

**IN THE IOWA DISTRICT COURT IN AND FOR
MARION COUNTY**

This Complaint and Affidavit is to be:

- Filed with Court Clerk (cc: CA)
- Submitted to County Attorney
- Filed with JCO - Defendant is a Juvenile

Agency Case Number: **P202000150**

Arrest Date: _____

THE STATE OF IOWA

VS.

OFFENDER

Last BOAT		First MICHELLE		Middle LEE		Suffix	
Address 135 PRAIRIE STREET				City PELLA		State IA	Zip Code 50219
DL# [REDACTED]	State IA	DL Class C	DL Endorsements		DL Restrictions		
Date of Birth 12/23/1964		Gender FEMALE	Race WHITE - W		Ethnicity NOT OF HISPANIC ORIGIN - N		
Height 5' 04"		Weight 192 LBS	Eye Color BLUE - BLU		Hair Color BROWN - BRO		

OFFENSE

State <input checked="" type="checkbox"/>	County <input type="checkbox"/>	Local <input type="checkbox"/>	Code Section 707.2(1)(A)	Crime Description MURDER IN THE 1ST DEGREE			Speed	in	Zone
Class FELA		Serious P.I. <input type="checkbox"/>	Fatal Accident <input type="checkbox"/>	Civil Damage Assessment <input type="checkbox"/>		Other <input type="checkbox"/>			
Location Type 20 - RESIDENCE/HOME									
Literal Description 101 GLENWOOD #4									
Address 101 GLENWOOD #4				City PELLA			State IA	Zip Code 50219	
Is Date and Time of Incident Known? YES		Incident Date or Low Range 05/18/2020		Upper Date Range	Incident Time or Low Range 20:21		Upper Time Range		

STATUS OF OFFENDER/JUVENILE

<input type="checkbox"/> TAKEN INTO CUSTODY	CUSTODY	<input type="checkbox"/> SUMMONS TO APPEAR (Citation Issued)
<input checked="" type="checkbox"/> WARRANT REQUESTED	<input type="checkbox"/> NO CONTACT ORDER REQUESTED	<input type="checkbox"/> RELEASED TO PARENT/GUARDIAN

NARRATIVE

Narrative of Offense Committed

On or about the above stated date and time, the Defendant did

Having malice aforethought, willfully, deliberately, and with premeditation killed T.M.

AFFIDAVIT

STATE OF IOWA, MARION COUNTY

I, the undersigned, being duly sworn, state that all facts contained in this Complaint and Affidavit, known by me or told to me by other reliable persons form the basis for my belief that the defendant committed this crime

State all facts and persons relied upon supporting elements of alleged crime

At 2021 hours on 05/18/2020 the Pella Police Department received a call regarding a possible domestic dispute behind 101 Glenwood #4, Pella, Marion County, Iowa in the alley. The caller stated it appeared two people were in a fight.

When Officers arrived in the alley behind 101 Glenwood #4 they observed a female victim, later identified as Tracy Mondabough slumped back against the vehicle's seat with the seat belt still on. The victim was later pronounced dead. Victim suffered what appears to be a puncture stab wound to the chest and laceration injuries to her hands.

Evidence establishes that the defendant is separated but still legally married to the victims' boyfriend.

An eye-witness identified a struggle between two individuals, Tracy Mondabough who was in the vehicle and another individual standing outside of the vehicle. The person standing outside the vehicle left the scene in a gray 4 door Cadillac. The defendant was located at her home. Outside her home was a gray/silver 4 door Cadillac with visible blood on the outside of the vehicle. The vehicle's engine and rotors were warm to the touch. There was no other person known to have access to the Cadillac on May 18, 2020. The defendant answered the door wearing a robe and having her hair in a towel and indicated she was taking a shower. Additional evidence supporting probable cause include 1.) In the washing machine of the defendant's home was a load of laundry, containing 1 outfit. 2.) A pair of rubber gloves, with what appeared to be blood on them, were found in the upper tank of the toilet in the defendant's bathroom. 3.) The defendant is observed on video following the victim both into and out of the Vermeer parking lot. The two vehicles leave the parking lot at approximately 20:10 hrs. The first call to law enforcement was approximately 10 minutes later. 4.) An additional eye-witness heard the person standing outside of the vehicle yell at the person inside the vehicle "He don't belong to you" 5.) On or about March 20, 2020 the Victim called the Ottumwa Police Department to report that Defendant followed her from Pella, Iowa to Ottumwa, Iowa and that she was requesting law enforcement meet her at a gas station as she was fearful.

Justin Bailey



BAILEY, JUSTIN 0177

Signature of Complainant or Officer, Officer Name & Number

GENERAL PROBABLE CAUSE

Defendant Implicated 14 - OTHER PHYSICAL EVIDENCE		
Operating Motor Vehicle in County	Other Physical Evidence	Attempted To Inflict Injury

STATE OF IOWA, MARION COUNTY

	Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on 05/19/2020		Signature of Verifying Party
	Notary Name KACI VISSER		
	Commission Number 723342	<input type="checkbox"/> Peace Officer <input checked="" type="checkbox"/> Notary <input type="checkbox"/> Prosecuting Attorney	
	My Commission Expires 07/10/2021		