

CASE NO. CR29-22-2805  
9/4/24 @ 3:07pm  
DATE/TIME

LATAH COUNTY, CLERK OF DISTRICT COURT  
BY TJR  
Deputy

LATAH COUNTY PROSECUTOR'S OFFICE  
WILLIAM W. THOMPSON, JR., ISB No. 2613  
PROSECUTING ATTORNEY  
ASHLEY S. JENNINGS, ISB No. 8491  
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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,

BRYAN CHRISTOPHER KOHBERGER,  
Defendant.

Case No. CR29-22-2805

STATE'S RESPONSE AND  
SUPPLEMENTAL RESPONSES  
TO DEFENDANT'S REQUESTS  
FOR DISCOVERY

TO: THE DEFENDANT, BRYAN CHRISTOPHER KOHBERGER, and Counsel  
Anne Taylor:

COMES NOW the State of Idaho, by and through the Latah County Prosecuting  
Attorney, and submits the attached Exhibits A, B, C, D, E, F, G, H, I, J, K, L, M, N, and O in  
supplemental response to Defendant's Request for Discovery and Defendant's Supplemental  
Requests 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 16. The State submits the attached

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Exhibit P in response to Defendant's 17<sup>th</sup> Supplemental Request for Discovery. The State notes it has previously complied with the Defendant's Discovery Request pursuant to the Court's Order related to Defendant's Supplemental Requests 3 and 15 (IGG related materials).

The State incorporates the following responses as fully set forth at this point:

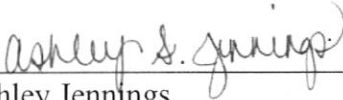
- "State's Response to Request for Discovery" filed on January 23, 2023.
- "State's Response to Defendant's First Supplement Request for Discovery" filed on February 21, 2023.
- "State's Response to Defendant's Second Supplemental Request for Discovery" filed on March 29, 2023.
- "State's Response to Defendant's Third Supplemental Request for Discovery" filed on May 12, 2023.
- "State's Response to Defendant's Motion to Compel Discovery" filed on May 12, 2023.
- "State's Supplemental Response to Defendant's 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> Supplemental Requests for Discovery" filed on June 8, 2023.
- "State's Response to Defendant's 4<sup>th</sup> Supplemental Request for Discovery" filed on June 16, 2023.
- "State's Supplemental Response to Defendant's 4<sup>th</sup> Supplemental Request for Discovery" filed on June 29, 2023.
- "State's Response to Defendant's Second Motion to Compel Discovery" filed on June 29, 2023.
- "State's Response to Defendant's Third Motion to Compel Discovery" filed on July 5, 2023.
- "State's Supplemental Response to Defendant's 2<sup>nd</sup> Supplemental Request for Discovery and Defendant's Motion to Compel Discovery" filed on July 12, 2023.

- “State’s Supplemental Response to Defendant’s Second Motion to Compel Discovery” filed on July 12, 2023.
- “State’s Response to Defendant’s 5<sup>th</sup> and 6<sup>th</sup> Supplemental Requests for Discovery” filed on July 25, 2023.
- “State’s Supplemental Response to Defendant’s Third Motion to Compel Discovery” filed on August 30, 2023.
- “State’s Response to Defendant’s 7<sup>th</sup> Supplemental Request for Discovery” filed on September 6, 2023.
- “State’s Response to Defendant’s 8<sup>th</sup> and 9<sup>th</sup> Supplemental Requests for Discovery” filed on October 24, 2023.
- “State’s Response to Defendant’s 10<sup>th</sup> Supplemental Request for Discovery” filed on November 20, 2023.
- “State’s Response to Defendant’s 11<sup>th</sup> Supplemental Request for Discovery” filed January 22, 2024.
- “State’s Response to Defendant’s 12<sup>th</sup> Supplemental Request for Discovery” filed March 25, 2024.
- “State’s Response to Defendant’s 13<sup>th</sup> Supplemental Request for Discovery” filed April 1, 2024.
- “State’s Objection to Defendant’s 15<sup>th</sup> Supplemental Request for Discovery” filed on April 4, 2024.
- “State’s Response to Defendant’s 14<sup>th</sup> Supplemental Request for Discovery” filed April 10, 2024.
- “State’s Response to Defendant’s Fourth Motion to Compel Discovery” filed April 23, 2024.
- “State’s Supplemental Response to Defendant’s Fourth and Response to Fifth Motions to Compel and Motion to Limit Scope of Testimony” filed May 10, 2024.

- “State’s Supplemental Response to Defendant’s Fifth Motion to Compel Discovery” filed May 10, 2024.
- “State’s Second Supplemental Response to Defendant’s Fourth Motion to Compel Discovery” filed May 10, 2024.
- “State’s Second Supplemental Response to Defendant’s Fifth Motion to Compel Discovery” filed on May 28, 2024.
- “State’s Third Supplemental Response to Defendant’s Fifth Motion to Compel Discovery” filed June 10, 2024.
- “State’s Fourth Supplemental Response to Defendant’s Fifth Motion to Compel and Motion to File Under Seal” filed on June 14, 2024.
- “State’s Response to Defendant’s 16<sup>th</sup> Supplemental Request for Discovery” filed on August 19, 2024.

The State has and will continue to provide discovery in accordance with Idaho Criminal Rule 16 and applicable law and reserves any and all objections thereunder.

DATED this 4<sup>th</sup> day of September, 2024.

  
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Ashley Jennings  
Senior Deputy Prosecuting Attorney

CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the STATE'S RESPONSE AND SUPPLEMENTAL RESPONSES TO DEFENDANT'S REQUESTS FOR DISCOVERY were served on the following in the manner indicated below:

Anne Taylor  
Anne Taylor Law Offices  
PO Box 2347  
Coeur D Alene, ID 83816-9000

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

Dated this 4<sup>th</sup> day of September, 2024.

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**Under Seal with the Court**

**Exhibits A-P Attached to State's Response and Supplemental  
Responses to Defendant's Requests for Discovery**