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Attorney for Defendant

**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF FREMONT**


STATE OF IDAHO,)	
)	CASE NO. CR22-20-0755
Plaintiff,)	CR20-22-20-0838
)	
vs.)	DECLARATION OF COUNSEL
)	FOR CHAD DAYBELL IN
CHAD GUY DAYBELL)	RESPONSE TO MOTIONS
LOR NORENE VALLOW)	
)	
Defendant.)	
)	

COMES NOW the above name defendant, CHAD GUY DAYBELL by and through his attorney of record, JOHN PRIOR, and I make this declaration in response to Defendant Lori Vallow's motions set before this court on February 17, 2021.

1. I am the attorney for Chad Daybell, one of the defendant's in the above-entitled action. I make this declaration based upon my own personal knowledge and belief.
2. That my client is currently being held in the Fremont County Jail. That there has not been a single issue with the Fremont County Jail or their staff as it relates to visitation or treatment of my client in the Fremont County Jail.

3. That given the tremendous amount of local exposure given this case, the Fremont County Jail deputies, and the entire staff, have responded immediately to any question I might have and have conducted themselves as exemplary professionals. Their exemplary conduct and professionalism have been consistent throughout the entire process so far.
4. That as it relates to Mr. Daybell, I have not had a single incident of any type and have not had the same experience that Mr. Means has apparently had with Madison County.
5. As provided by Idaho Code Section 9-1406, I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 12th day of February 2021.



JOHN PRIOR
Attorney for Defendant Chad Guy Daybell

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered to the Fremont County Special Prosecuting Attorney by email to mcpo.madison.id.us and to Mark Means counsel for Lori Norene Vallow at mlm@means-law.com

DATED 12th of February 2021



JOHN PRIOR
Attorney for Defendant Chad Guy Daybell