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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, Defendant.	Case No. CR22-21-1623 FIRST SUPPLEMENTAL DISCOVERY DISCLOSURE
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COMES NOW, The State of Idaho, by and through the Madison County Prosecuting Attorney's Office and pursuant to Idaho Criminal Rule 16, hereby notifies the Defendant of the following:

- 1) **STATEMENT OF THE DEFENDANT:**
The substance of any statements made by the Defendant are contained in discovery provided to defense counsel including but not limited to: The Rexburg Police Department Incident Report No. 201905298, Fremont County Sheriff's Office reports, recordings of the officers' body and/or dash cameras, interview recordings and Defendant's jail phone calls and visits.
- 2) **STATEMENT OF CO-DEFENDANT:**
The substance of any statements made by the Co-Defendant are contained in discovery provided to defense counsel including but not limited to: The

Rexburg Police Department Incident Report No. 201905298, Fremont County Sheriff's Office reports, recordings of the officers' body and/or dash cameras, interview recordings and Defendant's jail phone calls and visits.

3) DEFENDANTS' PRIOR RECORDS:

Defendants' prior records were previously provided to defense counsel on July 15, 2021, via hand delivery.

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 was previously provided on July 15, 2021, via hand delivery:

- Please see Addendum A, all of which was provided on July 15, 2021, via hand delivery;

5) REPORTS OF EXAMINATION AND TESTS

- Please see Addendum A, all of which was provided on July 15, 2021, via hand delivery;

6) STATE'S WITNESSES:

- Please see Addendum B;

7) EXPERT WITNESSES

- Please see Addendum B;

8) POLICE REPORTS

The following reports have either previously been provided or are attached hereto:

- Please see Addendum A, all of which was provided on July 15, 2021, via hand delivery;

DATED this 9th day of August, 2021

/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 9 day of August, 2021, that a copy of the foregoing
FIRST SUPPLEMENTAL DISCOVERY DISCLOSURE was served as follows:

John Prior
john@jpriorlaw.com

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

By:

John L THURBER