

LATAH COUNTY PROSECUTOR'S OFFICE  
WILLIAM W. THOMPSON, JR.  
PROSECUTING ATTORNEY  
Latah County Courthouse  
P.O. Box 8068  
Moscow, ID 83843  
(208) 883-2246  
ISB No. 2613  
paservice@latahcountyid.gov

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,

V.

BRYAN CHRISTOPHER KOHBERGER,  
Defendant.

Case No. CR01-24-31665

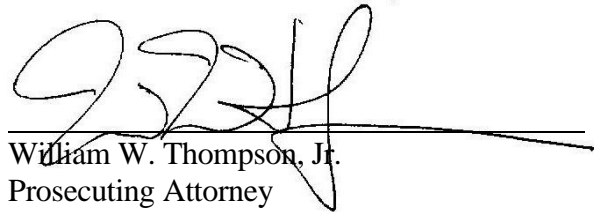
MOTION FOR LEAVE TO  
AMEND NOTICE PURSUANT  
TO IDAHO CODE §18-4004A

COMES NOW the State of Idaho, by and through the Latah County Prosecuting Attorney, and respectfully moves the Court for leave to amend its June 26, 2023, "Notice Pursuant to Idaho Code §18-4004A" by withdrawing the Idaho Code §19-2515(9)(g) aggravating factor. The proposed "Amended Notice Pursuant to Idaho Code §18-4004A" is attached hereto.

In support of this motion, the State has continued to review this case and prepare for upcoming pre-trial motions practice and trial, and the State has determined that the remaining four aggravating factors contained in the State's "Notice Pursuant to Idaho Code §18-4004A" adequately reflect the State's interest and position on penalty.

WHEREFORE, the State respectfully prays that the Court grant leave for the State to file the attached “Amended Notice Pursuant to Idaho Code §18-4004A.”

RESPECTFULLY SUBMITTED this 9th day of October, 2024.



William W. Thompson, Jr.  
Prosecuting Attorney

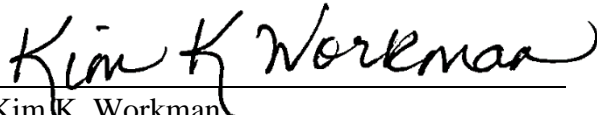
CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the MOTION FOR LEAVE TO AMEND NOTICE PURSUANT TO IDAHO CODE §18-4004A was served on the following in the manner indicated below:

Anne Taylor  
Attorney at Law  
PO Box 2347  
Coeur d'Alene, ID 83816

- Mailed
- E-filed & Served / E-mailed
- Faxed
- Hand Delivered

Dated this 9th day of October, 2024.

  
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Kim K. Workman