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

STATE OF IDAHO, Plaintiff, v. JEREMY ALBERT BEST, Defendant.	Case No. CR41-23-0877 INDICTMENT
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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

/s/ _____
The Presiding Juror