

LATAH COUNTY PROSECUTOR'S OFFICE
WILLIAM W. THOMPSON, JR., ISB No. 2613
PROSECUTING ATTORNEY
ASHLEY S. JENNINGS, ISB No. 8491
SENIOR DEPUTY PROSECUTING ATTORNEY
JOSHUA D. HURWIT, ISB. No. 9527
SPECIAL DEPUTY PROSECUTING ATTORNEY
Latah County Courthouse
522 S. Adams Street, Ste. 211
Moscow, ID 83843
Phone: (208) 883-2246
paservice@latahcountyid.gov

IN THE DISTRICT COURT OF THE FOURTH DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

STATE OF IDAHO,
Plaintiff,

V.

BRYAN C. KOHBERGER,
Defendant.

Case No. CR01-24-31665

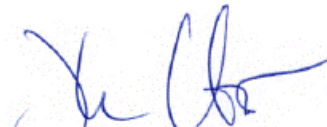
STATE'S FIRST
SUPPLEMENTAL REQUEST
FOR DISCOVERY
DISCLOSURE

TO: THE DEFENDANT, BRYAN CHRISTOPHER KOHBERGER,
AND COUNSEL

PLEASE TAKE NOTICE that the undersigned, pursuant to Rule 16(C) of the Idaho Criminal Rules and Idaho Code 18-207, requests discovery and inspection of the information, data, and materials listed in the attached Sealed Exhibit S-1. This is a continuing request pursuant to Idaho Criminal Rule 16(j).

While this First Supplemental Request applies to all of the defendant's expert witnesses, the specific basis for this request is that the Defendant's disclosures of the reports of the Forensic Psychiatric Evaluation by Dr. Eileen Ryan and the Neuropsychological Evaluation by Rachel Orr appear to be incomplete. The reports do not appear to be accompanied by all (i) the results and tests conducted as part of the examinations, Idaho Crim R. 16(c)(2) and (ii) "the facts and data for th[e] opinions" contained in the reports, Idaho Crim. R. 16(c)(4). As such, they do not afford the State "a complete opportunity to consider the substance of such testimony and prepare for rebuttal" through its own experts. Idaho Code I.C. § 18-207. Accordingly, the State requests that defendant immediately produce the underlying data, evaluation, and examination results as outlined in Sealed Exhibit S-1.

DATED this 2nd day of April 2025.



JOSHUA D. HURWIT
Special Deputy Prosecuting Attorney

CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the STATE'S FIRST SUPPLEMENTAL REQUEST FOR DISCOVERY DISCLOSURE were served on the following in the manner indicated below:

Anne Taylor
Attorney at Law
PO Box 2347
Coeur d'Alene, ID 83816
info@annetaylorlaw.com

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

Dated this 2nd day of April 2025.

