

**JOHN PRIOR**  
**LAW OFFICES OF JOHN PRIOR**  
ISB#5344  
429 SW 5<sup>th</sup> Avenue #110  
Meridian, Idaho 83642  
Telephone: (208) 465-9839  
Email john@jpriorlaw.com  
Attorney for Defendant

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

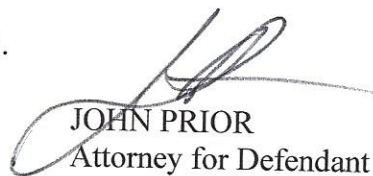
THE STATE OF IDAHO,	)	CASE NO. CR22-21-1623
	)	
Plaintiff,	)	
	)	
-vs-	)	<b>MOTION TO CHANGE VENUE</b>
	)	
CHAD GUY DAYBELL,	)	
	)	
Defendant.	)	
	)	
	)	

COMES NOW, The Defendant, by and through his attorney, JOHN PRIOR, and moves this court for an order changing venue because a fair and impartial jury cannot be had in Fremont County nor within the Seventh Judicial District of the State of Idaho. The motion is brought pursuant to ICR 21(a) and ICR 21 and is supported by the Sixth and Fourteenth Amendments to the United States Constitution and Article 1 section 7 of the Idaho Constitution. It shall be supported by the papers and pleadings in this case, memorandum of law to be filed, evidence submitted to this court and testimony adduced at the hearing on this motion. Counsel for the

Defendant requests an opportunity to present evidence and offer argument. Defendant respectfully requests a hearing on this matter.

WHEREFORE, Defendant respectfully requests that this Honorable Court set an expedited time for a hearing on a Motion to Change Venue and Transfer outside of the Seventh Judicial District and at the conclusion of said hearing move this case to a Judicial District in which the Defendant may receive a fair and impartial trial by jury.

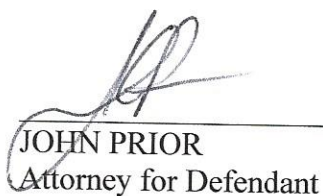
DATED this 21<sup>st</sup> day of July 2021.

  
JOHN PRIOR  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered to the FREMONT COUNTY PROSECUTING ATTORNEY'S OFFICE, by efileing and service to prosecutor@co.fremont.id.us on this date.

DATED this 21 day of July 2021.

  
JOHN PRIOR  
Attorney for Defendant