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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 No. CR01-24-31665
Defendant's Objections to the
SEALED
STATE'S JURY
QUESTIONNAIRE PROPOSALS

COMES NOW the State of Idaho, by and through the Latah County Prosecuting Attorney, and pursuant to the Court's October 9, 2024, Scheduling Order, submit the following proposals for a jury questionnaire.

The State acknowledges and appreciates the Court providing us with a draft Jury Questionnaire. The Court's draft, in fact, parallels closely with the draft questionnaire the State had separately been developing. It is the State's proposal that the Court use its draft questionnaire with the following additions or changes:

1. In "PART I. GENERAL BACKGROUND" the State proposes that the Court add the following questions:

- a. What is your race or ethnic group? _____
- b. ~~Please list any civic, political, social, religious or charitable organizations to which you belong. This is covered in #15 of Court's proposed and Defendant's Proposed.~~ _____
- c. Do you have any bumper stickers or decals affixed to your vehicles?
Yes _____ No _____
If "yes," please describe: _____
- d. What type of books do you read? _____
- e. What is the last book you have read or are currently reading? _____
- f. Please state hobbies and major recreational activities which are most important to you? _____

2. In "PART III. EDUCATION" the State proposes that the Court add the following:

- a. Have you or anyone close to you had any experience, training, or involvement in the following areas: (CHECK THOSE THAT APPLY).

	SELF	FAMILY	FRIEND	NO
Police/law enforcement	_____	_____	_____	_____
Court system	_____	_____	_____	_____
Coroner's office	_____	_____	_____	_____
Psychology/mental health	_____	_____	_____	_____
Medicine	_____	_____	_____	_____
Medical research or testing facility	_____	_____	_____	_____

If "yes," please explain the experience or involvement for all areas selected.

- b. If you have ever had any training or education in law, please describe what kind of training or education you have had: _____
- c. If you have any relatives or close friends who have had any training or education in law, what is your relationship to that person? _____
- d. How often do you talk to that person about things that relate to law? _____

e. What is that person's occupation and where does he/she work? _____

3. In "PART IV. GENERAL ATTITUDES AND KNOWLEDGE OF THE LAW" the State proposes that the Court add the following:

- a. The Defendant, victims or witnesses may come from a different racial, ethnic, cultural or social background than you. Would this if true affect your decision making as a juror in this case? Yes ___ No ___

If yes, please explain: _____

- b. Have you, or any member of your family, or close friend, ever been involved in a lawsuit? Yes ___ No ___

If yes, please describe the nature of the lawsuit, your role and its outcome: _____

- c. Have you, or any member of your family, or close friend ever been witness in a court case? Yes _____ No ___

Please describe your experience being a witness: _____

- d. Which best describes how you behave when you believe you were correct about something? (Check One).

_____ Always hold my ground
_____ Generally hold my ground
_____ Generally hold my ground, but can be swayed by forceful arguments
_____ Generally am swayed by others
_____ Almost always am swayed by others

- e. The State would recommend that the following be included in 43:

Was there anything in your prior jury experience that upset or bothered you to the extent that jury service was an unsatisfactory experience? Yes ___ No ___

If yes, please describe: _____

- f. In recent years, Idaho's Legislature revised its law on procedures to be used in invoking the death penalty and how death penalties may be carried out.

What, if anything, are you aware of regarding the Legislature's actions? _____

What are your personal feelings, if any, regarding the Legislature's revisions? _____

The State would also suggest that the Court consider substituting the following for question 61 appearing on page 16 of the Court's draft:

(61). Have you ever discussed this case with anyone? Yes _____ No _____

If "yes," who did you discuss it with? _____

What did you say? _____

What did they say? _____

Was there any discussion about the guilt or innocence of Bryan Christopher Kohberger? Yes _____ No _____

If yes, what was said? _____

~~In addition to the above suggestions for inclusion, the State would also suggest that the Court consider adding Dylan Mortensen and Bethany Funke to the list of victims appearing under item 54 at page 14 since they are victims of the burglary charge.~~

~~With Ms. Batey's departure from the Attorney General's Office, the State is in the process of identifying additional counsel to assist with trial. We anticipate that will be accomplished by the first of next month and we will be able to apprise Court and Counsel at that point.~~

In sum, the State concurs with far and away the majority of the Court's proposed jury questionnaire and respectfully submits the above suggestions and recommendations for the Court's consideration.

RESPECTFULLY SUBMITTED this 24th day of March 2025.

A handwritten signature in black ink, appearing to read 'W. Thompson, Jr.', written over a horizontal line.

William W. Thompson, Jr.
Prosecuting Attorney

CERTIFICATE OF DELIVERY

I hereby certify that true and correct copies of the STATE'S JURY QUESTIONNAIRE

PROPOSALS were served on the following in the manner indicated below:

Anne Taylor
Attorney at Law
PO Box 2347
Coeur D Alene, ID 83816

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

Dated this 24th day of March 2025.


