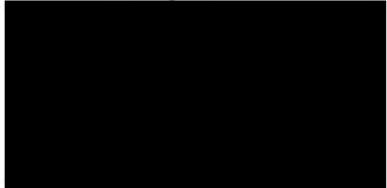


LATAH COUNTY PROSECUTOR'S OFFICE  
WILLIAM W. THOMPSON, JR.  
PROSECUTING ATTORNEY  
Latah County Courthouse



IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF LATAH

STATE OF IDAHO,  
Plaintiff,

v.

JAMES CURTIS LEONARD,  
Defendant.

Case No. *CR29-22-2673*  
CRIMINAL COMPLAINT

The undersigned, based upon the Affidavit of Nathanael Rosendahl, complains and says that JAMES CURTIS LEONARD, in the County of Latah, State of Idaho, on or about December 7, 2022, did then and there commit crimes against the People of the State of Idaho: DOMESTIC BATTERY WITH TRAUMATIC INJURY IN THE PRESENCE OF A CHILD, Idaho Code § 18-903(a), 18-918(2), 18-918(4), a Felony in Count I, AGGRAVATED ASSAULT, Idaho Code § 18-901(b), and 18-905(a), a Felony in Count II, ATTEMPTED STRANGULATION, Idaho Code § 18-923, a Felony in Count III, INJURY TO CHILDREN - FELONY, Idaho Code § 18-1501(1), a Felony in Count IV, committed as follows:

COUNT I  
DOMESTIC BATTERY WITH TRAUMATIC INJURY IN THE PRESENCE OF A CHILD  
Idaho Code § 18-903(a), 18-918(2), 18-918(4), a Felony

That the Defendant, James Curtis Leonard, on or about December 7, 2022, in Latah County, Idaho, did wilfully and unlawfully use force or violence upon while they were household members, and in committing such act inflicted a traumatic injury upon by punching her or striking her, or both, all done while in the presence of a child, to wit

COUNT II  
AGGRAVATED ASSAULT  
Idaho Code § 18-901(b), and 18-905(a), a Felony

That the Defendant, James Curtis Leonard, on or about December 7, 2022, in Latah County, Idaho, did intentionally, unlawfully, and with apparent ability, threaten by word or act to do violence to the person of [REDACTED] with a deadly weapon or instrument, a knife, which created a well-founded fear in [REDACTED] that such violence was imminent, by following her with a knife in hand in a threatening manner.

COUNT III  
ATTEMPTED STRANGULATION  
Idaho Code § 18-923, a Felony

That the Defendant, James Curtis Leonard, on or about December 7, 2022, in Latah County, Idaho did willfully and unlawfully choke or attempt to strangle [REDACTED] a household member, by placing his hands on or around [REDACTED] neck or throat, and applying pressure.

COUNT IV  
INJURY TO CHILDREN - FELONY  
Idaho Code § 18-1501(1), a Felony

That the Defendant, James Curtis Leonard, on or about December 7, 2022, in Latah County, Idaho, did, under circumstances likely to produce great bodily harm or death, willfully cause or permit [REDACTED] a child under the eighteen (18) years of age, whose date of birth is [REDACTED] to suffer, or did willfully inflict thereon unjustifiable physical pain or mental suffering, by repeatedly kicking, punching, and/or striking [REDACTED]

All of which is contrary to the form, force and effect of the statutes above cited, and against the peace and dignity of the People of the State of Idaho, WHEREFORE complainant REQUESTS that

JAMES CURTIS LEONARD  
[REDACTED]

be dealt with according to law.

DATED this 7<sup>th</sup> day of December, 2022.

WILLIAM W. THOMPSON, JR.  
Prosecuting Attorney

by   
Deputy Prosecuting Attorney

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF LATAH

CRIME NO. CR29-22-2673  
BY [Signature] DEPUTY  
DEC 7 2022 AM 8:47  
CLERK OF DIST CT. LATAH

THE STATE OF IDAHO,

Plaintiff

Vs

James Curtis Leonard  
DOB: 07/09/1983

Defendant

MPD CASE NO: 22-M10598

CR29-22-2673

UNIFORM CITATION NO: Felony

AFFIDAVIT OF: Officer Nate Rosendahl  
SUPPORTING INITIAL DETERMINATION OF  
PROBABLE CAUSE PURSUANT TO I.C.R.5(C)

Your affiant, the undersigned police Officer, being first duly sworn, deposes and says under oath as follows:

1. Your affiant is a duly qualified peace Officer serving with the Moscow Police Department.
2. The above indicated defendant has been arrested for the crime of:
  - I.C. 18-918(2)(a) – Domestic Battery with Traumatic Injury
  - I.C. 18-905 – Aggravated Assault
  - I.C. 18-923 – Attempted Strangulation
  - I.C. 18-1501(1) – Injury to Child (Felony)

Without a warrant on December 7, 2022, and your affiant asks that a Judge, after your affiant lays a complaint before him, determine whether there is probable cause to believe that said offense has been committed and that the defendant has committed it.

The facts upon which affiant relied in believing there was probable cause for said arrest are:

THE FOLLOWING OCCURRED IN THE STATE OF IDAHO, COUNTY OF LATAH, CITY OF MOSCOW:

On 12/6/2022 at around 2347 hours, I responded to a physical domestic dispute at [Redacted] with Cpl Green and Ofc Waters.

As units were enroute, dispatch advised an intoxicated husband punched his wife in the head and struck his daughter. The RP, later identified as [Redacted], said that her husband, later identified as James Leonard, was actively cutting himself with a knife. Several more people called in regarding the same incident and said James was now hitting everyone. [Redacted] told dispatch James was following her around the house as she was on the phone.

I arrived on scene with Cpl Green and as I approached the house, [Redacted] walked outside and was still on the phone with dispatch. I could see [Redacted] had blood on her nose and mouth, and

multiple areas of [REDACTED] head were covered in blood. She also had blood on her vest and a large part of her left hand was covered in blood. I quickly asked [REDACTED] who else was in the house. She said her three kids and a grandchild were still inside the house, and James was in the east bedroom still armed with a knife. Once [REDACTED] was safely away from the house, I went to the front door with Cpl Green. Based on the report of James acting violently while armed with a knife, and based on [REDACTED] being covered in blood, I drew my pistol and entered the house. I loudly identified myself as Moscow Police and told James to come out of the bedroom with his hands up. After a short time, James walked out of the bedroom. I could see blood on his face and head, a long bloody cut on his left forearm, and blood on both hands. James followed my instructions and I placed him in handcuffs which were double locked and checked for proper fit. At no point during my contact did he complain of pain from the handcuffs.

I frisked James for weapons and found two knives in his right pants pocket. I removed both of these and felt two more hard objects in the pocket. I removed a lighter and a commercially packaged marijuana joint from his pocket. I walked James outside where Ofc Waters advised him of his Miranda Rights and James said he understood. Ofc Waters stood with James and I contacted [REDACTED] who was clearly upset and very scared. I asked her to briefly tell me what happened and she explained the following:

James was heavily intoxicated, having drank around half of a bottle of gin during the evening. He had been working on his truck in the driveway and [REDACTED] was in the living room on the phone with the internet company. James walked into the living room, saw [REDACTED] on her phone, and began accusing her of cheating on him. James slammed his phone on the ground and began screaming at [REDACTED] children. [REDACTED] (20 yoa) and [REDACTED] (15 yoa), were in the living room at this time. [REDACTED] boyfriend [REDACTED] (21 yoa) and her child [REDACTED] (1 yoa) were also in the living room. After yelling at [REDACTED] James began yelling at others in the living room. After a period of time, James made a statement implying he was going to kill himself and walked into the bedroom. [REDACTED] went into the bedroom to check on James, who had a history of cutting himself, and she found James actively cutting his wrist with his green automatic knife.

[REDACTED] sat down next to James, who turned and struck her in the head with his closed fist. [REDACTED] later told Ofc Waters that James's knife was in the closed fist when he struck her which reinforced James's hand as he struck [REDACTED]. James then began to choke [REDACTED] from behind, wrapping his arm around her throat and applying pressure with a chokehold. [REDACTED] said she had difficulty breathing and, for a second, she could not breathe. [REDACTED] entered the room at this time and she tried to hit James with a lamp to prevent him from strangling [REDACTED] boyfriend. [REDACTED] entered the room and while holding [REDACTED] and pulled [REDACTED] out of the room. [REDACTED] took [REDACTED] and [REDACTED] to the neighbor's house where they remained for the rest of the incident. [REDACTED] later told me he saw James trying to choke [REDACTED] when he took [REDACTED] out of the room.

Around this time, MFD medics arrived on scene and treated James, [REDACTED] and [REDACTED] for their injuries. I photographed [REDACTED] injuries and, in addition to the blood on her face, I saw several swollen bumps on her forehead. I saw red marks across her neck which were consistent with being choked. I saw red marks on both sides of her face and chin which were consistent with being struck. I was unable to see the bite mark on [REDACTED] hand due to the blood.

Ofc Waters later interviewed both [REDACTED] and [REDACTED] and gave me additional details about the altercation. After [REDACTED] entered the bedroom and hit James with the lamp, [REDACTED] was able to free herself from James's chokehold. James pushed [REDACTED] back on the bed, climbed on top of her, and continued striking her in the head with his fists. As [REDACTED] was trying to fight James off, he bit her on the hand, drawing blood. He then pinned her down on the bed by pressing his forearm against her throat and [REDACTED] told Ofc Waters she was barely able to breathe. [REDACTED] entered the bedroom, jumped on the bed, and tried to push James off [REDACTED] while screaming for him to stop. James grabbed [REDACTED] and threw her against a dresser, and began striking her with his closed fists.

I later spoke with [REDACTED] and she told me James punched her with a closed fist in the face, head, and arms around 12 times. James also kicked her and pulled her by the hair. [REDACTED] complained of severe pain all over her body, especially her left arm and side where she was thrown against the dresser. [REDACTED] was unable to recount how she got away from James or how she made it to her room where Cpl Green found her hiding under a chair. [REDACTED] was very lethargic during my conversation with her and during her conversation with Cpl Green. She appeared to be suffering from a concussion based on her headache, fatigue, impaired memory, and slow speech. Cpl Green photographed [REDACTED]'s injuries.

Ofc Waters told me that as James was beating [REDACTED] [REDACTED] was able to get up and grab her phone. She called 911 and tried to separate [REDACTED] and James. James shoved [REDACTED] away and tried to grab [REDACTED] again, but she ran out of the room. As [REDACTED] was on the phone with dispatch, James followed her through the house, holding the knife in his hand. James told [REDACTED] multiple times to hang up the phone but she refused. James said something to the effect of "if you love me, you will hang up the phone", but [REDACTED] refused. Ofc Waters asked [REDACTED] if she believed James was going to stab her with the knife. [REDACTED] told Ofc Waters she had no idea what James was going to do. [REDACTED] said she was trying to listen to the dispatcher, locate her children, and keep an eye on James. [REDACTED] said while she was on the phone with dispatch, James made the large cut on his left arm with the knife and yelled that [REDACTED] cut him and he needed help. I photographed a trail of blood drops which lead from the east bedroom to the west side of the house. This was consistent with [REDACTED] account of being followed by James with the knife.

MFD medics transported both [REDACTED] and [REDACTED] to Gritman for their injuries. Both [REDACTED] and [REDACTED] signed medical release forms and I will update my report when the full extent of their injuries becomes available. Medics treated James but he refused to be transported to Gritman. I placed James in the back of my patrol car and interviewed him. His eyes were bloodshot and watery, his speech was slurred, and I could smell the strong odor of an alcoholic beverage coming from his person.

I asked James what happened and he told me the gas tank on his truck fell on top of him, which is how he got the large cut on his arm. I pulled out the green automatic knife which I took off his person, opened the knife, and showed him the blood on the tip. James said the blood was his, but denied cutting himself. James also denied striking [REDACTED] saying the only incident that occurred was [REDACTED] arguing with [REDACTED] James told me he just went to bed as he could not handle [REDACTED] arguing with [REDACTED] His answers to my questions did not make much sense and were very contradictory to the similar stories being told by all the other involved parties. James finally asked invoked his Miranda Rights and I told James he was under arrest.

James and [redacted] have been married for 5 years, and [redacted] is the biological daughter of [redacted] not James. Probable cause existed to charge James for I.C. 18-918(2)(a) – Domestic Battery with Traumatic Injury In The Presence Of A Child for striking Amber multiple times with a closed fist and during one of the strikes, he held the knife in his closed fist. [redacted] (1 yoa) was in the living room directly adjacent to the bedroom during the first part of the altercation, then was carried into the bedroom by [redacted] as he tried to get [redacted] out of the room.

Probable cause existed to charge James for I.C. 18-905 – Aggravated Assault for striking [redacted] with a closed fist while holding the knife, then after the fight, he followed her across the house still holding the knife. [redacted] did not know what James was going to do, but she retreated across the house as James followed her with the knife, having just been violently battered by him.

Probable cause existed to charge James for I.C. 18-913 – Attempted Strangulation for putting [redacted] in a chokehold from behind so she struggled to breathe, then after he pushed her on to the bed, he pressed his forearm into her throat so she again struggled to breath.

Probable cause existed to charge James for I.C. 18-1501(1) – Injury To Child (Felony) for slamming [redacted] (15 yoa) into the dresser, striking her around a dozen times with his fists, pulling her by her hair, and kicking her. [redacted] was transported to the hospital for her injuries and complaints of pain.

I transported James to LCSO Jail where he was booked on the above charges. James green knife was impounded as evidence. The marijuana found in James's pocket was impounded for destruction. Copies of the medical release documents were submitted to MPD records.

I certify (or declare) under penalty of perjury pursuant to the laws of the State of Idaho that the foregoing is true and correct.

Date: 12/7/22 Signature [Handwritten Signature]

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Supervisor Initials CM #11  
Criminal History Attached Yes  No