

NANCY SWEENEY
CLERK DISTRICT COURT

2015 MAR -3 AM 10:00

FILED
BY *Michelle Wray*
CLERK

1 HP145111; CR2014-727
LEO J. GALLAGHER
2 County Attorney
Lewis and Clark County
3 Courthouse - 228 Broadway
Helena, MT 59601
4 (406) 447-8221

5 Attorney for Plaintiff

6
7 **ORIGINAL**

8 MONTANA FIRST JUDICIAL DISTRICT COURT, LEWIS AND CLARK COUNTY

9 * * * * *

10 THE STATE OF MONTANA,)

11 Plaintiff,)

12 -vs-)

No. CDC 2015-65

13 DANIELLE LEE TOONE CADIEUX,)

14 aka DANIELLE LEE TOONE,)

14 aka DANIELLE LEE OLSON,)

15 Defendant.)

MEMORANDUM

16 * * * * *

17 I N F O R M A T I O N

18 * * * * *

19 ACCOUNTABILITY (Robbery), a felony, Sections 45-2-301, 45-2-302, and 45-
20 5-401(1)(b), MCA, alleged to have occurred on or about October 20, 2014

21 * * * * *

22 STATE OF MONTANA)
:ss.
23 County of Lewis and Clark)

24 LEO J. GALLAGHER, County Attorney for Lewis and Clark County,
25 states the defendant committed the following offenses in Lewis and Clark
26 County, Montana.

27 The Court is informed that the facts constituting the offense are
28

1 that on or about the 20th day of October, 2014, the above-named defendant
2 committed the offense of ACCOUNTABILITY (Robbery), a felony, in
3 violation of Sections 45-2-301, 45-2-302, and 45-5-401(1)(b), MCA, in
4 that when, either before or during the commission of the felony offense
5 of Robbery by Shadric Macho Chippewa and/or Greg William KnowsHisGun
6 with the purpose to promote or facilitate the commission, the defendant
7 solicited, aided, abetted, agreed, or attempted to aid Shadric Macho
8 Chippewa and/or Greg William KnowsHisGun in the planning or commission
9 of the offense.

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

12 Representative(s) from State Crime Laboratory
13 Representative(s) from State Identification Bureau
14 Evidence Technician, HPD
15 S. Gleich
16 Shadric Macho Chippewa
17 Greg Knowshisgun
18 Jed Reeves
19 Carey Edward Kingsland
20 Jack Harry Avery
21 Richard Charles Locke
22 Benjamin Lowell Carrell
23 Jeffrey Brian Hewitt
24 Hoyt Wooley
25 Representative(s) from Hastings
26 Representative(s) from Green Meadow Market
27 Officer Matt Lewis, HPD
28 Detective Nathan Casey, HPD
Detective Gerald LaChere, HPD
Corporal Randy Ranalli, HPD
Officer Shawn Lashway, HPD
Detective Adam Shanks, HPD
Sergeant Jeff Wilson, HPD
Corporal Kevin Carlson, HPD
Sergeant Cory Bailey, HPD
Corporal Dave Peterson, HPD
Officer Marietti, HPD
Deputy Matt Reighard, LCSO
Deputy Gregory Holmlund, LCSO
Corporal Buck Herron, HPD
Officer Josh Ray, HPD
Officer Ray, HPD
Detective Michael Hayes, HPD
Sergeant Kevin Wright, HPD

1 Detective Daniel David, MRDTF
Reserve Deputy Joshua Schmidt
2 Montana Highway Patrol Trooper Jeremy Lee
Montana Highway Patrol Trooper Sergeant Jay Nelson
3 Deputy Allen Hughes, LCSO
Sergeant Shane Hildenstab, LCSO
4

5 DATED this 27 day of February, 2015.

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7 LEO J. GALLAGHER, County Attorney
Lewis and Clark County

8 POSSIBLE PUNISHMENT:
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10 ACCOUNTABILITY (Robbery), a felony: Imprisonment in the state
prison for a term of not less than 2 years or more than 40 years and may
11 be fined not more than \$50,000, except as provided in Sections 46-18-219
and 46-18-222, MCA.

12 BAIL FOR THE DEFENDANT IS SET AT O.R.

13 ALL PREVIOUSLY IMPOSED CONDITIONS OF DEFENDANT'S RELEASE ON BOND OR ON
HER OWN RECOGNIZANCE SHALL REMAIN IN FULL FORCE AND EFFECT.
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15 DATED this 2 day of February, 2015.

16
17 Kathy Sealey
18 DISTRICT COURT JUDGE
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