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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:

Debi 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 knowingly 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

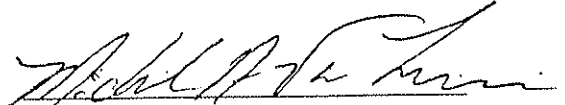
The Prosecuting Attorney further informs the Court that the Defendant, **JONATHAN DANIEL RENFRO**, on or about the 5th day of May, 2015, in the County of Kootenai, State of Idaho, did use a firearm, to wit: a handgun in the commission of the felony crime alleged in Count I, and is properly subject to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


COMPLAINANT

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


MAGISTRATE