

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF BURLEIGH

SOUTH CENTRAL JUDICIAL DISTRICT

State of North Dakota,

Plaintiff,

-VS-

Raymond John Geffre,

Defendant.

COMPLAINT

SA # F1090-18-17

Cr. No.

082018 CR2037

STATE OF NORTH DAKOTA )

) ss.

COUNTY OF BURLEIGH )

[¶1] The undersigned complainant, being first duly sworn, says that on or about the 3rd day of July, 2018, in Burleigh County, the defendant, Raymond John Geffre, did commit the crime of **Terrorizing (CST # C00280)**, committed as follows:

[¶2] The defendant, with intent to place another human being in fear for that human being's or another's safety, or in reckless disregard of the risk of causing such terror, threatened to commit a crime of violence or act dangerous to human life and in the course of committing such offense threatens another with imminent bodily injury with a dangerous weapon, explosive, destructive device, or firearm; specifically, the defendant pointed a gun at Edward Weber;

N.D.C.C. 12.1-17-04(1)  
12.1-32-02.1  
12.1-32-01(4)

MANDATORY MINIMUM:  
Two (2) Years' Incarceration  
CLASS C FELONY

[¶3] This contrary to the statute in such cases made and provided and against the peace and dignity of the State of North Dakota.

[¶4] WHEREFORE, Complainant prays that the defendant, Raymond John Geffre, may be arrested and dealt with according to law.

Complainant

Subscribed and sworn to before me this 5<sup>th</sup> day of July, 2018.

JACLYN BITNER  
Notary Public  
State of North Dakota

My Commission Expires Aug 11, 2021

Complaint Approved

Julie Lawyer, BAR ID: 06693  
Burleigh County Assistant State's Attorney

Notary Public  
Burleigh County, North Dakota

District Court Judge

STATE OF NORTH DAKOTA )

COUNTY OF BURLEIGH )

) SS.  
)

AFFIDAVIT


082018CR2037

I Clint Wohler, attest to the following:

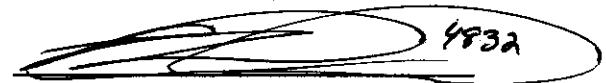
1. That I am a trained and licensed peace officer with 4 years of experience with jurisdiction to enforce state law in Burleigh County, North Dakota.
2. That on the 3rd day of July, 2018 at approximately 1020 hours, in Burleigh County, North Dakota at (specific location) 8953 Hwy 1804 Bismarck, ND 58503
3. The suspect was identified as Raymond John Geffre (Full Name) whose Date of birth is (Month) September (Day) 11th (Year) 1948, and is 69 years of age.
4. The vehicle/person was stopped for. Responding to a call of Terrorizing.
5. The following gives rise to probable cause to charge the suspect with: Terrorizing-C Felony

**Circumstances and/or other facts:** Deputies Clint Wohler, Chad Rempher and Sgt. Jeff Vyska responded to a call of a terrorizing situation. Deputy Wohler talked with victim, Edward Michael Weber (DOB 01/28/1965), at Midland Garage Door Mfg Co. Weber said he was looking for an address for a customer. Weber said he drove down the wrong driveway and attempted turning around. Weber said a vehicle pulled up beside him and a male got out of the vehicle holding a cellphone in one hand and a black semi automatic handgun in the other. Weber said Geffre pointed the gun at him through Weber's driver side window. Weber said he was scared and in fear for his life. Deputies arrived at the location described and talked with Raymond John Geffre (DOB 09/11/1948). Geffre said a company pickup drove onto his property and he saw the vehicle leaving his residence. Geffre stated he pulled in front of the vehicle blocking it and approached the driver's side door. Geffre said he had a phone in one of his hands. Wohler asked about the other hand and Geffre stated he can legally carry and has a concealed weapons permit. Wohler did not mention anything about a gun at this point. While demonstrating how the interaction occurred, Geffre used his finger and pointed it like a gun. Wohler asked Geffre about the finger gesture and he said he didn't remember what he had in his hand and refused to answer any more questions about the gun. Wohler later interviewed Geffre who changed his story stating he indeed had a gun on him but did not point the gun at the victim.

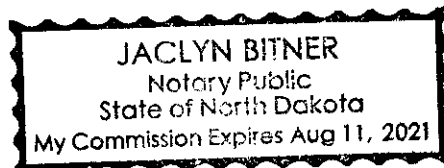
Dated this 3rd day of July, 2018.


  
Complaining Officer

I swear the above affidavit is true and correct as provided to me on this 5<sup>th</sup> day of July, 2018.

  
Peace Officer / Affiant

Subscribed and Sworn before me on the 5<sup>th</sup> day of July 2018



  
Notary Public

State of North Dakota,

Plaintiff,

vs.

Raymond Geffre  
Defendant.

## SCHEDULING ORDER

## NOTICE:

Hon. Hill

is assigned as trial judge for this case.

All documents filed with the Court must include the case number. The defendant is required to inform the Clerk of District Court of any change of address or telephone number. The defendant must maintain contact with the defense attorney or a bench warrant will be issued. Requests for continuance must be made using the South Central Judicial District form.

## PERSONAL APPEARANCES WILL BE REQUIRED:

1. **Final Dispositional Conference:** N/A at the Burleigh County Courthouse.
2. **JURY BENCH TRIAL:** 12/20/18 at 8:30 a.m., Burleigh County Courthouse.
3. **Change of plea:** If change is to occur within ten days of trial, contact the court reporter for the above named judge. Contact court administration to schedule all other changes of plea at [SCJDScheduling@ndcourts.gov](mailto:SCJDScheduling@ndcourts.gov) or by phone at (701) 222-6682.

## DEADLINES

1. Rule 16 discovery request – 14 days from the date of this order.
2. Reply to Rule 16 Discovery request – 28 days from the date of this order.
3. Filing, service, requesting hearing, and notice of any other motion – 43 days from the date of this order.
4. Response to motions and requests for hearing – 58 days from the date of this order.
5. Notification to Court of proposed plea agreement – 10 days prior to trial date. Pleas offered without such notification will not be considered as plea agreements.
6. Orders to transport defendants must be prepared by defense attorney and both filed and delivered to the law enforcement agency which will provide transportation – 10 days prior to a scheduled hearing.
7. Filing of proposed jury instructions, witness list, and trial brief – 10 days prior to trial.
8. All trial exhibits must be pre-marked. Multi-page exhibits must be numbered at the bottom of each page. It is the party's responsibility to test any audio or video equipment intended to be used at trial and to provide equipment necessary to presentation of evidence if it is not in courtroom. If an audio or video recording is offered, and is not clearly audible, notice must be provided at least 10 days before trial and a transcript may be required.
9. Parties must ensure witnesses are present and prepared to testify so that the trial will not be delayed.

Dated 8/20/18.

BY THE COURT:

Defendant:

Raymond GeffreJas S. Jine

District Judge