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STATE OF IDAHO }
COUNTY OF KOOTENAI } SS
FILED:

2015 MAY -5 PM 3:18

CLERK DISTRICT COURT
Cindy O'Reilly
DEPUTY

IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF THE STATE OF
IDAHO, IN AND FOR THE COUNTY OF KOOTENAI

STATE OF IDAHO,
Plaintiff,

vs.

JONATHAN DANIEL RENFRO
DOB:05/19/1988
SSN: XXX-XX-4965
Defendant.

Case No. CR-F15- 6589

CRIMINAL COMPLAINT

Agency Case:

Det. Van Leuven, appeared personally before me, and being first

duly sworn on oath, that the above named Defendant did commit the crimes of: **COUNT I:**

ATTEMPTED MURDER IN THE FIRST DEGREE, a Felony, Idaho Code §§ 18-306, 18-

4001, 18-4003(b), **COUNT II: GRAND THEFT**, a Felony, Idaho Code §§ 18-2403(1), 18-

2407(1)(b)(1), and **COUNT III: GRAND THEFT**, a Felony, Idaho Code §§ 18-2403(1), 18-

2407(1)(b)(6) and **COUNT IV: UNLAWFUL POSSESSION OF A FIREARM**, Idaho Code,

§§ 18-3316, 18-310, **COUNT V: REMOVING A FIREARM FROM A LAW**

ENFORCEMENT OFFICER, Idaho Code § 18-915A, committed as follows:

COUNT I

That the Defendant, **JONATHAN DANIEL RENFRO**, on or about the 5th of May,
2015, in the County of Kootenai, State of Idaho, did attempt to unlawfully kill and murder Greg
Moore, a human being and a police officer, who was acting in the lawful discharge of an official

Mitchell

duty as a police officer, and was known or should have been known by **JONATHAN DANIEL RENFRO**, the perpetrator of the murder to be an officer so acting, and

COUNT II

That the Defendant, **JONATHAN DANIEL RENFRO**, on or about the 5th of May, 2015, in the County of Kootenai, State of Idaho, did wrongfully take, obtain, or withhold, property of another, with the intent to deprive another of property and/or appropriate to himself certain property of another and/or appropriate to a third person certain property of another, to-wit: a police vehicle belonging to the City of Coeur d'Alene, Idaho, with a value in excess of one thousand dollars (\$1,000.00), and

COUNT III

That the Defendant, **JONATHAN DANIEL RENFRO**, on or about the 5th of May, 2015, in the County of Kootenai, State of Idaho, did wrongfully take, obtain, or withhold, property of another, with the intent to deprive another of property and/or appropriate to himself certain property of another and/or appropriate to a third person certain property of another, to-wit: a firearm, belonging to the City of Coeur d'Alene, Idaho, and

COUNT IV

That the Defendant, **JONATHAN DANIEL RENFRO**, on or about the 5th day of May, 2015, in the County of Kootenai, State of Idaho, did have under his custody or control a firearm, to-wit: a handgun, knowing he has been convicted of Assault and/or Battery Upon Certain Personnel in violation of Idaho Law on or about July 7th, 2008, in criminal case CR2008-0004, a felony crime, and

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COUNT V

That the Defendant, **JONATHAN DANIEL RENFRO**, on or about the 5th day of May, 2015, in the County of Kootenai, State of Idaho, did knowing remove a firearm from the possession of another person, to wit: Greg Moore, while Greg Moore was a law enforcement officer acting in his official capacity who was authorized to make arrests, all of which is contrary to the form, force and effect of the statute in such case made and provided and against the peace and dignity of the people of the State of Idaho. Said complainant therefore prays for proceedings according to law.

PART II

The Prosecuting Attorney further informs the Court that the Defendant, **JONATHAN DANIEL RENFRO**, on or about the 5th day of May, 2015, in the County of Kootenai, State of Idaho, did use a firearm, to wit: a handgun in the commission of the felony crime alleged in Count I, and is properly subject to enhanced penalty pursuant to Idaho Code §19-2520.

PART III

The Prosecuting Attorney further informs the Court that the Defendant, **JONATHAN DANIEL RENFRO**, while committing the offense of **ATTEMPTED MURDER IN THE FIRST DEGREE, TWO COUNTS OF GRAND THEFT, UNLAWFUL POSSESSION OF A FIREARM**, and **REMOVING A FIREARM FROM A LAW ENFORCEMENT OFFICER**, as charged in the Complaint, had previously been convicted of at least two (2) prior separate felony offenses, and, pursuant to I.C. §19-2514, is properly considered a persistent violator. Defendant's previous convictions consist of the following felony offenses:

- 1) Grand Theft, County of Kootenai, State of Idaho, Judgment and Sentence on or about 07-07-2008 in CR2008-4502.
- 2) Assault or Battery Upon Certain Personnel, County of Latah, State of Idaho, Judgment and Sentence on or about 02-13-2009 in CR2008-0004.

DATED this 5TH day of MAY, 2015.

Michael P. La Hara
COMPLAINANT

SUBSCRIBED AND SWORN to before me this 5th day of May,
2015.

James T. St
MAGISTRATE

BARRY MCHUGH
Kootenai County Prosecuting Attorney
501 N. Government Way/P.O. Box 9000
Coeur d'Alene, ID 83816-9000
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IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF THE STATE OF
IDAHO, IN AND FOR THE COUNTY OF KOOTENAI

STATE OF IDAHO,
Plaintiff,

vs.

JONATHAN DANIEL RENFRO
DOB:05/19/1988
SSN: XXX-XX-4965
Defendant.

Case No. CR-F15- 6589

AFFIDAVIT

Agency Case: K15000035

I, Senior Detective Michael A. Van Leuven, being first duly sworn, under penalty of perjury,
hereby depose and state as follows:

1. I am a Senior Detective employed by the Idaho State Police (ISP), Investigations Division, assigned to the Coeur d'Alene, Idaho, District One Investigations Office. My primary duties are the investigation of major criminal violations and violations of state and federal controlled substance laws.
2. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter. I have set forth only the facts necessary to support a finding of probable cause and any facts that would lead the court to not find probable cause on the charges.
3. My knowledge of the facts set forth in this affidavit are based upon my own observations or the observations of other sworn officers who have relayed their personal observations

to me for purposes of this probable cause affidavit. I have no reason to doubt the accuracy of the information provided herein.

4. I was contacted at approximately 02:30 a.m. on 5-5-2015 by ISP Detective Gary Tolleson, who advised me there had been a shooting involving a police officer and that the Officer Involved Critical Incident Task Force was being called to respond. I contacted the ISP Communications Center and was advised that Coeur d'Alene Police Department (CDAPD) Sergeant Greg Moore had been shot and critically wounded during an investigative contact. I was further advised that the unknown suspect and/or suspects had taken Sgt. Moore's gun and/or guns and had fled the scene in his patrol car and that their whereabouts were unknown. I was also told that Sgt. Moore had been transported to the Kootenai Health (KH) for treatment.
5. I met with other ISP Detectives at the District One Office. I asked ISP Detective Huff to respond to KH to collect whatever evidence he could obtain from Sgt. Moore. I had been advised that many of the initial first responders from CDAPD and from the Kootenai County Sheriff's Office (KCSO) were waiting at the CDAPD office to be interviewed. I asked ISP Detectives Tolleson and Snell to respond to the CDAPD office to conduct interviews and collect whatever physical evidence was available. I contacted ISP Lt. Swanson, who advised me the crime scene was located on West Wilbur Avenue at the intersection with West Timberlake Loop. This is a residential area located in Coeur d'Alene, Kootenai County, Idaho.
6. I responded to the scene with ISP Detective J. Clark and ISP Investigations Assistant L. Correia. I observed the scene had been cordoned off with police tape and that CDAPD officers were holding the perimeter. At the crime scene I observed a pool of blood on the pavement near the north side of West Wilbur Avenue just west of the West Timberlake Loop intersection. I also noticed paint marks noting the position of five (5) vehicles that had been moved from the scene prior to my arrival. I called for an ISP crash reconstructionist to respond to the scene to measure the scene with a laser instrument. While processing the scene I learned that a suspect had been arrested in Post Falls after a

high-speed pursuit and subsequent K9 search. The suspect had been identified as Jonathan Daniel RENFRO (DOB 5-19-1988).

7. I later learned that Sgt. Moore had contacted a male pedestrian walking near West Wilbur Avenue at approximately 1:20 a.m. Sgt. Moore was on duty as Coeur d'Alene Police Officer and in his full uniform. At or about that time, Sgt. Moore had run a driver's license inquiry for the pedestrian's identification over the radio as that of Jonathan Daniel RENFRO. RENFRO's driver's license was found in Sgt. Moore's possession at the hospital.
8. RENFRO is known to law enforcement as a multi-state offender. According to a NCIC records check and copies of judgments, RENFRO has been convicted in Idaho for Grand Theft, Burglary, and Assault on a Corrections Officer. RENFRO has been convicted in Nevada for Possession of a Stolen Vehicle and Assault on a Police Officer. RENFRO is currently on felony parole.
9. At approximately 1:34 a.m., Cinda ALLEN (a resident of 2820 W. Wilbur Ave, Coeur d'Alene, ID) called 911 to report hearing a loud, pop-type noise from the street outside her house. She went outside and observed a patrol vehicle drive away from the area and saw someone laying in the street. I later interviewed Ms. ALLEN and her companion, Chris WERTS. Mr. WERTS advised that after waking from hearing the loud noise he had stepped out of the house and observed a police car parked in the middle of the road, facing east, just west of his house on Wilbur Avenue. He also observed an adult male standing over another figure lying on the ground. WERTS advised the standing male was bent down over the prone figure. WERTS said he yelled at the standing subject who then got into the patrol vehicle and left the area at a high rate of speed traveling eastbound on Wilbur Avenue. At that point he said he told ALLEN to call 911.
10. A short time later, a Post Falls Police Department (PFPD) officer aired the information that a CDAPD officer was down and that his vehicle was presumed missing. At approximately 1:43 a.m. a PFPD Officer observed a marked CDAPD patrol car traveling

westbound on Seltice, near McGuire at approximately 90 mph and engaged in a pursuit. A few minutes later the vehicle was found abandoned at Point Parkway and Beck Road, near the Wal-Mart at State Line, Post Falls, Idaho. A subsequent search using a K9 resulted in the arrest of RENFRO who was found hiding under a semi-trailer nearby. Nine millimeter bullets were recovered from RENFRO's pocket. Sgt. Moore's issued service pistol was found near RENFRO. A second, 9mm pistol was found in a nearby field along with Sgt. Moore's flashlight and RENFRO's eye glasses. RENFRO was transported to the Kootenai County Public Safety Building (PSB) for booking.

11. Sgt. Moore was wearing a Vievue body camera at the time of the shooting. This device was active and recorded both video and audio. A review of this footage shows Sgt. Moore contacting RENFRO. After speaking with RENFRO and running RENFRO's identification, Sgt. Moore asks RENFRO to step over toward his patrol vehicle. At that point RENFRO is observed shooting Sgt. Moore. After being shot, Sgt. Moore falls to the ground, causing his body camera to point skyward. A short time later RENFRO's face comes back into frame. RENFRO is seen using a flashlight while searching Sgt. Moore's person. A few seconds later the voices of a man and a woman can be heard in the background. RENFRO leaves the frame of the camera again. A car door can be heard shutting and a vehicle being driven away.

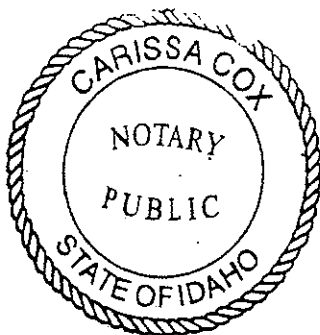
KCSO Detective Lallatin and I interviewed RENFRO at the PSB. I read RENFRO his Miranda warning. I asked him if he understood his rights and was willing to speak with us. He said he did understand his rights and was willing to speak with us without an attorney. This interview was recorded. During the course of the interview RENFRO repeatedly admitted to shooting Sgt. Moore. RENFRO said he shot Sgt. Moore because he had a gun in his pocket and knew Sgt. Moore was going to find it. RENFRO advised he shot Sgt. Moore with a 9mm Glock pistol he had secreted in his right coat pocket. RENFRO further admitted to taking Sgt. Moore's issued sidearm from its holster after having shot Sgt. Moore. RENFRO also stated he took two

pistol magazines as well as a flashlight from Sgt. Moore. RENFRO admitted to driving Sgt. Moore's patrol vehicle away from the scene in an attempt to escape. He stated he abandoned the vehicle in Post Falls because he believed law enforcement was tracking it using an on-board GPS tracking system. I observed RENFRO's demeanor to swing from lethargic to states of being more alert thought the interview. RENFRO admitted to using hydrocodone and methamphetamine the day before.

DATED this 5 day of MAY, 2015.

Mehel A. V. [Signature]
Affiant

SUBSCRIBED AND SWORN to before me on this 5th day of May, 2015.



Carissa Cox
Notary Public for Idaho
Commission expires: 6-17-19

ORDER

The above named defendant having been charged with the offense(s) of 2015 MAY 5 PM 3:18
AA Misdemeanor CLERK DISTRICT COURT
G. Thelx Z, Unl. Poss. Firearm, Removing a Firearm, and the Court having
examined the affidavit and police report(s), the Court finds probable cause, based on the under oath
substantial evidence, for believing that said offense has been committed and that the said
Defendant committed it.

IT IS THEREFORE ORDERED that a Complaint/Petition/Summons/Warrant be issued
for the detention/appearance of the above named Defendant.

ENTERED this 5th day of May, 2015.

[Signature]
MAGISTRATE

CR15-6589