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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**

STATE OF IDAHO, Plaintiff, vs. CHAD GUY DAYBELL, Defendants.	Case No.: CR22-21-1623 THIRTEENTH SUPPLEMENTAL DISCOVERY DISCLOSURE
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COMES NOW, The State of Idaho, by and through the Fremont County Prosecuting Attorney's Office and pursuant to Idaho Criminal Rule 16, hereby notifies the Defendant of the following:

4) DOCUMENTS AND TANGIBLE OBJECTS

- a) Defense counsel can inspect and copy or photograph the items or material described in Idaho Criminal Rule 16(b)(4) by simply making prior arrangements with the Madison County Prosecutor's Office or the Law Enforcement Agency holding such items or evidence;
- b) In addition to the above, the State may also utilize the following as evidence at the trial. All of which has either previously been provided or is attached hereto:
 - Please see the Attached Addendum A7;

Further, while there has never been a specific request from the Defendant, and while they

are not items specifically referenced by ICR 16, the State wanted to remind counsel that all jail calls are recorded, and if counsel would like to review any of those calls, arrangements can be made. To clarify, any jail calls which the State intends to introduce in evidence have previously been provided to Defense.

Additionally, there are some in person visits which have been retained by the Fremont County Sheriff's Office; however, those visits are not automatically saved or recorded. While these have never been specifically requested, and are not required pursuant to IRC 16, if Defense would like to review any or those, they will be made available.

Finally, there have also been a few individuals who have contacted the prosecutor's offices claiming to have information regarding the case and/or threatening the prosecutors, these have been determined to have no evidentiary value; however, while not required under ICR 16, if the Defense would like to review any of these, they can be made available.

DATED this 27th day of February, 2023.

/s/ Lindsey A. Blake
Lindsey A. Blake
Prosecuting Attorney for Fremont County

/s/ Rob H. Wood
Rob H. Wood
Prosecuting Attorney for Madison County

CERTIFICATE

I HEREBY CERTIFY that on this 27th day of February, 2023, that a copy of the foregoing THIRTEENTH SUPPLEMENTAL DISCOVERY DISCLOSURE was served as follows:

R. James Archibald
Jimarchibald21@gmail.com

- U.S. Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & Serve
- Email

John Kenneth Thomas
jthomasserve@co.bonneville.id.us

- U.S. Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & Serve
- Email

John Prior
john@jpriorlaw.com

- U.S. Mail – Overnight Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & Serve
- Email

By: /s/ Jodi L. Thurber