer Fisher has said to me that if I get two months behind on fees, she has to take my equipment away and tell the judge that I can't pay and it's a violation of my probation and I will be incarcerated.
44. When I got out in September 2021, I couldn't start work right away because of my knee. I needed to first go back to physical therapy and build up my strength so that I could be on my feet and walk for extended periods of time.
45. I started working in late October 2021 at a grocery store. But even then, I could only initially manage 2–3 hours shifts because of my knee.
46. In November 2021, for one of my 6am blows, the machine malfunctioned. It kept showing on the screen "please wait." I took a picture of it, and when I went to see Officer Fisher later that week, I showed her the picture and explained what happened. Officer Fisher said that because I hadn't called her right away when the device malfunctioned, it was considered a violation and she already sent the violation to the prosecutor. She also said that I now had a summons to come to court in December 2021 because of the violation.
47. At my December 2021 court hearing, despite my machine malfunctioning, Judge Ray ordered me to call in every day for random UAs once/week plus continue doing the remote breathalyzer.
48. The UAs cost \$35 each and the remote breathalyzer is \$295/month, so I have to pay about \$435/month in fees, though UAs are free if I test negative. These fees are more than my house payment, which is \$400/month.
49. I can't afford these fees, but I pay what I can because I don't want to go back to jail. I only make \$11/hour for about 30 hours/week at a grocery store, so pre-tax I only make about \$1,320/month. My house payment is \$400/month, my car insurance is \$100/month, my cell phone bill is \$30/month, I have a storage unit I pay \$75/month for, and that does not include money for gas, food, car repairs, utilities, and other necessities.
50. To do the UAs, I have to call in every day, five times a week, to see if I have to test that day. If I do, I have to go or otherwise it's a violation and I can go back to jail.
51. I also have to pay in advance for my UAs. If I don't pay in advance, I can't test, and if I don't test, that's a violation and I can go back to jail.
52. When I do the UAs, I have to pee in a cup in front of one of the officers. They come into the bathroom stall with me. It's degrading and humiliating.
53. For the remote breathalyzer, I continue to have to blow every day, four times a day, at set times. If I miss a blow, I can go back to jail. I have to blow even if I'm at work. It doesn't matter what I'm doing; I have to stop what I'm doing and blow at the set times. I had to tell

my supervisor what I was doing to explain why I have to pause so many times throughout a shift. I set an alarm on my phone and when it goes off, I excuse myself to blow before returning to work.

54. Even the therapy I go to is under threat of incarceration. If I miss a session, that's a violation and I can go to jail.
55. In January 2022, Officer Chris Colgan told me, in front of Officer Fisher, that I need to budget for my equipment and UAs before I pay my bills. It seems like, to them, it's more important I pay their fees than pay for my housing.
56. Officers Ellsworth and Fisher have also told me several times that if I don't pay my fees, it's a violation and I'll go back to jail.
57. On February 15, 2022, I have court because of my missed blow from November 2021 due to the device malfunctioning. Even though my probation is supposed to be over at the end of February, there are still 49 days Judge Ray can sentence me to jail and I'm terrified. I'm scared of my home going into foreclosure if I'm away from home for so long again. I also fear what will happen to my mother if I go back to jail. My partner is currently incarcerated and if I go back to jail, there will be no one at home to help my mother pay her bills and take care of her. Her only income is social security, so I provide a lot of financial assistance, in addition to helping her around the house.
58. It is draining and upsetting to keep up with these conditions. I live in constant fear of going back to jail. I have to put on a smiley face at work even though I am so stressed on the inside. Keeping up with the requirements also means I can't make plans. My son and newborn granddaughter live in North Dakota, but I have yet to be able to see her because of these conditions. I have to think about my conditions every day and what I have to do to avoid going back to jail.

I declare under penalty of perjury that the statements above are true and correct. Executed on

3.8.2022, in Hamilton, Montana.



Bonnie Jean Thurman



# **EXHIBIT 12**

## **DECLARATION OF CHARLES POST**

## DECLARATION OF CHARLES POST

I, Charles Post, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been in the Jail Diversion Program in Ravalli County since January 2022. I am an elderly man living off of social security disability. I can't afford Jail Diversion Program fees, but I have gone into credit card debt to do my best to pay them because I am afraid of going back to jail if I don't pay.
3. In November 2021, I was wrongfully arrested and charged with a DUI and driving on a suspended license.
4. I bailed out before my first hearing. My bail was set at \$1,500. I paid about \$250 plus I provided some personal property of mine as collateral to Lucky Bail Bonds to bail me out. I also had to pay over \$500 to get my truck back, which had been towed following my arrest.
5. Due to some miscommunication, I missed my arraignment in December 2021. When I called the court the next day, a warrant had already been issued for my arrest and my bail was doubled to \$3,000.
6. I turned myself in. I was booked into the jail. Once again, I hired Lucky Bail Bonds to bail out. This time, I had to pay around \$450.
7. My arraignment was before Justice of the Peace Bailey on January 25, 2022. He placed me on the Jail Diversion Program, with alcohol monitoring and supervision conditions. He also suspended my driver's license for one year.
8. I told Judge Bailey that I could not afford the Jail Diversion Program fees, but he did not change his order. He didn't ask me about my ability to pay and just said something to the effect that I would figure it out.
9. After court, I went over to the Jail Diversion Program office. I told the staff there that I didn't know how I was going to afford the program fees and I asked about payment plans. Jail Diversion Program Officer Shane Fisher responded that there were no payment plans and that I had three choices for alcohol monitoring. She didn't ask about my ability to pay. I picked the cheapest option, which requires me to go in person, twice a day, every day, seven days a week to do a breathalyzer test between 6–8am and 5–7pm. It costs \$2 per test, or \$4 per day or about \$120 per month.
10. Officer Fisher made me sign contracts regarding the alcohol monitoring and supervision. She explained that I would have to pay a \$50 "intake fee" as part of the program. That day,

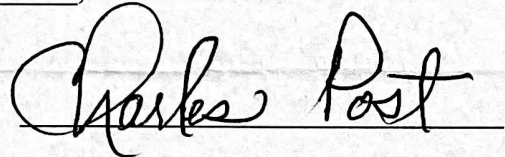


I had to pay for and do my first blow (breathalyzer test) right then and there before I could leave. I asked what would happen if I don't pay because I can't afford these fees, and Officer Fisher responded that I would go to jail and to court.

11. On a separate occasion, when I went into blow, I asked the staff member administering the blows if I would get arrested if I couldn't afford the tests, and she said yes.
12. I can't afford these fees and live in constant fear of going back to jail as a result. I am almost 68 years old and my only income is \$540/month in social security disability benefits. I receive two dinners through Meals on Wheels per week. I pay about \$40/month for my cell phone and about \$50/month for car insurance. I am currently staying at my father's house, so I fortunately do not have to pay rent. If it weren't for that, I would be homeless because I can't afford housing plus my other basic needs on my income.
13. Because my driver's license is suspended, I also have to rely on others to drive me places, including to my twice-daily blows and trips to the food bank, the store, medical appointments, and other needs. I try to pay for others' gas to drive me around.
14. To keep up with Jail Diversion Program fees, I have gone into credit card debt. I have never been in so much debt and I have no idea how I'm going to pay it off.
15. I also have no idea how long I'm going to have to pay these fees.
16. I am an elderly man who lives a simple life. Because of the Jail Diversion Program, I am now in debt and living in constant fear of going back to jail, all while I haven't been convicted of anything.

I declare under penalty of perjury that the statements above are true and correct. Executed on

02-14-2022, in Hamilton, Montana.



Charles Post

# **EXHIBIT 13**

## **DECLARATION OF LAWRENCE JAKUB**

### DECLARATION OF LAWRENCE JAKUB

I, Lawrence Jakub, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been in the Jail Diversion Program in Ravalli County since October 2021. I am homeless and my only source of income is social security disability benefits, but I have to pay hundreds of dollars every month in Jail Diversion Program fees. I can't afford these fees, but I do my best to pay them because I am afraid of going back to jail if I don't pay.
3. In October 2021, I was arrested on drug-related charges.
4. My bond hearing was before Justice of the Peace Bailey. Judge Bailey set my bail at \$1,000. He also placed me on the Jail Diversion Program, with drug testing and supervision conditions.
5. Judge Bailey did not mention that the Jail Diversion Program would cost money and he didn't ask me if I could afford the program, even though I qualified for a public defender.
6. After my hearing, I remained in jail for a few additional days because I did not have money to pay my bail.
7. Once my monthly social security disability benefits arrived, I hired Lucky Bail Bonds to post my bail, which cost me about \$140.
8. Even though I had paid my bail and the judge had ordered my release, I still wasn't allowed to go home. Still in chains, I was taken to the clerk of court by Jail Diversion Program staff and told I had to pay \$140 to start supervision. I was not allowed to leave the jail until I paid. No one asked me if I could afford to pay. I paid the \$140 out of my social security disability benefits.
9. After getting released, I had to take two random drug tests (UA's) per week at a cost of \$55 per UA, or about \$440/month. Jail Diversion Program staff didn't ask me if I could afford this.
10. To drug test, I had to call the Jail Diversion Program office every morning to see if I had to go in and test that day.



11. In November 2021, I missed one of my random UAs. The next time I went in to test, Jail Diversion Program Officer Michelle Stokes told me I had failed the test and I was arrested on the spot. The experience was shocking and scary.
12. After waiting in jail for over a week, I had a hearing before Judge Recht. He reinstated my bond conditions and bail amount. Judge Recht did not ask about my ability to pay and he did not mention what the cost of the UAs would be.
13. I was doing good until I relapsed in December 2021. I was afraid to contact the Jail Diversion Program office because I was afraid to go back to jail.
14. I was arrested in January 2022 and taken back to jail.
15. I had a hearing before Judge Recht over a week later. He doubled my bond to \$2,000 and continued my bond conditions. He didn't ask me about my ability to pay or discuss the cost of the Jail Diversion Program. I paid Lucky Bail Bonds about \$240 to bail out.
16. I have not been offered any treatment options, counseling, or services — only drug testing, which I have to do or else go back to jail. Even if the court or the Jail Diversion Program were to offer treatment, it would cost me more money.
17. On one occasion recently, Officer Stokes told me that I'm not allowed to UA if I don't have the money to pay for it. If I don't UA, I go back to jail, as had happened to me before.
18. I also asked Officer Stokes if I could do my UAs at Ideal Option in Missoula, where my UAs would be free, minus the gas to drive to and from there. I explained that it would be more affordable for me. She said no because Ideal Option does not have male staff to supervise me in the bathroom stall while I do my UA. In the Jail Diversion Program, I have to UA with a male officer in the bathroom stall with me.
19. Because I could not afford the UAs, my public defender filed a motion with the court to switch me to the drug patch, which was granted in February 2022. The drug patch costs me \$65 per 10 days, which is less expensive than the UAs, which are about \$110 per week, but I still can't afford it.
20. I can't afford Jail Diversion Program fees. Whether it's about \$440/month in UAs or about \$195/month for a drug patch, I can't afford it. My only income is from social security disability benefits, which are less than \$1,100/month. My rent is \$250/month for a homeless shelter, where I have been staying since I got out of jail in November

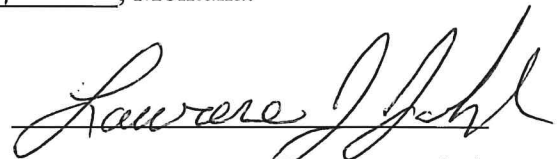
2021. I pay \$55/month for my cell phone and must also pay for other necessities such as food and gas.

21. To keep up with Jail Diversion Program fees, I've had to be late on my bills and borrow money, but I'm still behind.

22. I have no idea how long I am going to have to pay these fees. Even though I haven't been convicted of anything, I live in constant fear of going back to jail because I can't afford Jail Diversion Program fees.

I declare under penalty of perjury that the statements above are true and correct. Executed on

3-9-2022, in Hamilton, Montana.

  
Lawrence Jakub

# **EXHIBIT 14**

## **DECLARATION OF RAGAN CONVERSE**

### DECLARATION OF RAGAN CONVERSE

I, Ragan Converse, state and declare as follows:

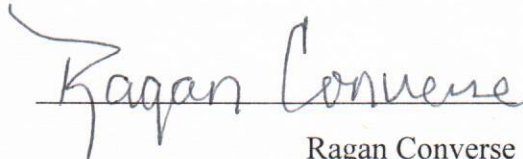
1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been in the Jail Diversion Program in Ravalli County since December 2021. I am on social security and I take care of my daughter who has terminal cancer. I can't afford Jail Diversion Program fees, but I do my best to pay what I can because I do not want to go back to jail for not paying. I am terrified that if I end up back in jail due to not making these payments, I will lose my daughter while in jail.
3. In November 2021, I was arrested and charged with a DUI.
4. I bailed out before my first hearing. My bail was set somewhere around \$1,400 or \$1,500. I couldn't afford my bail. A friend of mine hired Lucky Bail Bonds and paid to bail me out. I still owe him the money he paid for my bail, but I do not know how I'm going to afford to pay him back.
5. My arraignment was before Justice of the Peace Bailey on December 16, 2021. He placed me on the Jail Diversion Program, with alcohol monitoring and supervision conditions. He also suspended my driver's license. He told me that I was facing up to six months in jail.
6. Judge Bailey did not mention anything about the cost of the Jail Diversion Program and he didn't ask me about my ability to pay. I told Judge Bailey that I could not afford to pay for the Jail Diversion Program. I also told Judge Bailey that my mom has bone cancer. I told Judge Bailey that my daughter has stage four terminal colon cancer and the doctor only gave her six months to live. I told him that I am taking care of my daughter, but he did not change his order.
7. After court, I went over to the Jail Diversion Program office. I spoke to Jail Diversion Program Officer Ronny Jessup and told him I couldn't afford to pay for the program. All he said in response was that there were three options for alcohol monitoring and that I could pick the cheapest option. He did not offer me any payment plan or waiver.
8. I picked the cheapest option, which is the breathalyzer tests ("blows"). This option requires me to go in person, twice a day, every day, seven days a week to do a breathalyzer test between 6-8am and 5-7pm in Hamilton, Montana. Each blow costs \$2, or \$4/day, or approximately \$120/month. This doesn't include the cost of transportation to get to and from my blows because with a suspended driver's license, I had to take taxis or get rides until I got my driver's license restored, which cost over \$200 in reinstatement fees.



9. Before I was allowed to leave the Jail Diversion Program office, I had to do my first blow and pay for it. Officer Jessup also told me that I was going to have to pay a \$50 "intake fee." I had to sign contracts regarding alcohol monitoring and supervision before I was allowed to leave.
10. In February 2022, I asked Trish, one of the sheriff's secretaries who administers the breathalyzer tests, if I would get arrested if I couldn't pay for the tests, and she said yes.
11. I can't afford these fees but I pay what I can because I'm afraid of going back to jail.
12. My only consistent source of income is less than \$850/month in social security benefits. Before I was arrested, I also took occasional seasonal work as a security guard making \$13/hour, but I have not had any of this work since I was arrested. My rent is \$395/month plus electricity. I live in a trailer, and so in addition to rent, I also have a monthly payment for the trailer of \$200/month and a storage unit payment of \$100/month. My car insurance is approximately \$98/month and my cell phone is \$40/month. These basic expenses alone consume my income, without considering other necessities such as food or clothing, or my Jail Diversion Program fees.
13. To keep up with Jail Diversion Program fees, I have fallen behind on my bills and rely on family and the food bank for food.
14. I cannot afford these fees and I have no idea how long I'm going to have to pay these fees.
15. Because of the Jail Diversion Program, I am living in constant fear of going back to jail, all while I haven't been convicted of anything. I am afraid that if I go back to jail, I will lose everything, including my home and my daughter. I moved to Hamilton to be closer to my daughter who is dying from cancer, yet I live in fear that I might be in jail during her final moments and that I won't be allowed to attend her funeral. I feel like I'm constantly treading water. The Jail Diversion Program has created an enormous financial and emotional burden for me at a time where I really need to be focused on providing for my daughter and being with her.

I declare under penalty of perjury that the statements above are true and correct. Executed on

3-12-22, in Hamilton, Montana.

  
Ragan Converse



# **EXHIBIT 15**

## **DECLARATION OF BILLY MARTIN**

### DECLARATION OF BILLY MARTIN

I, Billy Martin, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been in the Jail Diversion Program in Ravalli County since about December 2020. I can't afford the program fees. Rather than "diverting" me from jail, the program has landed me back in jail multiple times because I can't afford the fees. I live in constant fear of going back to jail even though I haven't been convicted of anything.
3. I had my arraignment in December 2020 while I was still at the jail. Judge Recht set my bail at \$20,000 and put me on supervision and drug testing (UAs). He said something about there being fees, but he didn't specify how much and he didn't ask me if I could afford them, even though I qualified for a public defender.
4. I hired Lucky Bail Bonds to bail me out and I had to pay Lucky \$2,000. I borrowed the money from family.
5. Even though I had paid my bail, I still wasn't allowed to leave the jail. I was taken over to the Jail Diversion Program Office and Jail Diversion Program Officer Shane Fisher explained to me that I was going to have to pay \$105/month in supervision fees and \$55 per UA. She didn't ask me if I could afford these fees. I told her I was on disability and couldn't pay.
6. A few months later, my supervision fee was reduced to \$25/month. Officer Fisher told me that was the most they could reduce my fees. The UAs remained the same fee at \$55 per UA.
7. To do my UAs, I have to call in every day, Monday through Friday, to see if I have to test that day. If I do, I have to drop everything and get there that same day by 3:30pm.
8. I test twice a week, at \$55 per test, plus the supervision fee, so in total I have to pay at least \$465/month (\$55 times at least 8 tests a month plus a \$25 supervision fee).
9. In about January 2021, I was sent to jail because I was already behind on my fees. I had to pay somewhere around \$1,500–2,000 in bail to be released.
10. For about a month in February or March 2021, I went to Western Montana Center to do my UAs, because Medicaid paid for them. But then Officer Fisher said the results didn't come in fast enough, so I couldn't go there anymore, and would have to go back to drug testing at the Jail Diversion Program Office at \$55 per UA.
11. I can't afford these fees. My only source of income is social security disability, and I only receive about \$840/month. I pay \$300/month in rent and because I live in a camper, I also have to buy my own propane, which is about \$120/month. My cell phone is \$55/month. Just those basic expenses and Jail Diversion Program fees are already more than my entire income

and doesn't take into consideration my other basic needs like food, clothing, and transportation.

12. I do my best to pay my fees and try to pay at the beginning of the month when I get my disability income. But I can't pay the full amount of fees.
13. In approximately February or March 2021, I went to the Jail Diversion Program Office to UA and I was arrested on the spot, without notice. Officer Fisher and Officer Chris Colgan told me I was being jailed for non-compliance for non-payment of my fees.
14. I was in jail for about 2 or 3 months. I got out around May 2021. Judge Recht set my bail at \$20,000 again, so I had to hire Lucky Bail Bonds again and pay Lucky \$2,000 to get out.
15. But, once again, even though I had paid my bail, I wasn't allowed to leave the jail. Officer Fisher told me I had to pay about \$1,200 in overdue Jail Diversion Program fees to get out of jail. So, in total, I had to pay \$2,000 to the bail bond company and about \$1,200 to Officer Fisher to buy my freedom. I once again borrowed money from family.
16. I was home for a few months and then it all happened again. I got behind on my fees because I can't afford them and in about June 2021, I was arrested for non-compliance for non-payment of my fees.
17. I was in jail from about June to August 2021. I then went to rehab for about 2 months.
18. After rehab, I was doing well. But the Jail Diversion Program didn't believe that I had gone to rehab (something happened with the release of information paperwork) and after coming home from rehab, I missed some UAs because I couldn't afford them. They locked me up again in January 2022 because of the missed UAs and because they claimed I had not been reporting during the time I had been in rehab. I was in jail for about a month. I was finally released in February 2022 after my public defender got the documentation that I had gone to and successfully completed rehab. The judge reinstated my bail so I didn't have to pay bail again.
19. However, before I was released, Officer Fisher told me that I had to pay about \$400 in overdue fees by the next day by 2pm or I was going back to jail. I got the money together by borrowing money from family.
20. Before I was released, Officer Fisher also told me there were new program rules. She said that if I go to UA and can't pee, I have 10 minutes to pee and if I still can't pee, it's called "failure to supply" and I can go to jail. She also said that if I can't pay for the UA, I can't UA, and she will count it as a positive UA, which also means I can go to jail.
21. I try my best to comply with my conditions, but I just can't afford these fees. I have been in the Jail Diversion Program for over a year and I've paid thousands of dollars in fees so far and

I haven't even been convicted of anything. I live in constant fear of going back to jail. I haven't been able to pay the last few times I've gone to UA, so the Jail Diversion Program officers won't let me UA, and I worry about what will happen the next time I go in.

I declare under penalty of perjury that the statements above are true and correct. Executed on  
03 / 28 / 2022, in Victor, Montana.



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Billy Martin

# **EXHIBIT 16**

## **DECLARATION OF TYLER LARUE**

### DECLARATION OF TYLER LARUE

I, Tyler LaRue, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I was in the Jail Diversion Program for several months in 2020–2021. I lost jobs because of the program’s requirements and I had to pay pre-trial fees even though I couldn’t afford them. I was on alcohol monitoring and never once had a positive alcohol test, yet since being sentenced, I have had to continue with the same conditions and continue to pay fees. The program continues to interfere with my ability to earn a living, and I live with constant anxiety of being sent back to jail because I can’t afford my court-related financial obligations.
3. In late December 2020, I was arrested on driving-related charges.
4. In court, Justice of the Peace Bailey set my bail at \$1,300. He also said I would have to do alcohol monitoring. He said that if I miss a test, I go to jail, and if I blow hot (have a positive test), I go to jail. He said I would have to test until my case was resolved and that if I had any questions, I should direct them to Officer Stokes with the Jail Diversion Program. Judge Bailey said nothing about the cost of the program.
5. I couldn’t afford my bail, so I hired Lucky Bail Bonds to pay for my bail, and one of my roommates paid my bail for me.
6. Before being released from the jail, Officer Stokes went over a few options for alcohol monitoring and told me how much each was going to cost. The twice-a-day blows were \$2/each, or about \$120/month, whereas the remote breathalyzer option was about \$345 upfront to start, and I didn’t have that money, so I went with the blows. To do the blows, I have to show up in person, every day, seven days a week, between 6–8 am and 5–7pm at the Jail Diversion Program office in Hamilton.
7. Later on, I was told I was going to have to pay for my blows each time I blew, and that I couldn’t blow if I was in the negative, and if I didn’t blow, I would go back to jail.
8. At the time, I was working in a restaurant as a cook making \$10/hour. I made about \$1,100/month and my rent was about \$450/month. I live with four other people to be able to afford rent. Pre-trial fees were more than 10% of my income; adding about \$120/month to my expenses in pre-trial fees was a huge burden.
9. At no point did anyone ask me if I could afford pre-trial fees, even though I qualified for a public defender.

10. Until March 23, 2021, I longboarded to get to and from the Jail Diversion Office to do my blows. But on March 23, 2021, I was hit by a garbage truck going home after doing my morning blow.
11. I went to the hospital and my knee cap had been dislocated. It took me over two months to be able to walk again without crutches, and to this day I still have knee pain.
12. In the days immediately following my accident, I missed a court date because I couldn't walk to the courthouse in my condition and I couldn't get a ride.
13. When I went into the Jail Diversion Office on March 27th or 28th, I was arrested and taken to jail, even though I was on crutches from my accident.
14. I had to bail out again and hired Lucky Bail Bonds to post my bail, which was around \$80.
15. About a week after my accident, I had a hearing before Judge Archibald. I explained what had happened, but Judge Archibald said something to the effect that I had not given the court enough notice that I would be missing court.
16. The Jail Diversion Officers made fun of me for being on crutches and made jokes about me no longer having my longboard, which had been destroyed when I was hit by the garbage truck.
17. Because of my accident, I also got a bill for about \$5,000 from the hospital.
18. Between the pre-trial fees, losing work because of going in for blows and my accident, and my medical debt, I had to find other work to pay my bills. I picked up odd jobs and tried working at another restaurant, but keeping up with the twice-a-day blows got in the way of holding down a job.
19. I eventually found a new job doing various types of work on log homes, including staining and painting. However, I was let go because I couldn't be available for jobs and be in town every morning and evening to blow. A paint job that was supposed to take 5 days would take 7 or 9 days because we couldn't start until after I had done my morning blow, and I had to be back in town for the evening blow.
20. In the many months that I was in the Jail Diversion Program, I didn't once blow hot. A couple of times I asked the court to get off the program because my blows were clean, but my requests were denied.
21. I ended up taking a plea in my case, and I was sentenced in September 2021. I was sentenced to 31 days in jail, and 18 of those days were for days I had supposedly missed blows. Part of my reason for taking a plea was in hopes of finally being done with alcohol

monitoring, but despite having more than eight months of clean blows, the judge ordered me to continue with the twice-daily blows indefinitely. I still don't know when I'm going to finally be done with this nightmare. I didn't get any credit for the approximately \$1,000 I had already paid in Jail Diversion Program fees. I also have to do an alcohol education program (ACT) that I have to pay for, plus court fines.

22. It's been many months since I was sentenced, but I'm still doing the same thing I had to do while my case was in pre-trial status.
23. Several months ago, I went to blow but Probation Officer Wallace said I couldn't blow because I owed \$1 for prior blows. I didn't have any money to pay for my debt, but someone else who was in line to blow gave me \$2 so I could blow. Otherwise, I might have been booked into the jail.
24. I had been working to get promoted to manager at the restaurant where I used to work. My bosses knew I did good work, but my ability to get promoted was derailed because I had to leave work every day during the dinner hour to go blow, forcing others to cover for me during one of the busiest times at the restaurant.
25. Just this month, I found work with a HVAC company for \$15/hour. I am still paying off my medical debt and court fines, fees, and costs, and it was only because of an advance on my salary that I was finally able to get the money to pay for my ACT program. I continue to struggle to pay for all of my expenses and I live in constant fear of going back to jail because I can't keep up with the financial obligations of my case.
26. Alcohol monitoring, both as part of the Jail Diversion Program as well as my sentence, has also negatively affected my mental and physical health. I am constantly worried about going back to jail because if you're even a few minutes late for a blow or if you don't have the money to blow, you can go back to jail. I'm also regularly sleep-deprived because I have to blow every morning between 6am and 8am, otherwise I go back to jail. I don't know why I'm still on supervision, I don't know when I'll be off, I've been sober since my case started, and I just want to move on with my life.

I declare under penalty of perjury that the statements above are true and correct. Executed on  
03 / 30 / 2022, in Hamilton, Montana.



Tyler LaRue



# **EXHIBIT 17**

## **DECLARATION OF DANIEL LOEFFLER**

### DECLARATION OF DANIEL LOEFFLER

I, Daniel Loeffler, state and declare as follows:

1. I am over the age of 18, and I am a resident of Ravalli County, Montana.
2. I have been in the Jail Diversion Program in Ravalli County since September 2021, following my arrest in August 2021.
3. At my arraignment, which was by video conference at the jail, Judge Ray set bail and placed me on the Jail Diversion Program. Judge Ray set bail at \$50,000. I posted bond through Lucky Bail Bonds. I paid the \$5,000 deposit from my savings.
4. Although the judge had ordered my release and I had paid my bail, the Jail Diversion Program staff would not release me from the jail until I signed a contract regarding pre-trial supervision. The contract stated that I have to pay \$105/month in supervision fees.
5. My supervision consists of calling my Jail Diversion Program officer, Ronny Jessop, once a month and he asks me if anything has changed.
6. A few months into the Jail Diversion Program, I asked Officer Jessop if there was any way to lower my supervision fee. He said something to the effect that he had discretion to lower it to whatever he wanted but that there was no waiver option. He lowered my supervision fee to \$55/month.
7. In January 2022, Judge Lint added alcohol monitoring to my conditions because of a new case I picked up in another county, even though I was not required to be on alcohol monitoring in the new case. As a result, I now have to blow into a handheld breathalyzer device three times a day, every day, at set times.
8. I am now charged approximately \$265/month in Jail Diversion Program fees (\$55/month for supervision and \$210/month for alcohol monitoring).
9. At no point did anyone ask me if I could afford these fees or whether they would be a financial burden.
10. In January 2022, on my own initiative and at my own expense, I went to an in-patient rehab program. I was discharged early because the facility's conclusion was that I did not have an alcohol problem.
11. Even though I went to rehab, I am still required to do alcohol monitoring and pay for it.
12. I do my best to pay my fees because I do not want to go back to jail. In the court's order regarding my pre-trial release conditions, it says I have to pay for Jail Diversion Program

fees and not doing so is a violation of the court's order. I have been told many times that missing a blow, blowing hot, or not paying my fees is a violation, and I know people who have gone to jail for violating their conditions. In addition, I have been doing my alcohol monitoring with Compliance Monitoring Services, and the participation agreement I had to sign says I can go to jail for not paying my fees. I'm behind on my fees right now, so staff at Compliance Monitoring have told me that if I don't pay upfront, they will remove me from the program, tell the judge I'm not paying, and that I will be held in contempt. Staff at Compliance Monitoring also sent me a letter saying they were asking the court to remove me from the program because of non-payment of fees.

13. I do not know how long I am going to have to be in the Jail Diversion Program. I have paid hundreds of dollars in Jail Diversion Program fees so far, and I keep being charged fees even though I haven't been convicted of anything.

I declare under penalty of perjury that the statements above are true and correct. Executed on  
04 / 05 / 2022 in Ravalli County, Montana.

*Dan Loeffler*

Daniel Loeffler

# **EXHIBIT 18**

**JAIL DIVERSION PROGRAM NOTES  
REGARDING PLAINTIFF O'TOOLE  
(RC 0719–20)**

# RAVALLI COUNTY

205 Bedford Street, Suite G  
Hamilton, MT 59840



# SHERIFF'S OFFICE

Phone: (406)375-4060  
Email: sheriff@rc.mt.gov

Case Notes

Printed on February 17, 2022

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**Shane Fisher, 11/09/20 10:55**

Needs to UA on 11/9 for missed remote breath on 11/6

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**Shane Fisher, 11/24/20 10:25**

Please see attached email to OPD and response from 13-39 in rearguards to Missed tests

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**Shane Fisher, 11/30/20 10:02**

Missed test 11/27 2:30 PM

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**Shane Fisher, 12/04/20 09:56**

missed test 12/3- Allowing Mr Otoole to UA  
UPDATE Mr otoole did not show for his UA booth violations where sent out.

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**Shane Fisher, 12/15/20 09:13**

See attached missed Test- sent to Stevensville courts and OPD

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**Michelle Stokes, 12/28/20 08:15**

12/28  
Both missed tests sent to Colette with Stevi PD

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**Michelle Stokes, 12/28/20 09:27**

12/28  
emailed 12/25 missed test to Colette

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**Shane Fisher, 01/05/21 10:06**

Emailed 1/01/2020 to stevi courts

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**Shane Fisher, 01/05/21 10:29**

Emailed missed test from 1-4-2021

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**Michelle Stokes, 01/06/21 15:12**

1/6/21 New court documents from Stevi PD

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**Shane Fisher, 01/07/21 09:14**

In RCDC

\*\*\* Must pay past due and be put on CAM before bonding out\*\*

---

**Shane Fisher, 01/20/21 14:39**

See attached new conditions of release

I testified in Stevi court in regards to his UA conducted after arrest and his past positive patches with his last DC case.

---

**Shane Fisher, 01/25/21 11:02**

re- enrolled drug patch and scam cam applied

---

**Michelle Stokes, 02/16/21 16:16**

2/16 He told Ronny about his LEO contact, He had contact with Robert Butterfield, he wrote Daniel a check for 25K, Daniel stated he told the LT of the jail about it.

**Shane Fisher**, 02/22/21 09:51

WARRANT- No Bond

**Shane Fisher**, 03/03/21 12:51

Was notified he is still staying at Barz residence

**Shane Fisher**, 03/03/21 12:53

Filed a report with IT colgan for Theft of Scram Unit

**Christopher Colgan**, 03/03/21 13:39

3/3/2021: A Complaint Request was filed with the C/A for Felony Theft of the SCRAM Bracelet after it was determined that O'Toole had absconded on 2/26/21 (#SO2103-0014).

**Shane Fisher**, 03/22/21 10:56

ABSCONDED with equipment PTS CAM and Drug monitoring

**Christopher Colgan**, 04/15/21 17:29

Arrested on 4/15/21 by Corporal Mendonca. Remanded to RCDC.

Initially, only admitted to smoking Marijuana. Eventually, admitted to smoking Meth 2 days ago. O'Toole was given the option of completing a Drug Admission Form and was advised he was going to still submit a UA regardless. In response, O'Toole opted to just give a UA. RCDC Officers will retrieve the UA once O'Toole is ready. O'Toole admitted to just cutting the strap of his CAM and not damaging the CAM itself (evaluation of the CAM will be conducted on 4-26-21).

**Christopher Colgan**, 04/19/21 09:52

NEEDS TO PAY the following to be released with Jail Diversion:

\$100 for CAM strap

\$710 for past CAM fees

\$355 for CAM/PTS fees

\$140 for Drug Patch to be applied

\$1500 CASH deposit for CAM to be re-assigned

TOTAL: \$2805

**Christopher Colgan**, 04/19/21 10:19

1005 hrs: Advised O'Toole he was being charged for felony theft (CAM) and what he would owe Jail Diversion prior to release (\$2805). O'Toole responded to the theft by saying "it came with him." When I asked O'Toole why he did not give a UA as requested, he said he was tired and went to sleep. CAM #139434 was downloaded.

**Shane Fisher**, 05/06/21 09:02

Sentenced in Stevi released from all services. For PFMA case TK290047

Still on PTS for New Felony case

**Shane Fisher**, 05/07/21 12:07

re enrolled and paid may supervision fees

**Michelle Stokes**, 05/12/21 09:38

5/12/21 O'Toole did not show for IA, continued to 5/19/2021. O'Toole required to appear, Judge Recht will likely issue a warrant. DC-21-71

**Michelle Stokes**, 06/02/21 09:19

6/2/21 Omni DC-21-71 No changes

**Shane Fisher**, 07/06/21 11:24

Called D otoole- Number disconnected

# **EXHIBIT 19**

**EMAIL FROM PROGRAM  
ADMINISTRATOR ELLSWORTH TO  
PROGRAM OFFICERS (RC 0104)**

**Chris Colgan**

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**From:** cellsworth@rc.mt.gov  
**Sent:** Sunday, March 29, 2020 12:33 PM  
**To:** sfisher@rc.mt.gov; KRothie@rc.mt.gov  
**Subject:** Billing  
**Attachments:** BILLING OFF NEW SYSTEM 2019.2020.xlsx

Please review my billing attachment. When you get this some of the client might have started paying again on Monday – this is up to date as of this email. Please each out to each of your clients that is bold. If they have not paid Feb/March please advise them they have until the end of next week – April 3 to get paid in full. There are a few.....

If the client is unable to pay it in full, please send me a list of those clients so that I can send out violations and asked for their removal. We have to remember that things are tight and when a client does not pay it risk our division.

There are 4 tabs at the bottom. Please review each one of them with the expectation of the 24/7 program. Some of your clients will show full invoices in their profile but they are only required to pay the 28 per week – so that will not be an issue unless I see that people are not paying. For those that are only on technology I will be contact them myself.

Any questions, please let me know and I will review this again at the end of next week. Let me know if you need any help.

Christina Ellsworth  
Jail Diversion Administrator  
Ravalli County Sheriff's Jail Diversion  
205 Bedford, Suite G  
Hamilton, MT 59840  
406-375-4097 – Desk  
406-360-1907 – Cell

All emails are subject to Montana's Right to Know law (Article II Sec 9, Montana Constitution) and can be considered Public Record (2-6-202, MCA) available for public disclosure.



# **EXHIBIT 20**

**EMAIL FROM PROGRAM LIEUTENANT  
COLGAN TO PROGRAM OFFICERS  
(RC 0932)**

**Chris Colgan**

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**From:** Chris Colgan  
**Sent:** Friday, November 12, 2021 4:24 PM  
**To:** Michelle Stokes; Ronny Jessop; Shane Fisher  
**Cc:** Steve Holton; Jesse Jessop  
**Subject:** Unpaid dues regarding equipment

After speaking with the Sheriff, the following has been approved:

If an Offender falls behind on payments (can't afford it, etc.), email the County Attorney's Office advising them on a certain date and time, we will be removing them from the device they are assigned to them (and sending an RoV). Be sure to give the CA's Office a gracious time frame as a heads up so they can work on a plan on their end after the Offender is taken off the equipment.

As far as incarceration for not being on the device ("prior to release", etc), that will be a CA thing, not our issue.

This includes ALL equipment/devices.

Lt. Chris Colgan #13-10  
Ravalli County Sheriff's Office  
Court Security/Jail Diversion  
205 Bedford Street; Suite G  
Hamilton, MT 59840  
Cell #: (406) 531-7010  
Fax: (406) 375-6707

# **EXHIBIT 21**

**EMAIL FROM LIEUTENANT COLGAN  
TO PROGRAM OFFICERS (RC 0983)**

**Chris Colgan**

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**From:** Chris Colgan  
**Sent:** Wednesday, November 10, 2021 12:45 PM  
**To:** Michelle Stokes; Ronny Jessop; Shane Fisher  
**Subject:** UAs and payments

Today in Recht's Court it was brought up several times by OPD that the Offenders can't pay for their UAs and are getting turned away.

In a nice way, Recht reminded them of their agreement.

I was seeing a trend of this excuse and it might be getting passed around to others.

Bottom line: You can't pay for the UAs, you don't get UAed and the violation goes out (there might be a few exceptions based on track record).

I know we have been doing this, just wanted to give a heads up of the trend and what the judge thinks.

Lt. Chris Colgan #13-10  
Ravalli County Sheriff's Office  
Court Security/Jail Diversion  
205 Bedford Street; Suite G  
Hamilton, MT 59840  
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Fax: (406) 375-6707

# **EXHIBIT 22**

**EMAIL FROM LIEUTENANT COLGAN  
TO PROGRAM OFFICERS (RC 0938)**

**Chris Colgan**

---

**From:** Chris Colgan  
**Sent:** Tuesday, December 21, 2021 11:11 AM  
**To:** Michelle Stokes; Ronny Jessop; Shane Fisher  
**Cc:** Jesse Jessop  
**Subject:** Revisions to contracts

PTS Contract (last sentence):

5. SUPERVISION FEES: I am to pay supervision fees as directed by my supervision officer. Initial supervision fees are due upon completion of enrollment. Continued monthly fees will be due on or before the first day of each month (\$105.00 / month). Your monthly due date will depend on the original date of installation. Failure to maintain Supervision Fees will result in the removal from Pre-Trial services and could result in a warrant for your arrest.

CAM:

I understand failure to maintain payments will result in the removal from CAM services and could result in a warrant for my arrest.

---

Initials Here

Remote Breath:

I understand failure to maintain payments will result in the removal from Remote Breath services and could result in a warrant for my arrest.

---

Initials Here

I have eliminated the 3 month grace period. If the first month has not been paid (exception: approval from a supervisor), the Offender is to be removed from our services and email sent giving them a 1 week warning (advising 1 week from the time of the email the Offender will be removed from our services). Keep in mind, we want to avoid the Offender of falling behind on payments.

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Ravalli County Sheriff's Office  
Court Security/Jail Diversion  
205 Bedford Street; Suite G  
Hamilton, MT 59840  
Cell #: (406) 531-7010  
Fax: (406) 375-6707

# **EXHIBIT 23**

## **SAMPLE CONDITIONS OF RELEASE ORDER (RC 0970–72)**

HON. CURRENTJUDGE  
District Judge, Dept. \_\_  
Twenty-First Judicial District  
Ravalli County Courthouse  
205 Bedford, Suite \_\_  
Hamilton, Montana 59840  
Ph: (406) 802-7188/802-7192  
Fax: (406) 802-7199

MONTANA TWENTY-FIRST JUDICIAL DISTRICT COURT, RAVALLI COUNTY

THE STATE OF MONTANA,  
  
Plaintiff,  
  
vs.  
  
DEFENDANTNAME,  
  
Defendant.

Cause No. CaseNumber  
Department No. \_\_  
  
[Justice Court Cause No. CR-705-\_\_\_\_\_]

**CONDITIONS OF RELEASE  
AND BOND**

**EFFECTIVE:**

**THIS ORDER SUPERCEDES AND REPLACES ALL PRIOR  
CONDITIONS OF RELEASE, STANDING NO CONTACT ORDERS AND  
BOND ORDERS.**

**BOND:**

The above named Defendant will be released on \$ \_\_\_\_\_ bail.

OR

The above named Defendant has been released:

On his/her own recognizance.

or

On \$ \_\_\_\_\_ bail with \_\_\_\_\_ <<bondsman's  
name>> which is hereby approved.



**CONTACT RESTRICTIONS:**

1. Defendant is restricted from contacting any victims or witnesses associated with this case.
2. Defendant's contact with the following persons are limited as set forth below:
  - No contact with <<list people>>
  - Contact limited to: <<describe>> i.e. – through Family Wizard only, or through attorneys only for parenting purposes, etc.
  - There is a Standing Order of No Contact as to <<specify people>>, that Order is hereby  Continued, OR  Terminated.

For cases with victims under the age of 18:

- No contact with any persons under the age of 18.

**LOCATION RESTRICTIONS:**

3. Defendant is excluded from the following premises: <<describe>>
4. Unless the Defendant receives express permission from this Court the Defendant must not leave:
  - Ravalli and/or Missoula County  State of Montana  No travel restrictions.

**DRUG/ALCOHOL USE AND MONITORING CONDITIONS:**

Defendant is subject to the following, as indicated below, if boxes are not checked, the condition does not apply:

5.  Defendant must not consume any alcohol or take any drugs, and must not enter any bars, taverns, or other businesses where alcohol is the primary item of sale. Defendant is not to purchase any alcoholic beverages. Medications are excluded provided they have been prescribed for the Defendant by a licensed physician and medications must be taken in the manner prescribed
6.  Defendant shall submit to a test for alcohol/drugs at the request of this Court or a law enforcement officer if reasonable suspicion exists to search to determine if the Defendant is in violation of the terms of this order. Presence of alcohol, drugs, or refusal to submit to a test will be a violation of this order
7.  Defendant must submit to drug testing with  drug patch OR  random urinalysis two (2) times per week, at the discretion of jail diversion services. Drug patches must be applied 72 hours **after** the Defendant's arrest. The drug patch provider may substitute urinalysis testing prior to the application of the patch. Defendant is specifically cautioned that a positive test resulting from passive contact, or tampering with the test, shall constitute a violation.

8.  Defendant must submit to *drug/alcohol* monitoring as follows:
- 24/7 program [*Twice daily PAST tests; SCRAM Cam Bracelet; Remote Breath; most cost-effective method*]
  - Ravalli County Jail Diversion Program, Pre-Trial Supervision
9.  Defendant must submit to GPS monitoring.

**10. Defendant must enroll in the Ravalli County Jail Diversion Program, comply with all conditions of the Contract for Supervision, and pay for supervision and/or testing fees as directed by Jail Diversion. Failure to do so shall be deemed a violation of this Order and may result in Defendant's immediate arrest and imposition of a higher bail amount.**

**11. If defendant is arrested by pretrial services pursuant to § 46-9-505(3), MCA, bail will be in the amount of \$\_\_\_\_\_ until defendant is brought before the Court pursuant to § 46-9-505(4), MCA.**

**GENERAL CONDITIONS:**

- 12. Defendant must appear in Court each and every time he/she is required to do so, unless specifically exempted from appearance by this court.
- 13. Defendant must remain in contact with his/her attorney at all times; and must contact the attorney once a week until the case is resolved.
- 14. Defendant must keep address, telephone number, and place of employment current with the Court and, if applicable, Defendant's attorney.
- 15. Defendant must not be involved in any criminal activities nor be convicted of any criminal offense pending disposition of this case.
- 16. Defendant must have information booking within 10 days at the Ravalli County Detention Center.
- 17. For any monitoring ordered above, Defendant shall execute any and all necessary releases and comply with all conditions of any contract with any monitoring provider. Failure to provide releases or abide by contract terms shall be deemed a violation of this Order.
- 18. Other: \_\_\_\_\_

**REVIEW HEARING:**

- 19. A Review Hearing will be held on the Law and Motion calendar for Wednesday/Thursday, \_\_\_\_\_, 2022, at 9:00 a.m., to review all conditions of release, standing orders of no contact and bond.

***ELECTRONICALLY DATED AND SIGNED BELOW***

# **EXHIBIT 24**

**EMAIL FROM LIEUTENANT COLGAN  
TO PROGRAM OFFICERS (RC 0963)**

**Chris Colgan**

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**From:** Chris Colgan  
**Sent:** Thursday, February 3, 2022 5:02 PM  
**To:** Michelle Stokes; Ronny Jessop; Shane Fisher  
**Cc:** Steve Holton; Jesse Jessop  
**Subject:** Enrollment Protocols

After speaking with Steve, this is where we are at with those who have past due payments and need to enroll:

Incarcerated (prior to release):

1) Equipment related past dues: Offender must pay the "past" equipment dues before we will assign another device. The advanced payment for the new issuance can then be collected at a specific time and later date or we will turn the machine off and classify them as non-compliant. In regards to the GPS, same procedure, but we have the Offender report to Jail Diversion and we take the GPS off and PTS arrest them for non-compliance. In all these cases, email the CA as a courtesy as a "heads up." If the CA has an issue with it, have them speak with Steve.

2) Past due PTS monthly fees: If the overdue fees are \$500 or less, work with them in a form of a payment plan (use specific dates and times). If the past due fees are over \$500, give them until 1600 the following business day to zero out their balance or they will be classified as a Fail to Enroll.

3) UAs: Upon initial enrollment only, the Offender will be able to pay upon their next UA (if they don't have the money..1st ever UA only), but they will have to have both the past due UA and the money for the next UA in hand or they will not be able to UA (Failure to Provide). I would not tell them they don't have to pay the first time. This is in the event they try to use the no money excuse.

Let me know if there needs to be any clarification.

Lt. Chris Colgan #13-10  
Ravalli County Sheriff's Office  
Court Security/Jail Diversion  
205 Bedford Street; Suite G  
Hamilton, MT 59840  
Cell #: (406) 531-7010  
Fax: (406) 375-6707

# **EXHIBIT 25**

**SIGN-IN SHEET FOR JAIL DIVERSION  
PROGRAM ALCOHOL MONITORING  
(THE 24/7 PROGRAM) (RC 1896)**

Ravalli County Sheriff's Jail

Diversion

24/7 Program Client Summary

Collected: 42\$

Date 01/25/22 AM/PM Test Tester Jordann

Name	Signature	Time	Results	Payments
Anderson, Michael	<i>Michael Anderson</i>	5:00		2.00
Brown, Christopher***	<i>Christopher Brown</i>	6:35		
Butler, Tyler***	<i>Butler Tyler</i>			
Converse, Ragen	<i>Ragen Converse</i>			
Davis, Candice	<i>Candice Davis</i>	6:00		
Haacke, Patricia	<i>Haacke Patricia</i>	5:01		
Heinzman, Joseph	<i>HEINZMAN</i>	5:07		
Larue, Tyler	<i>Tyler Larue</i>	6:20		
Leonard, Keith	<i>KEITH LEONARD</i>			
Lewis, Michelle	<i>MICHELLE</i>	5:00	copy	
Munson, Julia				
Pfau, Tracy	<i>Tracy Pfau</i>	6:37	NO TEST	\$ 0.00 NO money/NO test
Post, Charles	<i>Charles Post</i>			\$ 40.00
Reed, Eva	<i>Eva Reed</i>	5:02		
Springer, Harold	<i>Harold Springer</i>	5:00		
Troxell, Colby	<i>Colby Troxell</i>	5:05		
Wheeler, James	<i>James Wheeler</i>	5:23		

\*\*\* Indicates person cannot be arrested for failed test, but still needs violation form filled out.

# **EXHIBIT 26**

## **JAIL DIVERSION PROGRAM LIST (RC 1961–74)**

	Disposition	Names	Case Number
	29 Jail Diversion	STOCKDALE, JAMES ELLIOTT	SO1909-0101
	29 Jail Diversion	NOFFSINGER, JAY HOWARD	SO1909-0131
	29 Jail Diversion	BORKHOLDER, DENNIS LEROY	SO1909-0132
	29 Jail Diversion	WEST, JOSEPH GLEN	SO1908-0228
	29 Jail Diversion	YATES, RYAN ALAN	SO1908-0230
	29 Jail Diversion	MITCHELL, GARY LARKIN	SO1908-0232
	29 Jail Diversion	HAJEK, RICKY JAMES	SO1909-0130
	29 Jail Diversion	CUTSFORTH, BRIAN EDWARD	SO1908-0163
	29 Jail Diversion	BRADFORD, RICHARD MITCHELL	SO1908-0144
	29 Jail Diversion	NEISINGER, RAYMOND GLENN	SO1909-0137
	29 Jail Diversion	FLYNN, TAZ J	SO1909-0291
	29 Jail Diversion	WHIPPLE, BRANDON TRUE	SO1909-0211
	29 Jail Diversion	BROWN, DANA MARIE	SO1908-0161
	29 Jail Diversion	HUDSON, JOHN DAVID	SO1908-0139
	29 Jail Diversion	BEDWELL, ERICK DANIEL	SO1908-0141
	29 Jail Diversion	CORMIE, JOHN DAVID	SO1908-0140
	29 Jail Diversion	TUMINELLO, MICHAEL PATRICK	SO1909-0025
	29 Jail Diversion	DOUGLAS, PENNY VIKTORA LOUISE	SO1909-0274
	29 Jail Diversion	PEASE, JOHNATHON WADE	SO1909-0027
	29 Jail Diversion	LAUDERDALE, SETH ROBERT	SO1908-0222
	29 Jail Diversion	PARR, MARSHA LYNN	SO1909-0214
	29 Jail Diversion	DAY, WILLIAM VIRGIL	SO1908-0070
	29 Jail Diversion	VAN VLECK, WILL GEORGE	SO1909-0208
	29 Jail Diversion	BIGELOW, JASON AARON	SO1908-0127
	29 Jail Diversion	BRIGHTMAN, CRYSTAL LEA	SO1908-0146
	29 Jail Diversion	BILYEU, GUY FRANCIS	SO1908-0143
	29 Jail Diversion	DORAN, DAVID MARK	SO1909-0128
	29 Jail Diversion	ANDERSON, FORREST MICHAEL	SO1908-0004
	29 Jail Diversion	ROOT, DOMINICK JOHN	SO1909-0217
	29 Jail Diversion	MONTGOMERY, ANTHONY ROGER	SO1908-0221
	29 Jail Diversion	POTTER, RICKY CLIFFORD	SO1909-0053
	29 Jail Diversion	KNAPP, JOHN EARL	SO1908-0095
	29 Jail Diversion	CHEETHAM, NICOLE MARIE	SO1909-0034
	29 Jail Diversion	HAJENGA, MARIE NOELLE	SO1909-0123
	29 Jail Diversion	ANDERSON, KELLY RICHTER	SO1908-0009
	29 Jail Diversion	RIEBLING, DERRIK RIAN	SO1909-0136
	29 Jail Diversion	SCHLOSSER, BETHANY DINA	SO1909-0207
	29 Jail Diversion	MOTT, RYAN PAUL	SO1909-0104
	29 Jail Diversion	BARBER, LYNDON JAMES	SO1908-0082
	29 Jail Diversion	CLARY, PATRICK RYAN	SO1909-0124
	29 Jail Diversion	CISNEROS, AARON JAMES	SO1909-0113
	29 Jail Diversion	TURNER, LIEF AARON	SO1908-0067
	29 Jail Diversion	LOCKWOOD, SONJA KAYE	SO1909-0112
	29 Jail Diversion	RALL, MICHAEL JACOB	SO1908-0109
	29 Jail Diversion	SNIVELY, JOSHUA ADAM	SO1908-0096
	29 Jail Diversion	RAMIREZ, ANGELA	SO1908-0224
	29 Jail Diversion	EST, JUDY KATHLEEN	SO1908-0111
	29 Jail Diversion	ZONTEK, ALEX ELIZABETH	SO1909-0063
	29 Jail Diversion	SCHWEHR, MIRIAM LORRAINE	SO1908-0097
	29 Jail Diversion	HAUGHTON, TRENTON JAY	SO1910-0035
	29 Jail Diversion	HAMILTON, MCKAYLA JEAN	SO1908-0066
	29 Jail Diversion	FISCHER, JOSHUA BRIAN	SO1909-0129
	29 Jail Diversion	CLAXTON, TYLER JOSEPH	SO1908-0099
	29 Jail Diversion	BOYE, LARRY KEITH	SO1908-0051
	29 Jail Diversion	HORSTMAN, MICHAEL PATRICK	SO1909-0222
	29 Jail Diversion	HOLLIDAY, CASEY AUSTIN	SO1908-0020
	29 Jail Diversion	KRATSCH, AMBER KRISTINE	SO1909-0270
	29 Jail Diversion	GESELLE, ANDREW TERRY	SO1909-0273
	29 Jail Diversion	WEBSTER, ALBERT ERNEST	SO1908-0227
	29 Jail Diversion	WILSON, JACOB SHANE	SO1908-0229



29 Jail Diversion	EVERS, SYDNEY MARIE	SO1908-0110
29 Jail Diversion	MOORE, HEATHER MARIE	SO1908-0223
29 Jail Diversion	HANSEN, MICHAEL RICHARD	SO1909-0058
29 Jail Diversion	KELLER, RANDALL ROBERT	SO1909-0061
29 Jail Diversion	HUBER, AUSTIN MAXWELL	SO1909-0271
29 Jail Diversion	GRAY, MITCHELL TIMOTHY	SO1908-0023
29 Jail Diversion	LEVANDOSKE, DARLA MAY	SO1909-0141
29 Jail Diversion	BOWES, DANIEL WATSON	SO1908-0063
29 Jail Diversion	WELLS, CASEY SHALOM	SO1908-0154
29 Jail Diversion	KELLY, ANDREW NICHOLAS	SO1908-0080
29 Jail Diversion	LINDON, LLOYD THOMAS	SO1909-0220
29 Jail Diversion	GARNER, CARL JAMES	SO1908-0098
29 Jail Diversion	MILLER, BRADY BRYAN	SO1909-0059
29 Jail Diversion	GODWIN, KASEY LEE	SO1908-0159
29 Jail Diversion	ESCHENBACHER, TERRY RAY	SO1908-0254
29 Jail Diversion	BRIGHT, JONATHAN EDWARD	SO1907-5005
29 Jail Diversion	PETERSON, NELS JERRY	SO1908-0019
29 Jail Diversion	BRUCKMAN, JOSHUA ADAM	SO1908-0081
29 Jail Diversion	MAUCHER, MICHAEL PATRICK	SO1909-0125
29 Jail Diversion	GORDON, TY MITCHELL	SO1908-0160
29 Jail Diversion	BRANDOS, DAVID THOMAS	SO1908-0079
29 Jail Diversion	GLAZE, RYAN CHARLES	SO1908-0005
29 Jail Diversion	BEARCHILD, JOHN DOUGLAS	SO1908-0016
29 Jail Diversion	WARILA, JUSTIN JOHN	SO1908-0226
29 Jail Diversion	LUCAS, JOSHUA SAGE	SO1908-0091
29 Jail Diversion	RABEY, RYAN MATTHEW	SO1908-0065
29 Jail Diversion	HARRIS, JOSEPH MEDFORD	SO1909-0114
29 Jail Diversion	TORRE, SUSAN ROSE	SO1908-0225
29 Jail Diversion	BILBEN, ANTHONY WAYNE	SO1909-0121
29 Jail Diversion	BARKAU, KOREY ROBERT	SO1908-0024
29 Jail Diversion	TOPOREK, WALTER RAYMOND	SO1908-0062
29 Jail Diversion	TAYLOR, AMANDA LYNN	SO1908-0064
29 Jail Diversion	TRISDALE, JASON LEE	SO1908-0071
29 Jail Diversion	LARSON, DEBORAH LYNN	SO1908-0072
29 Jail Diversion	GREENLEY, GABRIEL TIMOTHY	SO1908-0094
29 Jail Diversion	BERNING, SAMUEL WILBURT	SO1908-0136
29 Jail Diversion	PELTIER, BRIAN RAY	SO1908-0153
29 Jail Diversion	MARTUCCI, TRAVIS CHRISTOPHER	SO1908-0157
29 Jail Diversion	SAUMELL, DANIEL RENE	SO1908-0156
29 Jail Diversion	LEWIS, RONALD CARROLL	SO1908-0170
29 Jail Diversion	STAPLES, GABRIELLA DAWN	SO1908-0196
29 Jail Diversion	GOUGH, KARA ELIZABETH	SO1909-0109
29 Jail Diversion	GRAY, MITCHELL TIMOTHY	SO1908-0200
29 Jail Diversion	TUMINELLO, MICHAEL PATRICK	SO1909-0103
29 Jail Diversion	GLASS, JIMMY JUSTIN	SO1909-0105
29 Jail Diversion	KAUTZMAN, TERRY DANIEL	SO1908-0220
29 Jail Diversion	RUTLEDGE, ROBERT GIBBON	SO1908-0246
29 Jail Diversion	DAFFIN, JAMES ROBERT	SO1908-0247
29 Jail Diversion	BROWN, JACKSON JAY	SO1908-0269
29 Jail Diversion	BROWN, SAMUEL INGOLS	SO1908-0277
29 Jail Diversion	ROBINSON, LARRY DUANE	SO1908-0293
29 Jail Diversion	WHITNEY, CHRISTINA MARIE	SO1908-0298
29 Jail Diversion	PORTER, DEREK IAN	SO1908-0300
29 Jail Diversion	BUNDY, NEWMAN JAKE	SO1908-0310
29 Jail Diversion	BEEBE, JUSTIN RAY	SO1908-0311
29 Jail Diversion	MUNOZ MORGAN, IRVINE	SO1909-0004
29 Jail Diversion	LOOFBURROW, PHILIP K, JR	SO1909-0005
29 Jail Diversion	LANSER, JESSE LEE	SO1909-0006
29 Jail Diversion	MORAN, DAYLIN RYAN	SO1909-0007
29 Jail Diversion	KLEIN, ROBERT	SO1909-0018
29 Jail Diversion	MAPLETHORPE, DANIEL STEPHEN	SO1909-0022

29 Jail Diversion	LUTZ, WILLIAM ANDREW	SO1909-0024
29 Jail Diversion	HANSON, DONALD JAMES	SO1909-0026
29 Jail Diversion	SCHAFF, WILLIAM JAMES	SO1909-0039
29 Jail Diversion	PETERSON, NELS JERRY	SO1909-0060
29 Jail Diversion	GRAUBERGER, AUSTIN WARD	SO1909-0052
29 Jail Diversion	FANCHER, ANTHONY WILLIAM	SO1909-0055
29 Jail Diversion	TOWLE, DEVON ALLAN	SO1909-0106
29 Jail Diversion	ROBERTS, JASON RICHARD	SO1909-0110
29 Jail Diversion	HILL, DELLA JON	SO1909-0135
29 Jail Diversion	CAMPBELL, KEVIN SCOTT	SO1909-0160
29 Jail Diversion	YORGASON, JOHN GARY	SO1909-0188
29 Jail Diversion	KELLEY, ANTHONY RICHARD	SO1909-0161
29 Jail Diversion	MOREY, BRADY JAMES	SO1909-0238
29 Jail Diversion	SAGE, ALLEN ROBERT	SO1909-0189
29 Jail Diversion	ORTEGA, DEION LOYA	SO1909-0243
29 Jail Diversion	DALEY, PETER FRANCIS	SO1909-0164
29 Jail Diversion	FORTNER, JOHN KEVIN	SO1909-0186
29 Jail Diversion	O'LEARY, BRETT MATTHEW	SO1909-0240
29 Jail Diversion	DRISCOLL, EMILEE ELIZABETH	SO1909-0241
29 Jail Diversion	GRAY, DAVID DARRYL	SO1909-0242
29 Jail Diversion	JOHNSON, MICHAEL WILLIAM	SO1909-0204
29 Jail Diversion	GRAY, DAVID DARRYL	SO1909-0198
29 Jail Diversion	WANNER, DAVID JAMES	SO1909-0200
29 Jail Diversion	DRIVER, ANGELA MARIE	SO1909-0221
29 Jail Diversion	MASSA, MICHAEL JAMES	SO1909-0245
29 Jail Diversion	LINDHOLM, CHAD MICHAEL	SO1909-0269
29 Jail Diversion	FALK, RICHARD ERNEST	SO1909-0275
29 Jail Diversion	STRACHAN, LEVI GRANT	SO1909-0290
29 Jail Diversion	SMITH, SHANE MICHAEL	SO1909-0293
29 Jail Diversion	BOLINGER, STACEY MARIE	SO1910-0004
29 Jail Diversion	CUMMINGS, ERICA ANN	SO1910-0028
29 Jail Diversion	BURKE, REBECCA SULETSKY	SO1910-0040
29 Jail Diversion	SILLSTROP, JASON MICHAEL	SO1910-0055
29 Jail Diversion	ZITO, DAVID DARWEN	SO1910-0059
29 Jail Diversion	KERBY, DAVID MERLE	SO1910-0060
29 Jail Diversion	SNIVELY, JOSHUA ADAM	SO1910-0072
29 Jail Diversion	OTTO, MARTIN ROBERT	SO1910-0083
29 Jail Diversion	FAUSKE, JULIE DEVALL	SO1910-0110
29 Jail Diversion	BERRY, CASSIDY EVE	SO1910-0132
29 Jail Diversion	KRAUSE, DANIEL JAMES	SO1910-0125
29 Jail Diversion	HABERLOCK, DARIAN JEREMY	SO1910-0115
29 Jail Diversion	SHIPLEY, APRIL MARIE	SO1910-0131
29 Jail Diversion	SMITH, DEVONTAY WARREN	SO1910-0142
29 Jail Diversion	EMBRY, JERRY ROOSEVELT, JR	SO1910-0165
29 Jail Diversion	LOPEZ, AARON	SO1910-0166
29 Jail Diversion	MCLOUGHLIN, SHANE MAC THOMAS	SO1910-0185
29 Jail Diversion	DICKINSON, JAMES GLENN	SO1910-0234
29 Jail Diversion	DEAN, GARY WAYNE	SO1910-0241
29 Jail Diversion	JOHNSON, CODY SHANE	SO1911-0006
29 Jail Diversion	NATIONS, BRETT SAMUEL	SO1911-0057
29 Jail Diversion	MILLER, CODY DAWN	SO1911-0093
29 Jail Diversion	TAYLOR, JAKI LYN	SO1911-0200
29 Jail Diversion	THURMAN, BONNIE JEAN	SO1912-0021
29 Jail Diversion	HARGROVE, DEAN LINCOLN	SO1912-0043
29 Jail Diversion	FORTNER, JOHN KEVIN	SO1912-0047
29 Jail Diversion	STRAVENS, JOSEPH EDWARD	SO1912-0075
29 Jail Diversion	LEISTER, ARIELLE CINDY	SO1912-0080
29 Jail Diversion	HUDLOW, CODY LAWRENCE	SO1912-0096
29 Jail Diversion	ATWOOD, KAYLA MARIE	SO1912-0110
29 Jail Diversion	WEDLAKE, KODY JAMES	SO1912-0187
29 Jail Diversion	CORDOVA, DEBORAH LOUISE	SO1912-0222

29 Jail Diversion	CAMPBELL, JOANN EVELYN	SO1912-0227
29 Jail Diversion	OTOOLE, DANIEL ROBERT	SO1912-0229
29 Jail Diversion	SIMMONS, CHRISTOPHER BRETT	SO2001-0059
29 Jail Diversion	THIEFAULT, LORI LORENA	SO2001-0089
29 Jail Diversion	TORREY, ALICIA MARIE	SO2001-0130
29 Jail Diversion	THIEFAULT, LORI LORENA	SO2001-0116
29 Jail Diversion	NIELSEN, ZACHARY MICHAEL	SO2001-0179
29 Jail Diversion	LIEBERG, DANIEL MARC	SO2001-0227
29 Jail Diversion	CHRISTY, GABRIEL MICHAEL	SO2002-0025
29 Jail Diversion	COOMBES, TRAVIS DEAN	SO2001-0246
29 Jail Diversion	LUCAS, JOSHUA SAGE	SO2002-0035
29 Jail Diversion	TOLLEFSON, SETH ARLO	SO2107-0091
29 Jail Diversion	BICOS, ANTHONY T	SO2002-0026
29 Jail Diversion	GRAINGER, CHRISTOPHER WILLIAM	SO2002-0040
29 Jail Diversion	TOLLEFSON, SETH ARLO	SO2002-0046
29 Jail Diversion	MCCOWN, CHRISTOPHER LEE	SO2002-0047
29 Jail Diversion	BAECHT, CHRISTOPHER DUANE	SO2002-0079
29 Jail Diversion	WISE, MAX GEOFFREY	SO2002-0148
29 Jail Diversion	MARTIN, DERRICK CHAD	SO2002-0139
29 Jail Diversion	MCCLUNG-PEEPLES, BRYCON JAMES	SO2002-0150
29 Jail Diversion	PAGE, MICHELLE ESTHER	SO2002-0152
29 Jail Diversion	HARDING, SCOTT CHRISTOPHER	SO2002-0153
29 Jail Diversion	MITCHELL, KRISTEN LEE	SO2002-0154
29 Jail Diversion	HAUPT, LISA ANN	SO2002-0155
29 Jail Diversion	LEINUM, CAITLIN PAIGE	SO2003-0052
29 Jail Diversion	BAKER, MICHAEL GREGORY	SO2003-0012
29 Jail Diversion	WAKEFIELD, CHRISTINE MARIE	SO2003-0032
29 Jail Diversion	MARTIN, SANDRA ARLENE	SO2003-0034
29 Jail Diversion	TOLLEFSON, SETH ARLO	SO2003-0037
29 Jail Diversion	HAAS, JEANETTE SUZANNE	SO2003-0036
29 Jail Diversion	SMITH, JAMES KENNETH	SO2003-0053
29 Jail Diversion	BABINEAU, KORY RICHARD	SO2003-0104
29 Jail Diversion	CHILDS, TERI LEA	SO2003-0078
29 Jail Diversion	NEWSOM, DERICK REESE	SO2003-0110
29 Jail Diversion	DANA, CODIE JAMES	SO2003-0103
29 Jail Diversion	SCHULZ, KENNETH FRANK	SO2003-0112
29 Jail Diversion	KESTER, ROBIN ELIZABETH	SO2003-0144
29 Jail Diversion	PENMAN, KURTISS WILLIAM	SO2003-0193
29 Jail Diversion	HAMILTON, CRYSTAL DAWN	SO2003-0200
29 Jail Diversion	HULLINGER, KOEL DOUGLAS ALAN	SO2003-0204
29 Jail Diversion	SHERRILL, TERRELL WAYNE	SO2003-0216
29 Jail Diversion	USHER, JASON RUSSELL	SO2003-0229
29 Jail Diversion	REISTER, DERRIS ROY	SO2003-0239
29 Jail Diversion	HADYS, MELANIE ROSE	SO2003-0266
29 Jail Diversion	PHILLIPS, CORY MICHAEL	SO2004-0011
29 Jail Diversion	DOBSLAW, GREGORY PAUL	SO2004-0006
29 Jail Diversion	RIDDERS, JOHN RAY	SO2004-0008
29 Jail Diversion	MOORE, JAMIE RAE	SO2004-0018
29 Jail Diversion	BIRCH, ANDREW DALE	SO2004-0048
29 Jail Diversion	ANDERSON, DREAM JESSYKA	SO2004-0039
29 Jail Diversion	ECHERRY LAURSEN, KAYLA MAGSILY	SO2004-0055
29 Jail Diversion	MERCER, CORBY JAMES	SO2004-0078
29 Jail Diversion	TOLLEFSON, ARIANA KAY	SO2004-0080
29 Jail Diversion	QUINN, TIMOTHY JOSEPH	SO2004-0126
29 Jail Diversion	ENGHUSEN, DEREK MICHAEL	SO2004-0132
29 Jail Diversion	SOMERLOT JR, LEWIS ALVIN	SO2004-0137
29 Jail Diversion	CHAVEZ, RUBEN COLE	SO2004-0138
29 Jail Diversion	MITCHELL, BONNIE ANN	SO2004-0178
29 Jail Diversion	TROGDON, STEVEN JAY	SO2004-0193
29 Jail Diversion	WHIPPLE, RYAN KANE	SO2004-0244
29 Jail Diversion	CAPEN, KADEN AARON	SO2004-0246

29 Jail Diversion	EDMONDS, THOMAS GWINN	SO2004-0253
29 Jail Diversion	WARNER, RODNEY EUGENE	SO2004-0260
29 Jail Diversion	FINLAY, JOSHUA DANIEL	SO2004-0274
29 Jail Diversion	MAIER, MISTI LEE	SO2005-0006
29 Jail Diversion	LARSON, JANET LEE	SO2005-0038
29 Jail Diversion	BOVEE, BRIAN ALAN	SO2005-0031
29 Jail Diversion	BRIGHT, CYNTHIA ANN	SO2005-0043
29 Jail Diversion	DVORAK, DALTON JAY	SO2005-0063
29 Jail Diversion	CADDELL, JERHMIA DOUGLAS	SO2005-0085
29 Jail Diversion	SAUMELL, DANIEL RENE	SO2005-0087
29 Jail Diversion	BARZ, KATRINA SUE	SO2005-0105
29 Jail Diversion	BIRCH, ANDREW DALE	SO2005-0139
29 Jail Diversion	LEWIS, KATELYN MARIE	SO2005-0114
29 Jail Diversion	BUTLER, TYLER KAIN	SO2005-0117
29 Jail Diversion	STARKEY, ABBY JEAN	SO2005-0147
29 Jail Diversion	GREEN, JENEVIE ELYSE	SO2005-0156
29 Jail Diversion	MAUS, DONALD MCINTOSH	SO2005-0158
29 Jail Diversion	DURAN, RICHARD FRANK	SO2005-0166
29 Jail Diversion	HUSEBY, MARCUS RAY	SO2005-0204
29 Jail Diversion	BROOKE, MICHAEL LESLIE	SO2005-0231
29 Jail Diversion	FROST, MELIA ROSE	SO2005-0210
29 Jail Diversion	POTTER, RICKY CLIFFORD	SO2005-0230
29 Jail Diversion	FLINT, DEAN ALFRED	SO2006-0005
29 Jail Diversion	HEINZMAN, JOSEPH ROBERT	SO2006-0011
29 Jail Diversion	LANDINGHAM, MELONY FAITH	SO2006-0014
29 Jail Diversion	LEA, DANIEL RICHARD	SO2006-0019
29 Jail Diversion	HOSKINS, PATRICK JAN JAMES	SO2006-0022
29 Jail Diversion	MARTIN, JADE CHRISTOPHER	SO2006-0035
29 Jail Diversion	LARSON, ANDREW DAVID	SO2006-0047
29 Jail Diversion	LOCKE, JUSTIN SCOTT	SO2006-0053
29 Jail Diversion	HAMMOND, JIMMY E	SO2006-0079
29 Jail Diversion	JESSOP, SHARON IRENE	SO2006-0081
29 Jail Diversion	MCDANIEL, DOUGLAS REX	SO2006-0095
29 Jail Diversion	PALMIERI, REX	SO2006-0099
29 Jail Diversion	DUTTON, BRYON ALAN	SO2006-0114
29 Jail Diversion	DEERING, COREY ELTON JOHN	SO2006-0105
29 Jail Diversion	BROWN, DANA MARIE	SO2006-0153
29 Jail Diversion	PHILLIPS, CORY MICHAEL	SO2006-0235
29 Jail Diversion	CALLOWAY, MICHAEL HERNANDEZ	SO2006-0166
29 Jail Diversion	JOHNSON, ARRON RAY	SO2006-0211
29 Jail Diversion	DINEHART, DERRICK ALLEN	SO2006-0236
29 Jail Diversion	INGMAN, ROSS THOMAS	SO2006-0216
29 Jail Diversion	GOETSCH, MATTHEW K	SO2006-0219
29 Jail Diversion	MOORE, MEGAN JOLENE	SO2006-0225
29 Jail Diversion	BERNHARDT, TYLER JOSEPH	SO2006-0234
29 Jail Diversion	NIXON, AARON GABRIAL	SO2006-0239
29 Jail Diversion	SAMPSON, SCOTT DALE	SO2006-0280
29 Jail Diversion	DELANEY, TODD ALLEN	SO2006-0281
29 Jail Diversion	LAMBERT, CORY DANIELLE	SO2007-0013
29 Jail Diversion	GRINNELL, TRAVISE GREGORY	SO2007-0014
29 Jail Diversion	MOSS, TIMOTHY ALLEN	SO2007-0017
29 Jail Diversion	LONG, ANDREW BENJAMIN RAY	SO2007-0018
29 Jail Diversion	GLINES, QUINTEN REED	SO2007-0064
29 Jail Diversion	SALAZAR, CARLOS FRANCISCO	SO2007-0050
29 Jail Diversion	RICHARDS, JACOB DYLAN	SO2007-0057
29 Jail Diversion	RODRIGUEZ, TIMOTHY STEVEN	SO2007-0062
29 Jail Diversion	ROBERTSON, SAM EDWARD	SO2007-0075
29 Jail Diversion	TUKE, STEPHANIE LYNN	SO2007-0086
29 Jail Diversion	STRASSBURG, CODY DANIEL	SO2007-0094
29 Jail Diversion	KINDLE, KAREN LOUISE	SO2007-0131
29 Jail Diversion	JOHNSON, JESSICA MARIE	SO2007-0144



29 Jail Diversion	TRACY, JOSHUA TRAND	SO2007-0165
29 Jail Diversion	SHIPPY, KENNETH EUGENE	SO2007-0168
29 Jail Diversion	STANSBURY, GARY CHRISTOPHER	SO2007-0171
29 Jail Diversion	LINDQUIST, RACHEL SUE	SO2007-0178
29 Jail Diversion	CONWAY, MICHEAL DEAN	SO2007-0184
29 Jail Diversion	JAKUB, LAWRENCE JOHN	SO2007-0194
29 Jail Diversion	KLEINJAN, CALEB CHARLES	SO2007-0205
29 Jail Diversion	MIKESELL, KASEY DAWN	SO2007-0249
29 Jail Diversion	HOFFMAN, MARY LOUISE	SO2007-0276
29 Jail Diversion	HADLEY, ZACHARY HEINZ	SO2007-0266
29 Jail Diversion	WANNER, KENNEDY SCOTT	SO2007-0275
29 Jail Diversion	THURMAN, RICHARD LAWRENCE	SO2007-0281
29 Jail Diversion	PEARSON, ROBIN DEL	SO2007-0283
29 Jail Diversion	MARTIN, DONALD ALBERT	SO2007-0284
29 Jail Diversion	HOLLEY, BRENDA LYNN	SO2008-0020
29 Jail Diversion	OPSAHL, ANDREA DAWN	SO2008-0021
29 Jail Diversion	PADILLA, CAMERON DWAIN	SO2008-0022
29 Jail Diversion	HOFMAN, ORIN SCOTT	SO2008-0023
29 Jail Diversion	TORRES, CARLOS ALBERTO	SO2008-0233
29 Jail Diversion	BULLOCK, MICHAEL R	SO2008-0035
29 Jail Diversion	GRAINGER, CHRISTOPHER WILLIAM	SO2008-0046
29 Jail Diversion	ASHCRAFT, CLAYTON JAMES	SO2008-0048
29 Jail Diversion	WARREN, THEODORE ALEXANDER	SO2008-0096
29 Jail Diversion	WARR, JONAH MICAH	SO2008-0109
29 Jail Diversion	BANKS, STEVEN JAMES	SO2008-0110
29 Jail Diversion	JOHNSON, DUANE DEAN	SO2008-0116
29 Jail Diversion	FISHER, DAVID WILLIAM	SO2008-0132
29 Jail Diversion	KUNTZ, DRUOX KURTIS MATTHEW	SO2008-0133
29 Jail Diversion	KIRKBRIDE, JASON STEVEN	SO2008-0122
29 Jail Diversion	KLINE-RANGEL, ALEXANDRA CODY	SO2008-0136
29 Jail Diversion	HURT, JESSICA ELAINE	SO2008-0151
29 Jail Diversion	TRIPP, NICOLE MARIE	SO2008-0170
29 Jail Diversion	ESSICK, ARIANNE NICOLE	SO2008-0199
29 Jail Diversion	KOVICK, MCKENZIE LEE	SO2008-0229
29 Jail Diversion	VANDECAR, KEVIN MARK, JR	SO2008-0230
29 Jail Diversion	HUTCHINSON, JACOB ROBERT	SO2009-0009
29 Jail Diversion	TURNER, BRIAN LEMONT	SO2008-0264
29 Jail Diversion	WESTFALL, ABRAMS LARRY	SO2009-0005
29 Jail Diversion	PARKER, THOMAS ORA, JR	SO2009-0015
29 Jail Diversion	EDDEN, BRIAN MICHAEL	SO2009-0032
29 Jail Diversion	SOULSBY, RAYMOND LESLIE	SO2009-0030
29 Jail Diversion	ASK, JASON ORION	SO2009-0069
29 Jail Diversion	GERVAIS-STEELE, HOLLY MARNETTE	SO2009-0085
29 Jail Diversion	PANKHURST, MICAH NATIONS	SO2009-0086
29 Jail Diversion	SELLERS, ROGER LAWRENCE	SO2009-0089
29 Jail Diversion	HAMMETT, CHARLES RUSSELL	SO2009-0094
29 Jail Diversion	SAGE, ALLEN ROBERT	SO2009-0095
29 Jail Diversion	CARTER, JAMES ROBERT	SO2009-0096
29 Jail Diversion	KUETTEL, CODY TYLER	SO2009-0219
29 Jail Diversion	KRETSCHMER, JOSEPHINE ECHO MORIAH	SO2009-0164
29 Jail Diversion	SCOTT, KIMBERLY ANN	SO2009-0145
29 Jail Diversion	BAILEY, VANESSA LYNN	SO2009-0162
29 Jail Diversion	VANDEHEY, ERIN ELIZABETH	SO2009-0221
29 Jail Diversion	WHITLOW, JACE A	SO2009-0152
29 Jail Diversion	DEMINCK, WAYNE PATRICK	SO2009-0153
29 Jail Diversion	TRAINOR, CATHERINE JEAN	SO2009-0154
29 Jail Diversion	NEFF, JASON EARL	SO2009-0155
29 Jail Diversion	GERGEN, MIKA MARK	SO2009-0195
29 Jail Diversion	CLARKE, BRANDI ALICE	SO2009-0206
29 Jail Diversion	OLSON, TRISTAN CHARLES	SO2009-0205
29 Jail Diversion	CARROLL, KENNETH WILLIAM	SO2009-0222

29 Jail Diversion	POLLARD, MATTHEW WILL	SO2009-0227
29 Jail Diversion	VADNAIS, RANDAL SCOTT	SO2009-0228
29 Jail Diversion	HOGUE, DAVID LONNIE	SO2009-0262
29 Jail Diversion	BAKER, MATTHEW ALLAN	SO2009-0263
29 Jail Diversion	STRAVENS, JOSEPH EDWARD	SO2009-0275
29 Jail Diversion	SEBASTIAN, VICTOR GALEN	SO2009-0274
29 Jail Diversion	STRAIN, CHAD DANIEL	SO2009-0282
29 Jail Diversion	SKAW, JENNIFER RENEE	SO2010-0016
29 Jail Diversion	SCHADEWITZ, ZACHARY E	SO2010-0017
29 Jail Diversion	BOUCHER, ROBERT DANIEL	SO2010-0018
29 Jail Diversion	OLSON, SETH AARON	SO2010-0020
29 Jail Diversion	ERNSBERGER, BRIDGER HAVEN	SO2010-0030
29 Jail Diversion	HARDING, SCOTT CHRISTOPHER	SO2010-0032
29 Jail Diversion	OKERSON, ANNA MARIE	SO2010-0059
29 Jail Diversion	VINSON, JAMES EARL	SO2010-0080
29 Jail Diversion	DUGGAN, MICHAEL P	SO2010-0065
29 Jail Diversion	GRAN, KADEN DAVID JAMES	SO2010-0082
29 Jail Diversion	WATSON, ELISE MARIE	SO2010-0094
29 Jail Diversion	TENESCH, JASON WILLIAM	SO2010-0095
29 Jail Diversion	ELVERUD, JEREME STEVEN	SO2010-0120
29 Jail Diversion	VAUGHN, PATRICK JOSEPH	SO2010-0135
29 Jail Diversion	HULLINGER, SHEA THOMAS	SO2010-0137
29 Jail Diversion	DESHAZO, TARA LEIGH	SO2010-0146
29 Jail Diversion	LEINUM, CAITLIN PAIGE	SO2010-0147
29 Jail Diversion	BOWLES, CAMERON TROY	SO2010-0148
29 Jail Diversion	KRATSCH, AMBER KRISTINE	SO2010-0159
29 Jail Diversion	OTOOLE, DANIEL ROBERT	SO2010-0178
29 Jail Diversion	MAVROS, JACOB RYAN	SO2010-0182
29 Jail Diversion	NEFFNER, ERIKA LOHRE	SO2010-0184
29 Jail Diversion	ORTEGA, VICTOR MANUEL	SO2010-0225
29 Jail Diversion	TRULOCK, JUSTIN BRETT	SO2010-0232
29 Jail Diversion	LAINE, CONNOR BRANDON	SO2010-0233
29 Jail Diversion	CHRISTIANSSEN, ELI DONALD	SO2011-0010
29 Jail Diversion	WEAVER, AIMEE DEAN	SO2011-0022
29 Jail Diversion	DUNBAR, ZANE SCOTT	SO2011-0023
29 Jail Diversion	CLEVENGER, PAIGE A	SO2011-0031
29 Jail Diversion	CURTIS, NIKKI DENISE	SO2011-0032
29 Jail Diversion	ELDER, NEAL STEVEN	SO2011-0033
29 Jail Diversion	ZITO, APRIL MARIE	SO2011-0037
29 Jail Diversion	SCHEELER, SHAWN VALENTINE	SO2011-0039
29 Jail Diversion	OTTESON, CORINNE LEE	SO2011-0061
29 Jail Diversion	EASTERLY, ZACHARY WILLIAM	SO2011-0075
29 Jail Diversion	GOLIE, KATHLEEN MICHELE	SO2011-0069
29 Jail Diversion	MACHA, JOSEPH ALLEN	SO2011-0070
29 Jail Diversion	NIEBLAS, DAKOTA JAMES	SO2011-0073
29 Jail Diversion	PETERSON, JOSEPHINE RAY	SO2011-0077
29 Jail Diversion	HALLFORD, JOHN ROBERT, JR	SO2011-0089
29 Jail Diversion	BERTELSEN, TREVOR NICOLAUS	SO2011-0129
29 Jail Diversion	PAGE, MICHELLE ESTHER	SO2011-0118
29 Jail Diversion	ROMERO, TINA MARIE	SO2011-0132
29 Jail Diversion	TOWNER, EUGENE LESLIE	SO2011-0133
29 Jail Diversion	FLAHERTY, PATRICK, JR	SO2011-0134
29 Jail Diversion	LAMPLEY, SHON O'NEILL	SO2011-0136
29 Jail Diversion	DESMIDT, DAVID LEONARD	SO2011-0139
29 Jail Diversion	COPENHAVER, JACQUELINE SUE	SO2011-0140
29 Jail Diversion	LANE, LEVI CASEY	SO2011-0147
29 Jail Diversion	DOWLESS, JESSIE RENEE	SO2011-0162
29 Jail Diversion	LUSTER, LARONTAE DUPRIE	SO2011-0148
29 Jail Diversion	PEREZ, JOHN DANIEL, JR	SO2011-0149
29 Jail Diversion	HILL, LESLIE EVAJAY	SO2011-0177
29 Jail Diversion	BOSEN, BRENT ANDREW	SO2012-0012

29 Jail Diversion	SMITH, JOHN DAVID	SO2012-0024
29 Jail Diversion	PAULSON, BRANDY LEE	SO2012-0027
29 Jail Diversion	WOLFF, BRANDON FORREST	SO2012-0026
29 Jail Diversion	DASHNAW, JEFFREY JAMES	SO2012-0036
29 Jail Diversion	BLACKWELL, TYLER CHRISTIAN	SO2012-0037
29 Jail Diversion	CHURCHILL, RICHARD JASON	SO2012-0038
29 Jail Diversion	BILBEN, SAMANTHA CHRISTINE	SO2012-0039
29 Jail Diversion	MOORE, MARK NICHOLAS	SO2012-0099
29 Jail Diversion	MYERS, NICKOLAS TAYLOR	SO2012-0097
29 Jail Diversion	LEWIS, RYAN HUNTER	SO2012-0120
29 Jail Diversion	PADILLA, SETH PATRICIO EARL	SO2012-0121
29 Jail Diversion	THOMAS, SARAH IRENE MARIE	SO2012-0125
29 Jail Diversion	MORRISON, DANIEL PHILIP PRICE	SO2012-0126
29 Jail Diversion	GORDON, JOSEPH DWIGHT	SO2012-0127
29 Jail Diversion	WEIDOW, KARLI JANEL	SO2012-0130
29 Jail Diversion	LACASSE, RACHEL ANNETTE	SO2012-0133
29 Jail Diversion	STEWART, GREG EUGENE	SO2012-0143
29 Jail Diversion	MARTIN, SANDRA ARLENE	SO2012-0162
29 Jail Diversion	ZABOLOTNEY, JEFFREY BRANDON	SO2012-0187
29 Jail Diversion	HANSON, DONALD JAMES	SO2012-0189
29 Jail Diversion	BAYLOR, KYLE RAY	SO2012-0190
29 Jail Diversion	STEVENS, BRANDON MICHAEL	SO2012-0193
29 Jail Diversion	BURNETT, ELAINE SUE	SO2012-0194
29 Jail Diversion	SUTTON, HOLLY BEA	SO2012-0195
29 Jail Diversion	PAULEY, TYLER	SO2012-0207
29 Jail Diversion	BARBER, BRANNAN WILLIAM	SO2012-0215
29 Jail Diversion	LAINE, LEAH RAE	SO2012-0246
29 Jail Diversion	LARUE, TYLER SCOTT	SO2012-0249
29 Jail Diversion	ALTHOF-STEPHENS, DANA CHRISTINE	SO2012-0257
29 Jail Diversion	REDCROW, LUCY MARIE	SO2012-0264
29 Jail Diversion	MCEVOY, BRIAN KEITH	SO2101-0018
29 Jail Diversion	MARTIN, BILLY RAY	SO2101-0019
29 Jail Diversion	MUNSON, JULIA WAYNETTE	SO2101-0030
29 Jail Diversion	SMITH, PEYTON ROBERT	SO2101-0027
29 Jail Diversion	LISTER, WALTER LEVI	SO2101-0033
29 Jail Diversion	BERRY, CASSIDY EVE	SO2101-0058
29 Jail Diversion	OLBRICHT, AARON LEE	SO2101-0065
29 Jail Diversion	WHEELER, JAMES BRADFORD	SO2101-0086
29 Jail Diversion	LAMB, MATTHEW THOMAS	SO2101-0092
29 Jail Diversion	MUNSON, GENA MARIE	SO2101-0130
29 Jail Diversion	DARICEK, KAYLA RAE	SO2101-0160
29 Jail Diversion	JOHNSON, HEATHER ROSE	SO2101-0169
29 Jail Diversion	ZARNIK, LAVENIA NOEL	SO2101-0188
29 Jail Diversion	BUTTERFIELD, ROBERT DAVID	SO2102-0001
29 Jail Diversion	LEONARD, KEITH STACY	SO2101-0192
29 Jail Diversion	JOLLEY, STEPHANIE NICOLE	SO2102-0003
29 Jail Diversion	BIDDINGER, KRISTI ANN	SO2102-0004
29 Jail Diversion	HAMPSHIRE, CHAD RYAN	SO2102-0008
29 Jail Diversion	GODARD, ALLEN LEE	SO2102-0064
29 Jail Diversion	NEEDLES, MATTHEW IVAN	SO2102-0057
29 Jail Diversion	RALL, JACOB SAMUEL	SO2102-0058
29 Jail Diversion	BOSHAW, SCOTT DANIEL	SO2102-0065
29 Jail Diversion	GRIMSLEY, BENJAMIN ALLEN	SO2102-0111
29 Jail Diversion	STEINER, JOHN WILLIAM	SO2102-0114
29 Jail Diversion	MAURICE, JACOB RYAN	SO2102-0119
29 Jail Diversion	QUIROAURIZAR, WELMAN RANFERY	SO2102-0142
29 Jail Diversion	RANDLES, RYAN WILLIAM	SO2102-0152
29 Jail Diversion	INSUA, OSCAR ALBERT	SO2102-0164
29 Jail Diversion	MAXEY, MARK SCOTT	SO2102-0166
29 Jail Diversion	ACOSTA, SYLVIA LORAYNERENE	SO2102-0167
29 Jail Diversion	MATHIS, GREGORY COLE	SO2102-0172

29 Jail Diversion	LARA, JUSTIN ALLEN	SO2102-0174
29 Jail Diversion	LOVSTROM, TAYLOR KARL	SO2102-0180
29 Jail Diversion	STANWORTH, DUANE LORNE	SO2103-0022
29 Jail Diversion	DEBEAORD, JUSTIN ALLEN	SO2103-0023
29 Jail Diversion	RITCHIE, GINA LAVON	SO2103-0025
29 Jail Diversion	LLEWELLYN, LESLIE ANNE	SO2103-0029
29 Jail Diversion	THOMAS, JIMMY LYNN	SO2103-0031
29 Jail Diversion	DELAMATER-REED, BARRET PATTON	SO2103-0055
29 Jail Diversion	SIMS, ROBBY GENE	SO2103-0061
29 Jail Diversion	TERRY, MICHELLE LEILANI	SO2103-0062
29 Jail Diversion	DIAZ, MIKAYLA RENEE	SO2103-0074
29 Jail Diversion	CHAVEZ, RAYNALDO MAGNIA	SO2103-0082
29 Jail Diversion	PATZER, DARIN SCOTT	SO2103-0110
29 Jail Diversion	GARRARD, NATHANIEL JAMES	SO2103-0115
29 Jail Diversion	KAUFMAN, JASON TROY	SO2103-0117
29 Jail Diversion	HIRMANN, SETH ARTHUR	SO2103-0118
29 Jail Diversion	GUARDIPEE, JESSI LEE	SO2103-0119
29 Jail Diversion	CRAUN, AUSTIN DAVID	SO2103-0122
29 Jail Diversion	CLINTON, JOSHUA MICAH	SO2103-0124
29 Jail Diversion	KNIGHT, JEFFREY DEAN	SO2103-0127
29 Jail Diversion	LONG, MATTHEW ROBERT	SO2103-0132
29 Jail Diversion	ZITO, JASON LEN	SO2103-0160
29 Jail Diversion	BIRCH, RANDY JOSEPH	SO2103-0162
29 Jail Diversion	SUTTON, SANDY LEE	SO2103-0201
29 Jail Diversion	SMITH, BLAINE ADAM	SO2103-0203
29 Jail Diversion	ANACLETO, OLIVIA KRISTINE	SO2104-0004
29 Jail Diversion	NAYLOR, ALEXANDER HAMILTON	SO2104-0043
29 Jail Diversion	JENKINS, JACK J	SO2104-0044
29 Jail Diversion	WILSON, TOBIAS RICKERICH	SO2104-0048
29 Jail Diversion	FAWCETT, JORDEN RAY	SO2104-0055
29 Jail Diversion	MEYER, AMBER MARIE	SO2104-0066
29 Jail Diversion	BOLLES, RIAL CONNER	SO2104-0067
29 Jail Diversion	STEWART, LINDA LEE	SO2104-0096
29 Jail Diversion	HEMBROOK, CORI LEE	SO2104-0097
29 Jail Diversion	MORELOCK, JESSE LEE	SO2104-0105
29 Jail Diversion	WALLES, JACOB GILLY	SO2104-0116
29 Jail Diversion	KOWALSKI, MEGAN ASHLEY	SO2104-0135
29 Jail Diversion	MOLINA, ROBERT SCOTT	SO2104-0159
29 Jail Diversion	SCHWARTZ, JEREMY CLAY	SO2104-0163
29 Jail Diversion	DEMYER, REUBEN JOHNATHAN	SO2104-0174
29 Jail Diversion	JOHNSON, DYLAN RICHARD	SO2104-0176
29 Jail Diversion	PEDERSON, EDWARD JAMES	SO2104-0180
29 Jail Diversion	NICKERSON, ARNOLD STILLMAN	SO2104-0203
29 Jail Diversion	HANSEN, MATTHEW TUELLER	SO2104-0227
29 Jail Diversion	SAWYER, AMANDA LYNN	SO2104-0250
29 Jail Diversion	HARTJES, EDWARD ALPHONS	SO2105-0018
29 Jail Diversion	LEMUS, J ANTHONY MICHAEL	SO2105-0019
29 Jail Diversion	HILBUN, BRANDON MICHAEL	SO2105-0043
29 Jail Diversion	ZAVARELLI, ANGELINA CHERIE	SO2105-0044
29 Jail Diversion	VADHEIM, MALIK SALIM	SO2105-0051
29 Jail Diversion	SMITH, DOMINIQUE	SO2105-0052
29 Jail Diversion	RICHTER, DENALI CAE	SO2105-0082
29 Jail Diversion	CLARY, PATRICK RYAN	SO2105-0099
29 Jail Diversion	TROXELL, COLBY JOSEPH	SO2105-0106
29 Jail Diversion	LAVERGNE, LOUIS JAMES	SO2105-0152
29 Jail Diversion	DAVY, JOSHUA MICHAEL	SO2105-0157
29 Jail Diversion	SCHIFFMAN, SIDNEY OTTO	SO2105-0166
29 Jail Diversion	YEAGER, SAMANTHA LYNN	SO2105-0167
29 Jail Diversion	SCHIFFMAN, TODD PARLEY	SO2105-0174
29 Jail Diversion	AALBERS, BRENT PITANN	SO2105-0176
29 Jail Diversion	RANGLES, RUBEN SAYLER	SO2105-0181



29 Jail Diversion	CARROLL, JARRETT HAMPTON	SO2105-0192
29 Jail Diversion	HERMAN, THOMAS DION	SO2105-0208
29 Jail Diversion	CORBINO, LAURIE KAY	SO2105-0209
29 Jail Diversion	BUNTJER, KENNETH J	SO2105-0211
29 Jail Diversion	STOKER, SHAWN ANTHONY	SO2105-0216
29 Jail Diversion	STEWART, CAMERON RAY	SO2105-0217
29 Jail Diversion	TURNER, MATTHEW GLEN	SO2105-0218
29 Jail Diversion	BARTEL, LEILA KUNTZ	SO2105-0219
29 Jail Diversion	SPRINGER, HAROLD DEAN	SO2105-0227
29 Jail Diversion	DODSON, KENNIN DULANE	SO2105-0235
29 Jail Diversion	WALISER, JODI SUZIANNE	SO2105-0238
29 Jail Diversion	ERRETT, JOHN STEPHEN	SO2105-0239
29 Jail Diversion	COLEMAN, CODY GENE	SO2106-0002
29 Jail Diversion	ELLSWORTH, MICHAEL DEAN 2ND	SO2106-0013
29 Jail Diversion	DAVIS, AMANDA GAYLE	SO2106-0015
29 Jail Diversion	BERRY, TYSON TODD	SO2106-0028
29 Jail Diversion	DAVIS, EARLE TRISTIN	SO2106-0029
29 Jail Diversion	WINDER, JUSTIN WAYNE	SO2106-0042
29 Jail Diversion	REYES, TIANA RINAY	SO2106-0073
29 Jail Diversion	BURKEY, JENNIFER LYNN	SO2106-0098
29 Jail Diversion	WALDNER, STANLEY PAUL	SO2106-0125
29 Jail Diversion	FRANCE, EXIE ERIN	SO2106-0126
29 Jail Diversion	NEWMAN, CHARLOTTE ROSE	SO2106-0136
29 Jail Diversion	YOCKEY, GREGORY ALAN	SO2106-0137
29 Jail Diversion	DOWNARD, DILLON ANDREW	SO2106-0148
29 Jail Diversion	PFAU, TRACY MICHAEL	SO2106-0151
29 Jail Diversion	FITZWILLIAMS, DAVID JAMES ANTHONY	SO2106-0160
29 Jail Diversion	BLOEMEKE, BRANDON HARTMUT	SO2106-0161
29 Jail Diversion	BANKS, STEVEN JAMES	SO2106-0162
29 Jail Diversion	MARTIN, NORA ASHLEY-CORLL	SO2106-0210
29 Jail Diversion	HANSEN, MICHAEL RICHARD	SO2106-0247
29 Jail Diversion	CHANA, JASPREET SINGH	SO2106-0250
29 Jail Diversion	ABRAMS, ZACHARY JAMES	SO2106-0252
29 Jail Diversion	BARBER, BRANNAN WILLIAM	SO2107-0008
29 Jail Diversion	NIXON, AARON GABRIAL	SO2107-0021
29 Jail Diversion	KAMPA, ISAIAH PAUL	SO2107-0058
29 Jail Diversion	KAUFFMAN, KURTIS BARNABY RAY	SO2107-0071
29 Jail Diversion	QUIROZ, CHELSEA OFELIA	SO2107-0059
29 Jail Diversion	MCKEE, DUSTY LYNN	SO2107-0061
29 Jail Diversion	STROPPEL, BRENT LEE	SO2107-0068
29 Jail Diversion	TYLER, JENNY ANN	SO2107-0073
29 Jail Diversion	MACKEY, LESLIANNE	SO2107-0078
29 Jail Diversion	ALLEN, DENNIS EUGENE	SO2107-0088
29 Jail Diversion	SCHIFFMAN, TROY DONALD	SO2107-0092
29 Jail Diversion	WHITE, ISAIAH RAY	SO2107-0125
29 Jail Diversion	VAN VLECK, WILL GEORGE	SO2107-0126
29 Jail Diversion	MADRUGA, JEREMIAH JAMES	SO2107-0127
29 Jail Diversion	BIGNELL, WARREN MITCHELL	SO2107-0132
29 Jail Diversion	BADURA, JOSEPH LEONARD	SO2107-0186
29 Jail Diversion	ENGLISH-LITTLE, WILLIAM TYLER	SO2107-0195
29 Jail Diversion	LANGLEY, TIM TILDEN, JR	SO2107-0196
29 Jail Diversion	ESLINGER, ADRIAN JOSEPH	SO2107-0217
29 Jail Diversion	LONDON, JAMES DANIEL	SO2107-0223
29 Jail Diversion	WISE, MAX GEOFFREY	SO2107-0225
29 Jail Diversion	WISE, MAX GEOFFREY	SO2107-0225
29 Jail Diversion	EVANS, JIMMY LEE	SO2107-0227
29 Jail Diversion	MCNINCH, KAYLEE ANN	SO2107-0269
29 Jail Diversion	JOHNSON, KAMILLA JEAN	SO2107-0261
29 Jail Diversion	BROWN, ROBERT SCOTT	SO2107-0268
29 Jail Diversion	FERULLO, TALYN CHANCE	SO2107-0270
29 Jail Diversion	WILLIAMS, PATRICK JOSEPH	SO2107-0274

29 Jail Diversion	DOEBLER, KATRINA JO	SO2107-0286
29 Jail Diversion	WALKER, JASON ANDREW	SO2107-0289
29 Jail Diversion	BRANTLEY-JOHNSON, KATHLEEN MARIE	SO2107-0299
29 Jail Diversion	WANNER, PATRICK SCOTT	SO2107-0300
29 Jail Diversion	ROOT, KELSEY DEAN	SO2107-0310
29 Jail Diversion	DIXON, JUSTIN RYAN	SO2108-0011
29 Jail Diversion	SMITH, SPRING FELEZITAS	SO2108-0013
29 Jail Diversion	STEICHEN, JEFFREY MICHAEL	SO2108-0037
29 Jail Diversion	CRAMER, SEAN MICHAEL	SO2108-0045
29 Jail Diversion	SWINK, RANDALL OWEN	SO2108-0047
29 Jail Diversion	LYONS, KEVIN STUART	SO2108-0074
29 Jail Diversion	KUNNARY, MYKELLA RAE	SO2108-0080
29 Jail Diversion	JENNINGS, CHRISTOPHER LEE	SO2108-0091
29 Jail Diversion	CONWAY, KATRINA MARIE	SO2108-0095
29 Jail Diversion	DONAHUE, ROBERT RALPH	SO2108-0101
29 Jail Diversion	HAMMONS, LONI RENEA	SO2108-0102
29 Jail Diversion	BABINEAU, KORY RICHARD	SO2108-0109
29 Jail Diversion	HAMMONS, LONI RENEA	SO2108-0133
29 Jail Diversion	BURNAM, ZACHARIAH JAMES	SO2108-0134
29 Jail Diversion	FARINA, PAOLA GABRIELA	SO2108-0153
29 Jail Diversion	SLYTER, JERRY ALLEN	SO2108-0168
29 Jail Diversion	NORDAHL, JAYME DEANE	SO2108-0178
29 Jail Diversion	BUEHL, LANNY WADE	SO2108-0204
29 Jail Diversion	PIKE-MEFFORD, LEVI DOUGLAS	SO2108-0207
29 Jail Diversion	VINCE, MADELINE MARRIE	SO2108-0209
29 Jail Diversion	DONEY, BRITTANY RAE	SO2108-0229
29 Jail Diversion	WATSON, BRYCE ALLEN	SO2108-0234
29 Jail Diversion	BOYD, MATTHEW PAUL	SO2108-0235
29 Jail Diversion	LEMMON, DARRION MICHAEL	SO2108-0266
29 Jail Diversion	SMARTT, KENTON MADISON	SO2108-0267
29 Jail Diversion	REICHENBERG, CURTIS TODD	SO2108-0268
29 Jail Diversion	LOEFFLER, DAN ROBERT	SO2109-0007
29 Jail Diversion	WALLER, BRIAN EDWARD	SO2109-0010
29 Jail Diversion	MEYER, KATHLEEN JEAN	SO2109-0012
29 Jail Diversion	SHUNKWILER, THOMAS EDWARD	SO2109-0065
29 Jail Diversion	CAHOON, NANCY JEANNE	SO2109-0056
29 Jail Diversion	ADAMS, JAMES DUANE	SO2109-0064
29 Jail Diversion	GOFF, TALON DAVID	SO2109-0078
29 Jail Diversion	ANDERSON, CHRISTOPHER LEE	SO2109-0087
29 Jail Diversion	CONWAY, JAMIE MICHAEL	SO2109-0131
29 Jail Diversion	SCOTT, SHANE ANTHONY	SO2109-0134
29 Jail Diversion	SHERRILL, KRISTAL MARIE	SO2109-0137
29 Jail Diversion	NELSON, KIAH LYNN	SO2109-0141
29 Jail Diversion	MARUCCI, LYNETTA ANN	SO2109-0197
29 Jail Diversion	BRUSHIA, TANNER STEVEN	SO2109-0186
29 Jail Diversion	KLEMUNDT, RYAN JOSEPH	SO2109-0190
29 Jail Diversion	DUNNE, LOGAN	SO2109-0199
29 Jail Diversion	MERSON, TIVA CHARMAIN	SO2109-0213
29 Jail Diversion	WOOLLEY, MISTY ANN	SO2109-0274
29 Jail Diversion	LLOYD, JADEN RAIN	SO2109-0278
29 Jail Diversion	BURT, STEVEN LEE	SO2109-0286
29 Jail Diversion	WOOLLEY, MISTY ANN	SO2110-0002
29 Jail Diversion	CARMAN, CHASE PATRICK	SO2110-0009
29 Jail Diversion	SANTOS, DILLON QUINN	SO2110-0030
29 Jail Diversion	FLINT, DEAN A LEONARD, JR	SO2110-0032
29 Jail Diversion	LARSON, CHRISTOPHER WAYNE	SO2110-0044
29 Jail Diversion	RODNE, AUTUMN MAPLE	SO2110-0045
29 Jail Diversion	OLIVER, JOSEPH RICHARD	SO2110-0046
29 Jail Diversion	LEWIS, MICHELLE LEE	SO2110-0066
29 Jail Diversion	GOLIE, ANDREA OPAL	SO2110-0114
29 Jail Diversion	BRYAN, DAVID M	SO2110-0115

29 Jail Diversion	JONES, HYSHAM	SO2110-0117
29 Jail Diversion	REED, EVA LANAE	SO2110-0127
29 Jail Diversion	VOGT, MELVIN JAY	SO2110-0128
29 Jail Diversion	MOEN, DEREK MATHEW	SO2110-0137
29 Jail Diversion	CLARKE, BRIAN LEE	SO2110-0160
29 Jail Diversion	STEWART, LINDA LEE	SO2110-0161
29 Jail Diversion	TERRELL, TIMOTHY ALAN	SO2110-0167
29 Jail Diversion	CAMPER, SCOTT DAVID	SO2110-0171
29 Jail Diversion	NICKELSON, LUKE ANDREW	SO2110-0180
29 Jail Diversion	LAPORTE, RICHARD LEO	SO2110-0182
29 Jail Diversion	CANFIELD, JARRID K	SO2110-0183
29 Jail Diversion	BROWN, CHRISTOPHER LYLE	SO2110-0188
29 Jail Diversion	ANDERSON, MICHAEL PHILIP	SO2110-0210
29 Jail Diversion	BARKAU, ROBERT HARRY	SO2110-0228
29 Jail Diversion	EAKLE, RYAN DOUGLAS	SO2110-0229
29 Jail Diversion	STRUZYNSKI, JOSHUA DANIEL	SO2110-0231
29 Jail Diversion	TAYLOR, MICHAEL WAYNE	SO2110-0239
29 Jail Diversion	TRAVIS, CHRISTOPHER ERIC	SO2110-0240
29 Jail Diversion	THURMAN, KENNETH RAY	SO2110-0242
29 Jail Diversion	EDENS, JESSE WAYNE	SO2110-0243
29 Jail Diversion	JACOBSON, LINDSEY DIANE	SO2110-0244
29 Jail Diversion	COOK, JULLIAN DON	SO2110-0250
29 Jail Diversion	JAKUB, LAWRENCE JOHN	SO2110-0270
29 Jail Diversion	WEEKS, GARTH AARON	SO2111-0014
29 Jail Diversion	ADAIR, WILLIAM CLIFTON	SO2111-0021
29 Jail Diversion	BAKER, MICHAEL GREGORY	SO2111-0059
29 Jail Diversion	JOHNSON, JOEL WILLIAM	SO2111-0060
29 Jail Diversion	WALDEN, BRANDI GAY	SO2111-0066
29 Jail Diversion	MOORE, TERRY SCOTT	SO2111-0073
29 Jail Diversion	HOGAN, ERIN MARIE	SO2111-0084
29 Jail Diversion	SCHRANTZ, JOSEPH ANTHONY	SO2111-0104
29 Jail Diversion	GOODPASTURE, DANIELLE ELAINE	SO2111-0129
29 Jail Diversion	MAYS, AMANDA MAE	SO2111-0133
29 Jail Diversion	FOSTER, WACHAZI R	SO2111-0137
29 Jail Diversion	OTTER, JOHN SIMPLOT	SO2111-0138
29 Jail Diversion	SILVEIRA, JODY LYNN	SO2111-0146
29 Jail Diversion	HARGROVE, JEFFERSON	SO2111-0155
29 Jail Diversion	NOAKES, LEO DEAN	SO2111-0168
29 Jail Diversion	MURPHY, REECE DANIEL	SO2111-0173
29 Jail Diversion	ZANDER, RICKIE DEAN	SO2111-0216
29 Jail Diversion	BURNETT, ROBIN MICAH	SO2111-0231
29 Jail Diversion	DODSON, RONALD JAY	SO2111-0262
29 Jail Diversion	STOOR, KARY LYNN	SO2111-0265
29 Jail Diversion	KAMMERER, JOSHUA ADAM	SO2111-0268
29 Jail Diversion	LANDINGHAM, MELONY FAITH	SO2111-0280
29 Jail Diversion	CASTERLINE, JOSHUA LEE	SO2112-0003
29 Jail Diversion	STEPHENS, DAVID LAWRENCE	SO2112-0005
29 Jail Diversion	CRAFT, WADE KAPUALEILANIALII	SO2112-0020
29 Jail Diversion	HAMMETT, CHARLES RUSSELL	SO2112-0022
29 Jail Diversion	PORTWOOD, KIRTUS JAMES	SO2112-0023
29 Jail Diversion	GALDIERI, BERNARD NICK	SO2112-0030
29 Jail Diversion	TROXELL, COLBY JOSEPH	SO2112-0032
29 Jail Diversion	ALEXANDER, AUSTIN TAYLOR	SO2112-0067
29 Jail Diversion	BOLAND, SUMMER WIND	SO2112-0121
29 Jail Diversion	STUCKEY, CHRISTOPHER ALAN	SO2112-0108
29 Jail Diversion	NAZER, JEFFREY GLEN	SO2112-0150
29 Jail Diversion	DONEY, LYDIA MAE	SO2112-0158
29 Jail Diversion	CONVERSE, RAGAN LAREE	SO2112-0177
29 Jail Diversion	RITTER, CHELSEA MAY	SO2112-0180
29 Jail Diversion	ARELLANO, ANGELIQUE MAY LORRAINE	SO2112-0183
29 Jail Diversion	NUTTALL, ADAM BROOKS	SO2112-0185

29 Jail Diversion	OLDAKER, BRYTON ELZAE	SO2112-0189
29 Jail Diversion	SMALLING, JESSICA LYNN	SO2112-0209
29 Jail Diversion	HAAF, ANDREW MICHAEL	SO2112-0210
29 Jail Diversion	MAUS, DONALD MCINTOSH	SO2112-0212
29 Jail Diversion	MUNSON, JULIA WAYNETTE	SO2112-0221
29 Jail Diversion	DAVIS, CANDICE LEA	SO2112-0223
29 Jail Diversion	KING, SHANNON DAVID AUSTIN	SO2112-0231
29 Jail Diversion	FRANCE, EXIE ERIN	SO2112-0232
29 Jail Diversion	COOK, JUSTIN CARL	SO2112-0236
29 Jail Diversion	REEM, ROBERT TIMOTHY	SO2112-0239
29 Jail Diversion	JONES, KASAWNDRA RAE	SO2112-0244
29 Jail Diversion	FOSTER, REINIE ROY	SO2112-0257
29 Jail Diversion	FERNLUND, BRAYDEN MICHAEL	SO2112-0265
29 Jail Diversion	DAMRON, RICHARD ALLAN	SO2112-0272
29 Jail Diversion	HISCOE, JARED EARL GEORGE	SO2112-0277
29 Jail Diversion	DVORAK, EDWARD ROSS	SO2112-0294
29 Jail Diversion	BURRELL, JACOB PAUL	SO2201-0019
29 Jail Diversion	BAHR, LEVI JOHN	SO2201-0021
29 Jail Diversion	OMLID, BRIDGER MICHAEL	SO2201-0022
29 Jail Diversion	HAACKE, PATRICIA LOUISE	SO2201-0023
29 Jail Diversion	RAQUEDAN, LORIE ANN	SO2201-0060
29 Jail Diversion	HAMMONS, LONI RENE A	SO2201-0086
29 Jail Diversion	MAGONE, KYLE JOSEPH	SO2201-0087
29 Jail Diversion	LOPEZ, CHRISTOPHER MICHAEL	SO2201-0089
29 Jail Diversion	DURAN, TIMOTHY JADE	SO2201-0102
29 Jail Diversion	KAHL, DUSTIN JAMES	SO2201-0109
29 Jail Diversion	KELLY, COREEN DOROTHY	SO2201-0117
29 Jail Diversion	ELLIS, AMBER DAWN	SO2201-0150
29 Jail Diversion	BALES, JAMES RYAN	SO2201-0157
29 Jail Diversion	LEWIS, BRANDON S	SO2201-0175
29 Jail Diversion	MURRAY, RAQUEL	SO2201-0194
29 Jail Diversion	MULLER, HAEDON	SO2201-0195
29 Jail Diversion	NIELSEN, ZACHARY MICHAEL	SO2201-0196
29 Jail Diversion	KLEMUNDT, RYAN JOSEPH	SO2201-0206
29 Jail Diversion	SANG, BIAK LIAN	SO2201-0209
29 Jail Diversion	POST, CHARLES WILLIAM	SO2201-0211
29 Jail Diversion	BROWN, SANDRA KAY	SO2201-0223
29 Jail Diversion	LUNDY, ALYSSA MICHELLE	SO2201-0227
29 Jail Diversion	STAAT, BRIAN DARL	SO2201-0235
29 Jail Diversion	JAKUB, KEVIN MICHAEL	SO2201-0239
29 Jail Diversion	CUMMINGS, JAMIE LYNN	SO2201-0260
29 Jail Diversion	GASVODA, SHELLY BLIESNER	SO2202-0002
29 Jail Diversion	GRENFELL, ALLEN ROY	SO2202-0025
29 Jail Diversion	UNDERWOOD, TENNILLE MARIE	SO2202-0076
29 Jail Diversion	BURROUS, SAMUEL	SO2202-0083
29 Jail Diversion	DARICEK, KAYLA RAE	SO2202-0117
29 Jail Diversion	BANDMANN, CHRISTIAN NICHOLAS	SO2202-0133
29 Jail Diversion	SCHIFFMAN, TODD PARLEY	SO2202-0139
29 Jail Diversion	RAPKE, JACEE R	SO2202-0180
29 Jail Diversion	SWAFFORD, MATTHEW ROBERT	SO2202-0185
29 Jail Diversion	MILLER, RAINE ELISE	SO2202-0190
29 Jail Diversion	MARSHALL, MAKAYLA RENEE	SO2202-0205
29 Jail Diversion	BISHOP, JOSEPH MELVIN	SO2202-0234
29 Jail Diversion	HOWARD, PATRICK JAMES	SO2203-0011
29 Jail Diversion	CAIN, CARLTON EUGENE	SO2203-0023
29 Jail Diversion	LEWIS, RYAN HUNTER	SO2203-0034
29 Jail Diversion	BARTLEY, ROBERT JOSEPH	SO2203-0067
29 Jail Diversion	FOGEL, BRANDEN BUTCH	SO2203-0072
29 Jail Diversion	WILLINGHAM, DEREK MICHAEL	SO2203-0075
29 Jail Diversion	GASSMANN, KORY MICHAEL	SO2203-0094
29 Jail Diversion	JONES, JAMES WILLIAM	SO2203-0098



# **EXHIBIT 27**

**EMAIL FROM ADMINISTRATOR  
ELLSWORTH TO SHERIFF HOLTON  
(RC 0119–21)**



**Chris Colgan**

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**From:** cellsworth@rc.mt.gov  
**Sent:** Friday, May 1, 2020 7:28 AM  
**To:** sholton@rc.mt.gov; tmcelderry@rc.mt.gov  
**Subject:** MPO Case Load - 05.01.20.xls  
**Attachments:** MPO Case Load - 05.01.20.xls

I am attempting to start reporting different type of information to you both concerning Jail Diversion.

I will also be reporting to the Court (s) , once I develop the numbers and reports. I will include you both on any reporting that I do.

Let me know if you have any questions.

Christina Ellsworth  
Jail Diversion Administrator  
Ravalli County Sheriff's Jail Diversion  
205 Bedford, Suite G  
Hamilton, MT 59840  
406-375-4097 – Desk  
406-360-1907 – Cell

All emails are subject to Montana's Right to Know law (Article II Sec 9, Montana Constitution) and can be considered Public Record (2-6-202, MCA) available for public disclosure.

<u>Case Number</u>	<u>Misd. Probation Officer</u>	<u>Client</u>	
SO2002-0079	Christina Ellsworth	BAECHT, CHRISTOPHER DUANE	
SO1908-0310	Christina Ellsworth	BUNDY, NEWMAN JAKE	
SO1909-0109	Christina Ellsworth	GOUGH, KARA ELIZABETH	Christina E
SO2003-0200	Christina Ellsworth	HAMILTON, CRYSTAL DAWN	Shane Fish
SO2002-0153	Christina Ellsworth	HARDING, SCOTT CHRISTOPHER	Keegan Rc
SO1912-0096	Christina Ellsworth	HUDLOW, CODY LAWRENCE	
SO1908-0095	Christina Ellsworth	KNAPP, JOHN EARL	
SO1908-0222	Christina Ellsworth	LAUDERDALE, SETH ROBERT	<u>Total Jail</u>
SO2003-0110	Christina Ellsworth	NEWSOM, DERICK REESE	<u>As of May</u>
SO1909-0243	Christina Ellsworth	ORTEGA, DEION LOYA	
SO2002-0152	Christina Ellsworth	PAGE, MICHELLE ESTHER	
SO2001-0059	Christina Ellsworth	SIMMONS, CHRISTOPHER BRETT	
SO2001-0116	Christina Ellsworth	THIEFAULT, LORI LORENA	
SO2004-0193	Christina Ellsworth	TROGDON, STEVEN JAY	
SO2004-0260	Christina Ellsworth	WARNER, RODNEY EUGENE	
SO1908-0227	Christina Ellsworth	WEBSTER, ALBERT ERNEST	
SO1909-0211	Christina Ellsworth	WHIPPLE, BRANDON TRUE	
<u>Case Total</u>	<u>17</u>		
SO1912-0110	Shane Fisher	ATWOOD, KAYLA MARIE	
SO2003-0104	Shane Fisher	BABINEAU, KORY RICHARD	
SO2004-0048	Shane Fisher	BIRCH, ANDREW DALE	
SO1907-5005	Shane Fisher	BRIGHT, JONATHAN EDWARD	
SO1908-0269	Shane Fisher	BROWN, JACKSON JAY	
SO1912-0227	Shane Fisher	CAMPBELL, JOANN EVELYN	
SO1909-0160	Shane Fisher	CAMPBELL, KEVIN SCOTT	
SO2004-0138	Shane Fisher	CHAVEZ, RUBEN COLE	
SO2003-0078	Shane Fisher	CHILDS, TERI LEA	
SO2002-0025	Shane Fisher	CHRISTY, GABRIEL MICHAEL	
SO1909-0113	Shane Fisher	CISNEROS, AARON JAMES	
SO1909-0164	Shane Fisher	DALEY, PETER FRANCIS	
SO2004-0006	Shane Fisher	DOBSLAW, GREGORY PAUL	
SO2004-0055	Shane Fisher	ECHEVERRY LAURSEN, KAYLA MAGSILY	
SO2004-0132	Shane Fisher	ENGHUSEN, DEREK MICHAEL	
SO1908-0254	Shane Fisher	ESCHENBACHER, TERRY RAY	
SO1909-0275	Shane Fisher	FALK, RICHARD ERNEST	
SO1910-0110	Shane Fisher	FAUSKE, JULIE DEVALL	
SO2004-0274	Shane Fisher	FINLAY, JOSHUA DANIEL	
SO1909-0291	Shane Fisher	FLYNN, TAZ J	
SO1909-0186	Shane Fisher	FORTNER, JOHN KEVIN	
SO1908-0098	Shane Fisher	GARNER, CARL JAMES	
SO1909-0273	Shane Fisher	GESELLE, ANDREW TERRY	
SO1908-0159	Shane Fisher	GODWIN, KASEY LEE	
SO2003-0036	Shane Fisher	HAAS, JEANETTE SUZANNE	
SO2003-0266	Shane Fisher	H Aidys, MELENIE ROSE	
SO1909-0114	Shane Fisher	HARRIS, JOSEPH MEDFORD	
SO2002-0155	Shane Fisher	HAUPT, LISA ANN	
SO1910-0060	Shane Fisher	KERBY, DAVID MERLE	
SO2003-0144	Shane Fisher	KESTER, ROBIN ELIZABETH	
SO1910-0125	Shane Fisher	KRAUSE, DANIEL JAMES	
SO1912-0080	Shane Fisher	LEISTER, ARIELLE CINDY	
SO1909-0141	Shane Fisher	LEVANDOSKE, DARLA MAY	
SO2001-0227	Shane Fisher	LIEBERG, DANIEL MARC	
SO1909-0220	Shane Fisher	LINDON, LLOYD THOMAS	
SO1910-0166	Shane Fisher	LOPEZ, AARON	



Willsworth	17
Ter	62
White	56

<b><u>Diversion Case Load</u></b>	<b><u>135</u></b>
<b><u>1, 2020</u></b>	

# **EXHIBIT 28**

**EMAIL FROM ADMINISTRATOR  
ELLSWORTH TO SHERIFF HOLTON  
(RC 0136)**

**Chris Colgan**

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**From:** cellsworth@rc.mt.gov  
**Sent:** Wednesday, July 1, 2020 6:21 AM  
**To:** sholton@rc.mt.gov; jjessop@rc.mt.gov  
**Cc:** sfisher@rc.mt.gov; KRothie@rc.mt.gov  
**Subject:** MPS Case Load - 07.01.20  
**Attachments:** MPO Case Load - 07.01.20.xls

**Importance:** High

Total Case Load as of 07.01.20.

Officer Fisher – Case Load - 71 Offenders  
Officer Rothie – Case Load - 71 Offenders  
Supervisor – Case Load - 22 Offenders

**Total Offender Case Load is 164.**

**We have increased our case load since the end of last month by 22 Offenders.**

Christina Ellsworth  
Jail Diversion Administrator  
Ravalli County Sheriff's Jail Diversion  
205 Bedford, Suite G  
Hamilton, MT 59840  
406-375-4097 – Desk  
406-360-1907 – Cell

All emails are subject to Montana's Right to Know law (Article II Sec 9, Montana Constitution) and can be considered Public Record (2-6-202, MCA) available for public disclosure.

# **EXHIBIT 29**

**EMAIL FROM ADMINISTRATOR  
ELLSWORTH TO SHERIFF HOLTON  
(RC 0150)**

**Chris Colgan**

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**From:** cellsworth@rc.mt.gov  
**Sent:** Tuesday, September 1, 2020 1:21 PM  
**To:** sholton@rc.mt.gov; jessop@rc.mt.gov  
**Cc:** sfisher@rc.mt.gov  
**Subject:** MPO Case Load - 09.01.20  
**Attachments:** MPO Case Load - 09.01.20.xls

As of 09/01/20, we have an increase of 14 offenders, making our computation of supervised offenders at 194. Officer Fisher is supervising 94 offenders, including all PFMA offender according to our Grant. I am supervising 100, due to taking over Officer Rothie offender.

We are currently at 194 Offenders

Please let me know if you have additional questions.

Christina Ellsworth  
Jail Diversion Administrator  
Ravalli County Sheriff's Jail Diversion  
205 Bedford, Suite G  
Hamilton, MT 59840  
406-375-4097 – Desk  
406-360-1907 – Cell

All emails are subject to Montana's Right to Know law (Article II Sec 9, Montana Constitution) and can be considered Public Record (2-6-202, MCA) available for public disclosure.

# **EXHIBIT 30**

## **DECLARATION OF NATASHA BAKER**

## DECLARATION OF NATASHA BAKER

I, Natasha Baker, declare and state as follows:

1. I am a staff attorney with the non-profit legal organization Equal Justice Under Law, and in that capacity, I am counsel for Plaintiffs in class action case *Evenson-Childs et al. v. Ravalli County et al.*, CV 21-89-M-DLC-KLD (D. Mont. 2021).
2. Since filing this case, numerous residents of Ravalli County have contacted Equal Justice Under Law and our co-counsel in this matter, Montana-based Upper Seven Law, via email and phone, to share their stories about their experience in the Jail Diversion Program.
3. Some of those stories have been converted into declarations, which in turn have been shared with the Court through Plaintiffs' motion for a preliminary injunction (Doc. 40, declarations Docs. 41-2 to 41-20, 41-24 to 41-25) and Plaintiffs' soon-to-be-filed motion for class certification.
4. A review of the declarations shows that 29 of the 35 declarants are indigent:
  - a. Declaration of Sandy Sutton ¶¶ 8, 10–12
  - b. Declaration of Michelle Voth ¶¶ 2, 7, 14–16
  - c. Declaration of Kamila Johnson ¶¶ 10, 12, 14–17
  - d. Declaration of Desiree Evans ¶¶ 2, 13–22
  - e. Declaration of Roger Sellers ¶¶ 3, 12–13, 17
  - f. Declaration of Zachary Hadley ¶¶ 9–12
  - g. Declaration of Jodi Waliser ¶¶ 2, 12–13, 16–19
  - h. Declaration of Tracy Pfau ¶¶ 2, 7–8, 19–25
  - i. Declaration of Joseph Heinzman ¶¶ 7, 9
  - j. Declaration of Holly Sutton ¶¶ 2, 10
  - k. Declaration of Newman Jake Bundy ¶¶ 9–10, 13
  - l. Declaration of Tristin Davis ¶¶ 8, 11–12
  - m. Declaration of Harold Springer ¶¶ 2, 8
  - n. Declaration of Talon Goff ¶¶ 11–13
  - o. Declaration of Derrik Riebling ¶¶ 3, 16–21, 23–25
  - p. Declaration of Ken Thurman ¶¶ 4, 16
  - q. Declaration of Tiva Merson ¶¶ 2, 20–22
  - r. Declaration of Justin Warila ¶¶ 2, 8
  - s. Declaration of Summer Boland ¶¶ 15–18

- t. Declaration of Bonnie Jean Thurman ¶¶ 5, 49
  - u. Declaration of Charles Post ¶¶ 2, 12
  - v. Declaration of Lawrence Jakub ¶¶ 2, 5, 20–21
  - w. Declaration of Ragan Converse ¶¶ 11–13
  - x. Declaration of Billy Martin ¶¶ 3, 11
  - y. Declaration of Tyler LaRue ¶¶ 8–9, 18–19
  - z. Declaration of Keith Leonard ¶¶ 13–16
  - aa. Declaration of Richard Churchill ¶¶ 2, 9, 14–17
  - bb. Declaration of Daniel O’Toole ¶¶ 30–31
  - cc. Declaration of Teri Lea Evenson-Childs ¶¶ 12, 15–22
5. To our knowledge, there are no conflicts of interests between Named Plaintiffs Teri Lea Evenson-Childs, Daniel O’Toole, Richard Churchill, and Keith Leonard, and the putative class members.
  6. All Named Plaintiffs have provided declarations and invaluable insight into how Ravalli County’s Jail Diversion Program works. They are committed to this case, having been willing to put their names and their stories in the public eye, and they continue to work with counsel to advance this case.
  7. Attorneys at Equal Justice Under Law have extensive experience with similar cases, having undertaken several constitutional civil rights class action lawsuits challenging debtors’ prisons. In five cases — *Mitchell, et al. v. Montgomery*, 2:14-cv-00186 (M.D. Ala. 2014); *Fant, et al., v. City of Ferguson*, 4:15-cv-00253 (E.D. Mo. 2015); *Jenkins, et al., v. City of Jennings*, 4:15-cv-00252 (E.D. Mo. 2015); *Cain, et al. v. City of New Orleans*, 15-cv-4479 (E.D. La. 2015); and *Bell, et al. v. City of Jackson*, 3:15-cv-00732 (S.D. Miss. 2016) — Equal Justice Under Law challenged the defendant municipalities’ jailing of individuals for failure to pay fines without any inquiry into their ability to pay. Those cases resulted in the cities of Montgomery, Alabama; Ferguson, Missouri; Jennings, Missouri; New Orleans, Louisiana; and Jackson, Mississippi agreeing to change their policies and practices with respect to individuals who fail to pay criminal fines. Phil Telfeyan, Co-Founder and Executive Director of Equal Justice Under Law, was directly involved in all of these cases. In addition, Equal Justice Under Law is currently litigating multiple civil rights class action cases challenging government practices that criminalize poverty, including *Easley et al. v. Howell et al.*, 6:21-cv-06125 (W.D. Ark. 2021) and *Perkins v. Anderson County*, 6:20-cv-00076 (E.D. Texas 2020); I am directly involved in these matters.



8. Attorneys at Upper Seven Law have experience in civil rights, class action, and complex civil litigation and have knowledge of federal court processes, particularly in the District of Montana.
9. By working closely with Named Plaintiffs and dozens of witnesses over the course of several months, engaging in the discovery process with Defendants' counsel, and conducting independent research, we have not only developed relationships with those impacted by Ravalli County's Jail Diversion Program, but we have also gained extensive knowledge as to how the program works in practice and how it impacts individuals in the program.
10. Our experience in past cases challenging state and local laws and policies on federal constitutional grounds, combined with our significant research into the Jail Diversion Program, has allowed us to develop a thorough understanding of how the program relates to the relevant state and federal constitutional law.

I declare under penalty of perjury that the statements above are true and correct.  
Executed on April 7, 2022, in Alameda County, California.



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Natasha Baker

# **EXHIBIT 31**

**EMAIL FROM LIEUTENANT COLGAN  
TO SHERIFF HOLTON (RC 0884)**

**Chris Colgan**

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**From:** Chris Colgan  
**Sent:** Wednesday, August 18, 2021 1:45 PM  
**To:** Steve Holton; Jesse Jessop  
**Subject:** District Court Procedures in regards to Jail Diversion...Heads Up

There have been talks amongst Judge Recht and Judge Lint regarding a 3 month status update with Offenders to determine if a lesser form of monitoring could be applied (incentive for staying clean).

One such "idea" is to allow just field tests from our iCups in regards to UAs where the UA is not sent in for analysis and the Offender is charged for the price of the cup.

I don't see much of an issue with this since this idea would be addressed "after" 3 months under our supervision AND our clientele is a constant revolving door. Before we hired Ronny, we were steady around 220 Offenders. Since then, we have increased to 293.

A meeting was suggested with the judges, public defenders and county attorney's office....along with me and I recommended one of you to be present as well.

Just heads up. I will keep you posted.

Lt. Chris Colgan #13-10  
Ravalli County Sheriff's Office  
Court Security/Jail Diversion  
205 Bedford Street; Suite G  
Hamilton, MT 59840  
Cell #: (406) 531-7010  
Fax: (406) 375-6707

# **EXHIBIT 32**

**ACCOUNT LEDGER FOR PLAINTIFF  
CHURCHILL**

CHURCHILL, RICHARD JASON  
**Customer Statement For 1/1/00 - 12/31/00****Outstanding Invoices**

Date	Invoice #	Reference	Owed	Paid	Remaining
7/1/21	IN2106-00391		\$55.00	\$0.00	\$55.00
8/1/21	IN2107-00315		\$55.00	\$0.00	\$55.00
9/1/21	IN2109-00387		\$55.00	\$0.00	\$55.00
10/1/21	IN2109-00388		\$55.00	\$0.00	\$55.00

<b>Outstanding Balance</b>	<b>\$220.00</b>
<b>Current Unapplied Funds Balance</b>	<b>\$0.00</b>

**Period Activity**

Date	Details	Charges	Payments
12/4/20	Invoice #IN2012-00220; Billed To: CHURCHILL, RICHARD JASON;	\$0.00	\$0.00
12/8/20	Invoice #IN2012-00244; Billed To: CHURCHILL, RICHARD JASON;	\$0.00	\$0.00
12/9/20	Invoice #IN2012-00291; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
12/9/20	Invoice Payment Receipt #RN2012-00211; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 12/09/20	\$0.00	\$55.00
12/10/20	Invoice #IN2012-00309; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
12/16/20	Invoice #IN2012-00391; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
12/16/20	Invoice Payment Receipt #RN2012-00368; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 12/16/20	\$0.00	\$55.00
12/16/20	Invoice Payment Receipt #RN2012-00369; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 12/16/20	\$0.00	\$15.00
12/18/20	Invoice #IN2012-00427; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
12/21/20	Invoice #IN2012-00455; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
12/22/20	Invoice #IN2012-00499; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
12/28/20	Invoice #IN2012-00552; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
12/30/20	Invoice #IN2012-00662; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
1/1/21	Invoice #IN2012-00609; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
1/5/21	Invoice #IN2101-00074; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
1/5/21	Invoice Payment Receipt #RN2101-00082; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 01/05/21	\$0.00	\$40.00
1/5/21	Invoice Payment Receipt #RN2101-00083; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 01/05/21	\$0.00	\$20.00

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1/8/21	Invoice #IN2101-00153; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
1/8/21	Invoice Payment Receipt #RN2101-00173; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 01/08/21	\$0.00	\$55.00
1/8/21	Invoice Payment Receipt #RN2101-00174; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 01/08/21	\$0.00	\$20.00
1/11/21	Invoice #IN2101-00193; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
2/3/21	Invoice Payment Receipt #RN2102-00121; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 02/03/21	\$0.00	\$15.00
2/3/21	Invoice Payment Receipt #RN2102-00122; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 02/03/21	\$0.00	\$55.00
2/3/21	Invoice Payment Receipt #RN2102-00123; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 02/03/21	\$0.00	\$5.00
2/8/21	Invoice Payment Receipt #RN2102-00203; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 02/08/21	\$0.00	\$50.00
2/8/21	Invoice Payment Receipt #RN2102-00204; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 02/08/21	\$0.00	\$55.00
2/8/21	Invoice Payment Receipt #RN2102-00205; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 02/08/21	\$0.00	\$55.00
2/8/21	Invoice Payment Receipt #RN2102-00206; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 02/08/21	\$0.00	\$20.00
3/3/21	Invoice Payment Receipt #RN2103-00058; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 03/03/21	\$0.00	\$35.00
3/3/21	Invoice Payment Receipt #RN2103-00059; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 03/03/21	\$0.00	\$55.00
3/3/21	Invoice Payment Receipt #RN2103-00060; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 03/03/21	\$0.00	\$55.00
5/1/21	Invoice #IN2104-00258; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
5/7/21	Invoice Payment Receipt #RN2105-00123; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 05/07/21	\$0.00	\$55.00
6/1/21	Invoice #IN2105-00242; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
6/11/21	Invoice Payment Receipt #RN2106-00251; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 06/11/21	\$0.00	\$55.00
7/1/21	Invoice #IN2106-00391; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
7/7/21	Invoice #IN2107-00080; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
7/7/21	Invoice Payment Receipt #RN2107-00122; Paid For: CHURCHILL, RICHARD JASON; Paid By: CHURCHILL, RICHARD JASON; Paid On: 07/07/21	\$0.00	\$55.00
8/1/21	Invoice #IN2107-00315; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
9/1/21	Invoice #IN2109-00387; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
10/1/21	Invoice #IN2109-00388; Billed To: CHURCHILL, RICHARD JASON;	\$55.00	\$0.00
11/1/21	Invoice #IN2110-00437; Billed To: CHURCHILL, RICHARD JASON;	\$0.00	\$0.00
Total Charges		\$1045.00	
Total Payments		\$825.00	
Total Payments Using Unapplied Funds		\$0.00	

Period Balance \$220.00

Ravalli County Sheriff's Office  
205 BEDFORD ST. - STE G  
HAMILTON, MT 59840  
Phone: