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Counsel for the State of Idaho

DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT TETON COUNTY, STATE OF IDAHO

STATE OF IDAHO,
Plaintiff,
v.

JEREMY ALBERT BEST,

Defendant.

INDICTMENT

The Grand Jury of Teton County, by this indictment, charges:

COUNT I MURDER IN THE FIRST DEGREE Felony, Idaho Code §§ 18-4001; 4002; 4003(a); 4004

The Defendant, Jeremy Albert Best, on or about November 30, 2023, in Teton County, Idaho, did willfully, unlawfully, deliberately, with premeditation and with malice aforethought, kill Kali Jean Best, a human being, by shooting her with a firearm and causing her death.

COUNT II MURDER IN THE FIRST DEGREE Felony, Idaho Code §§ 18-4001; 4002; 4003(a); 4004

The Defendant, Jeremy Albert Best, on or about November 30, 2023, in Teton County, Idaho, did willfully, unlawfully, deliberately, with premeditation and with

malice aforethought, kill a human fetus carried by Kali Jean Best by shooting Kali Jean Best with a firearm and causing her death, and thereby causing the fetus's death.

COUNT III MURDER IN THE FIRST DEGREE Felony, Idaho Code §§ 18-4001; 4002; 4003(a), (d); 4004

The Defendant, Jeremy Albert Best, on or about November 30 to December 2, 2023, in Bonneville County, Idaho and/or elsewhere including Teton County, Idaho, and as part of a continuing criminal transaction and/or common scheme or plan in Teton and/or Bonneville Counties in Idaho, did willfully, unlawfully, deliberately, with premeditation and with malice aforethought, and/or in the perpetration of or attempt to perpetrate an aggravated battery on a child under twelve (12) years of age, kill Zeke Gregory Best, a human being under one (1) year of age, by inflicting an injury on Zeke Gregory Best's neck using a knife and thereby causing his death.

COUNT I, PART II USE OF A FIREARM OR OTHER DEADLY WEAPON DURING THE COMMISSION A CRIME Enhancement, Idaho Code § 19-2520

The Defendant, Jeremy Albert Best, on or about November 30, 2023, in Teton County, Idaho, did use or attempt to use a firearm or other deadly weapon in the commission of the crime alleged in Count I.

COUNT II, PART II USE OF A FIREARM OR OTHER DEADLY WEAPON DURING THE COMMISSION A CRIME Enhancement, Idaho Code § 19-2520

The Defendant, Jeremy Albert Best, on or about November 30, 2023, in Teton

County, Idaho, did use or attempt to use a firearm or other deadly weapon in the

commission of the crime alleged in Count II.

COUNT III, PART II USE OF A FIREARM OR OTHER DEADLY WEAPON DURING THE COMMISSION A CRIME

Enhancement, Idaho Code § 19-2520

The Defendant, Jeremy Albert Best, on or about November 30 to December 2,

2023, in Bonneville County, Idaho and/or elsewhere including Teton County, Idaho,

and as part of a continuing criminal transaction and/or common scheme or plan in

Teton and/or Bonneville Counties in Idaho, did use or attempt to use a deadly weapon

in the commission of the crime alleged in Count III.

Dated: December 18, 2023

BY THE GRAND JURY

WITNESSES:

Kaden Moulton

Timothy Auchampach Robert Christensen Bridger Smith

Beau Godfrey Jeffrey Jacobson Kendra Powell Jason Stewart Michael Cox Garth Warren