

ORIGINAL

FILED

09/30/2025

Bowen Greenwood
CLERK OF THE SUPREME COURT
STATE OF MONTANA

FILED

Case Number: OP 25-0683

MONTANA SUPREME COURT

SEP 30 2025

Bowen Greenwood
Clerk of Supreme Court
State of Montana

STATE OF MONTANA,
Plaintiff,

OP 25-0683

v.

LINDSEY RAE HOYT,
Defendant/Relator.

District Court Cause No.: DDC-2023-606

Addendum to

PETITION FOR WRIT OF SUPERVISORY CONTROL

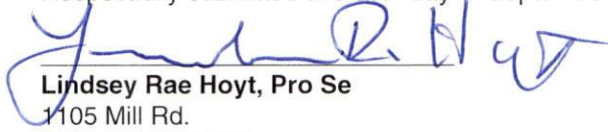
COMES NOW Petitioner, Lindsey Rae Hoyt, appearing pro se, and respectfully petitions this Honorable Court for a Writ of Supervisory Control over the Montana First Judicial District Court, Lewis and Clark County, the Honorable Christopher Abbott presiding, in Cause No. DDC-2023-606. In support thereof, Petitioner states as follows:

1. On September 15, 2025, Petitioner filed a Refiled Motion to Dismiss for Lack of Evidence with Exhibits. The District Court denied the motion on September 17, 2025, stating only that none of the asserted grounds were adequate, without addressing the substance of Petitioner's constitutional and evidentiary claims.
2. Petitioner has been repeatedly incarcerated not for new charges, but based solely on alleged "noncompliance" with pretrial drug testing, which is tied directly to Petitioner's inability to pay for testing. This has resulted in excessive bond of more than \$155,000 and repeated jailing, violating the Eighth Amendment to the U.S. Constitution and Article II, § 22 of the Montana Constitution.
3. The State's evidence inventory (Exhibit B to Petitioner's motion) listed an incorrect address (5820 N. Montana Ave.), which does not match Petitioner's residence. This discrepancy undermines chain of custody and validity of the State's evidence.
4. The charge filed December 14, 2023 has led to repeated incarceration, loss of housing, transportation, and employment, despite the State failing to present sufficient admissible evidence to sustain prosecution.
5. The denial of Petitioner's motion to dismiss, without a meaningful review of constitutional arguments and evidentiary defects, constitutes an abuse of discretion warranting this Court's supervisory control.

WHEREFORE, Petitioner respectfully requests that this Court:

- a. Accept jurisdiction and issue a Writ of Supervisory Control;
- b. Reverse the District Court's denial of Petitioner's Motion to Dismiss;
- c. Dismiss the charges in Cause No. DDC-2023-606 with prejudice; or, in the alternative,
- d. Grant such other relief as this Court deems just and proper.

Respectfully submitted this 30th day of September, 2025.



Lindsey Rae Hoyt, Pro Se

1105 Mill Rd.

Helena, MT 59602

Phone: (406) 410-4514

CERTIFICATE OF SERVICE

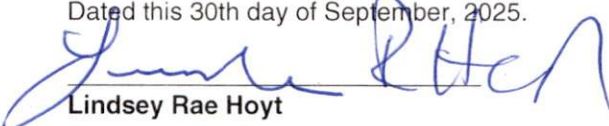
I hereby certify that on this date I served a true and correct copy of the foregoing Petition for Writ of Supervisory Control, with Proposed Order, by depositing the same in the U.S. Mail, postage prepaid, addressed to:

Montana Attorney General
215 N. Sanders
Helena, MT 59620

Lewis and Clark County Attorney
228 Broadway, Room 307
Helena, MT 59601

Hon. Christopher Abbott
Montana First Judicial District Court
228 Broadway
Helena, MT 59601

Dated this 30th day of September, 2025.


Lindsey Rae Hoyt