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IN THE DISTRICT COURT OF THE THIRD JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF PAYETTE

THE STATE OF IDAHO

Plaintiff,

vs.

STACEY JAMES WONDRA,
D.O.B. 9/12/1992

Defendant.

CASE CR38-25-1295

CRIMINAL COMPLAINT

**COUNT I – PART I - MURDER IN THE
FIRST DEGREE**

Felony, I.C. §18-4001; 18-4002; 18-4003

**COUNT II – PART I - KIDNAPPING IN THE
SECOND DEGREE**

Felony, I.C. §18-4501; 18-4502; 18-4503

**COUNT III – PART I - DESTRUCTION
AND/OR ALTERATION AND/OR
CONCEALMENT OF EVIDENCE**

Felony, I.C. §18-2603

**COUNTS I – III – PART II - PERSISTENT
VIOLATOR**

Felony, I.C. §19-2514

STATE OF IDAHO)
 ss
County of Payette)

PERSONALLY APPEARED before me this 11th day of June, 2025, MICHAEL

DUKE, of the Payette County Prosecuting Attorney's Office, who being duly sworn, complains
and says:

COUNT I – PART I

That the Defendant, Stacey James Wondra, on or about the 27th day of July, 2021, in the County of Payette, State of Idaho, did willfully, unlawfully, deliberately, with premeditation, and with malice aforethought, kill and murder M.V. (DOB XX/XX/2016), a human being, and/or did willfully, unlawfully and deliberately kill and murder M.V., a human being, in the perpetration of or in the attempted perpetration of a kidnapping.

All of which is contrary to **Idaho Code**, Sections §18-4001; 18-4002; 18-4003 and against the power, peace and dignity of the State of Idaho.

COUNT II – PART I

That the Defendant, Stacey James Wondra, on or about the 27th day of July, 2021, in the County of Payette, State of Idaho, did willfully and without lawful authority seize and/or confine and or lead and/or take and/or entice away, M.V., with the intent to cause him to be secretly confined and/or imprisoned and/or detained against his will within the State of Idaho.

All of which is contrary to **Idaho Code**, Sections §18-4501; 18-4502; 18-4503 and against the power, peace and dignity of the State of Idaho.

COUNT III – PART I

That the Defendant, Stacey James Wondra, on or between the 27th day of July, 2021 and the 21st day of May, 2025, in the County of Payette and/or State of Idaho, did willfully destroy and/or alter and/or conceal a thing, to-wit: a body and/or DNA evidence, knowing that the thing or things were about to be produced, used or discovered as evidence in a felony investigation or inquiry authorized by law, and with the intent to prevent such evidence from being so produced, used or discovered.

All of which is contrary to **Idaho Code**, §18-2603 and against the power, peace and dignity of the State of Idaho.

COUNTS I - III – PART II

That the Defendant, Stacey James Wondra, was previously convicted of the following felonies:

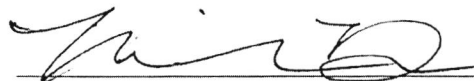
ISSUING A CHECK WITH INSUFFICIENT FUNDS

On or about the 4th day of June, 2020, under the name of Stacey James Wondra, the Defendant was convicted of the felony of Issuing a Check with Insufficient Funds in the County of Canyon, State of Idaho.

FALSE STATEMENT DURING FIREARMS TRANSACTION

On or about the 4th day of April, 2019, under the name of Stacey James Wondra, the Defendant was convicted of the felony of False Statement During Firearms Transaction, in the Federal Court for the State of Montana.

All of which is contrary to **Idaho Code**, Section 19-2514 and against the power, peace and dignity of the State of Idaho.


Complainant

SUBSCRIBED AND SWORN to before me this 11 day of June, 2025


Magistrate