

Lori A.G. Hellis
54.419.6647
Lori.hellis@gmail.com

**State of Idaho
County of Fremont**

IN THE MATTER OF

State v. Chad Guy Daybell
State v. Lori Norene Vallow NKA Daybell

Case Number CR22-21-1623
Case Number CR22-21-1624

**DECLARATION IN SUPPORT OF
MOTION TO INTERVENE and
MOTION TO UNSEAL AND
MOTION FOR INJUNCTIVE RELIEF**

Proposed Intervenor, Lori A.G. Hellis, hereby declares:

1. I am a retired attorney licensed to practice in Oregon and Arizona. I am inactive in both jurisdictions and was in good standing at the time of my retirement.
2. I am a published author and hold valid press credentials with the International Federation of Journalists. In addition, I am presently under contract with Pegasus Books to write a book about the Daybell case. I am, therefore, a member of the media.
3. In this consolidated matter, the court frequently has and consistently limited the public and the media's right to access hearings and documents without a prior hearing or sufficient justification.

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- 4. ICAR 31, the Idaho Constitution, and the U.S. Constitution require that the public and the media be permitted access to court records and proceedings subject to certain limited exceptions. The rules further require that the court hold a hearing after notifying all interested parties before sealing documents or closing proceedings.
- 5. Idaho law recognizes the legal standing of members of the media to intervene in court matters for the limited purpose of challenging the media’s right to access court documents and closed hearings.

I certify or declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

Dated June 30, 2022.

Lori A. G. Hellis
Proposed Intervenor

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CERTIFICATE

I HEREBY CERTIFY that on this 30th day of July 2022, a copy of the preceding was served as follows:

John Prior Attorney for the Defendant
429 SW 5th Street, Ste. 110 Meridian, Idaho
83462

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

R. James Archibald Attorney for Defendant
1493 North 1070 East Shelly, Idaho 83274
jimarchibald21@gmail.com

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

John Kenneth Thomas
Bonneville County Public Defender’s Office
605 N. Capital Ave. Idaho Falls, Idaho
83402

- U.S. First Class Mail
- Hand Delivered
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Rob Wood, Special Prosecutor
rwood@co.madison.id.us

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Rachel Smith, Special Prosecutor
smithlawconsulting@outlook.com

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Lindsey Blake, Fremont County Prosecutor
prosecutor@co.fremont.id.us

- U.S. First Class Mail
- Hand Delivered
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- File & serve
- Email

/s/ Lori A. G. Hellis

