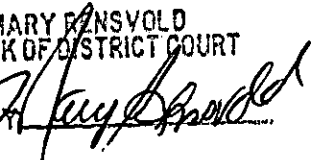


LAKE COUNTY ATTORNEY'S OFFICE
Lake County Courthouse
106 Fourth Avenue East
Polson, MT 59860
(406) 883-7245

MARY ENSVOLD
CLERK OF DISTRICT COURT
FILED BY 
2025 FEB 21 P 12:46

MONTANA TWENTIETH JUDICIAL DISTRICT COURT, LAKE COUNTY

STATE OF MONTANA,

Plaintiff,

vs.

CAMERON EDWARD FRANCIS,

Defendant.

Cause No.: DC-25- 28

MOTION AND AFFIDAVIT FOR LEAVE TO
FILE AN INFORMATION

COMES NOW, JAMES LAPOTKA, Lake County Attorney, and pursuant to MCA 46-11-201, moves the Court for leave to file an Information against the Defendant for the offenses of: COUNT 1: Deliberate Homicide, a Felony, under MCA 45-5-102, and COUNT 2: Attempt - Deliberate Homicide, a Felony, under MCA 45-4-103 and 45-5-102.

The State further moves the Court, pursuant to MCA 46-15-323 et seq. and *State ex rel. Carkulis, Relator, v. District Court*, 229 Mont. 265, 746 P.2d 604 (1987), for an Order requiring the Defendant, his counsel and his agents, to make available for examination and reproduction without delay all discovery.

This Motion is based upon the attached Affidavit.

DATED this 21st day of February, 2025.


JAMES LAPOTKA
Lake County Attorney

1 AFFIDAVIT

2 STATE OF MONTANA)

) ss.

3 County of Lake)

4
5 COMES NOW, JAMES LAPOTKA, Lake County Attorney, and being a person of lawful age,
duly sworn upon his oath, hereby deposes and says:

6 I have reviewed the reports supplied to me by the Polson Police Department and Lake County
7 Sheriff's Office. From these sources, it appears that, on or about February 14, 2025, in Lake County,
8 Montana, Polson Police Officer Michael Wharton was patrolling the City of Polson in full police
9 uniform in a marked police vehicle. Wharton observed a 2018 black Honda Accord traveling North on
10 Highway 93 across the Armed Services Memorial Bridge with no visible taillights, and he effectuated
11 a traffic stop of the vehicle at 11:51 p.m. just north of Rocky Point Road. As Wharton radioed his
12 status to his dispatch the driver of the Accord leaned out of the driver's window and began shooting at
13 Wharton's vehicle, striking the front fender, grill, radiator, windshield, passenger headrest, and other
14 parts of the vehicle. The bullets penetrated the vehicle body, the engine block, and they cut through the
15 windshield, showering Officer Wharton with broken glass.

16 The Accord fled the scene north on Highway 93 and Wharton attempted to pursue, however his
17 vehicle overheated and became inoperable. Wharton described the weapon used as "some kind of high-
18 powered rifle." A review of Officer Wharton's dash camera video shows approximately 20 shots
19 initially fired at his vehicle from outside the driver's window and 7 more in a second fusillade as the
Accord drives away. Officers later located upward of 20 spent 5.56 casings in the northbound lane of
Highway 93 where the suspect shot at Wharton.

1 Approximately a half hour later, a citizen reported a man acting odd in the Elmo area who said
2 "never do dumb stuff" and "call the cops." Officers responded and located the Accord and followed a
3 set of footprints in the snow to the Elmo Post Office where they located a man lying face down
4 surrendering. The man, later identified as CAMERON EDWARD FRANCIS (hereinafter Defendant),
5 said to law enforcement "I give up" "You got me". The Defendant was arrested and transported to the
6 Lake County Jail. On the way to jail the Defendant stated that all the shell casings would have his
7 fingerprints on them and that he could have taken a few of them out in a standoff if he wanted to.
8 Defendant stated he had been staying on "fourth street" in Polson with his girlfriend but was unsure if
9 it was East or West, and he said that he had only been there a few weeks. The Defendant stated that the
10 vehicle was registered to his girlfriend and that "you'll figure it all out from here." At the Lake County
11 Jail, while being processed for gunshot residue the Defendant stated that he had shot a few people a
12 few times before.

13 Officers obtained a search warrant for the Accord and located a 5.56 NATO military style rifle
14 with a 60 round barrel drum magazine and a red dot sight. The receiver of the rifle was custom milled
15 and had no serial number. Officers also found a large plastic tub containing hundreds of rounds of
16 NATO 5.56 ammo that have a green tip and are commonly referred to as "armor piercing ammunition"
17 because of their enhanced steel tip. The side of the vehicle was scorched with gunshot residue
18 consistent with the shots fired from the driver's window.

19 The Accord was registered to a Kimberly Goodson. The Defendant's arrest for shooting at law
enforcement made the local news. On February 16, 2025, Kimberly's son Aaron Pendergraft contacted
law enforcement and was concerned about the welfare of his mother. Pendergraft stated that Goodson
was in an abusive relationship with the Defendant and that he had not heard from his mother since

Valentines Day, February 14, 2025. Officers conducted a welfare check on Goodson's residence on 4th Avenue and found her deceased with a pool of blood under her in the bathroom.

Officers obtained a search warrant for Goodson's residence and documented the scene. Officers observed signs of a struggle in the home including broken glass, and they located large amounts of ammunition including green tipped 5.56 rounds and a single spent 5.56 casing several feet away from Goodson's body. An autopsy was conducted on Goodson and the Medical Examiner determined that Goodson died from a single gunshot wound to her face. A green tipped fragment of a 5.56 round was recovered from her skull.

Camera footage from near the home shows the black Accord driving on 4th Avenue away from Goodson's residence just minutes before Wharton's traffic stop. The Defendant shot his girlfriend in the face with a military style ghost gun, armor piercing ammunition, and a high-capacity magazine; stole her car, and then ambushed Officer Wharton on a traffic stop while trying to flee the original homicide scene.

The Defendant has prior convictions from the Federal Government and the State of California for manufacturing methamphetamine, felony assault with force likely to produce great bodily injury, felony vehicle theft, felony reckless evading a peace officer, felony obstructing or resisting an executive officer, felony assault with a firearm on person, felony possession of a firearm by a felon, and felony vandalism. Defendant's criminal history in California shows 34 cycles going back to 1996 and includes numerous parole revocations. The Defendant has no known ties to our community. The Defendant has a history of noncompliance with parole rules, a history of fleeing and eluding law enforcement and placing the public in harm's way, a history of violent crime, crimes with weapons, and a history of noncompliance with weapons restrictions. The State request bond be set at 5 million dollars.

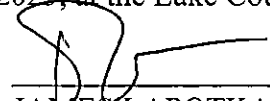
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2 From those facts, I believe there is probable cause to believe that within the jurisdiction of this
3 Court, the Defendant, CAMERON EDWARD FRANCIS, committed the offenses of: COUNT 1:
4 Deliberate Homicide, a Felony, under MCA 45-5-102, and COUNT 2: Attempted Deliberate
5 Homicide, a Felony, under MCA 45-4-103 and 45-5-102.

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JAMES LAPOTKA
Lake County Attorney

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 21st day of February, 2025, at the Lake County Courthouse in Polson, Montana.



JAMES LAPOTKA