

Declarations of Idaho Victims in Support of their
Applications for Restraining Order to Prevent
Continued Release of Law Enforcement Records
Regarding the Murders

Declaration of Karen Laramie,
Mother of Maddie Mogen

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IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT
OF THE STATE OF IDAHO IN AND FOR THE COUNTY OF LATAH

KAREN LARAMIE

Plaintiff,

vs.

the CITY OF MOSCOW, a municipal
corporation,

Defendant.

Case No. CV29-25-0755

DECLARATION IN SUPPORT OF MOTION
FOR TEMPORARY RESTRAINING ORDER

I, Karen Laramie declare as follows:

1. I am over the age of 18, and I am competent to testify to the matters set forth herein.
2. My testimony herein is based upon my personal knowledge.
3. I am the natural parent of Maddison Mogen (hereafter Maddie). Maddie, Kaylee Goncalves, Xana Kernodle and Eathan Chapin (Children) were stabbed to death by Bryan Kohberger (Kohberger) on November 13, 2022, in the house where Maddie, Kaylee, Xana resided, 1122 King Road in Moscow, Idaho.
4. Kohberger has admitted to stabbing the four Children..
5. Upon information and belief, the Defendant, the City of Moscow, is in the process of releasing images and video media related to the police investigation of the death and homicide of

the Children to third parties in response to a request for examination of public records pursuant to the Idaho Public Records Act.

6. Upon information and belief, the information being released contains images and video media showing events surrounding the investigation. Upon information and belief, these images were taken in furtherance of the homicide investigation related to the victims of Brian Kohberger.

7. Upon information and belief, the images being released include but are not limited to:

7.1. Images of the interior of Maddie's residence around the time the Children were killed;

7.2. Images including the scenes of the murders, pools of blood, blood platters, dried blood and personal items and property of Maddie, the descendants and her roommates, including containers of alcohol, underwear, ID cards and other personal items;

7.3. Images of the witnesses; and

7.4. Video media containing sounds of the witnesses, including sobbing and their statement to law enforcement officials.

8. The City has indicated through its attorney that it has released some of these images to a news outlet and intends to continue releasing these images and video media (including body camera footage) to numerous others.

9. I am experiencing extreme emotional distress with physical manifestations because the City has released some of these images and intends to release others and video media.

10. The City's release of the images and video media is an invasion of my privacy and the privacy of my deceased daughter; it is causing me irreparable harm in the form of severe emotional damage.

11. The City's continued release of these images and video media will cause me further extreme emotional distress, embarrassment, and irreparable harm.

I HEREBY CERTIFY AND DECLARE, under penalty of perjury pursuant to the laws of the State of Idaho, that the foregoing is true and correct.

DATED this 12 day of August, 2025.



KAREN LARAMIE

Declaration of Stacy Chapin,
Mother of Ethan Chapin

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Attorneys for Plaintiffs

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT
OF THE STATE OF IDAHO IN AND FOR THE COUNTY OF LATAH

KAREN LARAMIE, an individual; STACY
CHAPIN, an individual; JAMES CHAPIN,
an individual; and MAIZIE CHAPIN, an
individual,

Plaintiffs,

vs.

The CITY OF MOSCOW, a municipal
corporation,

Defendant.

Case No. CV29-25-0755

AMENDED DECLARATION OF STACY
CHAPIN IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER AND
INJUNCTION

I, Stacy Chapin, declare as follows:

1. I am over the age of 18 and competent to testify to the matters set forth herein. My testimony is based upon my personal knowledge.
2. I am the natural mother of Ethan Chapin (hereafter “Ethan”). Ethan, Maddie Mogen, Kaylee Goncalves, and Xana Kernodle (Children) were stabbed to death by Bryan Kohberger (Kohberger) on November 13, 2022, in the house where

Maddie, Kaylee, and Xana resided and Ethan was visiting, 1122 King Road in Moscow, Idaho.

3. Kohberger has admitted to stabbing the four Children.
4. Upon information and belief, the Defendant, the City of Moscow, has released and is in the process of releasing still images and body camera footage (video media) related to the police investigation of the homicide of the Children to third parties in response to requests for examination of public records pursuant to Idaho Code § 74-103.
5. Upon information and belief, the images being released include but are not limited to:
 - 5.1 Images of the interior of the private room where Ethan was murdered;
 - 5.2 Death scene images of the scenes of the murders, the victims, pools of blood, blood platters, dried blood and personal items and property of Ethan and the other Children;
 - 5.3 Images of the witnesses; and
 - 5.4 Video media containing sounds of the witnesses, including sobbing and their statement to law enforcement officials.
6. The release of the death scene images is horrific - made worse by the fact that my husband and I inadvertently came upon them with no notice. In one of the photographs, I recognize what I believe are my son's feet in socks. We saw a death scene photograph online on August 7, 2025, and we received our first email regarding the release of information on August 8, 2025. The email came from the prosecutor's office - not the City of Moscow attorney. We are personally haunted

by the photos and lose sleep nightly due to viewing them. We assure you that seeing a redacted photo is just as traumatizing because our son is still in the picture, clear or not. They are heartbreaking and continue to reopen a wound that has yet to heal.

7. The idea that the City of Moscow may release more of the death scene photos of the Children is extremely traumatizing to me and my husband. We now live in fear that these will be released to the World for everyone to see. Some of the media, bloggers and others in this case have shown that they will use images like death scenes for their own financial gain with no regard to the damage it does to family members.
8. In addition to those who will misuse these images, my husband and I are faced with the horrific reality that our son's murderer, Mr. Kohberger, can see these images online.
9. The images are not just photographs and body camera footage – they are painful reminders of our son's life taken too soon, a profound loss, and final moments which we have spent years trying to avoid in our minds. As a result of the released photos, we now have pictures in our minds – ones that we are unable to escape - and desperately do not want lingering in our memory. Releasing more of these death scene images of the Children will increase our pain and loss. Even the thought of releasing more of these images is damaging us.
10. Every single time anything is released regarding this murder case, the uptick in news articles, media requests and comments that keep this case top of the news is

just another kick in the gut that our son is no longer with us. It disrupts any peace that we may have found and sends us back to a dark place.

11. The thought that these images may be released, and some have been released, causes me, my husband and children psychological pain and anxiety, with physical manifestations, including serious sleep disturbances. We spend most nights trying to push the images out of our minds. No one should have access to these images. Releasing them is an unwarranted invasion of our privacy and into our lives; the images are graphic in nature and cause tremendous pain and sadness. We are at a loss for understanding why anyone would release them, let alone feel the need to look at them. Losing Ethan is a catastrophic loss to our family, and the photos are a gross reminder of that loss.
12. Any reasonable parent faced with the prospect of death scene images of their child being released to the world would fight to prevent their release because releasing these images is an unwarranted invasion of the parents' privacy. They are profoundly gruesome.
13. To the best of my knowledge, all of the parents and family members of the Children are against the release of death scene images of the Children because of the emotional trauma it will cause them. Unfortunately, some do not have the legal help we have from an attorney to voice their objection legally. But they are against releasing these images.
14. As for our other two children, they had not seen any death scene image until Maizie saw one on August 8, 2025. They worry and are anxious that the images may pop up online and cause them to have to live with those grotesque images

within their memory, and now one has with Maizie. That is tragic. I had hoped (more than anything) that they would not see them or view them online. The fear of seeing these images has caused them extreme anxiety in their everyday lives. It brings back memories of an incredible triplet life with a brother who is no longer here. Even the thought of crime scene photos being released or being on the internet takes us all back to that day of horror. It is a tremendous and heartbreaking loss for our family to live in fear, worry and sickness that we will inadvertently see death scene photos of Ethan and any of the Children. Just the words alone - death scene photos - cause emotional distress.

15. We lose sleep worrying that Maizie and Hunter (Ethan's surviving triplet siblings) will see more of these images. We can't imagine what it would be like for them - kids who have spent their entire lives together - to endure the gruesome images of their triplet brother during his final days alive. It is a parent's worst nightmare for their children who have already suffered unimaginable loss and emotional pain.
16. We are experiencing extreme emotional distress with physical manifestations because the City has released some of these images and intends to release others, including the body camera footage.
17. Releasing these images and video media is an unwarranted invasion of my privacy and the privacy of my husband, Ethan's siblings, our family, and my deceased son. Most importantly, I need to speak up for my son because he no longer has a voice.

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Declaration of Maizie Chapin,
Sister (Triplet) of Ethan Chapin

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Attorneys for Plaintiffs

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT
OF THE STATE OF IDAHO IN AND FOR THE COUNTY OF LATAH

KAREN LARAMIE, an individual; SCOTT LARAMIE, an individual; STACY CHAPIN, an individual; JAMES CHAPIN, an individual; and MAIZIE CHAPIN, an individual,

Plaintiffs,

vs.

the CITY OF MOSCOW, a municipal corporation,

Defendant.

Case No. CV29-25-0755

AMENDED DECLARATION OF MAIZIE CHAPIN IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER AND INJUNCTION

I, Maizie Chapin, declare as follows:

1. I am over the age of 18 and competent to testify to the matters set forth herein. My testimony is based upon my personal knowledge.
2. I am the biological triplet sibling of Ethan Chapin (hereafter "Ethan"). Ethan, Maddie Mogen, Kaylee Goncalves, and Xana Kernodle (Victims) were stabbed to

death by Bryan Kohberger (Kohberger) on November 13, 2022, in the house where Maddie, Kaylee, and Xana resided and Ethan was visiting, 1122 King Road in Moscow, Idaho.

3. Kohberger has admitted to stabbing the four Victims.
4. Upon information and belief, the Defendant, the City of Moscow, has released and is in the process of releasing still images and body camera footage (video media) related to the police investigation of the homicide of the Victims to third parties in response to requests for examination of public records under Idaho's Freedom Information Act law.
5. Upon information and belief, the images being released include but are not limited to:
 - 5.1 Images of the interior of the private room where Ethan was murdered;
 - 5.2 Death scene images of the scenes of the murders, the victims, pools of blood, blood platters, dried blood and personal items and property of Ethan and the other Children;
 - 5.3 Images of the witnesses; and
 - 5.4 Video media containing sounds of the witnesses, including sobbing and their statement to law enforcement officials.
6. The release of the death scene images is horrific - made worse by the fact that my mom inadvertently came across an investigation photo on the internet and recognized what she believes are the feet (in socks) of my deceased brother, Ethan.
7. I am personally haunted by the photos and lose sleep nightly, wondering what will show up on my computer and iPhone. A redacted photo is just as traumatizing

because my brother is still in the picture, clear or not. It is devastating to me, and continues to reopen a wound that has yet to heal.

8. Once these images, including images of the bedrooms (death scene images), are released to the public, they are published, republished and circulated on the Internet, causing me actual, threatened and ongoing irreparable harm in the form of extreme emotional distress with physical manifestations, including shaking, sobbing and sleeplessness. I see and resee that released death scene image over and over in my mind, which causes me continuing profound emotional injury. I will never be able to get that image out of my mind. I now live in constant fear that I will inadvertently encounter more of these images and have them forever imprinted on my mind.
9. Ethan and I were supposed to graduate together. Now, instead of graduation photos, I see photos of his death scene. The fact that some of these photos have been released, and more may be released, is devastating to me and causes me ongoing great harm.
10. The idea that the City of Moscow may release more of the death scene photos of the Victims is extremely traumatizing to me. I now live in fear that these will be released to the World for everyone to see. Some of the media, bloggers and others in this case have shown that they will use images like death scenes for their own financial gain with no regard to the damage it does to me and my family members.
11. In addition to those who will misuse these images, I think about Mr. Kohberger seeing these images online. The prospect that these images may be seen by my

brother's murderer, and perhaps enjoyed by him, causes me irreparable and great injury of the most profound kind.

12. The images are not just photographs and body camera footage – they are painful reminders of my brother's life taken too soon, a profound loss, and final moments, which I have tried not to think about. Releasing more of these death scene images of the Victims will increase my pain and loss. Even the thought of releasing more of these images is greatly damaging and injurious to me.
13. I struggle to deal with the loss of my triplet brother. There were always three of us. Now there are only two. That reality has caused me a deep emotional wound. The City's release of images of the crime scene and the death scene greatly opened that wound further. Continued release of these images will open the wound yet further, irreparably injuring me.
14. Every single time anything is released regarding this murder case, the uptick in news articles, media requests and comments that keep this case top of the news is unbearable. I can no longer sleep.
15. The thought that these images may be released, and some have already been released, causes me psychological pain and anxiety, with physical manifestations, including shaking, sobbing and serious sleep disturbances. I spend most nights trying to push the images out of our minds. No one should have access to these images. Releasing them is an unwarranted invasion of my privacy and into the lives of my family; the images are graphic and cause tremendous pain and sadness. I am at a loss for understanding why anyone would release them, let alone

feel the need to look at them. Losing my brother, my triplet, is a catastrophic loss to our entire family, and the photos are a gross reminder of that loss.

16. To the best of my knowledge, all of the parents and family members of the Victims are against the release of death scene images of the Victims because of the great emotional trauma and harm the release of the images has and will cause them.
17. The fear of seeing these images online has caused me extreme anxiety in everyday life. It brings back memories of an incredible triplet life with a brother who is no longer here. Even the thought of crime scene photos being released or being on the internet takes me back to that day of horror. It is a tremendous and heartbreaking loss for me and my family to live in fear, worry and sickness that we will inadvertently see death scene photos of Ethan and other Victims. Just the words alone - death scene photos - cause me emotional distress.
18. I worry that Hunter (my other surviving triplet sibling) will see more of these images. I do not want Hunter, nor myself, to endure the gruesome images of our triplet brother during his final days alive, because seeing them will cause irreparable, great, permanent harm.
19. I witnessed Hunter's great and irreparable emotional injury upon learning that some of the images of the crime scene and death scene had been released, and more may be released. He visibly expressed great agitation, sadness, fear and anguish. He was so emotionally damaged that he has been unable to speak out or join this lawsuit.
20. My family and I are experiencing extreme emotional distress with physical manifestations because the City has released some of these images and intends to

