

Lori A.G. Hellis
54.419.6647
Lori.hellis@gmail.com

**State of Idaho
County of Fremont**

IN THE MATTER OF

State v. Chad Guy Daybell
State v. Lori Norene Vallow NKA Daybell

Case Number CR22-21-1623
Case Number CR22-21-1624

**DECLARATION IN SUPPORT OF
MOTION TO INTERVENE and
MOTION TO UNSEAL AND
MOTION FOR INJUNCTIVE RELIEF**

Proposed Intervenor, Lori A.G. Hellis, hereby declares:

1. 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.
2. 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.
3. In this consolidated matter, the court frequently has and consistently limited the public and the media's right to access hearings and documents without a prior hearing or sufficient justification.

- 1 4. ICAR 31, the Idaho Constitution, and the U.S. Constitution require that the public and
2 the media be permitted access to court records and proceedings subject to certain
3 limited exceptions. The rules further require that the court hold a hearing after notifying
4 all interested parties before sealing documents or closing proceedings.
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6 5. Idaho law recognizes the legal standing of members of the media to intervene in court
7 matters for the limited purpose of challenging the media’s right to access court
8 documents and closed hearings.
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11 I certify or declare under penalty of perjury pursuant to the law of the State of Idaho
12 that the foregoing is true and correct.
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17 Dated June 30, 2022.

Lori A. G. Hellis
Proposed Intervenor

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CERTIFICATE

I HEREBY CERTIFY that on this 30th day of July 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

- 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
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- Facsimile:
- File & serve
- Email

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

- U.S. First Class Mail
- Hand Delivered
- Courthouse Box Facsimile:
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Rob Wood, Special Prosecutor
rwood@co.madison.id.us

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Rachel Smith, Special Prosecutor
smithlawconsulting@outlook.com

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

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- File & serve
- Email

/s/ Lori A. G. Hellis

