



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

/s/ \_\_\_\_\_  
The Presiding Juror

WITNESSES:

Kaden Moulton  
Timothy Auchampach  
Robert Christensen  
Bridger Smith  
Beau Godfrey  
Jeffrey Jacobson  
Kendra Powell  
Jason Stewart  
Michael Cox  
Garth Warren