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

<b>STATE OF IDAHO</b>	)	
	)	<b>CR22-21-1623</b>
Plaintiff,	)	
	)	<b>MOTION FOR DISCOVERY</b>
V.	)	<b>CONCERNING EVENTS THAT WERE</b>
	)	<b>REVEALED IN LORI VALLOW'S</b>
<b>CHAD DAYBELL,</b>	)	<b>MOTION DATED OCTOBER 27, 2021</b>
	)	
	)	
Defendant.	)	
	)	

CHAD DAYBELL, through undersigned counsel, files this Motion requesting discovery concerning events that were revealed in co-defendant Lori Vallow' s Motion dated October 27, 2021. This Motion is made pursuant to the Fifth, Sixth, Eighth and Fourteenth Amendments to the United States Constitution, Idaho Const. Art. I, secs. 6, 7, 8 and 13, and the other authorities cited below.

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**INTRODUCTION AND RELEVANT FACUAL BACKGROUND**

On October 27, 2021, Counsel for Ms. Lori Vallow filed a Motion titled “Declared Motion(s) Re: (1) Motion for State to Disclose Brady Violations Disclosures; (2) Motion for Criminal Deposition(s); (3) Motion for out-of-state subpoena(s); and (4) Motion to Disqualify Idaho Department of Health and Welfare.” In that Motion, Ms. Vallow’s counsel alleges that the State of Idaho committed serious misconduct; namely, that a state actor encouraged and/or coerced Mr. Daybell’s incompetent co-defendant to speak about this case to an attorney who is neither affiliated with the case nor licensed in the State of Idaho, without notification to counsel of record. Even more concerning, this third-party attorney is alleged to have thereafter communicated with prosecutor Rob Wood about the case and the content of his conversation with Ms. Vallow. At no point thereafter did Prosecutor Wood alert the Court or undersigned counsel to the fact that an employee of the State had encouraged, coerced, and facilitated communication between an incompetent defendant in the State’s custody and a private attorney, who then relayed that conversation back to the prosecution.

If these allegations are true, the prosecution’s failure to immediately disclose to the Court the State’s deliberate intrusion into the attorney-client relationship—and the fact that resulting information was then fed back to the State—represents a troubling departure from the







































