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IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF  
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

STATE OF IDAHO,	)	
	)	
Plaintiff,	)	Case No. <b>CR01-24-09374</b>
	)	
vs.	)	<b>COMPLAINT</b>
	)	
NICHOLAS DAVID UMPHENOUR,	)	Defendant's DOB: 05/02/1995
	)	Defendant's SSN: xxx-xx-1495
Defendant.	)	
	)	

**PERSONALLY APPEARED BEFORE** me on 3/20/2024, Whitney A. Faulkner, Deputy Prosecuting Attorney, in and for the County of Ada, State of Idaho, who, being first duly sworn, complains and says that: NICHOLAS DAVID UMPHENOUR, on or about the 20th day of March 2024, in the County of Ada, State of Idaho, did commit the crime(s) of: I. AGGRAVATED BATTERY ON CERTAIN LAW ENFORCEMENT PERSONNEL, FELONY, I.C. §§18-915(1), 18-907, II. AGGRAVATED BATTERY ON CERTAIN LAW ENFORCEMENT PERSONNEL, FELONY, I.C. §§18-915(1), 18-907, III. AGGRAVATED ASSAULT ON CERTAIN LAW ENFORCEMENT PERSONNEL, FELONY, I.C. §§18-915(1), 18-905, IV. USE OF A FIREARM OR DEADLY WEAPON DURING THE COMMISSION

OF A CRIME, FELONY, I.C. §19-2520 and V. AIDING AND ABETTING ESCAPE, FELONY, I.C. §18-2505 as follows:

COUNT I

That the defendant NICHOLAS DAVID UMPHENOUR, on or about the 20th day of March 2024, in the County of Ada, State of Idaho, did willfully and unlawfully use force and/or violence upon the person of Idaho Department of Corrections Officer Elijah Jackson by means of a deadly weapon, to-wit: a handgun, by shooting Idaho Department of Corrections Officer Elijah Jackson, where the defendant knew or had reason to know of Idaho Department of Corrections Officer Elijah Jackson's official status.

COUNT II

That the defendant NICHOLAS DAVID UMPHENOUR, on or about the 20th day of March 2024, in the County of Ada, State of Idaho, did willfully and unlawfully use force and/or violence upon the person of Idaho Department of Corrections Officer Daniel Lopez by means of a deadly weapon, to-wit: a handgun, by shooting Idaho Department of Corrections Officer Daniel Lopez, where the defendant knew or had reason to know of Idaho Department of Corrections Officer Daniel Lopez's official status.

COUNT III

That the defendant NICHOLAS DAVID UMPHENOUR, on or about the 20th day of March 2024, in the County of Ada, State of Idaho, did unlawfully and with apparent ability attempt to commit a violent injury upon the person of Idaho Department of Corrections Officer Christopher Wilskie with a deadly weapon, to-wit: a handgun, by shooting the gun at Idaho Department of Corrections Officer Christopher Wilskie, where the defendant knew or had reason to know of Idaho Department of Corrections Officer Christopher Wilskie's official status.

COUNT IV

That the defendant, NICHOLAS DAVID UMPHENOUR, on or about the 20th day of March 2024, in the County of Ada, State of Idaho, did use a firearm or deadly weapon, to-wit: a handgun, in the commission of the crime(s) alleged in Count(s) I, II and III.

COUNT V

That the defendant, NICHOLAS DAVID UMPHENOUR, on or about the 20th day of March 2024, in the County of Ada, State of Idaho, did aid and abet Skylar Meade, who was convicted of a felony and while confined in the Idaho State Penitentiary escape and/or attempt to

escape from the personal custody of Idaho Department of Correction Officer Jackson, Idaho Department of Correction Officer Lopez and/or Idaho Department of Correction Officer Wilskie.

All of which is contrary to the form, force and effect of the statute in such case and against the peace and dignity of the State of Idaho.

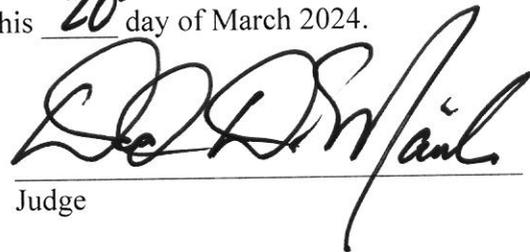
Said Complainant therefore prays that a Warrant issue for the arrest of the Defendant(s), and that NICHOLAS DAVID UMPHENOUR may be dealt with according to law.

**JAN M. BENNETTS**  
Ada County Prosecuting Attorney



By: Whitney A. Faulkner  
Deputy Prosecuting Attorney

**SUBSCRIBED AND** Sworn to before me this 20<sup>th</sup> day of March 2024.

  
Judge