

Lindsey A. Blake, ISB #7920  
Rob H. Wood, ISB #8229  
OFFICE OF THE FREMONT COUNTY  
PROSECUTING ATTORNEY  
22 W. 1<sup>st</sup> N.  
St. Anthony, ID 83445  
Tel: 208-624-4418  
Email: [prosecutor@co.fremont.id.us](mailto:prosecutor@co.fremont.id.us)

*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,

v.

CHAD GUY DAYBELL,

Defendant.

Case No.: CR22-21-1623

**STATE'S EXHIBIT LIST**

The State submits the following as its exhibit list in the above action:

**EXHIBITS:**

1. East Idaho News Article, from July 30, 2021, with attachment found in article.

DATED this 4<sup>th</sup> day of October, 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 4<sup>th</sup> day of October, 2021, that a copy of the foregoing STATE'S EXHIBIT LIST was served as follows:

John Prior  
[john@jpriorlaw.com](mailto:john@jpriorlaw.com)

Overnight Mail  
Hand Delivered  
Courthouse Box  
Facsimile:  
X File & serve  
Email

Jim Archibald  
[jimarchibald@gmail.com](mailto:jimarchibald@gmail.com)

Overnight Mail  
Hand Delivered  
Courthouse Box  
Facsimile:  
X File & serve  
Email

Mark L. Means  
[mlm@means-law.com](mailto:mlm@means-law.com)

Overnight Mail  
Hand Delivered  
Courthouse Box  
Facsimile:  
X File & serve  
Email

By: /s/ Jodi L. Thurber \_\_\_\_\_

# We provided this data to Daybell case attorneys. Here's why



Nate Sunderland, EastIdahoNews.com

Daybell Case

Published at 1:20 pm, July 30, 2021

Updated at 4:38 pm, July 30, 2021



East Idaho News

Published by Nathan Sunderland · December 20, 2019 ·

LATEST UPDATE: <https://www.eastidahonews.com/.../attorney-representing.../>

MISSING & IN DANGER: Rexburg Police believe these two kids are in serious danger, and they have no idea where they are. Please... See More



EASTIDAHONEWS.COM

**Police searching for Rexburg children believed to be in serious danger | East Idaho News**

REXBURG — Two local law enforcement agencies and the FBI are investigating a possible connection between the death of a Fremont County w...

489

245 Comments 23K Shares

Like

Comment

Share

East Idaho News' first social media post on Daybell case, posted Dec. 20, 2019.

In early May, EastIdahoNews.com was subpoenaed to testify as part of the Chad and Lori Daybell legal proceedings.

The purpose of the subpoena, filed by Chad's attorney, John Prior, was to compel reporter Nate Eaton to testify in a change in venue hearing about EastIdahoNews.com, including its geographic and/or online reach, audience size and amount of pageviews.

EastIdahoNews.com policy prevents reporters from actively being involved in any judicial proceedings related to a story they are covering. Our attorneys fought the subpoena, and Prior ultimately withdrew it.

Regardless of our participation, a change of venue hearing is still expected in the Daybell case with media coverage expected to be a central part of that hearing.



EastIdahoNews.com was approached independently by both Prior and Deputy Prosecutor Rachel Smith about voluntarily providing documentation of our Daybell case coverage. Since the information is already public, we agreed to compile the information for both parties.

In the interest of transparency, we are also sharing the information with our audience. The following is everything we have made available for attorneys in the Daybell case.

**1) Every story written by EastIdahoNews.com regarding Chad and Lori Daybell or JJ Vallow and Tylee Ryan between December 2019 and July 2021. Additionally, the stories are listed by popularity.**

- All 261 Daybell stories in text format.
- Stories ranked by pageviews: [Page 1](#), [Page 2](#), [Page 3](#), [Page 4](#), [Page 5](#), [Page 6](#), [Page 7](#), [Page 8](#), [Page 9](#), [Page 10](#)

**2) Every Facebook post by EastIdahoNews.com regarding Chad and Lori Daybell or JJ Vallow and Tylee Ryan between December 2019 and July 2021. Many of these posts also appeared on Twitter and Instagram.**

- All Daybell social media posts: [Page 1](#), [Page 2](#), [Page 3](#), [Page 4](#), [Page 5](#), [Page 6](#), [Page 7](#), [Page 8](#), [Page 9](#), [Page 10](#), [Page 11](#), [Page 12](#), [Page 13](#), [Page 14](#), [Page 15](#), [Page 16](#), [Page 17](#), [Page 18](#), [Page 19](#), [Page 20](#)

**3) Every video produced or shot by EastIdahoNews.com regarding Chad and Lori Daybell or JJ Vallow and Tylee Ryan between December 2019 and July 2021. All of the videos are part of a Youtube playlist.**

- [Youtube playlist containing 125 videos about the Daybell case.](#)

**4) All 231 photos taken or illustrations created by EastIdahoNews.com regarding Chad and Lori Daybell or JJ Vallow and Tylee Ryan between December 2019 and July 2021.**

- [Click here for a list of stories containing photos related to the Daybell case.](#)

**5) A comprehensive set of graphs and charts using Alexa Rankings to show EastIdahoNews.com audience size in comparison to other Idaho media, Utah media and Wyoming media. Additionally, the top cities in the United States containing the most EastIdahoNews.com users. Also total pageviews for EastIdahoNews.com. All data is taken between Sept. 2019 and July 2021.**

- Idaho Rankings: [Pageviews](#), [Traffic](#), [Engagement](#), [Reach](#), [Traffic Sources](#), [Trends](#)
- Utah Rankings: [Pageviews](#), [Traffic](#), [Engagement](#), [Reach](#), [Traffic Sources](#), [Trends](#)
- Wyoming Rankings: [Pageviews](#), [Traffic](#), [Engagement](#), [Reach](#), [Traffic Sources](#), [Trends](#)
- User Estimate by City: [Page 1](#), [Page 2](#)
- [Total pageviews for EastIdahoNews.com](#)

[SUBMIT A CORRECTION](#)

Primary Dimension: Country City Continent Sub Continent

Secondary dimension

advanced

City	Acquisition			Behavior			Conversions		
	Users	New Users	Sessions	Bounce Rate	Pages / Session	Avg. Session Duration	Goal Conversion Rate	Goal Completions	Goal Value
	25,336,978 % of Total: 100.00% (25,336,978)	25,077,354 % of Total: 100.00% (25,064,996)	85,965,463 % of Total: 100.00% (85,965,463)	57.66% Avg for View: 57.66% (0.00%)	2.20 Avg for View: 2.20 (0.00%)	00:02:13 Avg for View: 00:02:13 (0.00%)	0.00% Avg for View: 0.00% (0.00%)	0 % of Total: 0.00% (0)	\$0.00 % of Total: 0.00% (\$0.00)
1. Salt Lake City	1,427,633 (4.69%)	958,791 (3.82%)	8,115,805 (9.44%)	48.50%	2.38	00:02:24	0.00%	0 (0.00%)	\$0.00 (0.00%)
2. Boise	1,349,057 (4.43%)	984,699 (3.93%)	7,007,137 (8.15%)	51.86%	2.43	00:02:30	0.00%	0 (0.00%)	\$0.00 (0.00%)
3. (not set)	1,335,198 (4.38%)	1,142,205 (4.55%)	4,081,332 (4.75%)	58.98%	2.16	00:02:16	0.00%	0 (0.00%)	\$0.00 (0.00%)
4. Idaho Falls	1,085,763 (3.57%)	848,136 (3.38%)	11,197,579 (13.02%)	41.91%	2.89	00:03:11	0.00%	0 (0.00%)	\$0.00 (0.00%)
5. Chicago	1,079,837 (3.55%)	1,050,172 (4.19%)	1,209,691 (1.41%)	91.64%	1.14	00:00:34	0.00%	0 (0.00%)	\$0.00 (0.00%)
6. Meridian	761,531 (2.50%)	494,342 (1.97%)	3,696,700 (4.30%)	51.23%	2.48	00:02:34	0.00%	0 (0.00%)	\$0.00 (0.00%)
7. Los Angeles	611,421 (2.01%)	497,837 (1.99%)	1,676,857 (1.95%)	72.54%	1.56	00:01:45	0.00%	0 (0.00%)	\$0.00 (0.00%)
8. Seattle	532,788 (1.75%)	419,895 (1.67%)	1,465,285 (1.70%)	62.90%	1.92	00:01:50	0.00%	0 (0.00%)	\$0.00 (0.00%)
9. Denver	472,984 (1.55%)	341,888 (1.36%)	1,504,984 (1.75%)	57.61%	2.16	00:02:12	0.00%	0 (0.00%)	\$0.00 (0.00%)
10. Rexburg	452,448 (1.49%)	339,663 (1.35%)	3,586,307 (4.17%)	45.49%	2.71	00:03:01	0.00%	0 (0.00%)	\$0.00 (0.00%)
11. Nampa	346,229 (1.14%)	200,964 (0.80%)	1,391,132 (1.62%)	52.42%	2.44	00:02:29	0.00%	0 (0.00%)	\$0.00 (0.00%)
12. Pocatello	310,468 (1.02%)	244,460 (0.97%)	1,782,210 (2.07%)	56.91%	2.22	00:02:17	0.00%	0 (0.00%)	\$0.00 (0.00%)
13. Phoenix	310,302 (1.02%)	259,036 (1.03%)	771,841 (0.90%)	66.09%	1.85	00:01:55	0.00%	0 (0.00%)	\$0.00 (0.00%)
14. Dallas	303,705 (1.00%)	266,383 (1.06%)	453,214 (0.53%)	72.76%	1.61	00:01:23	0.00%	0 (0.00%)	\$0.00 (0.00%)
15. New York	301,206 (0.99%)	276,010 (1.10%)	490,978 (0.57%)	61.17%	2.01	00:01:36	0.00%	0 (0.00%)	\$0.00 (0.00%)
16. Murray	294,336 (0.97%)	129,757 (0.52%)	985,769 (1.15%)	48.66%	2.46	00:02:39	0.00%	0 (0.00%)	\$0.00 (0.00%)
17. Las Vegas	241,969 (0.79%)	200,647 (0.80%)	515,220 (0.60%)	67.16%	1.82	00:01:44	0.00%	0 (0.00%)	\$0.00 (0.00%)
18. Lehi	235,826 (0.77%)	99,238 (0.40%)	680,639 (0.79%)	48.60%	2.46	00:02:30	0.00%	0 (0.00%)	\$0.00 (0.00%)
19. Sandy	203,984 (0.67%)	88,955 (0.35%)	583,213 (0.68%)	47.88%	2.51	00:02:35	0.00%	0 (0.00%)	\$0.00 (0.00%)
20. Draper	186,044 (0.61%)	69,878 (0.28%)	524,187 (0.61%)	47.49%	2.54	00:02:34	0.00%	0 (0.00%)	\$0.00 (0.00%)
21. Atlanta	183,509 (0.60%)	167,030 (0.67%)	231,549 (0.27%)	79.49%	1.35	00:01:01	0.00%	0 (0.00%)	\$0.00 (0.00%)
22. Houston	173,056 (0.57%)	157,534 (0.63%)	229,641 (0.27%)	76.00%	1.49	00:01:13	0.00%	0 (0.00%)	\$0.00 (0.00%)
23. San Francisco	169,382 (0.56%)	134,098 (0.53%)	278,406 (0.32%)	68.97%	1.73	00:01:31	0.00%	0 (0.00%)	\$0.00 (0.00%)
24. Portland	158,653 (0.52%)	133,662 (0.53%)	243,767 (0.28%)	75.74%	1.52	00:01:13	0.00%	0 (0.00%)	\$0.00 (0.00%)
25. (not set)	151,942 (0.50%)	95,730 (0.38%)	1,182,169 (1.38%)	46.49%	2.74	00:02:54	0.00%	0 (0.00%)	\$0.00 (0.00%)

26.	West Jordan	142,108	(0.47%)	76,050	(0.30%)	327,390	(0.38%)	53.80%	2.25	00:02:24	0.00%	0	(0.00%)	\$0.00	(0.00%)
27.	South Jordan	120,702	(0.40%)	66,125	(0.28%)	258,146	(0.30%)	55.37%	2.19	00:02:19	0.00%	0	(0.00%)	\$0.00	(0.00%)
28.	Minneapolis	118,336	(0.39%)	106,289	(0.47%)	173,551	(0.20%)	77.48%	1.45	00:01:11	0.00%	0	(0.00%)	\$0.00	(0.00%)
29.	West Valley City	114,079	(0.37%)	56,669	(0.23%)	256,617	(0.30%)	52.86%	2.29	00:02:36	0.00%	0	(0.00%)	\$0.00	(0.00%)
30.	Caldwell	108,813	(0.36%)	66,521	(0.27%)	343,099	(0.40%)	56.33%	2.31	00:02:20	0.00%	0	(0.00%)	\$0.00	(0.00%)
31.	Washington	106,974	(0.35%)	97,285	(0.39%)	138,983	(0.16%)	78.87%	1.38	00:01:07	0.00%	0	(0.00%)	\$0.00	(0.00%)
32.	San Diego	106,434	(0.35%)	92,571	(0.37%)	153,244	(0.18%)	74.67%	1.53	00:01:19	0.00%	0	(0.00%)	\$0.00	(0.00%)
33.	Sacramento	106,019	(0.35%)	83,700	(0.33%)	168,678	(0.20%)	71.44%	1.65	00:01:27	0.00%	0	(0.00%)	\$0.00	(0.00%)
34.	Twin Falls	102,626	(0.34%)	73,065	(0.29%)	386,832	(0.45%)	55.24%	2.46	00:02:27	0.00%	0	(0.00%)	\$0.00	(0.00%)
35.	Rigby	96,562	(0.32%)	58,775	(0.23%)	1,442,853	(1.68%)	25.48%	3.80	00:03:15	0.00%	0	(0.00%)	\$0.00	(0.00%)
36.	Charlotte	96,338	(0.32%)	88,958	(0.35%)	123,063	(0.14%)	79.25%	1.39	00:01:07	0.00%	0	(0.00%)	\$0.00	(0.00%)
37.	Austin	95,149	(0.31%)	83,545	(0.33%)	144,877	(0.17%)	71.47%	1.67	00:01:22	0.00%	0	(0.00%)	\$0.00	(0.00%)
38.	Orlando	88,876	(0.29%)	77,174	(0.31%)	122,507	(0.14%)	73.14%	1.64	00:01:17	0.00%	0	(0.00%)	\$0.00	(0.00%)
39.	Philadelphia	88,760	(0.29%)	82,769	(0.33%)	106,742	(0.12%)	81.64%	1.29	00:00:56	0.00%	0	(0.00%)	\$0.00	(0.00%)
40.	Kansas City	87,649	(0.29%)	74,908	(0.30%)	130,492	(0.15%)	73.58%	1.55	00:01:21	0.00%	0	(0.00%)	\$0.00	(0.00%)
41.	Blackfoot	85,486	(0.28%)	50,722	(0.20%)	648,475	(0.75%)	45.27%	2.73	00:02:55	0.00%	0	(0.00%)	\$0.00	(0.00%)
42.	St. George	83,684	(0.27%)	54,935	(0.22%)	210,551	(0.24%)	53.03%	2.37	00:02:28	0.00%	0	(0.00%)	\$0.00	(0.00%)
43.	Provo	82,082	(0.27%)	51,066	(0.20%)	187,576	(0.22%)	54.85%	2.18	00:02:30	0.00%	0	(0.00%)	\$0.00	(0.00%)
44.	Coeur d'Alene	81,878	(0.27%)	73,009	(0.29%)	149,494	(0.17%)	81.76%	1.37	00:01:02	0.00%	0	(0.00%)	\$0.00	(0.00%)
45.	San Antonio	81,432	(0.27%)	76,454	(0.30%)	130,900	(0.15%)	67.08%	1.91	00:02:08	0.00%	0	(0.00%)	\$0.00	(0.00%)
46.	Orem	81,080	(0.27%)	52,007	(0.21%)	174,542	(0.20%)	59.24%	2.06	00:02:19	0.00%	0	(0.00%)	\$0.00	(0.00%)
47.	Nashville	80,487	(0.26%)	71,415	(0.28%)	106,781	(0.12%)	77.18%	1.44	00:01:16	0.00%	0	(0.00%)	\$0.00	(0.00%)
48.	Boston	79,323	(0.26%)	70,405	(0.28%)	152,245	(0.18%)	49.58%	2.61	00:01:51	0.00%	0	(0.00%)	\$0.00	(0.00%)
49.	Columbus	76,390	(0.25%)	70,822	(0.28%)	92,620	(0.11%)	81.12%	1.32	00:01:01	0.00%	0	(0.00%)	\$0.00	(0.00%)
50.	Layton	75,859	(0.25%)	51,794	(0.21%)	177,843	(0.21%)	56.86%	2.11	00:02:24	0.00%	0	(0.00%)	\$0.00	(0.00%)