

**OFFICE OF PROSECUTING ATTORNEY**

**BENJAMIN ALLEN**, Prosecuting Attorney

**BRITNEY JACOBS**, Chief Deputy Prosecuting Attorney

**SCOTT SERGEANT**, Deputy Prosecuting Attorney

700 Bank Street, Suite 200

Wallace, Idaho 83873

Phone: (208) 752-1106

Fax: (208) 753-8351

E-File Service Address: prosecutor@co.shoshone.id.us

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

<p>STATE OF IDAHO,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>Majorjon Kaylor DOB:09/26/1991 Address: 515 Brown Avenue, Apt. B Kellogg, Idaho 83837</p> <p style="text-align: right;">Defendant.</p>		<p>No. <u>CR40-23-970</u></p> <p><b>COMPLAINT - Criminal</b></p> <p><b>Violation of I.C. 18-4001, 18-4002, 18-4003(a), Murder in the First Degree, a Felony, Count One</b></p> <p><b>Violation of I.C. 18-4001, 18-4002, 18-4003(a), Murder in the First Degree, a Felony, Count Two</b></p> <p><b>Violation of I.C. 18-4001, 18-4002, 18-4003(a)/(d), Murder in the First Degree, a Felony, Count Three</b></p> <p><b>Violation of I.C. 18-4001, 18-4002, 18-4003(a)/(d), Murder in the First Degree, a Felony, Count Four</b></p> <p><b>Violation of I.C. 18-1401, Burglary, a Felony, Count Five</b></p>
--	--	---

STATE OF IDAHO                    )  
  ) ss.  
County of Shoshone                )

PERSONALLY APPEARED before me ☒ Benjamin Allen; ☐ Britney Jacobs; ☐ Scott  
Sergeant; a prosecuting attorney for the county of Shoshone, state of Idaho, who, being duly sworn,  
complains and says:

**1. COMPLAINT--CRIMINAL**

#### COUNT ONE

That the defendant, Majorjon Kaylor, on or about the 18<sup>th</sup> day of June, 2023 in the County of Shoshone, State of Idaho, did willfully, deliberately and with malice aforethought, unlawfully kill the person of Kenna L. Guardipee, a human being, to-wit: by shooting her which resulted in her death, and which was premeditated and/or to execute vengeance.

#### COUNT TWO

That the defendant, Majorjon Kaylor, on or about the 18<sup>th</sup> day of June, 2023 in the County of Shoshone, State of Idaho, did willfully, deliberately and with malice aforethought, unlawfully kill the person of Kenneth R. Guardipee, a human being, to-wit: by shooting him which resulted in his death, and which was premeditated and/or to execute vengeance.

#### COUNT THREE

That the defendant, Majorjon Kaylor, on or about the 18<sup>th</sup> day of June, 2023 in the County of Shoshone, State of Idaho, did willfully, deliberately and with malice aforethought, unlawfully kill the person of A.S., a human being, to-wit: by shooting him which resulted in his death, and which was premeditated, to execute vengeance, and/or committed in the perpetration of burglary.

#### COUNT FOUR

That the defendant, Majorjon Kaylor, on or about the 18<sup>th</sup> day of June, 2023 in the County of Shoshone, State of Idaho, did willfully, deliberately and with malice aforethought, unlawfully kill the person of Devin R. Smith, a human being, to-wit: by shooting him which resulted in his death, and which was premeditated, to execute vengeance, and/or committed in the perpetration of burglary.

#### COUNT FIVE

That the defendant, Majorjon Kaylor, on or about the 18<sup>th</sup> day of June, 2023 in the County of Shoshone, State of Idaho, did enter into a house, room, and/or apartment with the intent to commit the crime of murder.

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

Said complainant therefore prays that a Warrant may be issued for the arrest of said defendant and that they may be dealt with according to law, or if the defendant has been arrested

without a warrant, that they be detained and be required to post bail prior to being released.

  
PROSECUTING ATTORNEY

Subscribed and sworn to before me on June 20, 2023

  
KEISHA OXENDINE 683  
MAGISTRATE JUDGE