

Audrey Cromwell  
County Attorney  
Gallatin County Attorney's Office  
1709 W. College, Suite 200  
Bozeman, MT 59715  
Telephone: (406) 582-3745

**MONTANA EIGHTEENTH JUDICIAL DISTRICT COURT, GALLATIN COUNTY**

STATE OF MONTANA,

Plaintiff,

vs.

ALEXANDER LEDOUX,

Defendant.

Cause No.: DC-16-2024-0000131-IN

**AFFIDAVIT OF PROBABLE CAUSE  
AND MOTION FOR LEAVE  
TO FILE INFORMATION**

COMES NOW the State of Montana by Audrey Cromwell, Gallatin County Attorney, and  
being first duly sworn upon oath, deposes and says as follows:

1. That your affiant is the Gallatin County Attorney, and by law one of the attorneys  
to prosecute criminal matters in the State of Montana.

2. Based upon a report of investigation compiled by the Montana Highway Patrol,  
your affiant is aware of the following.

3. On January 4, 2024, Trooper Jeff Sargent was dispatched to the scene of a two-  
vehicle crash involving a fatality at 0232 hours.

4. The crash was the result of Alexander Norbert LeDoux, hereinafter referred to as  
the Defendant, driving his vehicle in the wrong direction on I-90 for approximately 20 miles. This

1 was first noticed by Bryan Aills (Ails) who was driving a commercial motor vehicle westbound  
2 on I-90 near Belgrade. Aills noticed a vehicle he had not previously seen approaching him from  
3 behind but on the wrong side of the roadway as both vehicles were heading west. Aills noticed the  
4 white SUV was continuing to accelerate while traveling west in the eastbound lane. Aills stated he  
5 honked his horn and flashed his lights to gain the driver's attention in hopes the driver would realize  
6 his mistake. Aills further reported the vehicle continued to accelerate and pull away from him and  
7 he lost sight of the vehicle shortly thereafter.  
8

9         5.       As the Defendant continued to drive West on I-90 East, he encountered several  
10 other motorists traveling in the correct direction. This included Alaura Crane, Jazmen McBride,  
11 Nadine Olive, Seth Gibson, William Johnson, and Deputy Mitch Sella.  
12

13         6.       Both Seth Gibson (Gibson) and William Johnson (Johnson) reported having to  
14 swerve out of the way to avoid a head on collision with the Defendant. Nadine Olive (Olive)  
15 reported the defendant struck her vehicle and took off the driver side exterior side mirror. The  
16 Defendant failed to stop after this accident and continued traveling the wrong direction on I-90.  
17

18         7.       By 0133 hours, Gallatin County 911 center received a total of six (6) 911 calls  
19 reporting the Defendant as a wrong way driver. The witnesses were consistent in describing the  
20 vehicle as either a light color or a white SUV with one headlight out. Deputy Sella received these  
21 reports and observed a vehicle matching the description traveling west in the eastbound lane at a  
22 high rate of speed. Deputy Sella positioned himself on the shoulder of the eastbound lanes with  
23 his lights and sirens activated. Deputy Sella attempted but was unable to deploy a tire deflation  
24 device to slow or stop the vehicle. Despite the visual and audio warnings directing the Defendant  
25 to pull his vehicle over, the Defendant continued to drive in the wrong direction at an extremely  
26 high rate of speed. In response, Deputy Sella utilized a median crossover and turned around to  
27  
28

1 pursue the vehicle and watched, from a distance, as the Defendant collided head on with another  
2 vehicle operated by Laysa Grewell (Grewell).

3 8. Upon arriving at the crash site, Trooper Sargent approached on foot and observed  
4 a vehicle which came to rest on its passenger side. The vehicle was unidentifiable due to the  
5 catastrophic front-end damage and to the extensive burn damage but appeared to be a full-size  
6 Sport Utility Vehicle (SUV). The SUV came to rest off the main travel portion of the highway on  
7 asphalt laid by the construction company and next to the cable barrier. The area below and around  
8 the SUV was scorched from fire. Just a couple feet to the northeast of the SUV was a tarp which  
9 covered the driver, Grewell, the lone occupant of the SUV.  
10

11 9. Approximately 100 feet to the west of the burned SUV was a white Buick Enclave.  
12 The Buick came to rest on its wheels, straddling the broken lane line, facing a northern direction.  
13 Trooper Sargent observed debris strewn throughout the crash site. The area of impact was covered  
14 by the debris and oil from both vehicles masking tire marks post impact. There were no noticeable  
15 tire marks prior to impact. The motor of the Buick separated from the vehicle and came to rest  
16 approximately 23 feet behind the Buick.  
17

18 10. Upon further observations of the Buick, the vehicle sustained heavy front end crush  
19 damage principally on the passenger side. The right front corner was crushed so extensively, the  
20 passenger side front tire was pushed near the "B" pillar on the passenger side. There was significant  
21 intrusion into the interior of the vehicle cabin. The speedometer was suspended in place and  
22 indicated a speed of approximately 96 MPH.  
23

24 11. Trooper Sargent observed several MAP Brewing beer cans inside the vehicle within  
25 the immediate reach of the driver. The beer cans were either crushed or ripped open from the force  
26 of the crash spilling beer inside the vehicle. There was a very strong odor of beer coming from  
27  
28

1 inside the vehicle. On top of the driver's seat cushion was an Apple iPhone and next to the iPhone  
2 was a flattened, but intact, beer can. The iPhone was collected as evidence and later a search  
3 warrant was acquired.

4 12. Trooper Sargent returned to the full-size SUV, viewed the damage to the vehicle  
5 and tried to ascertain the make and model of the vehicle. The vehicle sustained heavy front-end  
6 damage, principally to the passenger side. The Trooper also observed that the intake manifold,  
7 valve covers, and Vehicle Identification Number (VIN) had melted, the entire interior of the  
8 vehicle was burned, and the only material which remained was either constructed of steel, copper,  
9 or iron.  
10

11 13. After initial inspections of the vehicles Trooper Sargent spoke with Deputy Sella  
12 from the Gallatin County Sheriff's Office. Deputy Sella stated he was west of the wrong way driver  
13 and responded with the intention to lay down spike strips to stop the vehicle. According to Deputy  
14 Sella, he was unable to accurately assess the location and speed of the vehicle, and the vehicle  
15 passed him at what he estimated to be 100 MPH prior to the crash.  
16

17 14. After completing the crash investigation Trooper Sargent formed the opinion that  
18 Grewell's Ford Expedition was negotiating a gradual left curve in the roadway, proceeding east,  
19 with a partially obstructed view caused by the combination of the concrete jersey rail along the  
20 bridge deck and the slight uphill grade. While negotiating the gradual left curve, Grewell's vehicle  
21 remained centered properly in the #1, or left most lane of travel.  
22

23 15. At the same time, the Defendant's Buick Enclave was proceeding west while  
24 driving in the eastbound lanes of travel and was ascending the slight uphill grade while negotiating  
25 the slight right curve in the road. The two vehicles collided in the center of the eastbound left lane  
26 of travel. The vehicles collided in a partially offset, large overlap frontal collision. The collision  
27  
28

1 was mostly centered, but slightly eccentric to the passenger side of both vehicles causing both  
2 vehicles to separate on their right side and rotate in a clockwise fashion. The Buick rotated in a  
3 clockwise fashion after maximum engagement. The Buick then drove in an arc formation across  
4 the right lane, on the shoulder, back into the right most lane, and came to rest over the broken  
5 white lane line facing a northerly direction. The Buick came to rest approximately 83' west of the  
6 area of impact.  
7

8 16. The Ford also rotated in a clockwise direction and came to rest approximately 35'  
9 northeast of the area of impact. At some point, Grewell was ejected from the vehicle and came to  
10 rest approximately 3' from the vehicle. During the collision, Deputy Sella observed a large fireball  
11 originating from the Ford which incinerated everything inside the vehicle.  
12

13 17. Sam Clark from the Gallatin County Coroner's Office transported Grewell's body  
14 to Billings for an autopsy to be performed. The coroner's findings for Cause, Manner and  
15 Circumstances of Death were reported to be accidental with the cause being blunt force trauma  
16 from the crash.  
17

18 18. Grewell was a mother of one child and the primary provider for her child and her  
19 fiancé, Kody Pullen. It was also reported that approximately one week prior to the crash, the couple  
20 discovered they were expecting a second child.  
21

22 19. On the date of the crash, Trooper Dave Thomas was dispatched to Bozeman Health  
23 Hospital to procure a blood sample from the Defendant. Trooper Thomas met the Defendant at  
24 Bozeman Health and procured a blood draw under the implied consent advisory at 0342 hours.  
25 The blood kit was sealed and mailed to the Montana Crime Lab via United States Postal Service.  
26 On January 30, 2024, Trooper Sargent received an email from the Montana State Crime Lab with  
27  
28

1 the toxicology results for the Defendant. The toxicology report indicated a Blood Alcohol  
2 Concentration (BAC) of .198.

3 20. Trooper Sargent secured a search warrant to access the content on the Defendant's  
4 cell phone. During the search, the trooper discovered the phone did not have any locking device  
5 or screen protection and therefore Trooper Sargent was able to swipe up to unlock the phone. When  
6 Trooper Sargent unlocked the phone; the cell phone application Snap Chat was open. The app  
7 contained an unsent video of the Buick driving on 1-90 near Manhattan driving east in the  
8 eastbound lane. The music was blaring, and the operator of the Buick, the Defendant, was holding  
9 the phone in his right hand. The video shows the Buick traveling at 108 MPH for most of the two  
10 minutes the video was recorded. The instrument cluster, between the tachometer and speedometer,  
11 displayed a message to the effect of "Speed limited to 108 MPH."  
12

13  
14 Based on the forgoing facts, the undersigned moves the Court to find that probable cause  
15 exists to file an Information charging Defendant with the crime(s) of:

16 **COUNT 1:** Vehicular Homicide While Under Influence, a Felony, in violation of Montana  
17 law, namely: Mont. Code Ann. § 45-5-106. **COUNT 2:** Fleeing and Eluding causing the death of  
18 another, a Felony, in violation of Montana law, namely: Mont. Code Ann. § 61-8-316(2)(b).  
19 **COUNT 3:** Criminal Endangerment, a Felony, in violation of Montana law, namely: Mont. Code  
20 Ann. § 45-5-207. **COUNT 4:** Criminal Endangerment, a Felony, in violation of Montana law,  
21 namely: Mont. Code Ann. § 45-5-207. **COUNT 5:** Criminal Endangerment, a Felony, in violation  
22 of Montana law, namely: Mont. Code Ann. § 45-5-207. **COUNT 6:** Criminal Endangerment, a  
23 Felony, in violation of Montana law, namely: Mont. Code Ann. § 45-5-207. **COUNT 7:** Criminal  
24 Endangerment, a Felony, in violation of Montana law, namely: Mont. Code Ann. § 45-5-207.  
25  
26  
27  
28

1 **COUNT 8:** Criminal Endangerment, a Felony, in violation of Montana law, namely: Mont. Code  
2 Ann. § 45-5-207.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Dated this 27<sup>th</sup> day of February 2024, in Gallatin County, Montana.

5  
6 /s/Audrey Cromwell  
7 Audrey Cromwell  
8 County Attorney  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28