

DEFENDANT'S SECOND RESPONSE TO STATE'S FIRST SUPPLEMENTAL REQUEST FOR DISCOVERY: RESPONSES TO STATE'S EXHIBIT S-1 (bates 013646-014065)

I. Records from the Forensic Psychiatric Evaluation by Dr. Eileen Ryan

1. All written reports, handwritten or typed notes, scoring sheets, behavioral observations, and psychological data collected during the in-person forensic psychiatric evaluation of Bryan Kohberger on October 20–22, 2024 and January 2–4, 2025 at the Ada County Jail.

Mr. Kohberger produces notes written by Dr. Eileen Ryan throughout her evaluation process of Bryan Kohberger.

2. All documentation and materials (audio/video, notes, summaries) from the group/family evaluation conducted on November 29, 2024, with:
 - a. Michael Kohberger (father)
 - b. Mary Ann Kohberger (mother)
 - c. Amanda Kohberger (sister)

There were no evaluations of family members, however Mr. Kohberger produces notes from the meetings.

3. In-person individual evaluations:
 - a. Mary Ann Kohberger on November 30, 2024
 - b. Amanda Kohberger on November 30, 2024
 - c. Melissa Kohberger on November 30, 2024

There were no individual evaluations, however Mr. Kohberger produces notes from the meetings.

4. Phone and video interviews:
 - a. Mary Ann Kohberger (January 12, 2025 – follow-up call)
 - b. Alison Ackerman (January 7, 2025 – Zoom)
 - c. Ellen Trexler (January 9, 2025 – phone)
 - d. Dr. Ellen Novik-Cohen (January 11, 2025 – FaceTime)

Mr. Kohberger supplies interview notes from the meetings.

5. All investigative materials relied upon, including:
 - a. Audio/video recordings
 - b. Bryan Kohberger's educational and medical/mental health records
 - c. Any other third-party documents relied upon during the evaluation

Materials relied upon were provided in discovery to the State on January 9, 2025.

II. Neuropsychological Evaluation Materials— Rachel Orr, PsyD, ABPP-CN

1. All raw data, protocols, and response forms, including score sheets (handwritten or computer-generated), examiner notes, and behavioral observations for the following assessments:
 - a. WAIS-5 – Subtests Administered:
 - i. Similarities, Vocabulary, Information, Comprehension
 - ii. Block Design, Visual Puzzles, Matrix Reasoning, Figure Weights
 - iii. Digit Sequencing, Running Digits, Digit Span Forward/Backward, Symbol Span
 - b. WRAT-5 – Subtests:
 - i. Word Reading, Sentence Comprehension
 - c. Additional Tests:
 - i. Controlled Oral Word Association Test (COWAT)
 - ii. Stroop Color and Word Test
 - iii. Wisconsin Card Sorting Test (WCST)
 - iv. Tower of London, 2nd Ed.
 - d. Trails X
 - i. Conners Continuous Performance Test (CPT-3)
 - ii. Iowa Gambling Task (IGT-2)
 - iii. D-KEFS (Trail Making and other specified subtests)
 - iv. California Verbal Learning Test, 3rd Ed. (CVLT-3)
 - v. TOMAL-2
 - vi. DTVP-A-2 and Identifi (Visual Organization and Recognition)
 - vii. Grooved Pegboard Test
 - viii. Autism Diagnostic Observation Schedule, 2nd Ed., Module 4 (ADOS-2)
TOMM

Per stipulation Dr. Orr will transfer testing data directly to the State's expert upon receipt of identification and transfer protocol.

2. All scoring reports, percentiles, scaled scores, and norm references used in interpretation:
 - a. Rating Scales and Inventories – Completed Forms and Scores:
 - i. Beck Anxiety Inventory (BAI)
 - ii. Beck Depression Inventory-2 (BDI-2)
 - iii. Behavior Rating Inventory of Executive Function, Adult (BRIEF-2A)
 - iv. Conners Adult ADHD Rating Scales (CAARS-2)
 - v. Social Responsiveness Scale (SRS-2)
 - vi. Adaptive Behavior Assessment System (ABAS-3)
 - vii. Autism Diagnostic Interview – Revised (ADI-R)

Per stipulation Dr. Orr will transfer testing data directly to the State's expert upon receipt of identification and transfer protocol.

3. The original completed forms, observer/informant names, scoring data, and interpretation manuals or computer-generated results where applicable.
 - a. Interview Documentation:
 - i. Examiner's handwritten and typed notes
 - ii. All recordings of interviews (in-person, phone, Zoom, FaceTime)
 - iii. Documentation of the dates, locations, and durations of all interviews with the defendant and collateral sources

Interview notes are disclosed herein. No testing data otherwise exists, other than as disclosed in requests 1 and 2 above.

4. All materials used to form the basis of clinical opinions or conclusions.

All materials relied upon to for the basis of opinion and conclusion is disclosed through disclosure of testing data and interview notes. All other materials were disclosed in Defendant's discovery response on January 9, 2025 or discovery materials supplied by the State and noted in Dr. Orr's written reports.

5. Any Interpretive guides, scoring software output, or standardized references consulted.

The interpretive guides and scoring software output are subject to copyright and not reproducible. They are available for purchase directly from the test publishers for qualified professionals. The request for standardized references is a very general request as Dr. Orr regularly consults a wide range of resources, including medical journals and reference books and other resources to maintain competence as a board-certified neuropsychologist. She did include a sample of references within her report.