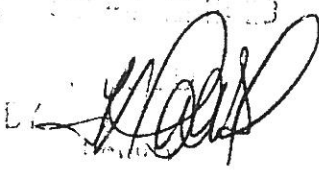


3740A

NANCY SWEENEY
DEPUTY COUNTY ATTORNEY
LEWIS AND CLARK COUNTY


1 CR-2013-552; HP134122
2 TARA A. HARRIS
3 Deputy County Attorney
4 Lewis and Clark County
5 Courthouse - 228 Broadway
6 Helena, MT 59601
7 (406) 447-8221

8 *Attorney for State*

9 MONTANA FIRST JUDICIAL DISTRICT COURT, LEWIS AND CLARK COUNTY

10 THE STATE OF MONTANA,
11 Plaintiff,
12 vs.
13 JENNIFER MARIE RAYMOND,
14 Defendant.

Case No. ADC 2014 333

AFFIDAVIT

15 STATE OF MONTANA)
16 :ss.
17 County of Lewis and Clark)



18 After being duly sworn the undersigned deposes and states that I am a Detective with the
19 Helena Police Department and acting in this capacity I am familiar with the investigation relating to
20 the above-named defendant. I believe the facts developed during the investigation support this court
21 finding that probable cause exists to believe the defendant committed the offense of **CUSTODIAL**
22 **INTERFERENCE**, a felony, alleged to have occurred during the month of August 2013, in
23 violation of Mont. Code Ann. § 45-5-304 (2011) in Lewis and Clark County, State of Montana.

24 The facts establishing probable cause are as follows:
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1 On June 19, 2012, Judge James P. Reynolds, signed an Order placing Jennifer Raymond's
2 minor children in the legal custody of their father, David Frost, until an amended parenting plan
3 could be put into place.

4
5 On August 19, 2013, Officer Mark Ekola met with David Frost and his attorney concerning
6 Raymond having physical custody of his four children and refusing to return them. Frost reported he
7 and Raymond were in the process of finalizing an amended parenting plan, so he allowed Raymond
8 to have physical custody of the four children with the understanding she would return them to him in
9 South Carolina ten days prior to school starting which would have been August 9, 2013. After
10 Raymond did not return the children, Frost secured an Order from Judge Kathy Seeley in cause
11 number CDR-2009-601, ordering Raymond to immediately return the children to Frost. Raymond
12 was personally served with a copy of this Order on August 19, 2013, by Frost's attorney. Raymond
13 informed Frost's attorney she was returning to work and was not going to make an effort to return
14 the children to Frost. Officer Ekola responded to the residence where it was believed Raymond was
15 staying with the children. Officer Ekola met with Raymond's sister who stated Raymond and the
16 children were not there.

17
18
19 On August 20, 2013, Officer Ekola discovered Raymond had not yet returned the children.
20 Officer Ekola contacted Raymond's employer and learned she did not show up to work and failed to
21 call her supervisor to let him know she would not be at work. Officer Ekola spoke with Raymond's
22 father who admitted that his wife was with Raymond and the children. He denied knowing where
23 they were, but that they would contact him when they arrived at their destination. He also admitted
24 Raymond had no intention of returning to Helena and that Raymond was aware of Judge Seeley's
25 Order to return the children to Frost.
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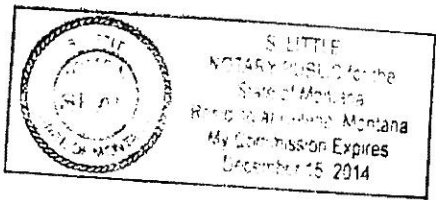
1 On Thursday, August 29, 2013, Cpl. D. Skidmore was assigned to the Criminal
2 Investigations Division of the Helena Police Department. He learned that the four children
3 previously entered NCIC as missing had been located by Rosebud Tribal Police on August 22, 2013.
4 The children were located in Parmelee, South Dakota, and were in the company of their mother
5 Jennifer Raymond.
6

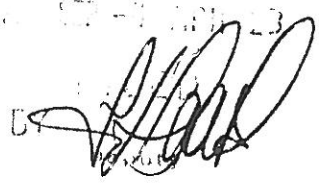
7 Based on the foregoing, the undersigned requests the court find that probable cause exists
8 and allow the State to prosecute the defendant in the manner provided by law.
9

10 
11 _____
12 Affiant

13 Subscribed and sworn to before me this 29 day of August 2014.

14 Name of Notary: S. Little
15 (SEAL)



SEP 11 2014 13


1 HP134122; CR2013-552
TARA A. HARRIS
2 Deputy County Attorney
Lewis and Clark County
3 Courthouse - 228 Broadway
Helena, MT 59601
4 (406) 447-8221

5 Attorney for Plaintiff

6
7

8 MONTANA FIRST JUDICIAL DISTRICT COURT, LEWIS AND CLARK COUNTY

9 * * * * *
10 THE STATE OF MONTANA,)

11 Plaintiff,)

12 -vs-)

No. ADC 2014 333

13 JENNIFER MARIE RAYMOND,)

I N F O R M A T I O N

14 Defendant.)

15 CUSTODIAL INTERFERENCE, a felony, Section 45-5-304(2011), MCA

16 STATE OF MONTANA)
17 :ss.
18 County of Lewis and Clark)

19 TARA A. HARRIS, Deputy County Attorney for Lewis and Clark County,
20 states the defendant committed the following offense in Lewis and Clark
21 County, Montana.

22 The Court is informed that the facts constituting the offense are
23 that on or during the month of August, 2013, the above-named defendant
24 committed the offense of CUSTODIAL INTERFERENCE, a felony, in that she,
25 knowing that she has no legal right to do so, withheld from lawful
26 custody her minor children, T.F., T.F., M.F., and R.F., from their
27 father, David Frost, who has legal custody of them pursuant to a valid
28 Court Order, in violation of Section 45-5-304 (2011).

1 A list of the possible witnesses for the State now known to the
2 prosecution is as follows:

3 Representative(s) from State Crime Laboratory
4 Representative(s) from State Identification Bureau
5 Anne Jacobson, Evidence Technician
6 S. Gleich
7 David Charles Frost
8 Gregory Beebe, Attorney at Law
9 Maria Wetzel
10 Robert Raymond
11 Officer Mark Ekola
12 Lee Keller, Department of Revenue
13 Ben Johnson
14 Probation and Parole Officer Gina Rasmussen
15 Representative(s) Montana Department of Family Services
16 T.F.
17 T.F.
18 M.F.
19 R.F.
20 Phyllis Raymond
21 Attorney Mark Pritchard, Department of Family Services
22 East Helena Police Chief Aschiam

23 DATED this 29th day of August, 2014.

24 

25 TARA A. HARRIS, Deputy County Attorney
26 Lewis and Clark County

27 POSSIBLE PUNISHMENT:

28 CUSTODIAL INTERFERENCE, a felony - Imprisonment in the state prison for
any term not to exceed 10 years or be fined an amount not to exceed
\$50,000, or both.

BAIL FOR THE DEFENDANT IS SET AT O/R.

ALL PREVIOUSLY IMPOSED CONDITIONS OF DEFENDANT'S RELEASE ON BOND OR ON
HER OWN RECOGNIZANCE SHALL REMAIN IN FULL FORCE AND EFFECT.

September 3rd, 2014


DISTRICT COURT JUDGE