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BY David Navarro
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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,)

vs.)

MELISSA SCOTT JENKINS,)

Defendant.)

FE-09-15269

Grand Jury No. 09-106

INDICTMENT

Defendant's DOB: 07-19-1979

Defendant's SSN: [REDACTED]

MELISSA SCOTT JENKINS is accused by the Grand Jury of Ada County by this Indictment, of the crimes of: I. MURDER IN THE FIRST DEGREE, FELONY, I.C. §§18-4001, 02, 03 (a) and (d), 18-204, and II. ACCESSORY TO FAILURE TO REPORT DEATH TO LAW ENFORCEMENT, FELONY, I.C. § 19-4301A(2), 18-205(1), which crimes were committed as follows:

COUNT I

That the Defendant, MELISSA SCOTT JENKINS, on or between June 2009 and the 24th day of July 2009, in the County of Ada, State of Idaho, did aid and abet another, DANIEL EDWARD EHRLICK JR., who did unlawfully and with malice aforethought kill and murder

ROBERT G. MANWILL, a human being, in the perpetration of or attempt to perpetrate the crime of Aggravated Battery on a child under twelve (12) years of age, to-wit: ROBERT G. MANWILL, who was approximately eight (8) years of age (DOB: 06/08/2001), by means of the willful and unlawful use of force or violence upon the person of ROBERT G. MANWILL, causing great bodily harm, to-wit: non-accidental abusive head trauma and/or abdominal injuries, from which the child died on or around July 24, 2009, or in the alternative, who did unlawfully and with the intentional application of torture, kill and murder ROBERT G. MANWILL, a human being, by intentionally inflicting upon ROBERT G. MANWILL extreme or prolonged pain with the intent to cause suffering, to execute vengeance, or to satisfy some sadistic inclination, and/or by inflicting upon ROBERT G. MANWILL extreme or prolonged acts of brutality with the intent to cause suffering, to execute vengeance, or to satisfy some sadistic inclination, by inflicting repeated acts of blunt force trauma to the abdomen and/or head of ROBERT G. MANWILL, an eight (8) year old child (DOB: 06/08/2001), with his hands, knees, fists, and/or feet, and/or by other means of physical force, physical abuse, and/or emotional abuse, which caused bruising, pain, abdominal bleeding and injuries, and/or head injuries including bleeding and/or brain swelling, from which injuries, force, and/or abuse ROBERT G. MANWILL died on or around the 24th day of July 2009, where MELISSA SCOTT JENKINS, the mother of ROBERT G. MANWILL, a child who was eight (8) years of age (DOB: 06/08/2001), while having a duty to protect and/or come to the aid of ROBERT G. MANWILL, did have active knowledge of the bodily injuries and/or other physical and/or emotional harm that DANIEL EDWARD EHRLICK JR. was inflicting upon ROBERT G. MANWILL; and/or did actively and repeatedly hide ROBERT G. MANWILL from governmental authorities and/or other persons and/or provided false information as to the whereabouts of ROBERT G. MANWILL to prevent governmental authorities and/or other persons from observing the ongoing physical harm that ROBERT G. MANWILL was suffering; and/or did knowingly elect not to seek medical attention for the injuries inflicted upon ROBERT G. MANWILL when she knew that he had visible bruising, was being subjected to escalating physical violence by DANIEL EDWARD EHRLICK JR., and where his physical health and condition were in decline; and/or did knowingly and intentionally leave ROBERT G. MANWILL in the custody and care of DANIEL EDWARD EHRLICK JR., knowing that DANIEL EDWARD EHRLICK JR. was continuing to inflict repeated acts of physical violence, physical abuse, and/or emotional abuse

upon ROBERT G. MANWILL; and/or did otherwise facilitate, promote, encourage, or in any other manner bring about the acts of physical violence, physical abuse, and/or emotion abuse inflicted upon ROBERT G. MANWILL by DANIEL EDWARD EHRLICK JR., from which ROBERT G. MANWILL died on July 24, 2009.

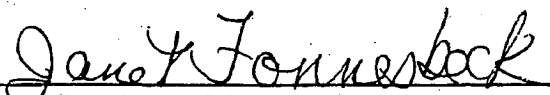
COUNT II

That the Defendant, MELISSA SCOTT JENKINS, on or between the 24th day of July 2009 and the 3rd day of August 2009, in the County of Ada, State of Idaho, having knowledge that a felony had been committed, to-wit: having knowledge that DANIEL EDWARD EHRLICK JR., did, having custody of the body of ROBERT G. MANWILL, an eight (8) year old child (DOB: 06/08/2001), and with the intent to prevent discovery of the manner of death, fail to notify the coroner and/or law enforcement of the death of ROBERT G. MANWILL, and where the death of ROBERT G. MANWILL, a child, occurred as a result of violence by homicide, occurred under suspicious circumstances, and/or occurred without a known medical disease to account for the death, did willfully withhold or conceal the commission of said felony from a peace officer.

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 State of Idaho.

A TRUE BILL

Presented in open Court this 18 day of August 2009.


Presiding Juror of the Grand Jury of
Ada County, State of Idaho.