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

STATE OF IDAHO, Plaintiff, v. JEREMY ALBERT BEST, Defendant.	Case No. CR41-23-0877 AMENDED CRIMINAL COMPLAINT
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Pursuant to Idaho Criminal Rule 3 and the sworn declaration submitted herewith, the Office of the Teton County Prosecuting Attorney complains against Defendant Jeremy Albert Best as follows:

COUNT I
MURDER IN THE FIRST DEGREE
Felony, Idaho Code § 18-4001; 4002; 4003; 4004
Penalty: 10 years-Life or Death and \$50,000 fine

That the Defendant, Jeremy Albert Best, on or about November 30, 2023, in the County of Teton, State of Idaho, did willfully, unlawfully, deliberately, with premeditation and malice aforethought and without legal justification, kill Mrs. Kali Randall Best, a human being, by shooting her in the back and/or right breast and/or right side and causing her death.

COUNT II
MURDER IN THE FIRST DEGREE
Felony, Idaho Code § 18-4001; 4002; 4003; 4004
Penalty: 10 years-Life or Death and \$50,000 fine

That the Defendant, Jeremy Albert Best, on or about November 30, 2023, in the County of Teton, State of Idaho, did willfully, unlawfully, deliberately, with premeditation and malice aforethought and without legal justification, kill a human fetus carried by Mrs. Kali Randall Best by shooting Mrs. Best and causing the fetus's death.

COUNT III
USE OF A FIREARM DURING THE COMMISSION OF A CRIME
Enhancement, Idaho Code § 19-2520
Penalty: Additional 15 years

That the Defendant, Jeremy Albert Best, on or about November 30, 2023, in the County of Teton, State of Idaho, did use a firearm in the commission of the crimes alleged in Counts I and II.

Dated: December 4, 2023.

OFFICE OF THE TETON COUNTY
PROSECUTING ATTORNEY

/s/ Bailey Smith
By: Bailey A. Smith
Lauretta Y. Welch

Counsel for the State of Idaho

Submitted and accepted for filing before me.

BY THE COURT

Jason D. Walker
Magistrate Judge