

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

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

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 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 freelance 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.

The court continues to resist recognizing my standing to ask that documents in this case be unsealed.

///

///

///

The court, once again, issued an order dated August 25, 2022, reaffirming his order to seal the following documents:

Motion to Disqualify Out of State Prosecutor,
Motion to Dismiss Special Prosecutor
Motion to Disqualify Prosecutor
Motion for Disclosure of Rachel Smith's Cases
And all of the associated objections and memoranda including the Defendant's Motion for a Permissive Appeal and the associated State's objections

I have reason to believe, and do believe, that the information contained in the above listed documents and any other documents associated with them, including the State's Motion to Strike and Exhibits in Memorandum have nothing to do with the defendants in this case. Instead, these documents contain information regarding the misconduct of several officers of the court and members of law enforcement and the subsequent attempts by the court and the state to cover up that misconduct by sealing court files and hearings where the misconduct was discussed. I also believe the court has issued a secret gag order in this case which the judge ordered sealed.

The court has been complicit in hiding official misconduct in sealed documents and continues to resist unsealing at all costs, not to protect the defendants, but instead to protect the reputations of the misbehaving officers to spare them from embarrassment.

This is not a permissible reason under ICAR 32 to seal documents. Further, the court did not hold a hearing before issuing his August 25, 2022 order. As ICAR 32 requires. It is my belief that the court entered this order in an effort to protect the officers of the court in question, prior to considering my motions to unseal the records and prior to designating me an Interested Party who would need to be notified of motions and their required hearings.

I further believe that the very intention of the U.S. and Idaho Constitutions are being violated by this action. The court's misguided continued protection of this professional misconduct comes at the expense of the defendant's right to a fair trial, and the public's right to transparency from the public servants they elect and pay. Further, it comes at the expense of the victim's families, who need confidence that the public servants they rely on to seek justice for their loved ones are acting on the people's behalf and not on behalf of their own interests.

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 29, 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:
- 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

jthomasserve@co.bonneville.id.us

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

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

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

Rachel Smith, Special Prosecutor
smithlawconsulting@outlook.com

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

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

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

/s/ Lori A. G. Hellis