STATE OF NORTH DAKOTA

COUNTY OF WELLS

SOUTHEAST JUDICIAL DISTRICT

State of North Dakota,)	
	Plaintiff,)	
	vs.)	Probable Cause Affidavit
Johnny Zip Lawson (D.O.B. 03/27/1976)	Defendant.)	

I, <u>Special Agent Craig Zachmeier</u>, being first duly sworn, depose and swear that I have a peace officer's license through the State of North Dakota, and that I am employed with the North Dakota Bureau of Criminal Investigation. I swear and affirm through the penalty of perjury that the following statements made in this affidavit are true and correct to the best of my knowledge, information and belief.

March 23, 2016

- 1. S/A Zachmeier assisted the Harvey Police Department and Fessenden Police Department with the investigations of two (2) residential burglaries which occurred in Harvey, ND on March 7, 2016 and in Fessenden, ND (Wells County) on March 14, 2016. Alexander Lall was identified as a suspect in both burglaries.
- 2. As part of the burglary investigation, Joseph "Ruger" Thomas was identified as a suspect and possible co-conspirator to the burglaries. Joseph Thomas was an employee of Alexander Lail, for Alexander Lail's business-Central Plains Restoration.
- 3. Through the burglary investigation, law enforcement learned that Alexander Lail and Joseph Thomas were involved in the usage and distribution of narcotics, namely: marijuana and methamphetamine.
- 4. S/A Zachmeier briefed Sheriff Johnny Lawson on the investigation. [In S/A Casey Miller's interview of Johnny Lawson on April 25, 2017, S/A Miller asked Lawson if anyone had given Lawson information about Alexander Lail selling or using narcotics and Sheriff Lawson stated not specifically. Sheriff Lawson stated that "people" were saying that Alexander Lail was the drug supplier, and that Alexander Lail is the individual that was doing it, but no real specific information.]

March 29, 2016

1. Joseph Thomas met with his probation officer, Aaron Hall, at the Harvey Police Department. Officer Hall met with Joseph Thomas in a closed office at the Harvey Police Department. The meeting was video recorded. Joseph Thomas admitted that he had been ingesting marijuana and methamphetamine and admitted there would be marijuana and methamphetamine in his system. Joseph Thomas advised that he last used

methamphetamine on March 27, 2016 with Alexander Lail in Alexander Lail's garage. Joseph Thomas tested positive for the ingestion of methamphetamine.

April 4, 2016

- Joseph Thomas was arrested by the Wells County Sheriff's Department for aggravated assault in reference to assaulting his ex-girlfriend Kehley Powell. Joseph Thomas was transported to the Pierce County iail.
- 2. S/A Zachmeier conducted a video recorded interview with Makayla Trautman from Harvey, North Dakota. Makayla Trautman was incarcerated at the Pierce County jall for a residential burglary which occurred in Harvey, North Dakota on March 27, 2016.
- 3. Makayla Trautman advised that she was involved in narcotics in the Harvey, North Dakota area. Makayla Trautman stated that she knows an "Alex" from Fessenden, North Dakota which Makayla Trautman referred to as the "tweaker guy." Makayla Trautman described "Alex" and her description matched the description of Alexander Lail.
- 4. Makayla Trautman stated that she receive methamphetamine from "Alex" on March 25, 2016 in Fessenden, North Dakota at Heather's (last name unknown to Trautman-later identified as Heather Burrington) house. Michaela Trautman stated that Heather works at the Cenex station in Fessenden, North Dakota and drives a red van. (S/A Zachmeier verified that a Heather Burrington worked at the Cenex station in Fessenden and drove a red van, and in April 2016 lived in a house across from Cenex in Fessenden.) Makayla Trautman stated "Alex" had a backpack and inside the backpack was a baggy approximately half full of methamphetamine. Makayla Trautman stated she traded approximate \$20 worth of marijuana for two tiny crystals of methamphetamine. Makayla Trautman advised that "Alex" provided a glass pipe for Makayla Trautman to smoke the methamphetamine from it.

April 5, 2016

- 1. S/A Zachmeier conducted a video recorded interview with Joseph Thomas. S/A Zachmeier advised Joseph Thomas of his Miranda rights.
- 2. Joseph Thomas stated that he last talked to Alexander Lail approximate two (2) to three (3) days ago. Alexander Lail was following Kehley Powell around and Kehley Powell reported to Joseph Thomas that Alexander Lail was stalking her. Joseph Thomas stated that he told Alexander Lail to leave Kehley Powell alone and added that he was not going to deal with texting.
- Joseph Thomas verified that the methamphetamine in Joseph Thomas' system on March 29, 2016 came from Alexander Lail. Joseph Thomas stated he smoked methamphetamine with Alexander Lail at Alexander Lail's house, in the garage in Fessenden, North Dakota. Joseph Thomas advised that Alexander Lail had been using methamphetamine for approximately eight (8) months. S/A Zachmeier asked Joseph Thomas how many times he saw Alexander Lail use methamphetamine. Joseph Thomas stated that it was under a dozen.

- 4. Later in April 5, 2016 S/A Zachmeier began reviewing text messages and photographs on Joseph Thomas' cell phone. There were multiple text messages and photographs indicating that Alexander Lail and Joseph Thomas are involved in the usage and distribution of narcotics including photographs of narcotics and photographs of US currency.
- 5. S/A Zachmeier briefed Sheriff Lawson about the information from Joseph Thomas, that there was evidence of narcotics use and distribution on Joseph Thomas' cell phone and of the information from Makayla Trautman. Sheriff Lawson identified the "Heather" that Makayla Trautman described as Heather Burrington. . [In S/A Casey Miller's interview of Johnny Lawson, S/A Miller asked Sheriff Lawson if anyone had given Sheriff Lawson information on Alexander Lail selling or using narcotics and Sheriff Lawson stated "not specifically". Sheriff Lawson stated that "people" were saying that Alexander Lail was the drug supplier, and that Alexander Lail is the individual that was doing it, but there was no real specific information.}
- 6. (S/A Zachmeier believes that this is probable cause that the April 25, 2017 statement by Sheriff Lawson to S/A Miller that he did not have specific information is a false statement as S/A Zachmeier provided detailed and specific information that Alexander Lail was using, delivering, and selling narcotics in Fessenden, Wells County, ND.)

April 8, 2016

- S/A Zachmeier obtained a search warrant for Alexander Lail's cell phone. The Honorable Judge Thomas Merrick issued the search warrant.
- 2. S/A Zachmeier advised Sheriff Lawson of the search warrant for Alexander Lail's cell phone.

April 12, 2016

- 1. A pre-search warrant briefing took place at the Harvey Police Department. Sheriff Lawson was present for the briefing in which it was discussed that Alexander Lail was involved in the usage and distribution of narcotics (methamphetamine) with Joseph Thomas.
- 2. Alexander Lail was located by the Wells County Sheriff's Department. Sheriff Lawson was present for the search warrant execution. The search warrant was executed and Alexander Lail's cell phone was seized. Located on the cell phone was a photograph of methamphetamine on a scale with the photograph being forwarded to Joseph Thomas. Also located was a photograph depicting property stolen during the Scott Rapp burglary.
- 3. 2:50 pm- S/A Zachmeier met with Alexander Lail in a closed office at the Harvey Police Department. S/A Zachmeier advised Alexander Lail of his miranda rights which Alexander Lail acknowledged he understood. Alexander Lail admitted he took the photograph of the methamphetamine and admitted he had been using methamphetamine. S/A Zachmeier showed Alexander Lail the photograph on Alexander Lail's phone of property stolen (speakers) from the Scott Rapp burglary at which time

Alexander Lail requested to have an attorney present.

- 4:15 pm- S/A Zachmeier conducted a videotaped interview with Kehley Powell, Joseph Thomas' girlfriend. Kehley Powell stated that she was aware that Tyler Schnase and Scott Rapp supposedly owed Alexander Lail money and she was 100% sure Alexander Lail did the burglaries. Kehley Powell stated that Alexander Lail would come to her house and go into the basement with Joseph Thomas to do drugs.
- 5. Kehley Powell advised she believed Alexander Lail was stalking her. Kehley Powell stated that Alexander Lail had been stalking her for three (3) to four (4) days prior to being assaulted by Joseph Thomas (April 4, 2016). Kehley Powell stated it was as if Alexander Lail was following her for days and seemed like Alexander Lail was always there.
- 6. 6:25 pm- S/A Zachmeier met with Donna Lail and showed Donna Lail the photographs of the stolen speakers from Alexander Lail's phone. Donna Lail confirmed that Alexander Lail was using methamphetamine and that Alexander Lail is having an affair with Deanna Neurohr. Donna Lail could not identify the closet the speakers were in in the photograph from Alexander Lail's phone.
- 7. Sheriff Lawson was with on the search of the Fessenden address with Donna Lail. Sheriff Lawson advised Donna Lail that when Alexander Lail was stopped earlier on this day that Alexander Lail tried to hide his cell phone in the vehicle which Alexander Lail was operating.

April 20, 2016

- 1. 4:00 pm-S/A Zachmeier met with Deanna Neurohr in a closed office at the Harvey Police Department. Deanna Neurohr advised that she had entered into a sexual relationship with Alexander Lail and that they both use methamphetamine and they had been using methamphetamine together.
- 2. S/A Zachmeier asked Deanna Neurohr what her knowledge was of the Scott Rapp and Tyler Schnase burglaries. Deanna Neurohr stated that she knew Alexander Lail did the burglaries because they owed Alexander Lail money. Deanna Neurohr stated Alexander Lail never admitted to doing the burglaries but implied to Deanna Neurohr that he did the burglaries so Deanna Neurohr would know he did them.
- 3. Deanna Neurohr advised that Alexander Lail was obsessed with Joseph Thomas' girlfriend, Kehley Powell. Deanna Neurohr advised that Alexander Lail put a Global Positioning System (GPS) tracking unit on Kehley Powell's vehicle and was tracking her. Alexander Lail pulled up the GPS website on his phone and showed Deanna Neurohr exactly where Kehley Powell was and they followed her online utilizing the tracking unit.
- 4. S/A Zachmeier briefed Sheriff Lawson on the information from Deanna Neurohr.

July 28, 2016

1. The Wells County Sheriff's Office called the Eddy County Sheriff's Office to report
Alexander Lail shall be arrested for a domestic abuse report filed for assaulting Donna
Lail. Alexander Lail drove the white CPR van to the Eddy County Sheriff's Office and

turned himself in (Wells County as Case 52-2016-CR-00112). Donna Lail informed Sheriff Leis that Alexander Lail had been in treatment for methamphetamine use in California and had now started using methamphetamine again. Donna Lail stated Donna Lail was filing for divorce due to Alexander Lail's methamphetamine use and extra marital affair with Deanna Neurohr.

August 1, 2016

- Stephanie McNaughton, Donna Lail's daughter, contacted S/A Zachmeier and advised S/A Zachmeier that on Saturday July 30, 2016, she and Donna Lail entered Donna Lail's and Alexander Lail's building in New Rockford known as The Lodge at 616 Central Avenue. Stephanie McNaughton advised they believe they located some of the stolen property from the burglaries.
- 8:30 pm-S/A Zachmeier and Eddy County Sheriff Paul Lies met with Donna Lail and Stephanie McNaughton. Donna Lail stated that she does not go to the The Lodge building often but had furniture items stored inside. Donna Lail advised that the building was owned by both Donna Lail and Alexander Lail. Donna Lail stated that she went to The Lodge to check on property since she was in the process of filing for divorce from Alexander Lail (as Alexander Lail had recently physically assaulted Donna Lail and was arrested for domestic violence in Wells County Case 52-2016-CR-00112).
- 3. Donna Lail advised that she and Stephanie McNaughton noticed an attic entry and decided to see what property was in the attic. Stephanie McNaughton advised that when she pushed opened the door to the attic she saw two (2) lap top computers concealed in the attic. Donna Lail advised she remember the list of the stolen property from the spring.
- 4. Donna Lail provided consent to search and directed officers to The Lodge building, 616 Central Avenue, New Rockford, ND. Donna Lail then directed officers to the room where the attic entry was. The entry was in the ceiling and was an approximate twenty-four (24) inch square. S/A Zachmeier had to stand on a stool then pushed up on the piece of square wood covering the attic entry. S/A Zachmeier identified to lap top computers. S/A Zachmeier removed the computers and immediately identified them as matching the description of the computers stolen from Scott Rapp's apartment. They both had identifiable features to include stickers. No other areas of the building were searched.
- 5. S/A Zachmeier confirmed with Scott Rapp that the computers were his by the identifying stickers on them and sent photographs of them by text message to Scott Rapp. Still missing from Scott Rapp's apartment burglary are A Custom K200 PA system from the 1970'sand a vintage Pioneer HPM 100 speaker.
- 6. S/A Zachmeier contacted Sheriff Lawson and advised Sheriff Lawson that S/A Zachmeier recovered the stolen computers in New Rockford, ND from Alexander Lail's building and that there was enough to charge Alexander Lail related to the Wells County burglaries.

August 4, 2016

 On August 4, 2016 at about 10 p.m. ND HP Trooper Savageau was patrolling along Wells County Road #5 when he observed a Chrysler Sebring convertible with no front license plate. Trooper Savageau turned around to follow the Sebring vehicle to determine if there was a license plate on the rear of the vehicle. The vehicle the turn off of Wells County road #5 onto a gravel road.

- 2. Trooper Savageau followed the Sebring on the gravel road to try to determine if there was any kind of temporary registration sticker in the vehicle windows. The vehicle was traveling at high rates of speeds while on the gravel road and appeared to be trying to evade Trooper Savageau. The vehicle stopped on private property and a female got out of the vehicle, later identified as Deanna Neurohr. Trooper Savageau pulled his patrol car up next to the vehicle. Trooper Savageau observed that there was not a temporary registration and/or plates on the vehicle.
- Trooper Savageau made contact with the female driver. Trooper Savageau asked for identification from the female driver, and she identified herself as Deanna Neurohr. Deanna Neurohr was acting very erratic and suspicious as she began yelling at Trooper Savageau that he had no reason to follow her and her speech was very rapid and she was very excited. Deanna Neurohr kept backing away from the car, and complaining that the Trooper was following her. Trooper Savageau explained that he did not observe any plates and that he was checking for registration. Trooper Savageau asked for proof of registration and insurance. Deanna Neurohr did not have proof of registration.
- 4. Deanna Neurohr stated that she purchased the vehicle from Alexander Lail, but at that time the vehicle was not registered in Alexander Lail's name. During this conversation, Deanna Neurohr was acting very erratic and suspicious. Deanna Neurohr said that she was leaving the vehicle at that location, and she would get a ride. In checking the possible property ownership where the vehicle was located, the real property was listed as owned by Jane Olson. Trooper Savageau believed that the property appeared to be private property, but there was no indication that Deanna Neurohr had any legal basis to be on the private property.
- Deputy Juarez [on August 4, 2016 Deputy Juarez worked for the Wells County Sheriff's Office] arrived to assist Trooper Savageau. Trooper Savageau asked Deanna Neurohr for consent to search of the vehicle because he wanted to check if there was any further proof of ownership and/or registration and/or to determine if the vehicle was possibly stolen because Deanna Neurohr was giving inconsistent and suspicious answers about how she obtained the vehicle, and she stopped out in rural Wells County, and was appearing that she was going to just leave the vehicle at that location. After Trooper Savageau asked for consent to search the vehicle, at first Deanna Neurohr said yes that he and Deputy Juarez could search the vehicle. Then, Deanna Neurohr stated that she has rights and does not have to allow them to search the vehicle. Trooper Savageau asked if she was consenting or not to allow them to search the vehicle. At that point, Deanna Neurohr revoked her consent to search the vehicle. Deanna Neurohr locked up the vehicle.
- 6. Deanna Neurohr obtained a ride from Alexander Lail, and left the area, and abandoned the vehicle upon the private property.
- 7. Later, Sheriff Lawson asked Deputy Juarez about this "stop" of Deanna Neurohr, and Deputy Juarez explained that there was not a "stop," but rather he was just assisting Trooper Savageau while he was investigating a suspicious vehicle that stopped on private property. Sheriff Lawson yelled at Deputy Juarez telling him that the stop was

improper and that Deputy Juarez should not have "stopped" Deanna Neurohr. Deputy Juarez explained that there was not a stop of the vehicle, and that he did not stop Deanna Neurohr, but rather, he was there to assist Trooper Savageau, and Trooper Savageau did not "stop" the vehicle. Sheriff Lawson told Deputy Juarez that if he were Deanna Neurohr that he would not have stopped, and that he would have told both Deputy Juarez and Trooper Savageau that they did not have the right to "stop" him and/or enter onto that private property and/or search the vehicle. Deputy Juarez explained to Sheriff Lawson that there was not a search conducted upon the vehicle as Deanna Neurohr locked up the vehicle and refused the consent to search of the vehicle.

August 5, 2016

1. Alexander Lail was charged and arrested for Burglary and Theft of Property related to the Scott Rapp burglary (Wells County Case 52-2016-CR-00117). Alexander Lail was arrested at the Wells County Court House when Alexander Lail went to the Wells County Sheriff's Department to provide proof of insurance related to a driving without liability insurance citation in Wells County Case 52-2016-TR-00727. Alexander Lail had driven a Central Plains Restoration Van to the Wells County Court House which remained at the court house.

August 8, 2016

- 1. Donna Lail contacted S/A Zachmeier and advised S/A Zachmeier that she located some disturbing items related to Alexander Lail. Donna Lail advised she had gone to the Wells County Court House on Friday, August 5, 2016, to retrieve the Central Plains Restoration van. Inside the van was a brief case.
- 2. Donna Lail advised that she was going through a divorce with Alexander Lail and Alexander Lail was rulning the Central Plains Restoration business by his business management skills and by the "druggie" employees he is hiring. Donna Lail stated she went through the brief case to located Central Plains Restoration business records.
- 3. Donna Lail stated she located a USB digital Storage Device and that there were about one hundred (100) recordings on the device. Donna Lail stated that it appeared Alexander Lail left the recording device in Fessenden Chief of Police Travis Tesch's office as there were recordings of just the Chief and others on the recordings, but not Alexander Lail. Donna Lail stated she was able to identify Chief Tesch's voice and Fessenden Auditor Jean Gross' voices in conversation saved on the USB storage device.
- 4. Donna Lail advised there was a blue folder in the brief case. Inside the blue folder were the directions of a Global Positioning Unit. The directions, username and password to the unit were inside the blue folder. Donna Lail stated she accessed the website that monitors the GPS unit and the unit was active on an unknown vehicle in Harvey, ND.
- 5. S/A Zachmeler contacted Sheriff Lawson and advised Sheriff Lawson that Donna Lail supposedly located a "bug" placed in Chief Tesch's office by Alexander Lail and that Alexander Lail supposedly had a GPS unit on someone's vehicle in Harvey, ND.
- 6. S/A Zachmeier made arrangements to meet with Donna Lail on August 9, 2016 at S/A Zachmeier's office.

August 9, 2016

- S/A Zachmeier met with Donna Lail at the Pierce County Law Enforcement Center.
 Donna Lail provided S/A Zachmeier with an Esonic white USB memory MQ-U300 digital
 recorder. Donna Lail stated this was the digital device that contained the recordings of
 Chief Tesch with others and Alexander Lail not being on the recording.
- Donna Lail provided S/A Zachmeier a blue folder containing information for US Fleet Tracking headquartered at 2912 NW 156th Street, Edmond, Oklahoma for a Global Positioning System (GPS) tracking unit. Hand written on a user card was Floodguv188@gmail.com and password CPRISMINE3468. Donna Lail stated she accessed that US Fleet Tracking Website and identified the GPS unit as being placed on Deanna Neurohr's car. Donna Lail stated the GPS unit was located at Deanna Neurohr's apartment building in Harvey and also had tracked Deanna Neurohr to the Pierce County Jail on August 8, 2016 when Alexander Lail presumably bonded out of jail on the Scott Rapp burglary charge.
- Donna Lail stated that she was aware that Alexander Lail had the GPS tracking unit as earlier this spring Alexander Lail told Donna Lail he had got it and placed it on Joseph Thomas' vehicle. Donna Lail stated that Alexander Lail had showed Donna Lail that he had it and showed Donna Lail that he was tracking Joseph Thomas. Donna Lail advised that she asked Alexander Lail if it was legal and Alexander Lail stated it was not.
- 4. Donna Lail advised that over the weekend of August 5, 2016 through August 7, 2016 she felt safe enough to enter the Central Plains Restoration Office, 20 South 8th Street, in New Rockford. Donna Lail was able to access the computers. Donna Lail advised she located videos on the computers where it appeared Alexander Lail was hiding cameras in person's homes without the people knowing it. (Please note that Alexander Lail has access to homes through Central Plains Restoration.)
- 5. Donna Lail stated that you can see Alexander Lail conceal the camera and see his face on it. You can then see persons walk in front of the camera as if they do not know it is there.
- 6. Donna Lail advised that she identified Alexander Lail in some videos having sexual intercourse with Deanna Neurohr and that the camera also appeared to be concealed as if Deanna Neurohr did not know it was there.
- 7. Donna Lail also stated she located a black assault rifle matching the description described by Tyler Schnase concealed in a closet in their home in New Rockford. (Alexander Lail is prohibited from possession fire arms under federal statute for a conviction for human smuggling.)
- 8. Donna Lail provided S/A Zachmeier with a statement from Central Plains Restoration employee John Willis. John Willis advised that on July 5, 2016 he was assisting Alexander Lail which led them to the Sunshine Spray garage, a noxious weed spraying company owned by Donna Lall. The garage is located in Fessenden, ND.
- John Willis reported that when they (John Willis, Alexander Lail, and unknown female) got to the garage Alexander Lail was in possession of a dart case and locked the door

behind them. Alexander Lail opened up the dart case and removed a scale and Ziploc bag about one (1) inch tall covering the entire length of the case, containing a hard clear substance. Alexander Lail began breaking the substance up creating three (3) powdered lines. Alexander Lail offered Willis a line.

- John Willis advised he left the garage to use the bathroom and returned a short time later leaving the door unlocked. Alexander Lail made sure to re-lock the door. Alexander Lail then looked at John Willis and advised she would give you oral sex. John Willis advised he glanced over and saw the female tied to a lawn chair with zip ties. John Willis stated no. John Willis then walked over to the girl and cut her loose. Alexander Lail asked John Willis if he was bashful and stated she liked to be dominated.
- 11. John Willis stated he began to leave and that Alexander Lail then went over to the female and the female began performing an oral sexual act on Alexander Lail.
- 12. S/A Zachmeier advised Sheriff Lawson of the information from Donna Lail to including the girl that was zip tied to a chair performing a sexual act to Alexander Lail.

August 11, 2016

 S/A Zachmeier obtained a search warrant to inspect the Esonic white USB memory MQ-U300 digital recorder. S/A Zachmeier located Chief Tesch on the recorder visiting with others. It was obvious the recorder was left in Chief Tesch's office to record Chief Tesch without Chief Tesch's knowledge. Alexander Lail was not part of the recordings which covered multiple hours.

August 12, 2016

- 1. S/A Zachmeier contact Chief Tesch to review the surreptitious intrusion on the digital recorder. Chief Tesch advised that his conversations with Alexander Lail were short and did not cover hours nor was Alexander Lail in his office for hours. Chief Tesch advised at no time was Alexander Lail authorized to place the digital recorder in the City of Fessenden Police Department office.
- 2. S/A Zachmeler advised Sheriff Lawson of the information on the digital recording device and that it appeared that Alexander Lail "bugged" Chief Tesch's office.

October 20, 2016

- 1. 11:35 pm-The Wells County Sheriff's Department received a call of suspicious activity at a residence in Heimdal, ND. Sheriff Lawson and Deputy Juarez responded to a residence under the control of Regina Lankford.
- Sheriff Lawson and Deputy Juarez approached the suspect residence. Present was Deanna Neurohr and Alexander Lail. Alexander Lail advised that Deanna Neurohr and Alexander Lail had recently purchased the residence from the Lankford's.
- 3. After the call, Deputy Juarez approached Sheriff Lawson's patrol vehicle passenger's window. At this point Deputy Juarez deactivated his on-person video recording camera

and audio in car microphone. Sheriff Lawson observed Deputy Juarez deactivate these recording devices.

- 4. Sheriff Lawson proceeded to tell Deputy Juarez that Alexander Lail "was not a bad guy." Sheriff Lawson provided Deputy Juarez with an example of when Sheriff Lawson's basement flooded that Alexander Lail fixed Sheriff Lawson's basement and did not charge Sheriff Lawson. Sheriff Lawson estimated that the services provided by Alexander Lail were valued at two thousand to three thousand dollars (\$2,000 to \$3,000). [In December 2016, Donna Lail stated that Sheriff Lawson also told her that Alexander Lail did an excellent job on his house, and she thought it was in the basement for some kind of flooding. Donna Lail had never seen a billing statement directly to Sheriff Lawson for his personal residence, and does not believe that there was any kind of billing for that basement work.]
- On unknown exact dates Courtney Lemer, Jaci Williams, and Janelle Pepple were all told by Sheriff Lawson that Alexander Lail had provided services to Sheriff Lawson at no charge, including the work to Sheriff Lawson's personal residence to clean up some basement flooding. Janelle Pepple told Sheriff Lawson that it was improper for him to receive such "gratuity" from Alexander Lail when Alexander Lail had pending felony criminal charges in Wells County.

November 2, 2016

 On November 2, 2016, North Dakota Highway Patrol Trooper Savageau was investigating a vehicle crash and Jeremy Nelson was the driver. During this Investigation, Jeremy Nelson stated that on or about October 31, 2016, at Heather Burrington's House in Fessenden, that he smoked methamphetamine that he received from Heather Burrington.

November 15, 2016

- S/A Zachmeier attended a preliminary hearing for the burglary and theft charges filed in Wells County against Alexander Lail for the Scott Rapp burglary in Harvey, ND, reported on March 7, 2016 (Wells County Case 52-2016-CR-00117). After the hearing, S/A Zachmeier met with Sheriff Lawson in Sheriff Lawson's office.
- 2. Sheriff Lawson advised S/A Zachmeier that he needed a break from work and took approximately three (3) weeks off to relax and get rid of some stress. Sheriff Lawson stated that he was now refreshed and doing much better. Sheriff Lawson indicated that he was having problems with the 2015 murder-suicide (the Sam Maxwell and Brady Wolff deaths) and thanked S/A Zachmeier for being on the phone with him while assistance was responding to Sheriff Lawson's location during the incident. (S/A Zachmeier was unable to respond to the incident, but stayed on the phone with Sheriff Lawson.)
- S/A Zachmeier noted that Sheriff Lawson was not acting consistently as S/A Zachmeier knew of Sheriff Lawson to normally act. S/A Zachmeier can best describe this as "Sheriff

- Lawson seemed off." S/A Zachmeier offered assistance to Sheriff Lawson if he needed someone to speak with and advised Sheriff Lawson not to be hesitant in speaking with a professional.
- 4. Sheriff Lawson advised S/A Zachmeier that he had been working out with the Harvey Wrestling Team and was going to continue to work out to lose some weight and get in shape. S/A Zachmeier later spoke with the Harvey Wrestling coach and learned that Sheriff Lawson came in on three (3) occasions, both at the beginning of November, 2016.

December 3, 2016

- 1. Troy McBain, the landlord to Heather Burrington served an eviction notice on Heather Burrington because Heather Burrington was failing to pay rent. Troy McBain inspected the residence and located property Troy McBain believed to be abandoned by Heather Burrington. Troy McBain requested Chief Tesch respond to the location. Troy McBain and Chief Tesch inspected the residence and located methamphetamine and methamphetamine drug paraphernalia. The North Dakota Crime Lab later confirmed that the substance was methamphetamine.
- 2. Tammy Neurohr, Deanna Neurohr's mother, wrote a letter to the Wells County Commissioners alleging various issues relating to Sheriff Lawson. In the letter, Tammy Neurohr alleged that Sheriff Lawson was using narcotics; specifically that he had been using methamphetamine. Tammy Neurohr indicated that she and her husband (Roger Neurohr) were very concerned about Sheriff Lawson's retaliation for writing the letter.

December 13, 2016

- 1. Chief Tesch observed Heather Burrington and a male identified as Alan Van Dam removing property from Heather Burrington's old residence in Fessenden, ND. Heather Burrington was arrested for Possession of a controlled substance (methamphetamine), Possession of methamphetamine Drug Paraphernalia, Ingesting a Controlled Substance, and Criminal Mischief stemming from the incident on December 3, 2016 when landlord Troy McBain and Chief Tesch located methamphetamine and methamphetamine drug paraphernalia in the residence. Alan Van Dam was charged with Ingesting a Controlled Substance.
- 2. (From December 13, 2015, to April 12, 2017, Heather Burrington had multiple positive drug patch test results that were positive for the presence of methamphetamine. On April 12, 2017 Heather Burrington plead guilty to charges including: the Possession of methamphetamine Drug Paraphernalia, Ingesting a Controlled Substance, and Criminal Mischief.)

January 18, 2017

- 1. S/A Bryan Lang received a phone call from Tammy Neurohr. Tammy Neurohr provided S/A Lang with the following information:
 - a. Tammy Neurohr stated that she had sent a letter to the Wells County Commissioners outlining several complaints about Sheriff Lawson. The Wells

County Commissioners gave a copy of the letter to Sheriff Lawson. [Randi Suckut provided the Tammy Neurohr December 3, 2016, letter to Sheriff Lawson as he considered the letter as an open record regarding a personnel issue about Sheriff Lawson that was going to be discussed at an open public meeting of the Wells County Commissioners]. Tammy Neurohr said that since Sheriff Lawson received the letter that Sheriff Lawson has not used illegal narcotics for about the last two (2) weeks.

- b. Tammy Neurohr stated that Sheriff Lawson was using methamphetamine and had been getting the methamphetamine from Alexander Lail. Alexander Lail was a methamphetamine dealer, and had threatened Tammy Neurohr. Tammy Neurohr's daughter (Deanna) has been dating Alexander Lail off and on. Sheriff Lawson had been buying and using methamphetamine with Alexander Lail.
- c. Tammy Neurohr stated that she was aware that Alexander Lail has done some work for Sheriff Lawson.
- d. Tammy Neurohr stated that they were having troubles with the Sheriff's Department pertaining to their youngest daughter's mental health issues. Sheriff Lawson will not let the Sheriff's Department come out to their residence when they [Tammy and Roger Neurohr] called for assistance with their daughter [Anna]. Tammy Neurohr threatened to sue Wells County for not doing their job. Alexander Lail then came out to their residence and wanted to know what it would take to get her to drop the charges against Wells County. Sheriff Lawson gave a copy of the letter that Tammy Neurohr had sent to the Wells County Commissioners. Alexander Lail indicated to Tammy Neurohr that Sheriff Lawson had made some threats towards Tammy Neurohr pertaining to the letter.
- e. Tammy Neurohr had overheard a phone conversation between Alexander Lail and Sheriff Lawson. The phone conversation gave Tammy Neurohr the impression that they were into something illegal.

January 23, 2017

- 1. S/A Lang received a letter from Tammy Neurohr. The letter was postmarked January 20, 2017. Enclosed in the letter were journal entries, a letter written to the Wells County Commissioners (dated December 3, 2016), and a letter to Sheriff Lawson.
- 2. The journal entries from Tammy Neurohr indicated that on December 1, 2016, Tammy Neurohr wrote "Alex [Lail] has said numerous times that taking on Johnny [Lawson] is stupid and dangerous. He keeps saying that 'people get hurt that way.' Deanna [Neurohr, Tammy's daughter] keeps asking me to drop it, and I know she is afraid. Alex told her that something very bad is going to happen if I follow [through with] sending the letter to the commissioners [Wells County Commissioners]. Rog thinks I should let it all go. I can't. If he can treat us this way, he can treat others the same. I'm sick of fighting with Lawson, but I can't pretend that nothing's happened. There is a sheriff in another county put on admin leave so someone has to have jurisdiction! Besides, he's not stupid enough to hurt me, and what's the worse he can do, beat Evan's Syndrome out getting me in a grave? I'm not afraid of him & I'm not quitting. If nothing else, people will know the truth about him before voting. I just hope someone does something, so I can be done & have some peace in whatever amount of time I have left. I'm so tired."

- 3. Tammy Neurohr had a note "JL told Alex to tell me that I better back off before there is an accident, and me or someone in my family get hurt very badly or worse. Deanna is afraid that we will die."
- 4. On the typed letter, dated December 3, 2016, to the commissioners, Tammy Neurohr wrote "This is the letter that I sent to the Co. Commissioners who then, gave Lawson his own copy. Things have gotten bad since then. I rarely leave home, keep doors locked & worry when Roger leaves. Alex [Lail] and Deanna [Neurohr] are convinced that sooner or later, that "accident" will happen. After what he had already caused to happen to us, it isn't so hard to believe."
- 5. Tammy Neurohr also attached a letter to Sheriff Lawson dated 05-16-2016. This letter refers to issues about Tammy Neurohr stating that Sheriff Lawson did not respond to assistance for an emergency situation with Tammy Neurohr's thirteen (13) year old daughter, and issues relating to a social services matter.

February 8, 2017

- 1. Heather Burrington was in Wells County District Court regarding her December 13, 2016 charges (Wells County Case 52-2016-CR-00170). Courtney Lemer was present and heard that Heather Burrington had agreed to cooperate with law enforcement, and Heather Burrington was going to be released after being transported back to the Pierce County Jail to retrieve her clothes.
- 2. After the Wells County Court hearing, Sheriff Lawson transported Heather Burrington to the Pierce County Jail. . [In interviews conducted by the ND BCI, Heather Burrington admitted that Sheriff Lawson stopped along Highway 3 to meet with Alexander Lail. Heather Burrington stated that she got out of Sheriff Lawson's patrol vehicle, and got into Alexander Lail's vehicle, and then, Alexander Lail got into the Sheriff's Vehicle and talked to Sheriff Lawson for about an hour. (During the April 25, 2017, interview of Sheriff Lawson by S/A Casey Miller, Sheriff Lawson admitted that he met up with Alexander Lail and dropped off Heather Burrington, and there was another male possibly named Jason with Alexander Lail. (In a later interview with Jason Saxer, Jason Saxer verified Heather Burrington's statements.)

February 10, 2017

1. Wells County Deputy Andrew Klegstad observed Alexander Lail driving on Hwy 52 at approximately mile marker 179, in Wells County. Deputy Klegstad checked Alexander Lail's driving status which indicated that Alexander Lail's driver's license was suspended. Deputy Klegstad initiated a traffic stop on the vehicle. The vehicle was registered to Stephen Kelly from Harvey, ND. As a result of the investigation, marijuana was located in a cigarette pack on the driver's side dashboard of the vehicle. Neither Alexander Lail nor Stephen Kelly was arrested at the scene. Andrew Klegstad cited Alexander Lail for driving under suspension and issued him a promise to appear. (Alexander Lail and Stephen Kelly were later charged with possession of marijuana through a long form complaint. Wells County Case 52-2017-CR -00008 (Alexander Lail) and Wells County Case 52-2017-CR-00014 (Stephen Kelly).

2. During the Stop with Deputy Klegstad, Alexander Lail told Deputy Klegstad that he was going to complain to Sheriff Lawson that Deputy Klegstad was harassing him.

February 11, 2017

- 1. McHenry County Sheriff's Deputy Richard Juarez (former Wells County Deputy) was patrolling in the Velva area when he observed Alexander Lail in a Dodge Ram vehicle, pulling a trailer. Deanna Neurohr was a passenger in the vehicle. Alexander Lail's driving privileges were suspended and there were no license plates on the trailer. Deputy Juarez initiated a traffic stop on the vehicle. (This was the day after Deputy Klegstad stopped and cited Alexander Lail in Wells County in which Alexander Lail told Deputy Klegstad that Alexander Lail would be complaining to Sheriff Lawson.)
- 2. Deputy Juarez approached the vehicle and informed Alexander Lail to exit the vehicle and placed him under arrest for driving under suspension. Deputy Juarez then placed Alexander Lail in the back seat of his patrol car.
- 3. Deputy Juarez then again approached Alexander Lail's vehicle as Alexander Lail requested his wallet from the vehicle and his cellular phone. Deputy Juarez observed that Sheriff Lawson was calling Alexander Lail's phone which was connected to the "blue tooth" of the vehicle. Deanna Neurohr answered the phone call displaying Sheriff Lawson's name "Johnny Lawson 2355" and yelled at Sheriff Lawson that they were being stopped. Deputy Juarez then hung up Alexander Lail's cell phone. After this the name displaying "Johnny Lawson 2355" called Alexander Lail's cellular phone again, but Deputy Juarez did not allow this phone call to be answered. Alexander Lail said he was on his way to Minot to buy a car from a "Stan" from Minot, ND.
- Deputy Juarez asked Alexander Lail why Sheriff Lawson was calling Alexander Lail and Alexander Lail stated he was trying to get legal advice from Sheriff Lawson and Sheriff Lawson was calling him back.
- 5. Deputy Juarez transported Alexander Lail to the Pierce County jail. During the booking process, Alexander Lail was asked for his emergency contact. Alexander Lail provided the name "Johnny Lawson" (Sheriff Lawson) at phone number 341-1306. (This is the same phone number (contact number) which S/A Zachmeier had for Sheriff Lawson and had utilized to talk with Sheriff Lawson on multiple occasions.)

February 13, 2017

- 1. Eddy County Sheriff Paul Lies conducted a recorded interview with Heather Burrington. Heather Burrington provided information about a methamphetamine distribution ring in the area.
- 2. During this interview, Heather Burrington, confirmed that in December of 2016, she was in possession of methamphetamine, and methamphetamine drug paraphernalia, as well as ingesting methamphetamine.
- 3. Heather Burrington admitted ingesting methamphetamine on February 8, 2017, with Deana Neurohr at Deanna Neurohr's apartment in Harvey, ND. (This was the same day as when Sheriff Lawson transported Heather Burrington and Sheriff Lawson met with

Alexander Lail.) While Heather Burrington was at Deanna Neurohr's apartment on February 8, 2017, Deanna Neurohr told her that both Deanna Neurohr and Alexander Lail had delivered methamphetamine to Sheriff Lawson. Heather Burrington stated that Sheriff Lawson "is involved" when she was talking about Deanna Neurohr and Alexander Lail selling methamphetamine.

4. Heather Burrington told Sheriff Lies that when she was being transported on February 8, 2017, from jail that Sheriff Lawson drove her from Rugby along Highway 3, and stopped along Highway 3 to allow her to get into Alexander Lail's van. Then, Alexander Lail got into Sheriff Lawson's patrol car, and spoke to Sheriff Lawson for over an hour.

February 17, 2017

- 1. ND BCI S/A Troy Keily, ND BCI S/A Christy Gass and Sheriff Lies conducted a recorded follow-up interview with Heather Burrington to discuss the details of the methamphetamine distribution ring occurring throughout multiple counties in North Dakota. Before the interview began, S/A Kelly advised Heather Burrington of her Miranda Warnings. Heather Burrington Indicated that she understood her rights. Heather Burrington informed officers of the following:
 - a. Heather Burrington stated that Heather Burrington and Alan Van Dam where involved in the sale, usage, and transportation of methamphetamine from Minnesota.
 - b. Heather Burrington then described an incident when Alexander Lail came to the Cenex store where Heather Burrington worked in Fessenden, ND (as previously described by Makayla Trautman). Heather Burrington explained that she asked Alexander Lail about Alexander Lail being involved with methamphetamine and invited Alexander Lail to her house where the two of them "used." Heather Burrington stated that Alan Van Dam was upset about Heather Burrington letting Alexander Lail know about "the business."
 - c. Heather Burrington stated that Alexander Lail purchased some of the methamphetamine and gave Alan Van Dam One Thousand Two Hundred dollars (\$1,200) to get an ounce of methamphetamine. Heather Burrington stated that the money given to Alan Van Dam from Alexander Lail came from Alexander Lail's "business account." Heather Burrington advised that Alan Van Dam supplied methamphetamine to Alexander Lail on multiple occasions and Alexander Lail would provide Alan Van Dam with US currency to travel to Minnesota to retrieve methamphetamine for Alexander Lail.
 - d. Heather Burrington stated that Alexander Lail was giving methamphetamine to "Dee" (Deanna Neurohr) to sell for Alexander Lail.
 - e. Heather Burrington commented that Sara Bender was receiving methamphetamine from Alan Van Dam.
 - f. (In May, 2016 reports were received by Wells County Social Services that Sara Bender was using methamphetamine and was not taking care of her minor children. As a result of the child protection investigation, Sara Bender was

placed on a drug testing patch. Wells County Office Deputy Janelle Pepple was aware that while Sara Bender was drug testing with the Wells County Sheriff's Office that Sara Bender had Sheriff' Lawson's cell phone number and Sara Bender would call Sheriff Lawson to ask for rides to perform her drug testing. Janelle Pepple reported that when there were any issues with Sara Bender's positive drug patch results that Sara Bender would contact Sheriff Lawson directly.

e. Heather Burrington stated that Alexander Lail pays his employees with methamphetamine.

February 18, 2017

- Eddy County Sheriff Paul Lies conducted and interview with Russell Beedle in regards to Russell Beedle's drug use in Foster, Eddy, and Wells County. Russell Beedle and Russell Beedle advised that he understood his rights. Russell Beedle informed Sheriff Leis of the following:
- 2. Russell Beedle's methamphetamine use started when he met Alexander Lail in July 2016 and began to work for Alexander Lail in August 2016. Russell Beedle stated Alexander Lail allowed people to use drugs at his residence.
- 3. Russell Beedle stated that Alexander Lail received methamphetamine from Deanna Neurohr from Harvey, ND. Russell Beedle described Deanna Neurohr as Alexander Lail's "right hand lady".
- 4. Russell Beedle, Deanna Neurohr, and Alexander Lail were at Alexander Lail's residence in New Rockford when Russell Beedle, Deanna Neurohr, and Alexander Lail smoked methamphetamine together. Russell Needle stated that Deanna Neurohr had approximately one-half (1/2) ounce of methamphetamine at that time. Russell Beedle stated that was the least amount of methamphetamine Russell Beedle ever saw in Deanna Neurohr's possession.
- 5. Russell Beedle stated that he and Alexander Lail would travel to Harvey to pick up methamphetamine from Deanna Neurohr or Deanna Neurohr would travel to New Rockford with methamphetamine.

February 19, 2017

On February 19, 2017, between 8 am or 9 am, Tawnia and Glen Heilman reported to Sheriff Lawson that there had been a burglary and theft on their farm near Wellsburg, ND, sometime from the evening of February 18, 2017, to the morning of February 19, 2017. Sheriff Lawson told Tawnia Heilman to make a list of the stolen property and provide it to him. Sheriff Lawson also told Tawnia Heilman that it was not likely this matter would be solved and unlikely that any of the property would be found, and to report it to her insurance company. The only thing that Sheriff Lawson did to investigate the matter was to meet with Tawnia and Glen Heilman at their farmstead and allegedly he photographed some of the areas, but the photographs have not been located and no law enforcement report was generated.

2. (This Heilman burglary was never referred to S/A Craig Zachmeler for investigation and was not referred to ND BCI for investigation. Sheriff Lawson gave a knowingly false statement to S/A Miller in his interview on April 25, 2017, when Sheriff Lawson stated that S/A Zachmeier was investigating the burglaries because Sheriff Lawson never referred any burglaries to S/A Zachmeier for investigation and S/A Zachmeier was only investigating the Scott Rapp burglary in Harvey, ND and the Tyler Schnase burglary in Fessenden, ND. These burglaries were not referred to S/A Zachmeier by Sheriff Lawson.)

February 21, 2017

- S/A Lang received a letter from Tammy Neurohr. The letter was postmarked February 17, 2017. Enclosed in the letter was information regarding Sheriff Lawson and Alexander Lail.
- 2. Tammy Neurohr told S/A Lang that she is afraid of being named due to fear of Alexander Lail and Sheriff Lawson. In her letter to S/A Lang, Tammy Neurohr stated that Alexander Lail had admitted that he supplied methamphetamine to Deanna Neurohr had provided methamphetamine to Sheriff Lawson, and that Alexander Lail also provided methamphetamine to Sheriff Lawson.
- 3. The letter also provided information that Alexander Lail always thinks about putting a smile on "Johnny's face", and that Alexander Lail was counting on Sheriff Lawson pulling strings for Alexander Lail if and when needed.

February 27, 2017

- S/A Zachmeier stopped at the Wells County Sheriff's Department to visit Sheriff Lawson. Sheriff Lawson was present, as was Sheriff Lawson's son Brandon Lawson, and newly hired Wells County Deputy Alex Schweim.
- 2. Through the conversation, S/A Zachmeier told Sheriff Lawson that it appeared a plea agreement had been reached for the Scott Rapp burglary in which Alexander Lail would plead guilty to a misdemeanor and return Scott Rapp's property and Tyler Schnase's property. Sheriff Lawson agreed with this plea agreement and seemed happy that the cases were solved and adjudicated.
- 3. Sheriff Lawson proceeded to tell S/A Zachmeier that Alexander Lail had did some work for Sheriff Lawson on Sheriff's Lawson's home and was a "Good Guy." Sheriff Lawson told S/A Zachmeier that Alexander Lail was no longer on methamphetamine and that Sheriff Lawson has been helping Alexander Lail stay away from the narcotics. [On April 25, 2017, during an interview with Sheriff Lawson by S/A Miller, Sheriff Lawson said that he did not have a relationship with Alexander Lail]. S/A Zachmeier told Sheriff Lawson that Alexander Lail was a con-man and to stay away from Alexander Lail and not to trust Alexander Lail.

4. S/A Zachmeier identified that Sheriff Lawson appeared to be under the influence of narcotics or having a mental occurrence. Sheriff Lawson was sweating profusely, sweating through his shirt and wiping sweat from his brow, had constricted pupils, could not sit still, and over exaggerated his arm and hand movements. . [These observations by S/A Zachmeier are inconsistent with the statements by Sheriff Lawson to S/A Miller on April 25, 2017, that there was a one-time isolated event months ago when Lawson received methamphetamine from Alexander Lail and snorted the methamphetamine alone.]

February 28, 2017

- 1. On February 28, 2017, Michael Kanwischer voluntarily spoke to Harvey Police Officer Tom Burr. The information provided by Michael Kanwischer, included:
 - Alex Lail was doing Methamphetamine in Deanna Neurohr's apartment. He knew this because he had done methamphetamine with Alexander Lail in Deana's apartment.
 - b. Alexander Lail was getting the Methamphetamine from in Minot, ND.
 - c. There were big people involved with the methamphetamine operation. Officer Burr asked what Michael Kanwischer meant by big people. Michael Kanwischer stated Law Enforcement, "the Sheriff."

March 2, 2017

- Steve Lape reported a break-in at his home. Steve Lape provided a handwritten list of the stolen property that was reported to the Wells County Sheriff's Office. There was no record of an investigation of this reported burglary and theft. There was Steve Lape's handwritten list of items stolen located in an envelope at the Wells County Sheriff's Office, but there was no record of any kind of investigative report
- This Lape burglary was never referred to S/A Craig Zachmeier or ND BCI for investigation. Sheriff Lawson gave a knowingly false statement to S/A Miller in his interview on April 25, 2017, when Lawson stated that S/A Zachmeier was investigating the burglaries.

March 3, 2017

- 1. Stutsman County Narcotics Task Force Officers Ryan Goff and Jon Hirchert interviewed Karri Daughtery. Karri Daughtery informed officers of the following:
 - a. Karri Daughtery started using methamphetamine around Christmas of 2015. Karri Daughtery stated that Karri Daughtery is addicted to methamphetamine and Karri Daughtery used approximately one (1) gram a day for the past few months.
 - b. Karri Daughtery met Alexander Lail through a childhood friend, Russell Beedle Karri Daughtery stated Russell Beedle brought Alexander Lail to Karri Daughtery's residence in New Rockford and they all three (3) ingested methamphetamine on that night. Alexander Lail has a sexual relationship with

- Deanna Neurohr. Alexander Lail and Deanna Neurohr both sell methamphetamine.
- c. Alexander Lail received most of his methamphetamine from "Maddie" aka Madison Flick. Madison Flick transports the methamphetamine from Minot.
- d. Alexander Lail and Deanna Neurohr sell "larger quantities of methamphetamine" mostly in the Harvey area.
- e. Alexander Lail sold methamphetamine to Russell Beedle, Heather Burrington, Alan Van Dam, and Thomas Mann.
- f. Kari Daughtery saw a small black handgun in Alexander Lail's truck and Alexander Lail takes the gun on "drug runs."

March 5, 2017

- 5:00 pm-Tom Burr contacted S/A Zachmeier and advised that he was investigating a theft and the possession of stolen property and that Deanna Neurohr was a suspect and wished to speak with S/A Zachmeier. Deanna Neurohr was "all over the place" during the phone conversation and her conversation did not make sense. Deanna Neurohr advised S/A Zachmeier that things "have gotten crazy" and she wanted to meet with S/A Zachmeier as she had information for S/A Zachmeier. Deanna Neurohr stated that she was scared and did not have a cell phone. Deanna Neurohr advised that she was going to drive and commit a traffic violation, and then have a methamphetamine pipe on her to get arrested so she could meet with S/A Zachmeier.
- 2. S/A Zachmeier advised Deanna Neurohr not to do this and to just go to the Police Department. Deanna Neurohr stated she could not as they were involved. S/A Zachmeier advised Deanna Neurohr to only speak with S/A Zachmeier then. Deanna Neurohr stated she had stolen property for S/A Zachmeier that someone had given her. S/A Zachmeier advised Deanna Neurohr to secure the property until S/A Zachmeier could meet with her.
- 3. S/A Zachmeler asked Deanna Neurohr if "she was in over her head." Deanna Neurohr stated she was.
- 4. S/A Zachmeier advised Deanna Neurohr that S/A Zachmeier would make it a point to track her down and meet with her.

March 8, 2017

 Sheriff Lawson contacted S/A Zachmeier and advised that he had ran into Deanna Neurohr and that Deanna Neurohr advised Sheriff Lawson that she wanted to meet with Sheriff Lawson and S/A Zachmeier as she had information. S/A Zachmeier told Sheriff Lawson that he did not have time during this week and for Sheriff Lawson to meet with Deanna Neurohr and take her information and let S/A Zachmeier know what the information was. 2. Sheriff Lawson advised S/A Zachmeier he would try to meet with her. Sheriff Lawson advised S/A Zachmeier that he felt good that persons in the county are finally starting to trust Sheriff Lawson and provide Sheriff Lawson with Information.

March 23, 2017

- 1. ND BCI S/A Christy Gass received an extraction report from the Heather Burrington phone and it includes the following messages
 - a. On 11/25/2016 Heather Burrington is texting DoNtFallAgAin (Alan Van Dam) and states "... out of necessity, I started selling drugs. ..." Cell (701) 399-6507.
 - b. On 12/13/2016 Heather Burrington is texting "Larrie the Painter" (Larrie Straatmeyer) and Larrie the Painter says "last time you gave me 3 qters ... and wanted 180.00 ... this time you have me 2 qtrs and nothing for me to smoke and want the same amount of money . . . so . . . ummmmm where do I benefit from this one . . . " Cell (701) 441-9059 and also (701) 301-9182. [Deputy Richard Juarez was told by Johnny Lawson not to pull over Larrie Straatmeyer for driving under suspension, even though Larrie Straatmeyer was suspended and repeatedly drove all over Wells County and the Harvey area.]
 - c. There are text messages and phone calls between Heather Burrington and Alexander Lail- Cell phone number (701) 399-6379.

March 25, 2017

1. Tammy Neurohr sent an email to ND BCI Agent Bryan Lang. Tammy Neurohr stated that she had names of persons committing burglaries in Wells County. Tammy Neurohr also stated that Sheriff Lawson knows who was committing the burglaries, and had known about it for several weeks, but Sheriff Lawson kept looking the other way.

March 26, 2017

- 1. S/A Zachmeier conducted an interview with Michael Hoffart from Harvey, ND. Michael Hoffart was incarcerated at the Pierce County Jail for a probation violation in reference to ingesting methamphetamine. Michael Hoffart advised that he did not know if Sheriff Lawson was using methamphetamine. 2. Michael Hoffart described an incident in which he was driving a vehicle from New Rockford to Harvey, ND. Alexander Lail was the passenger. West of Fessenden, ND a vehicle was coming up behind them at a high rate of speed. Alexander Lail told Michael Hoffert it was Sheriff Lawson and for Michael Hoffert to pull over so Sheriff Lawson doesn't "light him up."
- 2. Michael Hoffart pulled over and Sheriff Lawson pulled in behind them, Alexander Lail exited the vehicle and entered Sheriff Lawson's patrol vehicle. Alexander Lail and Sheriff Lawson sat in Sheriff Lawson's patrol vehicle for approximately one (1) hour after which time Alexander Lail got back in with Michael Hoffart. Michael Hoffart stated he did not ask what Alexander Lail and Sheriff Lawson were talking about or doing because he did

not want to know. [Michael Hoffart told his probation officer, Jaci Williams, that he was really freaking out about this incident because Michael Hoffart had marijuana and dope in his pocket at the time, and he believed that Alexander Lail also had methamphetamine on him at the time.]

March 28, 2017

- 1. S/A Bryan Lang had a telephone call with Tammy Neurohr. Tammy Neurohr stated that Sheriff Lawson knew who was performing the burglaries in the Wells County area, and had known for several weeks, but he kept looking the other way.
- ND HP Trooper Evan Savageau met Sheriff Lawson in Carrington, ND when Sheriff 2. Lawson was attempting to locate the Ray Grauman stolen vehicle. Trooper Savageau was unable to see Sheriff Lawson's eyes, as Sheriff Lawson was wearing sunglasses. Trooper Savageau noted that Sheriff Lawson seemed to be irritable, and his motions were sped up, consistent with a fast internal time clock. Trooper Savageau noted that Sheriff Lawson had a red nose, and it appeared that Sheriff Lawson had a runny nose. Trooper Savageau noted that at times Sheriff Lawson's speech was rambling and Sheriff Lawson didn't really make sense. Trooper Savageau described Sheriff Lawson's motions as exaggerated. Trooper Savageau indicated that he did not have an opportunity to conduct a DRE (Drug Recognition Expert) and/or ARIDE (Advanced Roadside Impaired Driver Enforcement) type of assessment of Sheriff Lawson, but his actions were consistent with indicators for a type of stimulant, such as methamphetamine. Trooper Savageau advised that if Trooper Savageau would have been on a traffic stop with Sheriff Lawson as the driver, Trooper Savageau would have conducted a DRE assessment.
- 3. Eddy County Deputy Sheriff Chris Bittman observed Sheriff Lawson and contacted Trooper Savageau to ask if he had observed Sheriff Lawson acting odd. Deputy Bittman indicated to Trooper Savageau that the actions appeared consistent with someone that was "tweaking" from methamphetamine usage, and so, Deputy Bittman asked Trooper Savageau if he observed the same behaviors.

March 30, 2017

 Deputy Andrew Klegstad (current Traill County Deputy Sheriff) observed Sheriff Lawson and Wells County Deputy Sheriff Alex Schweim parked at the Deanna Neurohr residence/property in Heimdal, ND. Alexander Lail's vehicle was also present.

April 1, 2017

1. Harvey Police Officer Jon Gallagher met with Michael Kanwisher on April 1, 2017. Michael Kanwischer told Officer Gallagher that on March 31, 2017, he was with Alexander Lail, Deanna Neurohr, Stephen C. Kelly, and Jason J. Saxer and that they had three (3) 8-balls of methamphetamine and also some cocaine.

- 2. Michael Kanwischer told Officer Gallagher that law enforcement is also involved. Kanwischer said that he believed it was an employee with the Wells County Sheriff's office, and the person he described was a person that had recently purchased a Ford Raptor pickup. Officer Gallagher knew that Sheriff Lawson had just recently purchased a Ford Raptor pickup. Officer Gallagher believed that Kanwischer was describing Sheriff Lawson.
- Michael Kanwischer claimed that he knew where Alexander Lail was getting a bulk of his methamphetamine, and he said that Alexander Lail was getting his methamphetamine from a man in Minot, ND

April 6, 2017

- On April 6, 2017, McHenry County Deputy Richard Juarez was investigating a domestic dispute that involved Jason Saxer. Jason Saxer provided the following statements to Deputy Richard Juarez:
 - a. Jason Saxer began to say he knew of all sorts of places where people go to buy drugs or receive them.
 - b. Jason Saxer stated Sheriff Lawsonwas performing unethically. Jason Saxer went on to say how he knew of Sheriff Lawson and Alexander Lail of Harvey hanging out and talking. Jason Saxer quoted Sheriff Lawson as saying, "I don't see anything" when he knew Alexander Lall was driving while suspended.
 - c. Jason Saxer also knew of an incident where he was riding with Alexander Lail and they met Sheriff Lawson near Selz, ND in January, 2017. Alexaander Lail and Sheriff Lawson talked. Heather got out of Sheriff Lawson's patrol vehicle and got inside of Alexander Lail's van. [Heather Burrington also told Sheriff Lies that when she was being transported on February 8, 2017, from jail that Sheriff Lawson drove her from Rugby along Highway 3, and stopped along Highway 3 to allow her to get into Alexander Lail's van. Alex Lail got into Sheriff Lawson's patrol vehicle, and spoke to Sheriff Lawson for over an hour].

April 13, 2017

- On or about April 13, 2017, Garnet Free of rural Wells County at 4087 26th Street NE, Heimdal, Wells County, ND, 58341, reported a burglary and theft at her residence in Wells County, ND. Garnet Free's list of stolen property included:
 - a. Vizio 32 inch television:
 - b. Two (2) gas cans five (5) gallons
 - c. Kitchen garbage can thirteen (13) gallons
 - d. Antique horsehead ashtray
 - e. White clothes basket
 - f. Cooler
 - g. Air Purifier
 - h. Dresser and Mirror

- i. Tide Laundry Detergent
- j. Step stool (2 steps)
- k. Barn picture frame
- I. Sterling Silver Chafing Dish
- 2. Garnet Free stated that Sheriff Lawson and an unknown Deputy (unknown to Garnet Free, but Alex Schweim was working as a Wells County Deputy at that time) met Garnet Free at her residence and took some photos and asked what items were taken. Wells County officials have not located these photos. There was no additional investigation by the Wells County Sheriff's Office, and there was no Wells County report completed regarding this matter. This Free burglary was never referred to S/A Craig Zachmeier, and was not referred to ND BCI for investigation. S/A Zachmeier believes that Johnny Lawson gave a knowingly false statement to S/A Miller in his interview on April 25, 2017, when Lawson stated that S/A Zachmeier was investigating the burglaries.

April 14, 2017

- 1. 2:00 pm-S/A Zachmeier responded to the Jason Thomas residence in rural Wells County. Jason Thomas was on hospice and given less than one (1) month to live from cancer and heart failure. (Jason Thomas died on April 28, 2017.) Jason Thomas reported that on or about March 10, 2017 he was held down by Deanna Neurohr, Stephen Kelly, and Alexander Lail on his property and burned with an ice auger which was heated on the end with a torch and held to the inside thigh of his right leg. This sent Jason Thomas into cardiac arrest and an approximate thirty-three (33) day hospital stay until he was sent home on April 13 under hospice care.
- Jason Thomas showed S/A Zachmeier the burns which were consistent with being made by an ice auger. S/A Zachmeier seized the ice auger Jason Thomas stated was utilized to burn him from a camper on Jason Thomas' property. Jason Thomas stated he was burned and threatened in an attempt by Alexander Lail to obtain signed vehicle titles from Jason Thomas. Jason Thomas believed that the cardiac arrest and subsequent heart damage will cause him to die, and that the cardiac arrest was a direct result of the ice auger being used as a weapon with force upon his leg and next to his penis.
- 3. During the investigation of Jason Thomas, Steven Candleberry was located staying in a camper on the Jason Thomas property. Steven Candleberry volunteered that he was at the Deanna Neurohr residence on April 13, 2017 and Deanna Neurohr was beat up with bruises observed around her neck from being choked by Alexander Lall and thrown through the wall at her residence. Steven Cantleberry advised that Deanna Neurohr contacted him to fix the damaged wall in her residence.
- 4:00 pm-S/A Zachmeier conducted a video recorded interview with Heather Burrington in a closed office at the Pierce County Sheriff's Department. Heather Burrington was serving time related to a search warrant conducted on her residence in Fessenden (Wells County), ND.
- 5. S/A Zachmeier asked Heather Burrington what was going on with Sheriff Lawson. Heather Burrington stated that the last time she was incarcerated (January 24, 2017 through February 8, 2017) that she and Sheriff Lawson "talked extensively" during the transport back and forth from court (Rugby, ND to Fessenden, ND). Sheriff Lawson

- explained to Heather Burrington that his son was in prison. Heather Burrington stated that Sheriff Lawson told her "just because we're drug addicts, doesn't make us bad people." Sheriff Lawson advised that he was from California and that he knows it is possible to be a "functioning addict".
- 6. Heather Burrington stated that after she was released from jail (February 8, 2017) she got back into the "using community". It was during this time that Deanna Neurohr told Heather Burrington that Alexander Lail was selling methamphetamine to Sheriff Lawson.
- 7. Heather Burrington advised that she had saw Sheriff Lawson at the Spirit Lake Casino, Fort Totten, ND on a couple occasions. Heather Burrington stated "It was not during normal people hours, it was during tweaker hours." Heather Burrington advised that it was at two (2), three (3), four (4) in the morning.
- 8. Heather Burrington advised that in the last year Sheriff Lawson had dropped a lot of weight which indicated to Heather Burrington that it was viable to Heather Burrington that Sheriff Lawson was using methamphetamine.
- 9. Heather Burrington stated that since Sheriff Lawson is in law enforcement, that Sheriff Lawson knows how to get out of it referring to any drug test which Sheriff Lawson would be requested to take.
- 10. S/A Zachmeier asked Heather Burrington how Sheriff Lawson and Alexander Lail became friends. Heather Burrington stated that from what she learned from driving with Sheriff Lawson for hours on end (referring to being transported to and from court by Sheriff Lawson), Sheriff Lawson had a flood in his basement at his home and contacted Alexander Lail to clean it up and repair it. Alexander Lail did this. After Alexander Lail finished, Sheriff Lawson asked Alexander Lail what Sheriff Lawson owed him. Alexander Lail told Sheriff Lawson "we will call it a wash".
- 11. Heather Burrington advised that this conversation occurred in Sheriff Lawson's patrol vehicle and was extensive. The conversation occurred at her court date in February 2017 (February 8, 2017). Heather Burrington advised that Sheriff Lawson was clear that Alexander Lail did not charge for any services Alexander Lail provided.
- 12. Heather Burrington was aware that there was another incident at Sheriff Lawson's residence and that Sheriff Lawson again contacted Alexander Lail. Alexander Lail again did not charge Sheriff Lawson. Heather Burrington stated "they have been friends ever since".
- 13. Heather Burrington explained that she was transport from the Pierce County jail in Rugby, ND to court (on February 8, 2017) by Sheriff Lawson. At court Heather Burrington received a personal recognizance (PR) bond. Heather Burrington contacted Alexander Lail for a ride to Rugby to be officially released from jail and retrieve her personal items. Alexander Lail was not yet ready so Heather Burrington requested transport from Sheriff Lawson back to the Pierce County Jail which Sheriff Lawson agreed to do.

- 14. After Heather Burrington was officially released from the Pierce County jail, Heather Burrington requested a ride back to Wells County as Alexander Lail was not yet to Rugby. Sheriff Lawson agreed to transport Heather Burrington back. Heather Burrington stated that once they left the jail, Heather Burrington requested Sheriff Lawson contact Alexander Lail and set up a place to meet. Sheriff Lawson then called Alexander Lail to arrange to meet half way between Rugby and Harvey.
- 15. Heather Burrington stated that Sheriff Lawson already had Alexander Lail's phone number. Heather Burrington stated she had requested Sheriff Lawson to contact Alexander Lail on two (2) prior occasions which Sheriff Lawson did via text message. Heather Burrington stated that Sheriff Lawson already had Alexander Lail's phone number.
- 16. Heather Burrington stated that when Alexander Lail and Sheriff Lawson met to exchange Heather Burrington, Heather Burrington got into Alexander Lail's vehicle. Alexander Lail got into Sheriff Lawson's patrol vehicle. Sheriff Lawson and Alexander Lail parked along the highway for a minimum of one-half (1/2) hour talking in Sheriff Lawson's patrol vehicle.
- 17. Heather Burrington told S/A Zachmeier of another instance in which Alexander Lail brought Heather Burrington to the Wells County Sheriff Office to get a new drug patch (April 3, 2017). Heather Burrington thought she was a day late for the drug patch exchange, so while in route to the Sheriff's Office, Heather Burrington requested Alexander Lail call Sheriff Lawson as Heather Burrington stated she did not have the Wells County Sheriff's Department phone number.
- 18. Alexander Lail stated "this is how I call the Sheriff's Office" and then Alexander Lail called Sheriff Lawson's direct line (cell phone number). Alexander Lail communicated over the phone "Hey buddy".
- 19. Heather Burrington advised that after being sentenced and transported back to the Pierce County jail to serve her jail time (April 13, 2017), they had just got onto ND Highway #52 leaving Fessenden when Sheriff Lawson referred to Heather Burrington as Miranda. Heather Burrington stated that Sheriff Lawson's "trainee" was also with on the transport.
- 20. Heather Burrington asked Sheriff Lawson how Sheriff Lawson got her named messed up. Sheriff Lawson stated "I'm sorry, I'm going through some stuff at work because someone called the Sheriff's Office and said they saw Sheriff Lawson and Alexander Lail meeting on a back road at 11:00-11:30 at night. Sheriff Lawson explained he was thinking of this person and that Sheriff Lawson was getting backlash at work because of it.
- S/A Zachmeier asked Heather Burrington about Deanna Neurohr telling Heather Burrington about Alexander Lail selling methamphetamine to Sheriff Lawson. Heather

Burrington explained that it occurred in February 2017 after Heather Burrington was released from jail. Heather Burrington described Deanna Neurohr as being high and Deanna Neurohr told Heather Burrington two (2) to three (3) times that Alexander Lail was providing methamphetamine to Sheriff Lawson.

April 15, 2017

1. S/A Bryan Lang received text messages from Tammy Neurohr. The text messages were between Tammy Neurohr and Alexander Lail. The text messages indicated that Alexander Lail admited that on March 10, 2017, he was at the Jason Thomas farm [in rural Wells County] and he was cleaning up the floor in the Jason Thomas house.

April 19, 2017

1. Courtney Lemer observed Sheriff Lawson in the Wells County State's Attorney's Office. Courtney Lemer observed that Sheriff Lawson had constricted pupils, a nasal sounding nose and a red nose. Sheriff Lawson was sweating profusely and having to repeatedly use his hand to wipe the dripping sweat from his brow. Sheriff Lawson appeared to have muscle tremors in his hands and arms, and was making exaggerated movements with his hands and arms. Sheriff Lawson appeared very irritated, restless, talkative, and dry mouthed. Courtney Lemer stated that everything seemed "sped up" with Sheriff Lawson. Courtney Lemer (a licensed law enforcement officer and prior full-time Harvey Police Officer) identified that Sheriff Lawson appeared to be under the influence of a narcotic (methamphetamine).

April 25, 2017

- 1. Alexander Lail was arrested in Eddy County for and arrest warrant out of Wells County for Interception of Wire and Oral Communications and Stalking in Wells County Case 52-2017-CR-00032 and also to arrest Deanna Neurohr for Possession of Methamphetamine and Possession of Unlawful Drug Paraphernalia, methamphetamine, in Wells County Case 52-2017-CR-00033.
- 2. 1:35 pm-Deanna Neurohr was arrested for possession of methamphetamine and methamphetamine drug paraphernalia (Wells County Case 52-2017-CR-00033) in Harvey, ND as a result of a traffic stop from the spring of 2016. S/A Zachmeier conducted a video recorded interview with Deanna Neurohr in a closed office at the Harvey Police Department. The interview was video recorded. S/A Zachmeier advised Deanna Neurohr of her miranda rights which she acknowledged she understood.
- Deanna Neurohr admitted to being involved in the usage and sale of methamphetamine with Alexander Lail. Deanna Neurohr admitted to being in a sexual relationship with Alexander Lail.
- 4. S/A Zachmeier asked Deanna Neurohr about her knowledge of the relationship between Sheriff Lawson and Alexander Lail. Deanna Neurohr advised that Alexander Lail had did some work for Sheriff Lawson and his wife, Christine Lawson.

- 5. Deanna Neurohr was aware that Sheriff Lawson and Alexander Lail were friends. Deanna Neurohr advised that Alexander Lail told Deanna Neurohr that he had been supplying methamphetamine to Sheriff Lawson.
- 6. S/A Zachmeier asked Deanna Neurohr about her wanting to supply S/A Zachmeier with information on March 5, 2017 when with Officer Tom Burr and about the phone call S/A Zachmeier received on March 8, 2017 from Sheriff Lawson indicating that Deanna Neurohr want to provided S/A Zachmeier and Sheriff Lawson with information. Deanna Neurohr advised that she did not believe Sheriff Lawson did anything, that Sheriff Lawson always helped Deanna Neurohr, and that she did request to speak with S/A Zachmeier through Sheriff Lawson.
- 7. 9:50 pm- S/A Zachmeier conducted a videotaped interview with Michael Kanwischer in a closed office at the Harvey Police Department. Michael Kanwischer requested to speak with S/A Zachmeier earlier on this day when a search warrant was executed on Deanna Neurohr's apartment. Michael Kanwischer lived in the same apartment building as Deanna Neurohr.
- 8. Michael Kanwischer advised that he used to be friends with Alexander Lail. Michael Kanwischer admitted he went with Alexander Lail to retrieve methamphetamine from Minot, ND which was transported back to Wells County. Michael Kanwischer admitted that he had received methamphetamine and marijuana from both Deanna Neurohr and Alexander Lail and that Deanna Neurohr sells methamphetamine for Alexander Lail.
- 9. S/A Zachmeler asked Michael Kanwischer about the relationship between Sheriff Lawson and Alexander Lail. Michael Kanwischer advised that Alexander Lail told Michael Kanwischer multiple times that Alexander Lail was supplying Sheriff Lawson with methamphetamine.
- Michael Kanwischer advised that Alexander Lail brought a bunch of tools consistent with being stolen from a farmstead towards the end of February to Deanna Neurohr's apartment. Michael Kanwischer advised that he contacted Sheriff Lawson and reported the tools to Sheriff Lawson and inquired of the tolls were stolen. Michael Kanwischer stated that Sheriff Lawson advised the items were not stolen. Michael Kanwischer reported that later (unknown how much later), that Alexander Lail came to the apartment and removed all the property.
- 11. 10:30 pm-S/A Zachmeier conducted a videotaped interview with Stephen Kelly in a closed office at the Harvey Police Department. Stephen Kelly came to the Police Department at his own accord. S/A Zachmeier advised Stephen Kelly of his miranda rights. Stephen Kelly acknowledged he under stood them.
- 12. Stephen Kelly admitted to being an acquaintance of Alexander Lail. Stephen Kelly stated he was afraid of Alexander Lail. Stephen Kelly admitted to getting methamphetamine from Alexander Lail and ingesting methamphetamine with Alexander Lail.

- 13. S/A Zachmeier asked Stephen Kelly about being afraid of Alexander Lail. Stephen Kelly advised that Alexander Lail had told Stephen Kelly more than once that he was supplying Sheriff Lawson with methamphetamine. Stephen Kelly stated that Alexander Lail would threaten Stephen Kelly with Sheriff Lawson being Alexander Lail's friend and taking law enforcement action against Stephen Kelly at Alexander Lail's request.
 - A. [On May 10, 2017, Alex Lail wrote out a note stating that "count of possession of weed! The guy's truck that I was driving took the charge of possession of weed. His name is (Steven Kellyl). On May 23, 2017, Stephen Kelly arrived at the Wells County Courthouse as he thought his court date for the February 10, 2017 possession of marijuana (weed) pretrial conference was on May 23, 2017 (the actual court date is May 24, 2017), and he voluntarily spoke to Eddy County Sheriff Paul Lies. Stephen Kelly told Sheriff Lies that he was upset that Lail was telling him that he had to take possession of the weed because it was not his weed. Stephen Kelly also told Sheriff Lies that sometime after October of 2016 that he was in Alexander Lail's Van sitting in Johnny Lawson's driveway, and Alexander Lail had methamphetamine that he and Stephen Kelly ingested in Sheriff Lawson's driveway, Stephen Kelly told Sheriff Lies that at that time Alexander Lail kept telling Stephen Kelly that Stephen Kelly had to do things for Alexander Lail and Alexander has said "Do I have to call Sheriff Lawson?" Stephen Kelly understood that to mean that Stephen Kelly would get in trouble for something by Sheriff Lawson because of Alexander Lail reporting something to Sheriff Lawson involving Stephen Kelly.]
- 14. Stephen Kelly also reported that Alexander Lail stole Stephen Kelly's 2016 four wheeled ATV and refused to return it to Stephen Kelly. Stephen Kelly stated he did not report the ATV as stolen as Alexander Lail was friends with Sheriff Lawson and believed Sheriff Lawson would not do anything because of the friendship. Alexander Lail told Stephen Kelly to keep insurance on the ATV indicating to Stephen Kelly that Alexander Lail planned on damaging Stephen Kelly's ATV.
- 15. S/A Zachmeier asked Stephen Kelly about other threats from Alexander Lail. Stephen Kelly stated he did not want to talk about it.
- 16. ND BCI S/A Casey Miller and ND BCI S/A Arnie Rummel conducted an interview of Sheriff Lawson at the Wells County Courthouse. S/A Miller advised Sheriff Lawson of his miranda rights. S/A Miller asked Sheriff Lawson if he was under the influence of any medication, narcotic or alcohol, and Sheriff Lawson said he was only using cold medicine. Sheriff Lawson agreed to talk to S/A Miller and S/A Rummel.
- 17. S/A Miller asked Sheriff Lawson about his relationship with Alexander Lail. Lawson stated that there was no relationship. Sheriff Lawson admitted that Alexander Lail had cleaned Sheriff Lawson's carpet at Sheriff Lawson's residence. S/A Miller asked Sheriff Lawson how often he speaks to Alexander Lail. Sheriff Lawson said "sometimes" and "I don't talk to Alexander Lail on a day to day basis." Sheriff Lawson stated that he did not see Alexander Lail for a long time.

- 18. S/A Miller asked Sheriff Lawson about burglaries in Wells County and if Alexander Lail was involved in the burglaries. Sheriff Lawson stated S/A Craig Zachmeier was investigating the burglaries. [Sheriff Lawson did not provide any information to S/A Zachmeier and/or ND BCI to ask to investigate the Heilman burglary, the Lape burglary and the Garnet Free burglary].
- 19. S/A Miller asked Sheriff Lawson about delays in the investigations. Sheriff Lawson stated that there had not been delays in the investigations, except that Sheriff Lawson had been spread thin with being short staffed.
- 20. (S/A Zachmeier is aware that the Jason Thomas' assault and attempted Armed Robbery was stated to have taken place on or about March 10, 2017, in rural Wells County. According to Jason Thomas' medical records, Jason Thomas reported the assault and attempted armed robbery to the hospital, and the hospital reported it to the Wells County Sheriff's Department. Located on Sheriff Lawson's desk were handwritten notes which indicated that he took notes on March 29, 2017, and March 30, 2017 indicating that Alexander Lail and Deanna Neurohr committed the attempted armed robbery and assault, but there was no investigation of any kind by Sheriff Lawson into these allegations. When S/A Rummel asked Sheriff Lawson about using a drill on someone, Sheriff Lawson stated that it was not until "a couple days ago" that Sara Bender reported to Sheriff Lawson about the Jason Thomas incident. Sheriff Lawson claimed that he was going to speak with Jason Thomas about it.)
- 21. S/A Rummel asked Sheriff Lawson if there was any illegal dumping in Wells County which was reported to Sheriff Lawson. Sheriff Lawson stated that he had a call for service, and he just had to finish the report. [Janelle Pepple and Courtney Lemer have not located a call for service and/or a case report]. Sheriff Lawson stated that Stephen Kelly and Alexander Lail were involved in the illegal dumping of garbage, and that Sheriff Lawson had spoken to Steven Kelly and Alexander Lail about this.
- 22. S/A Miller asked Sheriff Lawson if Sheriff Lawson had ever met Alexander Lail in locations where stolen property may be stored. Sheriff Lawson stated that Sheriff Lawson had never met Alexander Lail at those locations and/or secretly met Alexander Lail. Sheriff Lawson admitted that when Sheriff Lawson was on patrol with Deputy Alex Schweim [in March of 2017] that he met Alexander Lail in passing while driving. Sheriff Lawson stated that Alexander Lail was with Michael Hoffart, and that they stopped on [Wells] County Road 5, and they talked with Alexander Lail and Michael Hoffart. [Michael Hoffart stated that Alexander Lail got into Sheriff Lawson's vehicle and spoke with Sheriff Lawson and Alex Schweim while Michael Hoffart remained in the other vehicle. Sheriff Lawson admitted that during a transport of Heather Burrington [court records show transport on February 8, 2017], that Sheriff Lawson stated that Alexander Lail was going to Rugby to pick up Heather Burrington and Sheriff Lawson was transporting Burrington to Harvey. Sheriff Lawson admitted that he stopped along US Highway 3, and dropped off Heather Burrington to Alexander Lail. Sheriff Lawson thought that a male named Jason was with Alexander Lail.
- 23. S/A Miller asked Sheriff Lawson if he had told deputies not to stop Alexander Lail. Sheriff Lawson stated that Sheriff Lawson never said that and "would never do that." Sheriff Lawson said the only direction he gave was for the deputies not to patrol in the city of Harvey, ND.

- 24. S/A Miller asked Sheriff Lawson if anyone had given Sheriff Lawson information on Alexander Lail selling or using narcotics. Sheriff Lawson stated "not specifically." Sheriff Lawson stated that people were saying that Alexander Lail was the drug supplier and that Alexander Lail was the individual that was doing it, but "no real specific information." [S/A Zachmeier briefed Sheriff Lawson multiple times about Alexander Lail using methamphetamine.]
- 25. S/A Miller asked Sheriff Lawson if Sheriff Lawson had used drugs. Sheriff Lawson said "no."
- 26. S/A Miller asked Sheriff Lawson if he had used drugs since being in office. Sheriff Lawson answered "since being an officer, no."
- 27. S/A Miller asked Sheriff Lawson his urine test would it be clean and Sheriff Lawson stated "yes."
- 28. S/A Miller asked Sheriff Lawson if he had been using methamphetamine, and Sheriff Lawson stated "no."
- 29. S/A Miller asked Sheriff Lawson if he had ever used methamphetamine from Alexander Lail, and Sheriff Lawson answered "no, I have not used methamphetamine with Alexander Lail."
- 30. S/A Rummel asked Sheriff Lawson if he made a mistake about methamphetamine use, and Sheriff Lawson would not answer.
- 31. S/A Miller asked Sheriff Lawson if Alexander Lail had done thousands of dollars' worth of work for Sheriff Lawson at his residence and apartments for free. [Note Sheriff Lawson admitted to Brent Lemer that he was the manager of apartments in Harvey, and this was the apartment building in which Deanna Neurohr had her apartment.] Sheriff Lawson stated that was two (2) years ago and Sheriff Lawson said "Well, Canadian Pacific paid for it." [Note Sheriff Lawson had previously told Janelle Pepple, Courtney Lemer, Jaci Williams, and Richard Juarez that Alexander Lail did work for free for Sheriff Lawson at his residence and it was about couple thousand dollars' worth of work.]
- 32. S/A Miller asked Sheriff Lawson if he had ever used methamphetamine, and Sheriff Lawson said "back in high school." Sheriff Lawson then said it was after high school.
- 33. S/A Miller asked Sheriff Lawson how many times he had used methamphetamine, and Sheriff Lawson did not answer.
- 34. S/A Miller again asked Sheriff Lawson about using narcotics, and Sheriff Lawson said "that was a long time ago." S/A Miller asked Sheriff Lawson how long ago, and Sheriff Lawson said "months."
- 35. Sheriff Lawson stated that he had never covered up anything for anyone, but Sheriff Lawson admitted that the reports have not been getting done quickly.

- 36. S/A Miller asked Sheriff Lawson how long ago it was that Sheriff Lawson made the mistake of using methamphetamine, and Sheriff Lawson said it was longer than a couple of months ago, and before Thanksgiving last year [2016].
- 37. S/A Miller asked Sheriff Lawson if he used methamphetamine by himself, and Sheriff Lawson said "yes."
- 38. S/A Miller asked Sheriff Lawson the location of the Methamphetamine use, and Sheriff Lawson said that he could not remember.
- 39. S/A Miller asked Sheriff Lawson if he smoked methamphetamine, and Sheriff Lawson said "no." S/A Miller asked if Sheriff Lawson snorted methamphetamine, and Sheriff Lawson said "yes" and that he was by himself.
- 40. S/A Miller asked where Sheriff Lawson received the methamphetamine, and Sheriff Lawson said from Alexander Lail, a hand to hand and face to face meeting. [Note this would be an illegal delivery of a habit forming drug, namely delivery of methamphetamine, and Sheriff Lawson did not investigate, did not report, and did not assist in the prosecution of this criminal activity of Alexander Lail. NDCC 44-04-06].
- 41. S/A Miller asked Sheriff Lawson if Sheriff Lawson paid for the methamphetamine and Sheriff Lawson said "no" and "he just gave it to me." [Note Sheriff Lawson received the illegal controlled substance without paying for it with cash or some other kind of trade, and thus, this is circumstantial evidence of Sheriff Lawson accepting a thing of value for not investigating this violation of habit forming drug laws, in direct violation of the specific duties for a North Dakota law enforcement officer. See NDCC 12.1-12-01(1)(a)&(b) Bribery.]
- 42. S/A Miller asked Sheriff Lawson where the transaction took place, and Sheriff Lawson stated that they just met. [Note Sheriff Lawson is not providing evidence of the location of the delivery of methamphetamine in violation of his duties to provide evidence and reports of these violations of habit forming drug laws-NDCC 44-04-06].
- 43. S/A Miller asked if this was the one (1) time Alexander Lail gave Sheriff Lawson methamphetamine and Sheriff Lawson answered "yeah". Sheriff Lawson said that the methamphetamine use was a one (1) time isolated incident. [Note this was not consistent with observations made by law enforcement officers, such as S/A Zachmeier, Courtney Lemer, ND HP Trooper Evan Savageau, and Eddy County Sheriff's Deputy Chris Bittman].
- 44. During the interview, Sheriff Lawson claimed to S/A Rummel and S/A Miller that he was not friends with Alexander Lail, even though S/A Rummel confronted Sheriff Lawson with text messages between them referring to each other as buddy and friend.
- 45. Ultimately, Sheriff Lawson resigned as the Wells County Sheriff effective immediately on April 25, 2017.
- 46. After Sheriff Lawson resigned, S/A Rummel and S/A Miller searched the Wells County Sheriff's Office and looked through some of Sheriff Lawson's handwritten notes. They

found various notes on a white legal pad. Among those notes were notes dated March 29, 2017 and March 30, 2017 including the following:

- a. March 29, 2017 "Lori Davis Intake Cass County Soc. Serv. 701-239-6834
 Jason Thomas APS.
 +Jason Camling 605 290 1567+
 Jason is Dying in hospital
 Beet him up and used prod on penis.
 He cant talk because of state of health."
- b. March 30, 2017 "Jeff Camling 4 yr old Friendship

 Megan Thomas –

 Jason Thomas Fargo

 Attacked by Deana Alex Lail

 Took keys assaulted

 Wounds by private area

 Palative nursing (cancer care treatment)

 + Phone keys wallet+

Johnny Lawson (signatures at bottom of page)

May 2, 2017

- 1. ND BCI Agent Craig Zachmeier met with Tawnia Heilman and conducted an interview regarding the burglary of the Glen and Tawnia Heilman farmstead. After the interview, S/A Zachmeier contacted a Michael Kanwischer, and Michael Kanwischer indicated that at the end of February, 2017, Alexander Lail brought over property to him that appeared to be items that would in a farmer's buildings. Michael Kanwischer gave a description of some of the property such as name brands and tools that were consistent with the items listed as stolen by the Heilmans. Michael Kanwischer further stated that he contacted Sheriff Lawson to inquire whether or not the property was stolen and Sheriff Lawson told him that the property was not reported as stolen.
- 2. S/A Zachmeier and S/A Lang conducted and audio taped interview with Roger and Tammy Neurohr, Deanna Neurohr's parents, in a closed office at the Wells County Court House. Roger and Tammy Neurohr requested to speak with officers in reference to Deanna Neurohr and Alexander Lail, their interview was not solicited.
- 3. Tammy Neurohr complained about Sheriff Lawson in reference to her juvenile granddaughter, Anna. (Anna was adopted by Tammy Neurohr and Roger Neurohr. Anna is the biological daughter of Deanna Neurohr.) Tammy Neurohr advised that approximately one (1) year ago Anna was suicidal and Tammy Neurohr requested assistance from the Wells County Sheriff's Department, and called twice for assistance. Deputy Andrew Klegstad advised Tammy Neurohr that Sheriff Lawson would not allow Deputy Klegstad to respond.

- 4. Tammy Neurohr advised that Deanna Neurohr told Tammy Neurohr that Alexander Lail was supplying methamphetamine to Sheriff Lawson. Alexander Lail had later come to Tammy and Roger Neurohr's residence with Deanna Neurohr. They were sitting at the kitchen table. Tammy Neurohr asked Alexander Lail if he was buying from or selling Methamphetamine to Sheriff Lawson. Tammy Neurohr stated that Alexander Lail responded "the latter". Tammy Neurohr advised that this occurred after Christmas 2016.7. Tammy Neurohr advised that she sent a letter to the Wells County Commission (The December 3, 2016 letter) advising the Wells County Commission that Sheriff Lawson was using methamphetamine and that they were concerned of retaliation from Sheriff Lawson.
- 5. After Tammy Neurohr wrote the letter and the day the Wells County Commission addressed her letter, Alexander Lail came to Roger and Tammy Neurohr's residence. Alexander Lail had a copy of the letter. Alexander Lail told Tammy Neurohr that she better back off or someone would get hurt. Tammy Neurohr stated that Alexander Lail told her "You better back off now!"
- 6. Roger Neurohr advised that in October 2016, Deanna Neurohr was assaulted by Alexander Lail and came to Roger and Tammy Neurohr's residence after the assault. Roger Neurohr was upset and was going to go and confront Alexander Lail. Deanna Neurohr advised that Roger Neurohr shouldn't as Alexander Lail had gone to Sheriff Lawson's residence.
- 10. Tammy Neurohr advised there was another instance when Alexander Lail called Sheriff Lawson and put him on speaker phone so Tammy Neurohr could hear. Tammy Neurohr advised that it was obvious that Alexander Lail and Sheriff Lawson were close friends. (This occurred a couple weeks prior to Tammy Neurohr learning that Alexander Lail was providing Sheriff Lawson with methamphetamine.)

May 3, 2017

- 11:10 am-S/A Zachmeier conducted a video recorded interview with Deanna Neurohr in a closed office at the Pierce County jail. S/A Zachmeier advised Deanna Neurohr of her miranda rights which she acknowledged she understood.
- S/A Zachmeier asked Deanna Neurohr about her knowledge of Sheriff Lawson using methamphetamine. Deanna Neurohr stated she had asked Sheriff Lawson about his methamphetamine use. Sheriff Lawson denied using methamphetamine. This occurred at Deanna Neurohr's home in Heimdal, ND.
- 3. S/A Zachmeier met with Glen Heilman at the Tawnia and Glen Heilman residence. Glen Heilman advised that in February when the burglary was reported, Sheriff Lawson responded. Sheriff Lawson took pictures of some vehicle tracks from the burglars. Sheriff Lawson asked for an inventory of stolen items and advised the Heilman's to contact their insurance carrier as the theft would most likely not be solved and their property would not be recovered.
- 4. 7:35 pm-S/A Zachmeier conducted a video recorded interview with Stephen Kelly in a closed office at the Harvey Police Department. The interview was video recorded. Stephen Kelly first showed S/A Zachmeier a four wheeled ATV which he stated

- Alexander Lail stole from him and that Stephen Kelly recovered from the Amanda Ripplinger residence in Harvey.
- 5. Stephen Kelly admitted that he had got methamphetamine from and used methamphetamine with Alexander Lail. S/A Zachmeier asked Stephen Kelly if Alexander Lail ever told Stephen Kelly that Alexander Lail was supplying methamphetamine to Sheriff Lawson. Stephen Kelly reiterated that Alexander Lail had told Stephen Kelly that Alexander Lail was supplying methamphetamine to Sheriff Lawson.
- 6. Alexander Lail further told Stephen Kelly to make sure no one finds out or hears about it and stated "it could be the end of you".
- 7. S/A Zachmeier asked Stephen Kelly if Alexander Lail ever threatened Stephen Kelly with Sheriff Lawson taking action against Stephen Kelly. Stephen Kelly stated that Alexander Lail told Stephen Kelly that if Stephen Kelly did not do what Alexander Lail wanted that Stephen Kelly would end up in jail.

May 4, 2017

- 1. ND BCI S/A Christy Gass and ND BCI S/A Troy Kelly interviewed Jason Saxer. Jason Saxer identified that Alan Van Dam had stolen guns. Jason Saxer was aware that Alexander Lail, Sheriff Lawson and Alan Van Dam were shooting the stolen guns. During the Tyler Schnase and Scott Rapp burglary investigations, S/A Zachmeier obtained a criminal history for Alexander Lail which showed he had a federal conviction for smuggling aliens. This meant Alexander Lail was federally prohibited from possessing firearms.
- 2:00 pm-S/A Zachmeier was involved in an investigation relating to a probation search of the Amy Gudmunson and Alan Van Dam residence in Anamoose, McHenry County, ND. During the investigation Amy Gudmunson admitted to smoking (ingesting) methamphetamine about one (1) day earlier (May 3, 2017). During the probation search, items were recovered that were consistent with the Heilman Burglary, the Lape Burglary and the Free Burglary in Wells County. Amy Gudmunson admitted to being present at a farmstead near Heimdal, ND and gave a description of how to get to the address, and this was consistent with the description provided by burgalry victim, Garnet Free. Amy Gudmunson also admitted to going to other farmsteads near Heimdal, Wells County, ND. She admitted to being involved in the distribution of methamphetamine with others, including, but not limited to: Alexander Lail and Alan Van Dam. Agents reviewed lists of stolen property with Amy Gudmunson, and Amy Gudmunson showed the officers where some of the stolen items were located. She also assisted in collecting the stolen items.
- 3. The items which were seized from the Gudmunson property included some of the items on the lists of reported stolen property related to the Heilman burglary, the Lape burglary, and the Free burglary. Items from the Heilman burglary included a sickle mower, Schumacher battery chargers, Dewalt Greese gun, glass cleaners, Craftsman Impact ratchets, sickle guards, rubber mallet, Craftsman bolt cutter, hydraulic hose, and Stihl chain saw. The items from the Lape burglary included antique gold packet watch,

gold Seiko wrist watch, 1880 gold coin, 1952 ½ dollar, 1941 ½ dollar, 1886 silver dollar, 1922 silver dollar, 1921 silver dollar, Dell Lap Top computer, Samsung TV, Polo Cologne, Trail Cams, and Black North Face Coat. The items from the Free Burglary included the 32" Vizio TV, the Barn picture frame, the horsehead ashtray, the sterling silver serving dish. Amy Gudmunson admitted the items were brought to her residence by Alex Lail and Alan Van Dam. S/A Zachmeier photographed the items with his cell phone, and sent the photographs via cell phone to the victims. The victims positively identified items as being stolen from their property/residence.

- 4. Amy Gudmunson advised that she had received methamphetamine from and ingested methamphetamine with Alexander Lail. S/A, Zachmeler asked Amy Gudmunson how many times she received methamphetamine from Alexander Lail. Amy Gudmunson stated too many times to count.
- 5. Amy Gudmunson stated that she was aware that Alexander Lail was supplying Sheriff Lawson with methamphetamine. Alexander Lail told Amy Gudmunson that Alexander Lail had been supplying methamphetamine to Sheriff Lawson.
- 6. Amy Gudmunson than told of an instance in which Amy Gudmunson was with Alexander Lail while Alexander Lail was traveling to Minot to retrieve methamphetamine. Sheriff Lawson called Alexander Lail during the trip. Amy Gudmunson stated that Alexander Lail and Sheriff Lawson talked in code. Amy Gudmunson described that Sheriff Lawson asked Alexander Lail if Alexander Lail was going to the movies to which Alexander Lail indicated he was. Sheriff Lawson then asked how much the movie was and if the movie was good. Alexander Lail indicated the price of the methamphetamine as the same as the last movie and that it was a good movie.
- 7. Amy Gudmunson stated that she was physically afraid of Sheriff Lawson because of Sheriff Lawson's involvement with Alexander Lail. Amy Gudmunson advised that she recently installed surveillance cameras at her home because Sheriff Lawson was still out (meaning not in jail).
- 8. Amy Gudmunson advised that Sheriff Lawson knows about Alexander Lail and Deanna Neurohr's criminal activity and "looks the other way."

May 5, 2017

Donna Lail called S/A Zachmeier and advised that during the time Alexander Lail was charged with the burglary of Scott Rapp's apartment that Alexander Lail claimed he did not commit the burglary. Donna Lail said that Alexander Lail appeared scared and didn't want to go out at all. Donna Lail said that she asked Alexander Lail to go out, and he finally agreed to go out and stated to Donna Lail "I got Johnny Law in my pocket!" Donna Lail said that she couldn't believe what Alexander Lail told her about Sheriff Lawson. Donna Lail said that she went to speak to Sheriff Lawson and specifically told Sheriff Lawson that Alexander Lail told her that he had "Johnny Law in his pocket." Donna Lail advised that Sheriff Lawson had a shocked look on his face but didn't deny it.

May 9

- 7:35 pm-S/A Zachmeier conducted a video recorded interview with Jeremy Nelson in a closed office at the Harvey Police Department. The interview was video recorded. Jeremy Nelson admitted to receiving methamphetamine from Alexander Lail, Deanna Neurohr, and Stephen Kelly.
- 2. S/A Zachmeier asked Jeremy Nelson about Sheriff Lawson's involvement. Jeremy Nelson advised that when he was using with and receiving methamphetamine from Deanna Neurohr that he and Deanna Neurohr went to Larrie Straatmeyer's residence in Harvey, ND. Larrie Straatmeyer is a painter and is known as "Larrie the painter."
- 3. (Deputy Juarez had stopped Larrie Straatmeyer for driving under suspension in the spring of 2016 in Harvey, ND. Larrie Straatmeyer requested to talk to Sheriff Lawson at the traffic stop to request bail money from Sheriff Lawson stating that Sheriff Lawson owed him money for a job Larrie Straatmeyer did. Sheriff Lawson gave Deputy Juarez the directive not to take Larrie Straatmeyer to jall and to issue Larrie Straatmeyer a promise to appear. Deputy Juarez took Larrie Straatmeyer to jall based on Larrie Straatmeyer's multiple driving under suspension offenses at the direction of Wells County State's Attorney Kathleen Murrey.)
- 4. Jeremy Nelson advised that there were tools that appeared to be out of place (stolen) at the Larrie Straatmeyer residence. Jeremy Nelson learned from Larrie Straatmeyer that Larrie Straatmeyer painted Sheriff Lawson's residence in Harvey, ND and that Sheriff Lawson provided the tools to Larrie Straatmeyer as payment. (Please note that when a search warrant was executed on Deanna Neurohr's apartment that there was a set of keys in a backpack in her room labeled "Larrie Straatmeyer.")
- 5. Jeremy Nelson advised S/A Zachmeier that Deanna Neurohr told Jeremy Nelson that the methamphetamine Deanna Neurohr had was "fire" and that Sheriff Lawson even thought so.

May 10, 2017

1. Alexander Lail was in Court at the Wells County Courthouse in Fessenden, Wells County, ND, and wrote a handwritten note of information relating to his criminal charges. On this note, Alexander lail wrote "..... 1.) court possetion of weed! The guy's truck that I was driving took the charge of possetion of weed. His name is (Steven Kelly!). I have no drug charges/convictions I do own 18 properties in ND. Some residential & commercial worth in excess of \$2 Million." (The possession of marijuana charge relates to the Wells County Deputy Andrew Klegstad stop of Alexander Lail while Alexander Lail was driving Stephen Kelly's truck, and there was a small bag of marijuana on the dash. Originally, Deputy Klegstad gave a personal recognasence to Alexander Lail and did not charge anyone for the marijuana possession. Wells County State's Attorney Kathleen Murray prepared a long form complaints against both Alexander Lail and Stephen Kelly, and Deputy Klegstad signed the complaints. Both charges are still pending. Deputy Klegstad stated that Sheriff Lawson told him that Stephen Kelly is the owner of the truck

and "he took the charge of possession of the marijuana" and should be the only one charged.]

REQUEST FOR RESTRICTED AND CONFIDENTIAL COMPLAINT AND PROBABLE CAUSE AFFIDAVIT

- 1. This officer hereby requests "restricted" files and confidentiality, due to the seriousness of the offenses, an ongoing and continuing investigation, as well as for the protection of informants and witnesses that may be at risk of harm, and pursuant to NDCC 44-04-18.7(1) as an ongoing and active criminal investigation. This officer specifically requests the restricted files and confidentiality, because there are numerous informants and witnesses, and an ongoing and criminal investigation that will require additional interviews, and persons are at a risk of harm, and a risk of harm to the public at this time, and therefore, to protect the informants, witnesses, and the ongoing and continuing criminal investigation, this officer requests that the Court find that it is appropriate to temporarily restrict these files as confidential and restricted, and that there is no listing on Odyssey, and/or any type of ability for the public to view the items until further order of the Court.
- 2. A Co-conspirator, Alexander Lail, is currently charged with Conspiracy to Commit Armed Robbery and Conspiracy to Commit Aggravated Assault in Wells County Case 52-2017-CR-00034, and is a co-conspirator in the delivery of methamphetamine. These offenses show the seriousness and danger that Alexander Lail presents to witnesses and informants, and/or other persons that may be involved in a conspiracy with Alexander Lail. This officer has information that there are various other persons involved in the investigation with Alexander Lail.
- 3. Also, the Defendant was the prior Wells County Sheriff and had access to restricted files; it is also necessary to list these files, documents, complaint, and probable cause affidavit as CONFIDENTIAL and only viewed by persons authorized by the Court, until further order of the Court.

I, S/A Zachmeier, believes there is probable cause for the charges of:

- 1. 12.1-06-04 and 19-03.1-2(1)(a) Conspiracy to Deliver Methamphetamine, Class A Felony.
- 2. 12.1-12-01(1)(a) & (b) Bribery, Class C Felony.
- 3. 12.1-11-03 False Information to a Law Enforcement Officer, Class A Misdemeanor.
- 4. 12.1-11-06 Neglect of Duty by a Public Official, Class A Misdemeanor
- 5. 19-03.1-22.3 Ingestion of Methamphetamine, a Class A Misdemeanor.

Complainent May 26, 2017

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Subscribed and sworn to before me this	6 Day of 7/04 2017.
State of North Dakota)	
County of Pierce	2/ January May 2017
Subscribed and sworn to before me this	day of May, 2011.
	Notary Public, State of North Bakota
	ROSELLA KUNTZ FAUL Notary Public State of North Dakota
	My Commission Expires Apr 29, 2023