

Lori A.G. Hellis  
541.419.6647  
104 E. Fairview Avenue, #381  
Meridian, ID 83642-1733  
Lori.hellis@gmail.com

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

IN THE MATTER OF

State v. Chad Guy Daybell

Case Number CR22-21-1623

**DECLARATION IN SUPPORT OF  
MOTION TO UNSEAL DOCUMENTS**

---

Proposed Non-Party Movant, Lori A.G. Hellis, hereby declares:

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. I have omitted my home mailing address from these pleadings for security purposes. I have provided it to the court in a letter.

I write a popular blog about the legal issues of the Daybell case. I also regularly appear as a guest on several YouTube and podcast channels. 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.

In his Order dated August 18, 2022, in case CR22-21-1624 the court conceded that for the purpose of this motion the movant holds the status of “any person, and therefore has standing pursuant to I.C.A.R. 32.

In this consolidated matter, the court frequently and consistently has limited the public and the media’s right to access hearings and documents without a prior hearing or sufficient justification.

ICAR 32, 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.

Idaho law recognizes the legal standing of members of the media to file motions 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 August 25, 2022

/s/  
Lori A. G. Hellis  
Non-Party Movant

///

///

///

///

///

///

**CERTIFICATE**

I HEREBY CERTIFY that on August 25, 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

john@jpriorlaw.com

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

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

jthomasserve@co.bonneville.id.us

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

Rob Wood, Special Prosecutor  
rwood@co.madison.id.us

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

Rachel Smith, Special Prosecutor  
smithlawconsulting@outlook.com

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

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

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

/s/ Lori A. G. Hellis