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COUNSEL FOR RESPONDENT

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. OP 25-0049

RICHARD ANTHONY GONZALO,

Petitioner,

v.

TOM GREEN, Warden,
Dawson County Correctional Facility,

Respondent.

**ATTORNEY GENERAL'S RESPONSE TO PETITION
FOR WRIT OF HABEAS CORPUS**

In compliance with this Court's order issued January 31, 2025, the Attorney General's Office responds to the Petition for Writ of Habeas Corpus (Petition) by Anthony Gonzalo (Gonzalo). As discussed below, Gonzalo has not met his burden to show that the district court imposed an illegal sentence at his revocation dispositional hearing. Gonzalo has received all the credit for time served that he is

statutorily entitled to and there were specific violations during the requested elapsed-time periods in the records and recollections of Gonzalo's probation officer.

BACKGROUND FACTS AND PROCEDURE

The State charged Gonzalo by Information in Missoula County Cause No. DC-19-389 with criminal possession of dangerous drugs after law enforcement found methamphetamine in foil wrappers in Gonzalo's vehicle on May 9, 2018. (Exs. 1, 2.)

On June 11, 2019, a law enforcement officer caught Gonzalo placing a baggie inside the duct work of the men's bathroom in the Missoula City Hall building. (Ex. 3 at 2.) Inside the baggie was a small stuffed animal with a bag of methamphetamine hidden inside. (*Id.*) The State charged Gonzalo by Information in Missoula County Cause Number DC-19-392 with felony criminal possession of dangerous drugs and misdemeanor criminal mischief. (Ex. 4 at 1-2.) Gonzalo posted bond on June 12, 2019. (Exs. 3 at 3, 5, 6.)

On July 12, 2019, Gonzalo was captured on a storage facility security camera in the passenger seat of a vehicle punching the female driver and grabbing her head and banging it off the steering wheel. (Ex. 7 at 2.) When law enforcement stopped the vehicle, Gonzalo immediately fled. (*Id.*) Two officers pursued

Gonzalo, who “continued to run, jumping fences and a creek to avoid law enforcement.” (*Id.*) Officers were eventually able to detain and arrest Gonzalo. (*Id.*) The State filed a Petition to Revoke Defendant’s Release in DC-19-392 and he was served with the bench warrant the same day. (Exs. 8, 9.)

On July 23, 2019, the State charged Gonzalo by Information in Missoula County Cause Number DC-19-428 with felony Partner or Family Member Assault (PFMA) and resisting arrest for his July 12, 2019 conduct. (Ex. 10.) In a 2nd Amended Information filed in DC-19-428, the State added three counts of tampering with witnesses and informants and a misdemeanor PFMA. (Ex. 11 at 1-2.) The tampering charges stemmed from recorded calls Gonzalo made from the jail in which he told the female PFMA victim that she needed to “go in and get [the case] dropped, Baby[,]” that she “ha[d] to work diligently to get those dropped[,]” and that she needed to tell them she was bipolar and would be a hostile witness for the prosecution. (*Id.* at 2-3.)

On December 29, 2019, the court granted Gonzalo’s request to be released to attend treatment in Sheridan, Wyoming, and ordered GPS monitoring. (Exs. 12, 13, 14.) On February 20, 2020, Gonzalo requested to remain in Sheridan for additional treatment that would begin the following Monday and asked for GPS monitoring to be removed. (Ex. 15.) The district court granted both requests. (*Id.*) Gonzalo later self-reported that he completed inpatient treatment on March 1,

2020, and continued to receive counseling through the outpatient program. (Ex. 16 at 6, 22; Ex. 17.)

The parties subsequently entered into a global plea agreement to resolve DC-19-389, DC-19-392, and DC-19-428. (Ex. 18.) Gonzalo entered his pleas in accordance with the agreement. The district court sentenced him to the Department of Corrections (DOC) for five years, all suspended for Count I in DC-19-392 and ordered it to run concurrently with the sentence imposed in DC-19-428. (Ex. 19.) The court granted Gonzalo “credit for time served in the amount of 170 days at the rate of \$100.00 per day toward Defendant’s fine.” (*Id.* at 3.)

In DC-19-428, the district court sentenced Gonzalo to the DOC for 5 years, all suspended, for the felony PFMA; 6 months in the county jail, all suspended, for resisting arrest; 10 years with the DOC, all suspended, for tampering with witnesses and informants; and 12 months in the county jail, all suspended, for the misdemeanor PFMA. (Ex. 20 at 2-3.) The court ordered the sentences for all counts to run concurrently with each other and concurrently with the sentence imposed in DC-19-392. (*Id.*) The court dismissed cause number DC-19-389 and all remaining counts in DC-19-392. (*Id.*; Ex. 21.)

On November 24, 2021, the State filed Petitions to Revoke in DC-19-392 and DC-19-428. (Exs. 22, 23.) The attached affidavit stated that Gonzalo had absconded. (*Id.* at 4.) The probation and parole officer explained that he had called

Gonzalo on October 22, 2021, November 9, 2021, and November 16, 2021. (*Id.* at 5.) He also sent several emails. (*Id.*) On October 22, 2021, he emailed Gonzalo the documents for an interstate transfer to California and explained that the court may issue a warrant if Gonzalo did not complete the paperwork. (*Id.*) On November 5, 2021, he emailed Gonzalo asking if he had reviewed the paperwork. (*Id.*) On November 16, 2021, the officer emailed Gonzalo telling him to call immediately and said, “[a] warrant will be issued soon if you don’t start participating with supervision.” (*Id.*) Gonzalo never replied to any of the emails or calls. (*Id.* at 4-5.)

The district court issued a warrant in both matters on November 29, 2021. (Exs. 24, 25.) On June 15, 2022, the warrants were served on Gonzalo in Nevada. (*Id.*) Gonzalo entered admissions to the absconding violation on December 21, 2022, and the district court released him on his own recognizance. (Ex. 26.)

On March 30, 2023, probation and parole issued an Authorization to Pick Up and Hold Probationer for suspected probation violations. (Exs. 27, 28.) The State filed a 1st Supplemental to 1st Petition to Revoke in both matters. (Exs. 29, 30.) The attached affidavit explained that during a traffic stop on March 29, 2023, Gonzalo was associating with another felony probationer, had a syringe and 25 CO2 cartridges he said were for huffing, and admitted to using fentanyl and methamphetamine. (*Id.* at 4.) Gonzalo’s probation officer later learned Gonzalo had stopped showing up to work about ten days prior. (*Id.*) Additionally, Gonzalo’s

probation officer said Gonzalo had changed his residence numerous times, switched employment, and missed scheduled court hearings in Hamilton multiple times since his release in December. (*Id.* at 5.)

The district court held a disposition hearing on the Petitions to Revoke in both matters on July 26, 2023. (Exs. 31, 32.) Probation and Parole Officer Jeremy Lizotte testified on behalf of the State. (*Id.*) The court revoked Gonzalo's suspended sentences. (*Id.*) In DC-19-392, the district court sentenced Gonzalo to the DOC for 5 years with 3 years suspended, to run concurrently with the sentence in DC-19-428. (Ex. 33 at 1-2.) The court granted Gonzalo 500 days of credit for time served. (*Id.* at 2.) The court found that "[t]here [we]re not substantial grounds tending to excuse or justify [Gonzalo's] violations." (*Id.* at 3.)

In DC-19-428, the district court sentenced Gonzalo to 10 years with 7 suspended to run concurrently with the sentence in DC-19-392. (Ex. 32 at 1-2.) The court granted Gonzalo credit for 500 days of time served. (*Id.* at 2.) In the oral pronouncement, the court did not specify whether the 10-year sentence applied to the PFMA or the tampering charge. (Ex. 31.) The written judgment applied the sentence to the PFMA charge. (Ex. 34.) The district court subsequently amended the judgment to grant Gonzalo credit towards fines. (Ex. 35.)

The prosecutor filed a Motion for Clarification of Judgment noting that the court originally imposed a ten-year term on the tampering charge and a five-year

term on the PFMA charge and asked the court to clarify whether the court's oral pronouncement of sentence was intended for the tampering charge. (Ex. 36.)

The district court issued an Order Amending Judgment and a Second Order Amending Judgment. (Exs. 37, 38.) In the Second Order Amending Judgment the court amended Gonzalo's judgment to reflect a five-year sentence with two suspended for the PFMA and ten years with seven suspended for the tampering charge, with the sentences running concurrently. (Ex. 38 at 2.)

Gonzalo completed his custodial term for DC-19-392 on March 12, 2024, and he completed the custodial term for DC-19-428 on March 12, 2025. (Ex. 39 at 4, 6.) Gonzalo is currently serving the suspended portion of his sentences. (*Id.*)

DISCUSSION

I. Gonzalo has not met his burden to establish that the district court imposed a facially illegal sentence upon revocation when it granted him 500 days of credit for time served.

A person who is incarcerated may file a petition for a "writ of habeas corpus to inquire into the cause of imprisonment or restraint and, if illegal, to be delivered from the imprisonment or restraint." Mont. Code Ann. § 46-22-101(1); Mont. Const. art. II, § 19. Because "the burden in a habeas corpus proceeding is upon the petitioner to convince the Court that a writ should be issued," *Miller v. Eleventh Judicial Dist. Court*, 2007 MT 58, ¶ 14, 336 Mont. 207, 154 P.3d 1186, the

petitioner must present “to this Court a record that is sufficient to make a prima facie showing.” *In re Hart*, 178 Mont. 235, 249-50, 583 P.2d 411, 418-19 (1978).

Generally, a Montana prisoner may not file a petition for writ of habeas corpus in state court for the purpose of challenging the validity of a conviction or sentence for which the remedy of appeal has been exhausted. Mont. Code. Ann. § 46-22-101(2). Failure to file a timely notice of appeal constitutes exhaustion of the remedy of appeal. *State v. Lott*, 2006 MT 279, ¶ 4, 334 Mont. 270, 150 P.3d 337. An exception is permitted where the prisoner alleges that his incarceration is based on “a facially invalid sentence—a sentence which, as a matter of law, the court had no authority to impose[.]” *Lott*, ¶ 22. This Court has held that the denial of credit for time served or elapsed time when a defendant is entitled to the credit creates a facially invalid sentence which the Court may review in a habeas corpus proceeding. *See, e.g., LaForge v. Godfrey*, No. OP 24-0495, 2024 Mont. LEXIS 1146 (Mont. Sup. Ct. Oct. 17, 2024).

A. Gonzalo’s time in the treatment facility subject to GPS monitoring from January 1, 2020, to February 20, 2020, was a condition of his release on bond and the court was not required to allow credit.

In his Petition and exhibit Gonzalo asserts that he participated in the Sheridan VA Medical Center’s inpatient treatment program from December 29, 2019, until April 16, 2020, and that the court should have granted him credit for time served for the 109 days because it was “essentially house arrest.” (Pet. at 2-3,

Pet. Ex. at 9.) As an initial matter, these dates conflict with the record. When Gonzalo filled out his PSI questionnaire, he reported the inpatient treatment running from January 1, 2020, to March 1, 2020. (Ex. 16 at 22.) The court removed GPS monitoring on February 20, 2020. (Ex. 15.) Regardless of the timeline, Gonzalo's time on electronic monitoring at the treatment facility occurred prior to the imposition of sentence and was not the result of an order by the district court creating a home arrest plan nor was it part of a sentence of imprisonment. The district court was not statutorily required to allow credit against Gonzalo's revocation sentence for the 50 days he spent at the treatment facility on GPS monitoring.

When interpreting a statute, this Court is “guided by the long-held maxim that legislative intent must first be determined from the plain words used in the statute, and when that is possible no other means of interpretation are proper.” *State v. Cooksey*, 2012 MT 226, ¶ 32, 366 Mont. 346, 286 P.3d 1174 (citation omitted). “Courts may not disregard the plain language of a statute.” *Id.* (citation omitted). “The court’s role is to ascertain and declare what is in terms or in substance contained in a statute, and not to insert what is omitted or omit what is inserted.” *Id.* (quoting Mont. Code Ann. § 1-2-101 (internal quotation marks omitted)).

“Once a district court revokes a suspended sentence, the sentence is ‘particularly and expressly’ governed by [Mont. Code Ann.] § 46-18-203[.]” *See, e.g., State v. Southern*, 2022 MT 203, 410 Mont. 330, 519 P.3d 1 (citation omitted); *Flesch v. Salmonsens*, No. OP 23-0349, 2023 Mont. LEXIS 716 (Mont. Sup. Ct. July 12, 2023). Montana Code Annotated § 46-18-203(7)(b) provides that “[i]f a suspended or deferred sentence is revoked, . . . [c]redit must be allowed for time served in a detention center or for home arrest time already served.”

A “detention center” is “a facility established and maintained by an appropriate entity for the purpose of confining arrested persons or persons sentenced to the detention center.” *State v. Tippetts*, 2022 MT 81, ¶¶ 18-19, 408 Mont. 249, 509 P.3d 1 (citing Mont. Code Ann. §§ 46-18-203(7)(b), 7-32-2241(1)). “Home arrest” is a statutorily defined term and is imposed only under the procedures specified in Title 46, chapter 18, part 10 of the Montana Code Annotated. Mont. Code Ann. § 46-18-1001(2). This Court has determined that “home arrest” does not include time spent on “house arrest” as a condition of pretrial release. *See, e.g., State v. Makarchuk*, 2009 MT 82, ¶¶ 33-37, 249 Mont. 507, 204 P.3d 1213; *State v. Gulbranson*, 2003 MT 139, ¶¶ 10-14, 316 Mont. 163, 69 P.3d 1187, *overruled on other grounds in State v. Herman*, 2008 MT 187, ¶ 12 n.1, 343 Mont. 494, 188 P.3d 978.

Here, Gonzalo's time on GPS monitoring while in inpatient treatment does not qualify as time served in a detention center nor does it qualify as home arrest time already served. The Sheridan VA Medical Center is not a detention center because it is not a facility established for the purpose of confining arrested persons or persons sentenced to the medical center. It is a medical facility established for the purpose of providing medical care to veterans, including treatment for mental health and substance use disorders. Further, the GPS and inpatient treatment were not imposed as a part of a sentence of imprisonment but rather as a condition of release on bond. The district court did not impose a facially illegal sentence when it did not give Gonzalo credit against his revocation sentence for time spent on GPS monitoring at the treatment facility.

B. Gonzalo is not entitled to 41 days of credit for time served in a California detention facility because he was not incarcerated on DC-19-392 or DC-19-428.

Gonzalo is not entitled to credit time served for the 41 days he alleges he spent in the Monroe Detention Center in California from April 10 to May 20, 2022. (Pet.'s Ex. 1 at 9-10.) Gonzalo claims that he was arrested on April 11, 2022, in Yolo County California, "after passive police contact revealed a warrant from MT for absconding." (Pet. at 3.) Gonzalo asserts that he was released on May 20, 2022, because of the "court's determination that [he] had not absconded legally." (Pet. at 4.) Gonzalo continues, stating that after his release in May, while en route to

Montana to remedy his warrants, he was arrested in Reno, Nevada, on those same warrants. (*Id.*) Gonzalo’s assertion that he was arrested in California on warrants from DC-19-392 or DC-19-428 is contradicted by the record and defies logic.

A California court would not have had any authority to determine whether Gonzalo had “absconded legally” and nothing in the records for DC-19-392 or DC-19-428 would support Gonzalo’s assertion that the court determined he did not abscond. To the contrary, Gonzalo admitted to absconding and the court revoked his suspended sentences because of it. The records for DC-19-392 and DC-19-428 establish that Gonzalo was arrested on June 15, 2022, in Nevada, on the bench warrants, not on April 11, 2022. Gonzalo may have been incarcerated from April 11, 2022, until May 20, 2022, but he was not incarcerated on DC-19-392 or DC-19-428.

Documentation in the records indicates that Gonzalo is statutorily entitled to credit against his revocation sentence for the following days served in a detention center:

Dates	Description	Total days
June 11-12, 2019	Arrest on charges in DC-19-392 until he posted surety bond	1 day
July 12, 2019- December 29, 2019	Arrest on new charges in DC-19-428 and the Petition to Revoke Release in DC-19-392 until he was released to go to treatment in Wyoming	170 days

June 15, 2022 – December 28, 2022 ¹	Arrest on Petitions to Revoke in both cases until the court released Gonzalo on his own recognizance	190 days
March 30, 2023 – July 26, 2023	Issuance of the Authorization to Pick Up and Hold Probationer until the dispositional hearing on the Petitions to Revoke	118 days
Total		479 days

The district court granted Gonzalo credit for time served for a total of 500 days. Based on documentation in the records, the district court was only required to allow 479 days of credit against Gonzalo’s revocation sentence. Gonzalo has not met his burden to establish that the court imposed an illegal sentence when it did not allow additional credit for time served against his sentence upon revocation.

¹ Gonzalo asserts that he was released on December 22, 2022. (Pet. Ex. at 9.) This comports with the district court’s order granting Gonzalo’s release that was issued on December 21, 2022. (Ex. 26.) However, in the affidavit attached to the 1st Supplemental to 1st Petition to Revoke, Gonzalo’s probation officer states he was released on December 28, 2022. (Ex. 29.) Given the date of the order and Gonzalo’s self-reported release the following day, the State has used December 22, 2022. It appears the probation officer’s date may have been a scrivener’s error as it is unlikely Gonzalo remained in the jail on these cause numbers more than a week after the court ordered his release.

II. Gonzalo has not met his burden to establish that the district court imposed a facially illegal sentence upon revocation when it did not grant elapsed time credit.

Pursuant to Mont. Code Ann. § 46-18-203(7)(b), when a district court revokes a deferred or suspended sentence,

the judge shall consider any elapsed time, consult the records and recollection of the probation and parole officer, and allow all of the elapsed time served without any record or recollection of violations as a credit against the sentence. If the judge determines that elapsed time should not be credited, the judge shall state the reasons for the determination in the order.

This Court has interpreted the provision to require “a specific demonstration of a ‘record or recollection of violations’ in the period in question” to deny credit.

State v. Jardee, 2020 MT 81, ¶ 10, 399 Mont. 459, 461 P.3d 108.

As previously noted, a court’s denial of credit for elapsed time when a defendant is entitled to the credit creates a facially invalid sentence; however, a court’s failure to state its rationale for denying elapsed time credit is a waivable statutory defect and does not render a sentence facially illegal. *LaForge*; *State v. Youpee*, 2018 MT 102, ¶ 11, 391 Mont. 246, 416 P.3d 1050.²

² While Youpee was sentenced under the 2015 version of Mont. Code Ann. § 46-18-203(7)(b), both the 2015 and 2023 versions contain the same language regarding documentation for denial of credit.

A. Gonzalo is not entitled to the requested elapsed time credit from October 18, 2021, to November 23, 2021, because he absconded immediately after sentencing, never completed his required paperwork, and never checked in with probation.

In his Petition, Gonzalo asserts that he is entitled to 37 days of elapsed time credit from October 18, 2021, until November 23, 2021, because he “was without alleged violation during this time,” and the “court did not meet the criteria for disqualifying street time between the dates of sentencing and the date of the allegation of violation.” (Pet. at 3.) Gonzalo claims that “[d]ays after sentencing, [his] home was destroyed in the California Dixon fires, displacing [him] and his family before being able to sign probation rules and initiate interstate contact.” (*Id.*) He also claims he tried to contact his probation officer and his attorney, Jacob Coolidge, but his attorney had become a judge and could no longer speak to former clients. (*Id.* at 3-4.)

The district court imposed the original suspended sentences on October 14, 2021. It is unclear if Gonzalo is asserting a wildfire burned his home down in Dixon, California, in the days after sentencing or if he meant to say his home burned in the Dixie fires in California. Either way, there were no fire incidents in Dixon in 2021 and the Dixie fire started eight months after Gonzalo’s sentencing

hearing.³ Further, Judge Jacob Coolidge was sworn in January 2022, over a month after the State had already petitioned to revoke Gonzalo's suspended sentences.⁴

Finally, Gonzalo admitted to the absconding violation that began immediately after sentencing and the judge found there were no substantial grounds tending to excuse or justify his violations. The affidavit attached to the Petition to Revoke explained that Gonzalo never filled out the required interstate transfer of supervision paperwork, never signed his probation conditions, and never responded to any of his probation officer's numerous emails or calls that began immediately after sentencing. Gonzalo was never in compliance and thus is not entitled to credit.

B. Gonzalo is not entitled to elapsed time credit for December 22, 2022, to March 29, 2023.

In a document attached to his Petition, Gonzalo also asserts he is owed 98 days of elapsed time credit from December 22, 2022, until March 29, 2023. (Pet. Ex. at 9.) Gonzalo does not address the 98 days in his Petition and does not explain why he believes he is entitled to credit for those days. Gonzalo is not entitled to elapsed time credit for this time period because Jeremy Lizotte's affidavit attached to the 1st Supplemental to 1st Petition to Revoke mentioned

³ Cal Fire's 2021 Incident Archive map and listed incidents indicate there were no fires in Dixon in 2021 and the Dixie Fire began on July 13, 2021. *See* [fire.ca.gov/incidents/2021](https://www.fire.ca.gov/incidents/2021).

⁴ *See* [kpax.com/news/Missoula-county/three-missoula-municipal-court-judges-take-oath-of-office](https://www.kpax.com/news/Missoula-county/three-missoula-municipal-court-judges-take-oath-of-office).

numerous violations beginning immediately after Gonzalo was released from jail in December 2022 and Officer Lizotte also testified at the dispositional hearing.

Officer Lizotte specifically noted that since Gonzalo's release, he changed his residence numerous times, switched employment, and missed multiple court appearances in the Hamilton Municipal Court. Many of these violations were discovered after Gonzalo was arrested on March 29, 2023. Gonzalo was associating with another probationer, he had a syringe and 25 CO2 cartridges for huffing, and he admitted to using fentanyl and methamphetamine. Gonzalo had also stopped showing up to work without permission to end his employment.

The district court had documentation of specific violations in the records and recollections of the probation officer during the period from December 22, 2022, to March 29, 2023, and the probation officer testified at Gonzalo's dispositional hearing. Gonzalo has not met his burden to establish that the district court imposed a facially illegal sentence when it declined to give him elapsed time credit.

CONCLUSION

This Court should deny Gonzalo's Petition for Writ of Habeas Corpus.

Respectfully submitted this 31st day of March 2025.

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By: /s/ Christine Hutchison
CHRISTINE HUTCHISON
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CERTIFICATE OF COMPLIANCE

Pursuant to Rule 11 of the Montana Rules of Appellate Procedure, I certify that this response is printed with a proportionately spaced Times New Roman text typeface of 14 points; is double-spaced except for footnotes and for quoted and indented material; and the word count calculated by Microsoft Word for Windows is 3,876 words, excluding caption, signatures, certificate of compliance, certificate of service, and any exhibits.

/s/ Christine Hutchison

CHRISTINE HUTCHISON

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. OP 25-0049

RICHARD ANTHONY GONZALO,

Petitioner,

v.

TOM GREEN, Warden,
Dawson County Correctional Facility,

Respondent.

EXHIBITS
Fourth Judicial District Court

Motion and Affidavit for Leave to File Information (Doc. 1; filed 7/5/2019; DC-19-389)	Ex. 1
Information (Doc. 5; filed 7/9/2019; DC-19-389)	Ex. 2
Motion and Affidavit for Leave to File Information (Doc. 1; filed 7/8/2019; DC-19-392)	Ex. 3
Information (Doc. 4; filed 7/9/2019; Cause No. DC-19-392)	Ex. 4
Request to Transmit Bail (Doc. 6; filed 7/8/2019; DC-19-392)	Ex. 5
Surety Bond 50,500 (filed 7/9/2019)	Ex. 6
Motion and Affidavit for Leave to File Information (Doc. 1; filed 7/19/2019; DC-19-428)	Ex. 7

State’s Petition to Revoke Defendant’s Release (filed 7/12/2019)	Ex. 8
Arrest Warrant (filed 7/15/2019)	Ex. 9
Information (Doc. 3; filed 7/23/2019; DC-19-428)	Ex. 10
2nd Amended Information (Doc. 19; filed 8/20/2019; DC-19-428)	Ex. 11
Minute Entry (dated 12/26/2019; DC-19-392).....	Ex. 12
Order (Doc. 29; filed 12/27/2019; DC-19-392)	Ex. 13
Order (Doc. 39; filed 12/27/2019; Cause No. DC-19-428)	Ex. 14
Minute Entry (dated 2/20/2020; DC-19-392).....	Ex. 15
Filed Under Seal: PSI Report (filed 10/5/2021)	Ex. 16
Minute Entry (dated 6/25/2020; DC-19-392).....	Ex. 17
Global Plea Agreement (Doc. 50; filed 4/21/2021; DC-19-389, -392, -428)	Ex. 18
Judgment (Doc. 61; filed 10/20/2021; DC-19-392)	Ex. 19
Judgment (Doc. 65; filed 10/20/2021; DC-19-428)	Ex. 20

Minute Entry (dated 4/22/2021; Cause No. DC-19-389)	Ex. 21
Petition to Revoke (Doc. 62; filed 11/24/2021; DC-19-392)	Ex. 22
Petition to Revoke (Doc. 66; filed 11/24/2021; DC-19-428)	Ex. 23
Bench Warrant (Doc. 65; filed 7/11/2022; DC-19-392)	Ex. 24
Bench Warrant (Doc. 69; filed 7/11/2022; Cause No. DC-19-428)	Ex. 25
Order (Filed 12/21/2022; DC-19-428 and -392)	Ex. 26
Filed Under Seal: Authorization to Pick Up and Hold Probationer (filed 3/31/2023; DC-19-392)	Ex. 27
Initial Appearance on PV Hold (Doc. 80; filed 3/31/2023; DC-19-392)	Ex. 28
Filed Under Seal: 1st Supplemental to 1st Petition to Revoke (filed 4/7/2023; DC-19-392)	Ex. 29
Filed Under Seal: 1st Supplemental to 1st Petition to Revoke (filed 4/7/2023; DC-19-428)	Ex. 30
Minute Entry (Dated 7/26/2023; DC-19-392)	Ex. 31
Minute Entry (Dated 7/26/2023; DC-19-428)	Ex. 32
Judgment (Doc. 88; filed 8/1/2023; DC-19-392)	Ex. 33

Judgment (Doc. 92; filed 8/1/2023; DC-19-428)	Ex. 34
Order Amending Judgment (Doc. 95; filed 8/15/2023; DC-19-428)	Ex. 35
Motion for Clarification of Judgment (Doc. 96; filed 5/1/2024; DC-19-428)	Ex. 36
Order Amending Judgment (Doc. 99; filed 5/1/2024; DC-19-428)	Ex. 37
Second Order Amending Judgment (Doc. 97; filed 5/1/2024; DC-19-428)	Ex. 38
Affidavit of Michele McKinnon (Dated March 24, 2025; S.Ct. Case No. OP 25-0049)	Ex. 39

CERTIFICATE OF SERVICE

I, Christine M. Hutchison, hereby certify that I have served true and accurate copies of the foregoing Response/Objection - Petition for Writ to the following on 03-31-2025:

Kyle Patrick Chenoweth (Attorney)
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Service Method: eService

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Diane Anders (Interested Observer)
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Service Method: Conventional

Electronically signed by Wendi Waterman on behalf of Christine M. Hutchison
Dated: 03-31-2025