

1 ANDREW JENKS
2 Deputy County Attorney
3 MATT JENNINGS
4 Missoula County Attorney
5 Missoula County Courthouse
6 Missoula, Montana 59802
7 (406) 258-4737
8 Attorneys for Plaintiff

9 MONTANA FOURTH JUDICIAL DISTRICT COURT, MISSOULA COUNTY

10 STATE OF MONTANA,

11 Plaintiff,

12 -VS-

13 JASON MICHAEL WRIGHT,

14 Defendant.

Dept. No. 3

Cause No. DC-24-161

PLEA AGREEMENT

Offered June 2, 2026

15 COMES NOW ANDREW JENKS, Deputy County Attorney, JASON
16 MICHAEL WRIGHT, Defendant, and Ashley Holmes Hurlbert, Defendant's
17 attorney, and submit the following agreement for resolution of the above-
18 entitled cause.

19 The Defendant is aware that he has the right to be tried by a Jury, and at
20 that trial, he has the following rights:

- 21 a. The right to the assistance of counsel and time to prepare a defense.
22 b. The right to have witnesses testify on his behalf.
23 c. The right to confront and cross-examine the State's witnesses.
24

1 d. The right to remain silent.

2 e. The right to testify, but not to be compelled to incriminate himself.

3 f. The right to require guilt to be proved beyond a reasonable doubt.

4 g. The right to a speedy and public trial.

5 h. The right to appeal a judgment.

7 The Defendant is aware that entering a guilty or no contest plea will
8 “waive” or give up those rights mentioned above, with the exception of the
9 right to effective assistance of counsel. The Defendant understands that a
10 guilty or no contest plea constitutes a waiver of non-jurisdictional defects and
11 defenses, including claims of constitutional violations.
12

13 The Defendant is further aware of the maximum penalties of the charges
14 he will plead guilty or no contest to as set forth below.

15 **AGREEMENT**

16 The above-named Defendant agrees to enter a plea of guilty to the
17 offense(s) of COUNT I: CRIMINAL ENDANGERMENT, a Felony, in violation
18 of Mont. Code Ann. § 45-5-207; and COUNT II: CRIMINAL
19 ENDANGERMENT, a Felony, in violation of Mont. Code Ann. § 45-5-207.
20

21 **The State agrees as part of this agreement to not seek any**
22 **weapons enhancement pursuant to Mont. Code Ann. § 46-18-221 on**
23 **Counts I and/or II.**
24

In return for the pleas of guilty, the State agrees to recommend, pursuant to **Mont. Code Ann. § 46-12-211(1)(c)**, the following sentence below. The Defendant is aware by entering into this agreement that the parties' recommendations may not be binding upon the court. If the Court does not accept either recommendation or request, the defendant nevertheless has no right to withdraw their plea.

1 Criminal Endangerment (Mont. Code Ann. §45-5-207)

Finding	Total Sentence	Time Suspended	Deferral Date	Confinement Facility	Concurrent; Consecutive; Comment
Guilty	10 years	5 years		DOC	

2 Criminal Endangerment (Mont. Code Ann. §45-5-207)

Finding	Total Sentence	Time Suspended	Deferral Date	Confinement Facility	Concurrent; Consecutive; Comment
Guilty	10 years	5 years		DOC	Concurrent to Ct. I

3 Assault with Weapon (Mont. Code Ann. §45-5-213)

Finding	Total Sentence	Time Suspended	Deferral Date	Confinement Facility	Concurrent; Consecutive; Comment
Dismissed					

*** Defendant is free to argue for any legal sentence.**

DEFENDANT AGREES TO BE UNDER THE SUPERVISION OF ADULT PROBATION AND PAROLE SUBJECT TO THE FOLLOWING CONDITIONS:

STANDARD CONDITIONS OF SUPERVISION

1. The Defendant is under the supervision of the Department, subject to all requirements of a law-abiding citizen, and rules and regulations of adult Probation and Parole, including any sanctions.
2. The Defendant must obtain prior written approval from the Defendant's supervising officer before taking up residence in any location. The Defendant shall not change place of residence without first obtaining written permission from their supervising officer or the officer's designee. The Defendant must make the residence open and available to an officer for a home visit. The Defendant will not own dangerous or vicious animals and will not use any device that would hinder an officer from visiting or searching the residence.
3. The Defendant must obtain permission from their supervising officer or the officer's designee before leaving his/her assigned district. For any in-state travel, the Defendant must confer with their supervising officer about the travel permit policy.
4. The Defendant must personally contact their supervising officer or designee when directed by the officer.
5. The Defendant is prohibited from using, owning, possessing, transferring, or controlling any firearm, ammunition (including black powder), weapon, or chemical agent such as oleoresin capicum or pepper spray.
6. Upon reasonable suspicion that the Defendant has violated the conditions of supervision, a Probation and Parole Officer may search the person, vehicle, and residence of the Defendant, and the Defendant must submit to such search. A Probation and Parole Officer may authorize a law enforcement agency to conduct a search, provided the Probation and Parole Officer determines reasonable suspicion exists that the Defendant has violated the conditions of supervision.
7. The Defendant must notify their supervising officer within 72 hours whenever the Defendant has a change in circumstances of employment or alternative approved programming, or any contact with law enforcement.

1 8. The Montana Board of Pardons and Parole and the sentencing
2 court have the authority to order the Defendant to abide by additional
3 conditions and such conditions must be contained in the judgment or
parole decision.

4 **RECOMMENDED SPECIAL CONDITIONS**

5 9. The Defendant must seek and maintain employment or maintain
6 a program approved by the Board of Pardons and Parole or the
7 Probation Officer. Unless otherwise directed by his/her Probation
8 Officer, the Defendant must inform his/her employer and any other
person or entity, as determined by the Probation Officer, of his/her
status on probation, parole, or other community supervision.

9 10. The Defendant must obtain permission from his/her Probation
10 Officer before engaging in a business, purchasing real property,
11 purchasing an automobile, or incurring a debt.

12 11. The Defendant is prohibited from using or possessing alcoholic
13 beverages and illegal drugs. The Defendant is required to submit to
14 bodily fluid testing for drugs or alcohol on a random or routine basis
and without reasonable suspicion.

15 12. The Defendant is prohibited from gambling.

16 13. The Defendant, convicted of a felony offense, shall submit to DNA
17 testing. (Mont. Code Ann. § 44-6-103).

18 14. The Defendant shall obtain a Chemical Dependency Evaluation
19 by a state-approved evaluator. The Defendant shall pay for the
20 evaluation and follow all of the evaluator's treatment
recommendations.

21 15. The Defendant shall obtain a Mental Health Evaluation by a state-
22 approved evaluator. The Defendant shall pay for the evaluation and follow
all of the evaluator's treatment recommendations.

23 16. The Defendant shall not possess or use any electronic device or
24 scanner capable of listening to law enforcement communications.

17. The Defendant shall not enter any bars.

18. The Defendant shall not enter any casinos.

19. The Defendant shall not knowingly have any contact, oral, written, electronic or through a third party, with the victim(s) unless such contact is voluntarily initiated by the victim(s) through the Department of Corrections. DOC staff may notify victims about the availability of opportunities for facilitated contact with their offenders without being considered "third parties."

20. The Defendant shall attend self-help meetings at the direction of the Probation Officer.

21. The Defendant shall not knowingly have contact, oral, written, electronic or through a third party, with the victim(s) or the immediate family unless such contact is voluntarily initiated by the victim(s) through the Department of Corrections. DOC staff may notify victims about the availability of opportunities for facilitated contact with their offenders without being considered "third parties."

22. If the Defendant is convicted of a crime listed in Mont. Code Ann. § 46-23-502(13), he/she shall register as a violent offender. (Mont. Code Ann. § 46-18-201(7)).

23. The Defendant shall be restrained from the residences of 12420 O'Keefe Creek Boulevard, Missoula, Montana and from 12620 Highway 93 North, Missoula, Montana.

24. The PSI report shall be released by the Department to certain persons, such as treatment providers, mental health providers, and/or medical providers, as needed for the Defendant's rehabilitation.

FINES, FEES AND RESTITUTION

25. The Defendant shall pay all fines, fees, and restitution ordered by the sentencing court according to a schedule set up by the PO, in the amounts below:

Fine & Fees Description	Amount
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	Court Fees	
	Fine	\$0.00
	Credit for time served (at \$100 per day)	-\$0.00
	Count Attorney Surcharges	\$60.00
	A. Surcharge of \$15 for each misdemeanor (Mont. Code Ann. § 46-18-236(1)(a))	
	B. Surcharge of the greater of \$20 or 10% of the fine for each felony offense. (Mont. Code Ann. § 46-18-236(1)(b))	
	Prosecution Costs	\$100.00
	(Pursuant to §§46-18-232 and 25-10-201(9) and Local District Court Rule 11(d)(1)) (\$100 per case, \$10 per check or 10% each check)	
	IT – Court Information Technology Surcharge	\$10.00
	(Mont. Code Ann. § 3-1-317)	
	Victim Witness Admin & Surcharge	\$150.00
	(\$50.00 per count)	
	\$50 for each misdemeanor or felony charge under Title 45, Crimes; Mont. Code Ann. § 61-8-401 (DUI); Mont. Code Ann. § 61-8-406 (DUI-alcohol); or Mont. Code Ann. § 61-8-411 (DUI-delta-9-tetrahydrocannabinol). (Mont. Code Ann. § 46-18-236(1)(c))	
	Public Defender Fees	n/a
	(Mont. Code Ann. § 46-8-113) (Subject by Judge on ability to pay)	
	Miscellaneous	\$0.00
	TOTAL COURT FEES	\$320.00
	TO BE PAID TO:	
	CLERK OF COURT	
	200 WEST BROADWAY, MISSOULA, M5 59802	
	Department of Correction Fees	
	PSI Fee	\$50.00
	Restitution	\$TBD*
	10% Administrative Fee Mont. Code Ann. §46-18-241 (2)(a)	\$TBD

1 *** At this point, no restitution request has been received by the**
2 **Missoula County Attorney's Office. The State is aware that there**
3 **may be property damage stemming from the charges in this matter.**
4 **Should any of the victims request restitution, the State may argue**
5 **at sentencing for any lawful restitution and Defendant may oppose**
6 **any restitution request. The State shall submit any received**
7 **restitution request at least seven (7) days prior to sentencing.**

8 **OTHER TERMS OF AGREEMENT**

9 The parties agree that a Pre-sentence Investigation Report (PSI)
10 is necessary.

11 The parties reserve the right to argue for or against any special
12 conditions of probation recommended in the PSI.

13 By signing below and by accepting the benefit of this agreement
14 the Defendant expressly waives any right to appeal and any claims for
15 post-conviction relief, except claims for ineffective assistance of counsel.
16 Defendant understands all potential lesser included offenses and waives
17 any right to be found guilty of a lesser included offense. Defendant
18 further waives any right, as provided in 46-18-903 M.C.A., to make
19 application for sentence review.

20 Defendant specifically agrees that she is willing and able to pay
21 the monetary obligations and restitution under this agreement, and
22 agrees that payment of restitution is a condition necessary for
23 rehabilitation of the victims under Mont. Code Ann. § 46-18-201 (4)(n).
24 All of the methods for collection of restitution provided under Sections
25 Mont. Code Ann. § 46-18-241 through Mont. Code Ann. § 46-18-249
26 shall apply, including garnishment of wages and interception of tax
 refunds.

 The State's recommendation is specifically conditioned upon the
fact that the Defendant's criminal history as represented by Defense
Counsel and set out in the State's file is accurate. The State's
recommendation is also contingent upon the Defendant committing no
new crimes and following all conditions of bail and release. If the
Defendant is charged with additional crimes or if the Defendant violates
conditions of bail or release between the date of the Defendant's

signature on this Plea Agreement and sentencing, the Defendant agrees and stipulates that any such violation will render void the State's agreement to recommend the above sentence under Mont. Code Ann. § 46-12-211(1)(c). The Defendant agrees and stipulates that in such an event, the State shall be allowed to recommend any sentence up to the maximum possible sentence. However, the Defendant further stipulates that, following a finding that he has violated the terms of this agreement, a change in the State's sentence recommendation will not constitute a "good cause" basis for the Defendant to withdraw his plea(s) to the charged offense(s) pursuant to Mont. Code Ann. § 46-15-105(2).

This offer expires on **Friday, July 10, 2026**, unless changed in writing. The recommendation is conditioned upon the Defendant breaking no additional laws or violating conditions of release before sentencing.

ACCEPTANCE

I the undersigned Defendant, after full discussion of the charge(s) and penalties with my defense counsel, and after being fully advised of my rights to a jury trial, my understanding of my right to persist in my plea of not guilty and to demand a jury trial, do hereby accept the above offer and agree to enter plea(s) of guilty to the charge(s) specified. I hereby knowingly waive all objection to any substantive defect in said charge(s) and my right to a jury trial on the charge(s). I further understand that the offer made by the State is dependent upon the accuracy of my criminal history as I have represented it. My criminal history is as set out in the State's file. I understand that the Court is not bound by this Agreement and may impose the maximum penalty for the offense(s) charged, but that if the Court chooses not to follow this plea bargain, and I have not violated the terms of this Agreement, I will be allowed to withdraw my plea(s) of guilty to the charge(s) specified.


Jason Wright (Jul 1, 2026 09:48:54 MDT)

JASON MICHAEL WRIGHT
Defendant

Date: 07/01/2026


Ashley Holmes Hurlbert

Counsel for Defendant

Date: 7/1/26

1 /s/ Andrew Jenks
2 ANDREW JENKS
3 Deputy County Attorney

Date: 6/2/26

4 The undersigned as counsel for the Defendant advises the Court that:

- 5 1. He/She has explained the charge(s) and penalties to his/her client.
6 2. He/She has told his/her client that sentencing will be done by the
7 Court and the Court may impose the maximum penalty.
8 3. His/Her client understands the position of the County Attorney will
9 take at disposition, and understands that no particular sentence has
10 been promised.
11 4. His/Her client is sufficiently advised to knowingly proceed with the
12 entry of pleas(s) of guilty.

13 DATED this day of 7/1/26, 2026.

14 *Ashley Hurlbert*
15 _____
16 Ashley Holmes Hurlbert
17 Counsel for Defendant
18
19
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24

Updated Plea Agreement

Final Audit Report

2026-07-01

Created:	2026-07-01
By:	A&M Law (dakota@mymontanalawyer.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAv-I3LFpUkRdpVg72_Jn6M2qar5Zi2A2w

"Updated Plea Agreement" History

-  Document created by A&M Law (dakota@mymontanalawyer.com)
2026-07-01 - 3:43:52 PM GMT
-  Document emailed to Jason Wright (jwrightmt31@gmail.com) for signature
2026-07-01 - 3:43:57 PM GMT
-  Email viewed by Jason Wright (jwrightmt31@gmail.com)
2026-07-01 - 3:45:43 PM GMT
-  Document e-signed by Jason Wright (jwrightmt31@gmail.com)
Signature Date: 2026-07-01 - 3:48:54 PM GMT - Time Source: server - Signature Appearance Selected: MOBILE_DRAW
-  Agreement completed.
2026-07-01 - 3:48:54 PM GMT

CERTIFICATE OF SERVICE

I, Ashley Holmes Hurlbert, hereby certify that I have served true and accurate copies of the foregoing Stipulation - Plea Agreement to the following on 07-01-2026:

Andrew Scott Jenks (Govt Attorney)
200 W Broadway
Missoula MT 59802
Representing: State of Montana
Service Method: eService

Electronically signed by Dakota Holman on behalf of Ashley Holmes Hurlbert
Dated: 07-01-2026