

**In the Iowa District Court for Polk County**

<b>State of Iowa,</b> <i>Plaintiff,</i> v. <b>Jason M. Storm,</b> <i>Defendant.</i>	<b>Agency Case No.: WD19-05355</b> <b>Agency: West Des Moines Police</b> <b>Department</b>  <b>County Attorney</b> <b>Preliminary Complaint Review</b>
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COMES NOW the undersigned Assistant Polk County Attorney and states as follows:

**I have read and reviewed the attached complaint and affidavit. I:**

- Approve** the charge as HARASSMENT IN THE FIRST DEGREE—Aggravated Misdemeanor—in violation of Iowa Code Section 708.7(1)(a)(1) and ask the court to find probable cause for this charge.
- Request that the Court enter the attached *Arrest Warrant*.

**With regard to a bond amount, the State requests that:**

- The State requests that the Court enter a *No Contact Order at Initial Appearance*.
- The State requests defendant be held without bond until initial appearance, so a *No Contact Order* may be entered with the following victim at the following location: **Scott J. Zahnle, wherever the protected party may reside or be employed.**

**WHEREFORE** the State respectfully requests the Court find probable cause and allow the case to proceed under the circumstances set out above.

Respectfully submitted,  
JOHN P. SARCONI by:

/s/ Bret Lucas  
Assistant Polk County Attorney  
Polk County Attorney's Office  
222 Fifth Avenue, Des Moines, IA  
(515) 286-3737  
ctyatty@polkcountyiowa.gov

IN THE IOWA DISTRICT COURT IN AND FOR  
POLK COUNTY

This Complaint and Affidavit is to be:

- Filed with Court Clerk (cc: CA)
- Submitted to County Attorney
- Filed with JCO - Defendant is a Juvenile

Agency Case Number: **19-05355**

Arrest Date: \_\_\_\_\_

THE STATE OF IOWA

VS.

OFFENDER

Last <b>STORM</b>		First <b>JASON</b>		Middle <b>MATTHEW</b>		Suffix	
Address [REDACTED]				City <b>DES MOINES</b>		State <b>IA</b>	Zip Code [REDACTED]
DL# [REDACTED]	State <b>IA</b>	DL Class <b>C</b>	DL Endorsements		DL Restrictions		
Date of Birth [REDACTED]		Gender <b>MALE</b>	Race <b>WHITE - W</b>		Ethnicity <b>NOT OF HISPANIC ORIGIN - N</b>		
Height <b>5' 08"</b>	Weight <b>190 LBS</b>	Eye Color <b>BLUE - BLU</b>		Hair Color <b>BROWN - BRO</b>			

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section <b>708.7(2)</b>	Crime Description <b>HARASSMENT - 1ST DEGREE</b>			Speed	in	Zone
Class <b>AGMS</b>		Serious P.I. <input type="checkbox"/>	Fatal Accident <input type="checkbox"/>	Civil Damage Assessment <input type="checkbox"/>		Other <input type="checkbox"/>			
Location Type <b>22 - SCHOOL/COLLEGE</b>									
Literal Description <b>VALLEY STADIUM</b>									
Address <b>4440 MILLS CIVIC PARKWAY</b>				City <b>WEST DES MOINES</b>		State <b>IA</b>	Zip Code <b>50265</b>		
Is Date and Time of Incident Known? <b>YES</b>		Incident Date or Low Range <b>10/04/2019</b>		Upper Date Range	Incident Time or Low Range <b>19:34</b>		Upper Time Range		

STATUS OF OFFENDER/JUVENILE

<input type="checkbox"/> TAKEN INTO CUSTODY	CUSTODY		<input type="checkbox"/> SUMMONS TO APPEAR (Citation Issued)
<input checked="" type="checkbox"/> WARRANT REQUESTED	<input checked="" type="checkbox"/> NO CONTACT ORDER REQUESTED		<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN

NARRATIVE

Narrative of Offense Committed

On or about the above stated date and time, the Defendant did harass the victim, Scott Jay Zahnle, and threaten to commit a forcible felony against Scott Zahnle, who was officiating the football game that the defendant was coaching at, by threatening to 'fucking kill' the victim. The defendant had to be restrained by other members of the football team and escorted out of the stadium.

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

Last <b>ZAHNLE</b>		First <b>SCOTT</b>		Middle <b>JAY</b>		Suffix	
Business/Organization/State/County/Municipality Name							
Address [REDACTED]				City		State	Zip

AFFIDAVIT

STATE OF IOWA, POLK COUNTY

I, the undersigned, being duly sworn, state that all facts contained in this Complaint and Affidavit, known by me or told to me by other reliable persons form the basis for my belief that the defendant committed this crime

State all facts and persons relied upon supporting elements of alleged crime

On the 4th day of October 2019 at approximately 1934 hours, the defendant, an Assistant Lincoln Railsplitters Football Coach, did leave the sideline and did threaten the Head Official, Scott Jay Zahnle, by stating that he was going to 'fucking kill him' due to a 'no call' against the quarterback of the Lincoln Railsplitter's Football Team. The defendant had to be restrained from attacking the Head Official by other members of the coaching staff and he had to be escorted out of the Valley Football Stadium due to his aggressive behavior. The defendant did admit to being upset over the 'no call' and he did apologize for his actions, which disrupted the football game. This incident occurred at 4440 Mills Civic Parkway, West Des Moines, Iowa-Polk County and it was captured via video camera.

*Hatcher JD*



HATCHER, JASON 0170

Signature of Complainant or Officer, Officer Name & Number

**GENERAL PROBABLE CAUSE**

Defendant Implicated		
03 - ADMISSION/STATEMENTS, 07 - IDENTIFIED BY WITNESSES, 09 - NEAR SCENE OF CRIME, 14 - OTHER PHYSICAL EVIDENCE		
Operating Motor Vehicle in County	Other Physical Evidence <b>VIDEO EVIDENCE</b>	Attempted To Inflict Injury

STATE OF IOWA, POLK COUNTY

	Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on 10/07/2019	
	Notary Name	DANIEL F. JANSEN
	Commission Number	756279
	My Commission Expires	12/18/2020
		Signature of Verifying Party  <input type="checkbox"/> Peace Officer <input checked="" type="checkbox"/> Notary <input type="checkbox"/> Prosecuting Attorney