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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,**

**V.**

**BRYAN C. KOHBERGER,**

**Defendant.**

**CASE NUMBER CR01-24-31665**

**NOTICE OF FILING SIGNED AND  
NOTARIZED AFFIDAVIT TO THE  
DEFENDANT'S MOTION TO STRIKE  
DEATH PENALTY RE: AUTISM  
SPECTRUM DISORDER UNDER SEAL**

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and pursuant to I.C.A.R. 32(i) and I.C. § 74-124(1)(b) and (c), and hereby files the accompanying

**NOTICE OF FILING SIGNED AND NOTARIZED AFFIDAVIT TO  
THE DEFENDANT'S MOTION TO STRIKE DEATH PENALTY RE:  
AUTISM SPECTRUM DISORDER UNDER SEAL**

signed and notarized Affidavit of Dr. Cecil Reynolds under seal to complete the record of the previously filed document titled “Exhibits 1 & 2 in support of Motion to Strike Death Penalty RE: Autism Spectrum Disorder”.

DATED this   3   day of March, 2025.



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ANNE C TAYLOR  
ANNE TAYLOR LAW, PLLC

### CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served as indicated below on the   3   day of March, 2025 addressed to:

Latah County Prosecuting Attorney –via Email: [paservice@latahcountyid.gov](mailto:paservice@latahcountyid.gov)

Elisa Massoth – via Email: [legalassistant@kmrs.net](mailto:legalassistant@kmrs.net)

Jay Logsdon – via Email: [Jay.Logsdon@spd.idaho.gov](mailto:Jay.Logsdon@spd.idaho.gov)

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Jeffery Nye, Deputy Attorney General – via Email: [Jeff.nye@ag.idaho.gov](mailto:Jeff.nye@ag.idaho.gov)



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STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

**STATE OF IDAHO,**  
  
**Plaintiff,**

**V.**

**BRYAN C. KOHBERGER,**  
  
**Defendant.**

**CASE NUMBER CR01-24-31665**

**AFFIDAVIT OF CECIL R. REYNOLDS,  
Ph.D.**

STATE OF TEXAS    )  
                              : ss.  
County of Travis)


1. I am an adult, over the age of 18, and I have personal knowledge of the facts set forth in this Affidavit.

2. I was first licensed as a psychologist in 1978 and maintained a clinical practice in addition to my academic appointments for just over 25 years. I am currently an Emeritus Professor of Educational Psychology, Professor of Neuroscience, and Distinguished Research Scholar at Texas A&M University. I currently practice forensic neuroscience and specialize in high stakes, complex cases.
3. I have been retained as a consultant in issues of mental health and neuroscience by the defense in Mr. Kohberger's case. One of my key roles in the case is to assist the defense team in locating and securing the work of the most appropriate and properly qualified experts in the fields of psychology, neuropsychology, and forensic psychiatry.
4. During my work with the defense team, on my recommendation and after extensive vetting, they selected and hired Dr. Joette James, Neuropsychologist. She performed many hours of work including testing Mr. Kohberger and conducting collateral interviews. Over the course of many months she collected data and prepared to write a report. She had one additional round of tests planned to clarify diagnostic issues present with Mr. Kohberger prior to writing her report. Shortly before that trip Dr. James unexpectedly passed away. I was able to interview her regarding her (incomplete) impressions and (again incomplete) testing data and developed an understanding of the additional work required, which included the addition of a forensic psychiatrist to the team. She was unable at that time to forward her records, testing, and notes to me due to the severity of her illness and its unexpected and rapid onset.
5. After her death I assisted the team in interviewing and selecting an expert to assess Mr. Kohberger. It was necessary to review and vet multiple experts to ensure the proper expert would be retained. The team subsequently selected Dr. Rachel Orr as a replacement for Dr. James and added Dr. Eileen Ryan, Forensic Psychiatrist, whose expertise was then also required.
6. I made several attempts to obtain the raw data from testing performed by Dr. James. I was not successful. As a result, the neuropsychologist hired by the team had to conduct testing and interviews as if none had been done previously. This substantially delayed the development of a full understanding of his neuropsychological status and the determination of an evidence-based, defensible diagnosis of his multiple mental conditions.
7. Dr. Orr and Dr. Ryan have worked diligently to learn about Mr. Kohberger, review materials related to the case, conduct interviewing and testing, analyze the data and write an expert report, and the defense team has made every effort to assist them in completing their work in the most timely fashion possible without compromising the integrity of their work.
8. Neither Dr. Ryan nor Dr. Orr were able to present their findings to the team and develop initial reports until mid to late January of 2025.

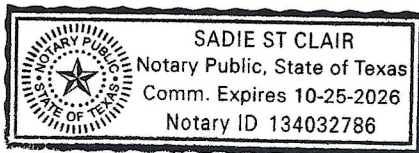
9. Given the amount of work that had to be done including in-person exams, reviews of extensive records, conducting many needed collateral interviews, and the like, I was frankly surprised either expert was able to respond as quickly as they did.
10. The delay in diagnosis did not occur due to lack of diligence is owing to the untimely and exceedingly unfortunate death of Dr. James.


FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 25<sup>th</sup> day of February, 2025.

  
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CECIL R. REYNOLDS, Ph.D.

SUBSCRIBED AND SWORN to before me this 25<sup>th</sup> day of February, 2025.



  
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Notary Public in and for the State of Texas  
Commission Expires: 10/25/2026