

Anne Taylor Law, PLLC
Anne C. Taylor, Attorney at Law
PO Box 2347
Coeur d'Alene, Idaho 83816
Phone: (208) 512-9611
iCourt Email: info@annetaylorlaw.com

Elisa G. Massoth, PLLC
Attorney at Law
P.O. Box 1003
Payette, Idaho 83661
Phone: (208) 642-3797; Fax: (208)642-3799

Bicka Barlow
Pro Hac Vice
2358 Market Street
San Francisco, CA 94114
Phone: (415) 553-4110

Assigned Attorney:

Anne C. Taylor, Attorney at Law, Bar Number: 5836
Elisa G. Massoth, Attorney at Law, Bar Number: 5647
Bicka Barlow, Attorney at Law, CA Bar Number: 178723
Jay W. Logsdon, First District Public Defender, Bar Number: 8759

**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

**2nd NOTICE OF FILING DEFENDANT'S
ADDITIONS/OBJECTIONS TO THE
JUROR QUESTIONNAIRE UNDER
SEAL**

COMES NOW, Bryan C. Kohberger, by and through his attorneys of record, and hereby submits to the Court the Defendant's additional objections and additions to the Jury Questionnaire received in court on June 18th, 2025.

V. ATTITUDE REGARDING THE DEATH PENALTY

- Question 50, the Defense requests that the question include the below additional language:

“If the defendant is found guilty of first-degree murder, it is possible that the jury will have to decide whether or not to impose **life without parole or** the death penalty. Before the jury....”

- Question 53, the Defense requests that the question include the below additional language in section d. and g.

“d. While I generally favor the death penalty, I can vote against imposing it if the State has not met its burden of proof that the death penalty should be imposed based on the facts, **or if mitigating evidence presented convinces me life without parole is appropriate**, law, and Judge’s instructions given in the case.”

“g. While I generally oppose the death penalty, I can vote to impose it if the State has met its burden of proof that the death penalty should be imposed based on the facts, **no mitigating evidence convinces me life without parole is appropriate**, law and Judge’s instructions given in the case.”

- Question 55, the Defense requests that the question include the following additional attorneys:

- Ingrid Batey
- Madison Allen

- Question 61, the Defense objects - The coverage of this case has been pervasive. It is in the media every day. There has been a lot of misinformation throughout the pendency and any prospective juror that has read, heard or watched the coverage cannot set aside what they have read, seen or heard. Bias runs deep and strong depending on many potential connections to the case or to stories read seen or heard. The change of venue was granted for this reason.

- Question 62, the Defense requests that the question be reworded to include the below additional language:

“If you do not hear evidence during trial matching what you have heard from media or other sources prior to the trial (or hear evidence that differs from what you heard from sources outside of trial), **how will that impact the evidence presented during trial when deciding about the case as a juror?**”

DATED this 27 day of June, 2025.



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 27 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


