

Lindsey A. Blake, ISB #7920  
Rob H. Wood, ISB #8229  
OFFICE OF THE FREMONT COUNTY  
PROSECUTING ATTORNEY  
22 W. 1<sup>st</sup> N.  
St. Anthony, ID 83445  
Tel: 208-624-4418  
Email: [prosecutor@co.fremont.id.us](mailto:prosecutor@co.fremont.id.us)

*Attorneys for the State*

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

<p>STATE OF IDAHO,                      Plaintiff,  vs.  CHAD GUY DAYBELL,                      Defendant.</p>	<p><b>CASE NO. CR22-21-1623</b>  <b>STATE’S MOTION IN LIMINE ON MENTAL HEALTH EVIDENCE</b></p>
--	--

The State of Idaho, by and through the Fremont County Prosecuting Attorney’s Office, submits the following Motion in Limine on Any Potential Mental Health Evidence related to Defendant Daybell’s Mental Health at the time of the crimes based on his waiver of the potential defense pursuant to Idaho Code §18-207.

The State respectfully requests any potential evidence of the Defendant’s mental health at the time of the commission of the crimes and/or any expert witness regarding such be excluded.

DATED this 26th day of January 2023.

/s/Rob H. Wood  
Rob H. Wood  
Prosecuting Attorney

/s/Lindsey A. Blake  
Lindsey A. Blake  
Prosecuting Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of January, 2023, that a copy of the foregoing document was served as follows:

Jim Archibald  
1493 North 1070 East  
Shelley, Idaho 83274  
[jimarchibald@gmail.com](mailto:jimarchibald@gmail.com)

- U.S. First Class Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & serve

John Thomas  
Bonneville County Public Defenders  
605 North Capital Ave.  
Idaho Falls, Idaho 83402  
[jthomasserve@co.bonneville.id.us](mailto:jthomasserve@co.bonneville.id.us)

- U.S. First Class Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & serve

John Prior  
Law Office of John Prior  
429 SW 5th Street, Ste. 110  
Meridian, Idaho 83462  
[john@jpriorlaw.com](mailto:john@jpriorlaw.com)

- U.S. First Class Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & serve

/s/Lindsey A. Blake

---