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IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF LATAH

STATE OF IDAHO, Plaintiff,

V.

BRYAN CHRISTOPHER KOHBERGER, Defendant.

Case No. CR29-22-2805

NOTICE OF <u>BRADY</u> DISCLOSURE AND REQUEST FOR PROTECTIVE ORDER

COMES NOW the State of Idaho, by and through the Latah County Prosecuting Attorney's Office, and respectfully gives notice to Court and Counsel that the State has become aware of potential <u>Brady/Giglio</u> material related to one of the officers involved in the above-referenced case. That material, in the form of a confidential internal affairs investigation, is hereby submitted *in camera* to the Court. The State intends to disclose this information to defendant's counsel but, because this information is confidential and exempt from public disclosure pursuant to Idaho Code 74-106(1) (personnel records), the State

respectfully prays for the issuance of a protective order pursuant to Idaho Criminal Rule 16(l), prohibiting defense counsel from disseminating the information contained in the internal affairs investigation absent further order of the Court.

Respectfully submitted this <u>14</u> day of <u>4</u>

2023.

William W. Thompson, Jr. Prosecuting Attorney

CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing NOTICE OF <u>BRADY</u> DISCLOSURE AND REQUEST FOR PROTECTIVE ORDER was served on the following in the manner indicated below:

Anne Taylor	☐ Mailed
Attorney at Law	E-filed & Served / E-mailed
PO Box 9000 Coeur D Alene, ID 83816-9000	☐ Faxed
	☐ Hand Delivered

Dated this 27 day of March, 2023