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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.

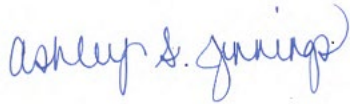
CASE NUMBER CR01-24-31665

**STIPULATED MOTION TO THE
ADMISSION OF ADDITIONAL
EXHIBITS AS EVIDENCE AT TRIAL**

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and hereby
submits to the Court a stipulation to the Defense's admission of two additional exhibits described

for the record as Exhibit D-1062, FBI Lab Report 4 (Bates 9887-9892), and Exhibit D-1063, FBI Lab Report 12 (Bates 9927-9931).

DATED this 5th day of June 2025.



ASHLEY JENNINGS
SENIOR DEPUTY PROSECUTOR



BY:

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 6 day of June, 2025 addressed to:

Latah County Prosecuting Attorney –via Email: paservice@latahcountyid.gov

Elisa Massoth – via Email: legalassistant@kmrs.net

Jay Logsdon – via Email: Jay.Logsdon@spd.idaho.gov

Bicka Barlow, Attorney at Law – via Email: bickabarlow@sbcglobal.net

Jeffery Nye, Deputy Attorney General – via Email: Jeff.nye@ag.idaho.gov



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FBI Laboratory

2501 Investigation Parkway
Quantico, Virginia 221354940/4946 Fowler Road
Huntsville, Alabama 35898

LABORATORY REPORT

To: TRAVIS SHIRLEY
RELIEF SUPERVISOR
Salt Lake City

Date: January 27, 2023

Case ID No.: SU-3683464

Lab No.: 2023-00090-4

Communication(s): January 4, 2023

Agency Reference(s): 22-M09903

Subject(s):

Victim(s): Ethan Chapin; Madison Mogen; Xana Kernodle; Kaylee Goncalves

Discipline(s): Trace - Hairs/Fibers

This document may contain privileged and/or personally identifiable information, including information related to juveniles and other protected individuals. This document must be afforded the protection required by applicable law, regulation, and policy. If you are not the intended recipient of this document, please destroy it promptly without further retention or dissemination, unless otherwise required by law.

FBI Laboratory Evidence Designator(s):

- Item 2 Head hair sample from Ethan J. Chapin (MPD #22M-1880)
- Item 3 Debris from right hand of Ethan J. Chapin (MPD #22M-1884)
- Item 5 Head hair sample from Kaylee J. Goncalves (MPD #22M-2012)
- Item 7 Head hair sample from Xana A. Kernodle (MPD #22M-1938)
- Item 8 Debris from left hand of Xana A. Kernodle (MPD #22M-1948)
- Item 9 Debris from body bag of Xana A. Kernodle (MPD #22M-1942)
- Item 11 Head hair sample from Madison M. Mogen (MPD #22M-1967)
- Item 12 Necklace from Ethan J. Chapin (MPD #22M-1878)
- Item 13 Bracelet from Ethan J. Chapin (MPD #22M-1878)

1 - Jeffery Talbott
Idaho State Police

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**DEFENDANT'S
EXHIBIT**

D-1062

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- Item 14 Earring from Kaylee J. Goncalves (MPD #22M-2023)
- Item 15 Fake eyelashes from Madison M. Mogen (MPD #22M-1983)
- Item 16 Ring from Madison M. Mogen (MPD #22M-1983)
- Item 17 Ring from Madison M. Mogen (MPD #22M-1983)
- Item 18 Ring from Madison M. Mogen (MPD #22M-1983)
- Item 19 Hair tie from Madison M. Mogen (MPD #22M-1983)
- Item 20 Comforter from 1122 King Road (MPD #22M-2035)
- Item 21 Debris from near northwest bedroom on second floor at 1122 King Road (MPD #22M-2040)
- Item 22 Debris from near northwest bedroom on second floor at 1122 King Road (MPD #22M-2040)
- Item 23 Debris from half wall leading to northwest bedroom on second floor at 1122 King Road (MPD #22M-2040)
- Item 24 Debris from door of northwest bedroom on second floor at 1122 King Road (MPD #22M-2040)
- Item 25 Debris from drying cabinet (MPD #22M-2038)
- Item 26 Debris from under computer pad on desk in bedroom at 1630 Northeast Valley Road, Apartment G201 (MPD #23M-0032)
- Item 27 Debris from under computer pad on desk in bedroom at 1630 Northeast Valley Road, Apartment G201 (MPD #23M-0035)
- Item 28 Debris from pillow in bedroom at 1630 Northeast Valley Road, Apartment G201 (MPD #23M-0036)
- Item 29 Debris from east wall of shower in bathroom at 1630 Northeast Valley Road, Apartment G201 (MPD #23M-0033)
- Item 30 Debris from broom head at 1630 Northeast Valley Road, Apartment G201 (MPD #23M-0030)
- Item 31 Left sock from Ethan J. Chapin (MPD #22M-1877)
- Item 32 Right sock from Ethan J. Chapin (MPD #22M-1876)
- Item 33 Left hand bag from Ethan J. Chapin (MPD #22M-1908)
- Item 34 Shirt from Kaylee J. Goncalves (MPD #22M-2018)
- Item 35 Left sock from Kaylee J. Goncalves (MPD #22M-2020)
- Item 36 Left hand bag from Kaylee J. Goncalves (MPD #22M-2022)
- Item 37 Underwear from Xana A. Kernodle (MPD #22M-1910)

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Item 38	Left hand bag from Xana A. Kernodle (MPD #22M-1914)
Item 39	Right hand bag from Xana A. Kernodle (MPD #22M-1913)
Item 40	Left foot bag from Xana A. Kernodle (MPD #22M-1915)
Item 41	Shirt from Madison M. Mogen (MPD #22M-1952)
Item 42	Left hand bag from Madison M. Mogen (MPD #22M-1985)
Item 43	Right hand bag from Madison M. Mogen (MPD #22M-1984)
Item 44	Dog hair sample from Murphy (MPD #23M-0079)
Item 45	Head hair sample from Bryan Christopher Kohberger (MPD #23M-0075)
Item 46	Arm hair sample from Bryan Christopher Kohberger (MPD #23M-0075)
Item 47	Blanket from 1122 King Road (MPD #22M-1811)
Item 48	Original packaging from Item 20 Comforter (MPD #22M-1851)
Item 49	Filter from Dryer II (MPD #22M-1951)
Item 50	Catch paper from Dryer II (MPD #22M-1951)
Item 51	Security tag from Dryer II (MPD #22M-1951)
Item 52	Right hand bag from Ethan J. Chapin (MPD #22M-1907)
Item 53	Pants from Kaylee J. Goncalves (MPD #22M-2019)
Item 54	Right hand bag from Kaylee J. Goncalves (MPD #22M-2021)
Item 55	Sweatshirt from Xana A. Kernodle (MPD #22M-1912)
Item 56	Pants from Madison M. Mogen (MPD #22M-1953)
Item 57	Filter from Dryer I (MPD #22M-2025)
Item 58	Catch paper from Dryer I (MPD #22M-2025)
Item 59	Security tag from Dryer I (MPD #22M-2025)
Item 60	Catch paper from drying cabinet (MPD #22M-2037)
Item 61	Vacuum container from 1630 Northeast Valley Road, Apartment G201 (MPD #23M-0029)

The results of the trace evidence examinations (hair and fiber) are included in this report.

Methods:

Microscopic examination of hairs is accomplished by using stereomicroscopy and comparison microscopy. The presence or absence, appearance, arrangement and distribution of the characteristics within the cuticle, cortex, and medulla of the hairs are examined and may be compared during a hair examination.

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Microscopic examination of fibers is accomplished by using one or more analytical techniques including stereomicroscopy, comparison microscopy, polarized light microscopy, fluorescence microscopy, and instrumentally using microspectrophotometry and Fourier transform-infrared spectroscopy. The microscopic characteristics and optical properties determined by these techniques are used for the examination and comparison of fibers.

Results of Examination:

Items submitted from Ethan Chapin (Items 3, 12, 13, 31 through 33, and 52); Kaylee Goncalves (Items 14, 34 through 36, 53 and 54); Xana Kernodle (Items 8, 9, 37 through 40, and 55); Madison Mogen (Items 15 through 19, 41 through 43, and 56); and from 1122 King Road (Items 20 through 25, 47 through 51, and 57 through 60) were examined for hairs microscopically consistent with hairs in the head hair sample from Bryan Christopher Kohberger (Item 45); however, none were found.

Items submitted from 1630 Northeast Valley Road, Apartment G201 (Items 26 through 30, and 61) were examined for hairs microscopically consistent with hairs in the head hair samples from Ethan Chapin (Item 2), Kaylee Goncalves (Item 5), Xana Kernodle (Item 7), and Madison Mogen (Item 11); however, none were found.

Animal hairs consistent with dog hairs found in Item 61 are microscopically dissimilar to hairs in the dog hair sample from Murphy (Item 44). Accordingly, Murphy cannot be included as a possible source of these hairs.

An animal hair consistent with cat hair found in Item 26 is of limited value for meaningful microscopic comparison purposes and has been preserved for possible future comparisons.

Additional debris collected from Items 3, 12, 13, 15 through 20, 30 through 43, and 47 through 61 has been preserved for possible future comparisons.

The specimens were examined using stereomicroscopy and comparison microscopy, where appropriate.

Interpretation:

Hairs may be characterized and classified according to their morphology. The first step is determining whether the hair is of human or animal (non-human) origin. Animal hairs may be further classified as to the type of hair (e.g., fur, guard) and the type of animal (e.g., dog, cat). Human hairs may be further examined for characteristics of ancestry and somatic origin (body area). Human hairs can exhibit characteristics of European Ancestry (previously Caucasian), African Ancestry (previously Negroid), or Asian/Native American Ancestry (previously Mongoloid). Human hairs may also exhibit characteristics of more than one ancestral group. Ancestral group classifications are based on macroscopic and microscopic characteristics which

are typically observed in hairs from individuals of different ancestral groups. It should be noted, there is the potential for a hair to be classified into an ancestral group which may not correspond with an individual's outward physical appearance and/or how an individual identifies their own race or ethnic group. Somatic origin classifications are based on the macroscopic and microscopic characteristics which are typically observed in hairs from different areas of the body.

The characteristics exhibited in the hair(s) are used as the comparison criteria. When the presence or absence, appearance, and distribution of characteristics exhibited in a recovered hair(s) are represented in the known sample, the source of the known sample can be included as a possible source of the recovered hair(s). Microscopic hair comparisons are meaningful due to the variation in macroscopic and microscopic characteristics between individuals. However, the comparison of hair characteristics does not constitute a basis for personal identification and the number of individuals who could be included as a possible source of a specific hair is unknown.

Fibers can differ as to type (e.g., rayon, cotton), color, shape, size, microscopic features (e.g., delustrant, voids) and optical properties (e.g., refractive index, sign of elongation). These are characteristics that may associate fibers with a group of items, but never to a single item to the exclusion of all others. However, even fibers with many similar properties may be excluded as originating from the same source by using the identified analytical methods.

The characteristics and optical properties of the fiber(s) are used as comparison criteria. When the characteristics and optical properties of a recovered fiber(s) are the same as a known sample, the recovered fibers are consistent with originating from the source of the known sample, or from another item comprised of fibers that exhibit the same microscopic characteristics and optical properties. A fiber association is not a means of positive identification and the number of possible sources for a specific fiber is unknown. However, due to the variability in manufacturing, dyeing, and consumer use, one would not expect to encounter a fiber selected at random to be consistent with a particular item.

The inability to associate persons/items through a microscopic hair/fiber examination does not necessarily mean the persons/items of interest had no contact. A number of factors can produce this result, including: 1) Hair/fiber evidence may not have transferred. 2) Hairs/fibers that did transfer may have been lost prior to submission to the laboratory. 3) The hairs/fibers transferred or the known sample submitted may not be representative of the source. 4) The hairs/fibers may be from a different source.

Remarks:

For questions about the content of this report, please contact Forensic Examiner Karen K. Lowe at [REDACTED] or kklowe@fbi.gov.

For questions about the status of your submission, including any remaining forensic examinations, please contact Brittany A. Swisher at [REDACTED]

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The evidence, which includes secondary evidence, will be returned under separate cover.

This report conforms to the "Department of Justice Uniform Language for Testimony and Reports for the Forensic Hair Discipline" and the "Department of Justice Uniform Language for Testimony and Reports for Forensic Textile Fiber Discipline".

This report contains the opinions and interpretations of the issuing examiner(s) and is supported by records retained in the FBI Laboratory files. Please allow a minimum of thirty days from the date of a discovery request for the FBI Laboratory to provide the related materials. The FBI cannot ensure timely delivery of discovery requests received in less time.

The work described in this report was conducted at the Quantico Laboratory.

Karen K. Lowe
Trace Evidence Unit

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FBI Laboratory

2501 Investigation Parkway
Quantico, Virginia 221354940/4946 Fowler Road
Huntsville, Alabama 35898

LABORATORY REPORT

To: TRAVIS SHIRLEY
RELIEF SUPERVISOR
Salt Lake City

Date: February 28, 2023

Case ID No.: SU-3683464

Lab No.: 2023-00090-12

Communication(s): January 4, 2023; February 8, 2023

Agency Reference(s): 22-M09903

Subject(s): Bryan Christopher Kohberger

Victim(s): Ethan Chapin; Madison Mogen; Xana Kernodle; Kaylee Goncalves

Discipline(s): Trace - Hairs/Fibers

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FBI Laboratory Evidence Designator(s):

- Item 2 Head hair sample from Ethan J. Chapin (MPD #22M-1880)
- Item 5 Head hair sample from Kaylee J. Goncalves (MPD #22M-2012)
- Item 7 Head hair sample from Xana A. Kernodle (MPD #22M-1938)
- Item 11 Head hair sample from Madison M. Mogen (MPD #22M-1967)
- Item 44 Dog hair sample from Murphy (MPD #23M-0079)
- Item 65 Head rest from seat in Compartment A of 2015 Hyundai Elantra (MPD #23M-0250)
- Item 66 Debris from behind fall down arm rest in Compartment C of 2015 Hyundai Elantra (MPD #23M-0253)
- Item 67 Vacuum sweepings from floor in Compartment A of 2015 Hyundai Elantra

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Idaho State Police

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DEFENDANT'S
EXHIBIT

D-1063

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- (MPD #23M-0257)
- Item 68 Vacuum sweepings from seat in Compartment A of 2015 Hyundai Elantra (MPD #23M-0257)
- Item 69 Vacuum sweepings from seat in Compartment B of 2015 Hyundai Elantra (MPD #23M-0257)
- Item 70 Vacuum sweepings from floor in Compartment B of 2015 Hyundai Elantra (MPD #23M-0257)
- Item 71 Vacuum sweepings from seat in Compartment C of 2015 Hyundai Elantra (MPD #23M-0257)
- Item 72 Vacuum sweepings from floor in Compartment C of 2015 Hyundai Elantra (MPD #23M-0257)
- Item 73 Vacuum sweepings from seat in Compartment D of 2015 Hyundai Elantra (MPD #23M-0257)
- Item 74 Vacuum sweepings from floor in Compartment D of 2015 Hyundai Elantra (MPD #23M-0257)
- Item 75 Vacuum sweepings from Compartment E of 2015 Hyundai Elantra (MPD #23M-0257)
- Item 76 Pants from laundry basket on TV stand in Room K at 119 Lamsden Drive (MPD #23M-0334)
- Item 77 Shirt from laundry basket on TV stand in Room K at 119 Lamsden Drive (MPD #23M-0334)
- Item 78 Shirt from laundry basket on TV stand in Room K at 119 Lamsden Drive (MPD #23M-0334)
- Item 79 Sweatshirt from laundry basket on TV stand in Room K at 119 Lamsden Drive (MPD #23M-0334)
- Item 80 Jacket from laundry basket on TV stand in Room K at 119 Lamsden Drive (MPD #23M-0334)

The results of the trace evidence examinations (hair and fiber) are included in this report.

Methods:

Microscopic examination of hairs is accomplished by using stereomicroscopy and comparison microscopy. The presence or absence, appearance, arrangement and distribution of the characteristics within the cuticle, cortex, and medulla of the hairs are examined and may be compared during a hair examination.

Microscopic examination of fibers is accomplished by using one or more analytical techniques including stereomicroscopy, comparison microscopy, polarized light microscopy, fluorescence microscopy, and instrumentally using microspectrophotometry and Fourier transform-infrared spectroscopy. The microscopic characteristics and optical properties determined by these techniques are used for the examination and comparison of fibers.

Results of Examination:

Items submitted from the 2015 Hyundai Elantra (Items 65 through 75) and from 119 Lamsden Drive (Items 76 through 80) were examined for hairs microscopically consistent with hairs in the head hair samples from Ethan Chapin (Item 2), Kaylee Goncalves (Item 5), Xena Kernodle (Item 7), and Madison Mogen (Item 11); however, none were found.

Animal hairs consistent with dog hairs found in or on Items 67, 70, 71, 74, and 76 through 80 are microscopically dissimilar to hairs in the dog hair sample from Murphy (Item 44). Accordingly, based on the Item 44 hair sample, Murphy cannot be included as a possible source of these hairs.

Additional debris from Items 65, 67 through 80 has been preserved for possible future comparisons.

The specimens were examined using stereomicroscopy and comparison microscopy, where appropriate.

Interpretation:

Hairs may be characterized and classified according to their morphology. The first step is determining whether the hair is of human or animal (non-human) origin. Animal hairs may be further classified as to the type of hair (e.g., fur, guard) and the type of animal (e.g., dog, cat). Human hairs may be further examined for characteristics of ancestry and somatic origin (body area). Human hairs can exhibit characteristics of European Ancestry (previously Caucasian), African Ancestry (previously Negroid), or Asian/Native American Ancestry (previously Mongoloid). Human hairs may also exhibit characteristics of more than one ancestral group. Ancestral group classifications are based on macroscopic and microscopic characteristics which are typically observed in hairs from individuals of different ancestral groups. It should be noted, there is the potential for a hair to be classified into an ancestral group which may not correspond with an individual's outward physical appearance and/or how an individual identifies their own race or ethnic group. Somatic origin classifications are based on the macroscopic and microscopic characteristics which are typically observed in hairs from different areas of the body.

The characteristics exhibited in the hair(s) are used as the comparison criteria. When the presence or absence, appearance, and distribution of characteristics exhibited in a recovered hair(s) are represented in the known sample, the source of the known sample can be included as a possible source of the recovered hair(s). Microscopic hair comparisons are meaningful due to the

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The characteristics and optical properties of the fiber(s) are used as comparison criteria. When the characteristics and optical properties of a recovered fiber(s) are the same as a known sample, the recovered fibers are consistent with originating from the source of the known sample, or from another item comprised of fibers that exhibit the same microscopic characteristics and optical properties. A fiber association is not a means of positive identification and the number of possible sources for a specific fiber is unknown. However, due to the variability in manufacturing, dyeing, and consumer use, one would not expect to encounter a fiber selected at random to be consistent with a particular item.

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Remarks:

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The work described in this report was conducted at the Quantico Laboratory.

Karen K. Lowe
Trace Evidence Unit

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