

AUSTIN KNUDSEN
Montana Attorney General
BRAD FJELDHEIM
Assistant Attorney General
215 North Sanders
P.O. Box 201401
Helena, MT 59620-1401
Phone: 406-444-2026
brad.fjeldheim@mt.gov

COUNSEL FOR RESPONDENT

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. OP 25-0157

BRYCE EVERETT PETERSON,

Petitioner,

v.

BRIAN GOOTKIN, Administrator,
Montana Department of Corrections,

Respondent.

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

In compliance with this Court's order of March 6, 2025, the Attorney General's Office (State) responds to the Petition for Writ of Habeas Corpus filed by Bryce Peterson (Peterson).

As part of its response, the State submits, and incorporates by reference, relevant documents from the district court proceeding and records from the Department of Corrections in the State's appendices. (*See* State's Appendices

(Apps.) 1-6.) The State requests that this Court take judicial notice of the documents and the facts presented in its appendices pursuant to Mont. R. Evid. 202(b)(6) (Court may take judicial notice of records from any Montana court) and Mont. R. Evid. 201(b)(2) (Court may take judicial notice of facts “not subject to reasonable dispute,” as they are “capable of accurate and ready determination by resort to sources whose accuracy cannot be reasonably questioned”).

BACKGROUND

I. Peterson’s charges, pleas, and sentences

On November 6, 2008, the State charged Peterson with the felony offenses of aggravated kidnapping, aggravated assault, assault with a weapon, intimidation, and aggravated burglary, and the misdemeanor offense of partner or family member assault (PFMA). (Pet’r’s Ex. 1; *State v. Peterson*, 2013 MT 329, ¶ 2, 372 Mont. 382, 314 P.3d 227 (hereinafter Peterson I); State’s App. 1.) On September 10, 2009, Peterson pleaded guilty by *Alford*¹ to all the charged offenses. (Pet’r’s Ex. 2; *Peterson I*, ¶¶ 8-14.) On November 13, 2009, the district court sentenced

¹ Pursuant to *North Carolina v. Alford*, 400 U.S. 25 (1970), a court may accept a defendant’s knowing, voluntary, and intelligent guilty plea, even if the defendant maintains his innocence. Defendants who enter *Alford* pleas have the same legal status as defendants who admit their guilt. *Lawrence v. Guyer*, 2019 MT 74, ¶¶ 6-10, 395 Mont. 222, 440 P.3d 1.

Peterson to a prison term of 70 years with 20 years suspended. (Pet'r's Ex. 3; State's App. 5 at 145-46.)

II. The offenses

A. The State's allegations

Because Peterson pleaded guilty by *Alford*, the facts begin with the State's allegations in its affidavit in support of the information. The affidavit provided:

On October 17, 2008, at 1:16 p.m., a resident of Victor called the Ravalli County 911 Center to report that an adult female, identified as Heather Portner, had just asked for her help, to call 911, because she was being chased by a man in a pickup with a gun. The reporting party assisted the victim in taking refuge in the Church of Nazarene building in Victor, Montana. The victim identified the assailant as Defendant.

The investigation determined that after Defendant and the victim had spent the previous night together at the Defendant's home in Victor, the victim had left Defendant's home on the morning of October 17th and returned to her home to prepare for the two of them going to doctor visits in Missoula. Eventually Defendant and the victim argued on the phone about Defendant cancelling his doctor's appointment that morning. In the end of the argument the victim told Defendant to never contact her again.

Shortly thereafter, while [the victim] was laying [sic] on the couch in her residence in Victor, Montana, Defendant knocked on her front door. The victim told Defendant to "go away," after which Defendant kicked in the door. During the investigation RCSO Deputy Pease observed that the door jam[b] to the victim's residence was now broken, with the locked door now easily swinging open.

After Defendant gained access to the victim's home, he began slapping her, and twisted her arm very hard to put her on the floor.

Defendant continued to assault the victim by hitting her and picking her up by her twisted arm. As Defendant tried to force the victim outside to his truck, the victim attempted to defend herself, causing the Defendant to knock the victim to the floor and hit and kick her for an extended period of time as she laid on the floor.

Defendant then forced the victim to leave with him in his truck, driving on Highway 93 toward Missoula. During this drive, Defendant made a cell phone call to St. Patrick's Hospital to report that the victim had "overdosed" on her medication and was combative. During this phone call the victim attempted to cry out, for which Defendant punched her in the head. Throughout this drive Defendant yelled questions at the victim, after which he slapped her repeatedly for either her answer or her non-responsiveness.

As Defendant slowed his truck within the town of Lolo to make a left turn onto Highway 12, the victim attempted to jump out of the moving truck. However, Defendant was able to grab the victim by the hair, keep her in the truck, and proceeded to slam her head and face into the seat and the console while holding her hair. Defendant told the victim that he was taking her where "nobody will ever find you," and after pulling off onto a side road and stopping, asked the victim "is this a good place?" Defendant then told the victim that he thought her arm looked like it was broken and posed the question "what do you want me to do?"

Thereafter, Defendant drove back to Victor, Montana to his residence. After parking in the garage, Defendant told the victim that "I'm going to end this for both of us," and proceeded to push the victim into the living room of his house. Defendant then put a handgun to his head, but when the victim looked away he began slapping and hitting her across the face. Because the victim's cell phone had been repeatedly ringing, Defendant then changed to demanding that the victim give him her password for her messages, slapping her repeatedly for refusing.

During this prolong[ed] assault, as the result of a separate 911 call concerned about the victim's safety, RCSO Sgt. Hudson approached the door of the residence looking for the victim, knocking and announcing himself. When this happened, Defendant pointed the

handgun at the victim's face in very close proximity, threatening her life if she said "a word." Eventually Sgt. Hudson, not receiving a response, left the residence.

While confined to this residence, the victim observed the Defendant make several phone calls. One she overheard was to Defendant's mother, in which he again told the story that the victim had "overdosed" and had struggled with him, causing the victim to be bruised up. Defendant told his mother that since he knew he would be arrested he was "just going to let her die."

During another phone call, while Defendant was pacing into another room, the victim managed to run out of the back door of the residence onto 5th Street, and flagged down a woman riding a bike. Shortly thereafter the reporting party also rode up on a bike, with her seven-year-old-son, placed the 911 call, and assisted the victim into the nearby church. During this frantic contact with the bicycle riders, the victim reported that Defendant had kidnapped and assaulted her, as described above.

Upon making contact, Deputy Pease noted multiple bruises and the injured arm described by the victim.

Defendant then barricaded himself into his residence, eventually being surrounded by a large number of Law Enforcement Officers. During this standoff, Defendant made numerous threats to kill Law Enforcement Officers, including a specific threat communicated to a Ravalli County Dispatcher that Defendant would shoot a particular Deputy, who was in a particular vehicle, in the head. In fact, at that moment, Detective Jesse Jessop was in the very position described by Defendant.

After approximately 18 hours, the standoff ended with Defendant surrendering to the officers. Because Defendant has an apparent history of bi-polar or similar disorder, he was taken immediately to St. Patrick's Hospital for evaluation, and cleared for return to the detention center. An initial search of Defendant's residence located at least 7 rifles and 1 shotgun within the residence.

(State's App. 2.)

B. Additional facts provided during the proceedings

Although Peterson pleaded guilty by *Alford*, testimony provided during pretrial and sentencing hearings provided additional facts regarding the offenses.

During the morning of October 17, 2008, Ravalli County Deputy Shad Pease (Deputy Pease) made a welfare check on a residence north of Stevensville, Montana, based on a report of an allegedly suicidal female. (State's App. 4 at 13; State's App. 5 at 25.) Deputy Pease found indications of forced entry because the front door jamb was broken and there was a footprint above the doorknob. (State's App. 4 at 13-14.) The front room of the home was in disarray, but no one was home, and Deputy Pease could not determine when the damage to the door occurred. (*Id.* at 15.) The home belonged to Heather Portner (Portner). (*Id.*)

At approximately 1:22 p.m., Deputy Pease responded to a second call from dispatch in Victor, Montana. (State's App. 3 at 51-52; State's App. 4 at 15-16.) Dispatch advised "that there was a woman running down the street screaming and being followed by a man in a pickup truck waving a gun." (State's App. 4 at 16.) The caller had seen Portner running away from the man, called 911, and escorted Portner to a church where they waited for law enforcement to arrive. (State's App. 3 at 56-57.)

About two minutes after the 911 call, Deputy Pease contacted Portner at the church. (*Id.* at 52.) Portner, who was wearing a T-shirt and pajama bottoms, was:

in a high state of agitation. She was very frightened. She was concerned for her safety, her well-being. When I got her inside the church and sat her down in the office, she was still jumpy. She was still reacting as if somebody was going to come through me and the surrounding individuals, as well as the church walls in order to get to her. She was extremely frightened. . . . her hair was a mess. She'd had [sic] been crying. Her features were flushed and very, very agitated, very disturbed. She was trembling. She had sizable bruises upon her body to show part of the reason for it, I suppose. It took a few minutes for her to finally settle down enough to actually talk to me and present me with some information²

(*Id.* at 54.)

Portner told Deputy Pease:

Bryce Peterson was trying to kill her; Bryce Peterson had told her that he was going to kill her and then kill himself. She further told me how Bryce had abducted her from her home that morning with the intent to make it appear as if she was suicidal that morning. She provided statements to me alleging to his continued demeanor throughout the several hours that she was in his possession that caused her to fear for her life.

(*Id.* at 55.) Portner described to Deputy Pease that Peterson had grabbed her by the hair and forced her into his truck, slamming her head into the interior of the truck.

(State's App. 4 at 25.) Portner said Peterson had kidnapped her and kept her in his home for a number of hours before she escaped. (*Id.* at 17.) Portner told

Deputy Pease, "He was kicking me and kicking me. He was beating me and

² Deputy Pease provided this testimony in a pretrial hearing regarding the admissibility of Portner's statements as an excited utterance exception to hearsay. (State's App. 3 at 60-65.) The district court ruled the statements Portner made in the church were excited utterances and admissible through Deputy Pease's testimony. (*Id.* at 65.)

beating me.” (State’s App. 3 at 59.) Portner said, “He was punching me in the back of the head with a gun.” (State’s App. 4 at 26.)

Deputy Pease saw “severe bruising” on Portner. (State’s App. 3 at 57.) “She had a large bruise upon her shoulder. She had bruises upon her legs where she had been kicked while laying on the ground in front of the couch. She had a sizable bruise and swelling on her wrist, on her right wrist.” (*Id.* at 59.) Portner believed her wrist was broken. (State’s App. 4 at 24.) Deputy Pease took photographs of Portner’s injuries on October 17, 2008, after medical personnel determined the injuries were not life threatening. (State’s App. 3 at 58; State’s App. 4 at 32-33.)

Deputy Pease spoke with Portner for approximately 35 to 40 minutes at the church. (State’s App. 3 at 61.) Portner remained in distress throughout this period because Peterson had not been located. (*Id.* at 61-62.) There was a report that Peterson’s truck was seen leaving Victor at a high speed. (State’s App. 4 at 22-23, 58-59.) Law enforcement searched for Peterson for about two hours before he was found at his house, which then resulted in an 18-hour standoff. (*Id.* at 22-23, 35-41, 54-55, 74-116.)

Around 4 p.m., Portner went to the emergency room in Missoula for treatment of her injuries, and she again sought medical care on October 20, 2008. (*Id.* at 43-44, 61-63.) The doctor found Portner to have a perforated eardrum and a concussion. (*Id.*) Portner’s eardrum had previously been reconstructed as a youth

but based on a CT scan the doctor determined the reconstructed eardrum had been perforated due to recent trauma. (*Id.*) On October 21, 2008, a deputy again photographed Portner's various injuries from the October 17, 2008 incident. (*Id.* at 28-34.) The second set of photographs showed bruises on Portner's back, left shoulder, both arms, right wrist, left hip and buttock, right thigh, and face. (*Id.*)

During the sentencing hearing, Portner said:

Physically I'm still healing, my neck and shoulder and tissue damage that I've been told may never entirely heal. More than likely there will always be some pain and discomfort. I'm deaf in one ear from being hit repeatedly in the head. I feel it's reasonable to say I will never be the same person I was prior to October 17th, 2008, either physically, emotionally or mentally.

(*Id.* at 153.) Portner said she had "nightmares, continued anxiety, and . . . withdrawal from social contact." (*Id.*) She said she had been in therapy for "a year to get over the fear of being in the same room as [Peterson]." (*Id.*)

Peterson also testified during the sentencing hearing. (State's App. 5 at 54-116, 131-33.) He made various admissions to his conduct, but he maintained that his intentions were innocent because he was trying to save Portner from suicide. (*Id.*)

III. Peterson's prior challenges to his convictions in state court

On January 22, 2010, Peterson filed a notice of appeal, but later moved to dismiss it. *Peterson v. State*, 2017 MT 165, ¶¶ 11-12, 388 Mont. 122, 398 P.3d 259 (hereinafter Peterson II). In November 2010, Peterson filed a motion to withdraw

his pleas in state district court, which the court denied after an evidentiary hearing. *Peterson I*, ¶¶ 16-18. On direct appeal, Peterson challenged the district court's denial of his motion and the restitution in the judgment. *Peterson I*, ¶¶ 1-42. This Court affirmed but remanded to determine the amount of restitution. *Id.* This Court denied Peterson's petition for rehearing. *Peterson II*, ¶ 4.

On December 17, 2014, Peterson filed a pro se petition for postconviction relief in state district court raising numerous claims. *Id.* ¶ 5. The district court rejected the State's argument that Peterson's petition was time-barred and denied Peterson's petition on the merits. *Id.* This Court affirmed the denial of Peterson's petition but concluded it was untimely. *Id.* ¶¶ 11-20.

On November 7, 2016, while Peterson's postconviction appeal was pending, Peterson filed a petition for writ of habeas corpus in this Court, arguing the state district court judge in his criminal case should have recused himself for judicial bias. *Peterson v. Kirkegard*, Mont. Sup. Ct. No. OP 16-0668. This Court denied Peterson's habeas petition and his petition for rehearing. *Peterson v. Kirkegard*, OP 16-0668, (Mont. Sup. Ct. Nov. 22, 2016 Order; Dec. 28, 2016 Order).

On December 19, 2019, Peterson filed a pro se second petition for postconviction relief. *Peterson v. State*, 2021 MT 153N, ¶ 5, 404 Mont. 557, 489 P.3d 1. Peterson claimed both his trial and appellate attorneys provided him ineffective assistance of counsel and alleged he was actually innocent of

aggravated assault, assault with a weapon, and aggravated kidnapping. *Id.* The state district court rejected Peterson's actual innocence allegations and denied his petition as untimely. *Id.* This Court affirmed. *Id.* ¶¶ 7-13.

On August 18, 2023, Peterson, through counsel, filed another petition for writ of habeas corpus. *Peterson v. Kirkegard*, Mont. Sup. Ct. No. OP 23-0453. This Court rejected Peterson's argument that the parole board exceeded its authority in its initial denial of his parole and imposition of programming requirements before the next scheduled hearing and denied his petition. *Peterson v. Kirkegard*, OP 23-0453, (Mont. Sup. Ct. Nov. 14, 2023 Order).

IV. Peterson's challenges to his convictions in federal court

On February 17, 2017, Peterson filed a petition for habeas relief in federal court pursuant to 28 U.S.C. § 2254. (State's App. 6.) After various federal district court proceedings and two appeals, the Ninth Circuit affirmed the denial of all Peterson's claims in memorandum opinions. *Peterson v. Montana*, 848 Fed. Appx. 781 (2021), 2021 U.S. App. LEXIS 15889 (9th Cir. May 27, 2021); *Peterson v. Montana*, ___ Fed. Appx. ___ (2024), 2024 U.S. App. LEXIS 3097 (9th Cir. Feb. 9, 2024). On March 4, 2024, the federal district court entered the Ninth Circuit's mandate into the record, which concluded Peterson's federal habeas case. (State's App. 6.)

V. Peterson's most recent state habeas petition

On February 21, 2025, Peterson, through counsel, filed the habeas petition in this case. Peterson argues two of his convictions violate his statutory and constitutional double jeopardy rights. He asserts that his PFMA conviction (Count VI) was the predicate offense to the aggravated burglary conviction (Count V) and his aggravated assault conviction (Count II) is a lesser included offense of assault with a weapon (Count III). For both challenges, Peterson argues he is serving two sentences for the same conduct in violation of his double jeopardy rights. He asks this Court to remand for resentencing with instructions to strike his sentence for his aggravated assault conviction and provide unspecified relief based on his sentences for his convictions for aggravated assault and assault with a weapon.

STANDARD OF REVIEW AND APPLICABLE LAW

A person who is incarcerated or restrained of liberty can 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. “[T]he 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. This Court will grant relief to a convicted offender who meets their burden to show they are serving “a facially invalid sentence—a sentence which, as a matter of law, the court had no authority to impose.” *Lott v. State*, 2006 MT 279, ¶ 22, 334 Mont. 270, 150 P.3d 337.

ARGUMENT

I. Peterson’s claims are not appropriate for habeas review.

“The writ of habeas corpus is not available to attack the validity of the conviction or sentence of a person who has been adjudged guilty of an offense in a court of record and has exhausted the remedy of appeal.” Mont. Code Ann. § 46-22-101(2); *Lott*, ¶¶ 4, 18-19; *Morrison v. Mahoney*, 2002 MT 21, ¶ 9, 308 Mont. 196, 41 P.3d 320. Despite Peterson’s numerous efforts to challenge his 2009 plea and sentence, he has never before raised a double jeopardy claim. Peterson is precluded from challenging his convictions on double jeopardy grounds in a petition for habeas corpus relief because he has appealed, thereby exhausting the remedy of appeal. Mont. Code Ann. § 46-22-101(2); *see also Robertson v. State*, 2022 Mont. LEXIS 146, *2, 408 Mont. 541 (table format), 507 P.3d 141 (refusing to consider a double jeopardy claim for the first time in a habeas corpus petition); *Toulouse v. Salmonsén*, 2025 Mont. LEXIS 103, *2-3, 565 P.3d 1184 (table format) (same).

Habeas corpus is not a second avenue to raise constitutional claims that could have been raised on direct appeal. *Toulouse*, *3 (“Habeas corpus is also not the remedy for constitutional challenges.”). “More than thirty years ago, this Court stated that alleged violations of constitutional rights cannot be addressed in a writ of habeas corpus because the claims do not ‘challenge the legal sufficiency of the cause for incarceration.’” *Henderson v. Salmonsens*, 2023 Mont. LEXIS 133, *3-4, 411 Mont. 390 (table format), 526 P.3d 708 (table format) (quoting *Gates v. Missoula County Comm’rs*, 235 Mont. 261, 262, 766 P.2d 884, 884-85 (1988)) (emphasis in original).

Peterson has only challenged his convictions based on the general principles of double jeopardy. He has relied on numerous opinions addressing double jeopardy claims on direct appeal that explain the statutory and constitutional double jeopardy protections. These cases confirm that Peterson should have raised these claims on direct appeal. Moreover, the mere existence of a statutory or constitutional right does not support a violation, and the authority Peterson cites does not show that any sentence imposed by the district court in this case is unconstitutional on its face. *See Lott*, ¶ 22. The district court sentenced him within the statutory range for every offense that Peterson pleaded guilty to by *Alford*, and this Court previously affirmed that his pleas were valid. *Peterson I*, ¶ 39. Habeas corpus cannot provide Peterson with the remedy he seeks. *See Toulouse*, *2-3.

It is Peterson’s burden to present a record sufficient to make a prima facie showing that he is entitled to habeas relief. *See Miller*, ¶ 14. To support his petition, Peterson provided three documents: the Information, the document confirming his *Alford* pleas and waiver of rights, and the judgment. These documents merely confirm that the State charged Peterson with these offenses, Peterson pleaded guilty by *Alford* to all the charges, and the district court sentenced him accordingly. He has not provided anything to support his argument that the aggravated burglary conviction was based on the same conduct that supported the PFMA conviction or that the aggravated assault conviction was based on the same conduct that supported his conviction for assault with a weapon. Peterson has failed to meet his burden to present a sufficient record, *see id.*, and “[a] writ of habeas corpus is not the vehicle for a fact-finding endeavor.” *Billedeaux v. Bell*, 2024 Mont. LEXIS 162, *2, 416 Mont. 552 (table format), 545 P.3d 1068 (table format).

This Court should deny Peterson’s petition because he has failed to raise an appropriate claim for habeas relief and otherwise fails to meet his burden.

II. Even if this Court considers Peterson’s claims, he has failed to show he is entitled to relief based on double jeopardy.

Peterson has omitted from his petition the facts that supported the State’s charges and compelled him to plead guilty by *Alford*. Peterson entered his *Alford*

pleas based on the facts alleged by the State, which were further supported by testimony provided during various district court proceedings. Those facts provided independent grounds to support every one of Peterson's convictions, including those he has attempted to challenge in his petition. The facts show Peterson kicked in Portner's front door after she told him to go away and he repeatedly assaulted Portner in her home. The facts support Peterson's aggravated burglary conviction, and the extended duration of numerous subsequent assaults independently supports his convictions for PFMA, aggravated assault, and assault with a weapon.

Peterson forced Portner to leave with him in his pickup and assaulted her repeatedly in the pickup. This included punching Portner in the head when she attempted to call out to emergency medical services and pulling Portner back into the pickup by her hair when she tried to escape. Peterson drove Portner to the end of a remote mountain road and told her they were going to commit suicide together. Peterson drove Portner back to his house, told Portner "I'm going to end this for both of us," and continued to assault Portner in numerous ways. (State's App. 2 at 3.) While she was in Peterson's home, an officer knocked on the door, and Peterson pointed a gun at Portner's face and threatened her life to keep her quiet. During a phone call with his mother, Peterson said he was going to be arrested and he was "just going to let [Portner] die." (*Id.* at 4.) As a result of Peterson's actions, Portner exhibited extreme emotional trauma to multiple

witnesses and had numerous serious bodily injuries that were well-documented in the record.

Peterson's double jeopardy arguments are merely conceptual and unsupported by facts. Double jeopardy does not prohibit the State from charging a defendant for numerous assaults in the same case. Mont. Code Ann. § 46-11-410(1); *State v. Davison*, 2003 MT 64, ¶ 17, 314 Mont. 427, 67 P.3d 203. This Court has "stated that 'when the facts support a possible charge of more than one crime, the crime to be charged is a matter of prosecutorial discretion.'" *Davison*, ¶ 17 (quoting *State v. Savaria*, 284 Mont. 216, 224, 945 P.2d 24, 29 (1997)). Here, the State exercised its discretion to charge Peterson with multiple assaults that were each supported by separate and distinct evidence. *See id.*; Mont. Code Ann. § 46-11-410(1).

Peterson's double jeopardy arguments are meritless. He has provided nothing to show the facts supporting the aggravated burglary charge were the same as those that supported the PFMA. The lesser-included offense analysis provides no support for the challenge of his convictions for aggravated assault and assault with a weapon because independent evidence supported both convictions. More than 15 years ago, Peterson knowingly, voluntarily, and intelligently pleaded guilty by *Alford* to all his offenses of conviction, and the district court imposed lawful sentences for each. Peterson has failed to show he is serving a facially invalid sentence, and he is not entitled to habeas corpus relief. *See Lott*, ¶ 22.

CONCLUSION

The State respectfully requests this Court deny Peterson's petition for habeas corpus.

Respectfully submitted this 24th day of July, 2025.

AUSTIN KNUDSEN
Montana Attorney General
Justice Building
P.O. Box 201401
Helena, MT 59620-1401

By: /s/ Brad Fjeldheim
BRAD FJELDHEIM
Assistant Attorney General

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 4,367 words, excluding caption, signatures, certificate of compliance, certificate of service, and any exhibits.

 /s/ Brad Fjeldheim
BRAD FJELDHEIM

IN THE SUPREME COURT OF THE STATE OF MONTANA

No. OP 25-0157

BRYCE EVERETT PETERSON,

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BRIAN GOOTKIN, Administrator,
Montana Department of Corrections,

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APPENDIX

Ravalli County District Court Cause No. DC-08-151

Case Register.....	App. 1
State’s Affidavit in Support of Information.....	App. 2
Transcript of August 25, 2009 pretrial hearing.....	App. 3
Transcript of October 23, 2009 sentencing hearing, day 1	App. 4
Transcript of November 13, 2009 sentencing hearing, day 2	App. 5

United States District Court of Montana Cause No. CV 17-19

Docket Report	App. 6
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CERTIFICATE OF SERVICE

I, Brad Fjeldheim, hereby certify that I have served true and accurate copies of the foregoing Response/Objection - Petition for Writ to the following on 07-24-2025:

Nicholas Kirby Brooke (Attorney)
315 W. Pine St.
Missoula MT 59802
Representing: Bryce Everett Peterson
Service Method: eService

Kyle Patrick Chenoweth (Attorney)
5 S. Last Chance Gulch
Helena MT 59620
Representing: Brian Gootkin
Service Method: eService

Charity N Yonker (Govt Attorney)
5 S LAST CHANCE GULCH
HELENA MT 59601-4178
Service Method: eService
E-mail Address: Charity.Yonker@mt.gov

Electronically signed by LaRay Jenks on behalf of Brad Fjeldheim
Dated: 07-24-2025