

JENSIE L. ANDERSON (06467)
2936 S. La Rue Lane
Salt Lake City, UT 84106
Telephone: (801) 870-2553
jensie.anderson@law.utah.edu

SKYE LAZARO (14071)
Ray Quinney & Nebeker PC
30 South State Street, Ste 1400
Salt Lake City, UT 84111
Telephone: (801) 323-3333
slazaro@rqn.com

ANN MARIE TALIAFERRO (08776)
Brown Bradshaw & Moffat
422 North 300 West
Salt Lake City, Utah 84103
Telephone: (801) 532-5297
ann@brownbradshaw.com

LACEY COLE SINGLETON (12233)
275 East 200 South
Salt Lake City, UT 84111
Telephone: (972) 345-3609
lsingleton783@gmail.com

Attorneys for Petitioner

IN THE THIRD JUDICIAL DISTRICT COURT
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

EUGENE CHRISTOPHER WRIGHT, Petitioner, v. STATE OF UTAH, Respondent.	DECLARATION OF NOELLA SUDBURY Case No. Case No. 220904680 Judge Heather Brereton Underlying Criminal Case No. 081400519FS
---	--

I, Noella Sudbury, declare as follows:

1. My name is Noella Sudbury. I am a resident of the State of Utah, over the age of majority, and competent in every respect to make this declaration.
2. I graduated from the S.J. Quinney College of Law at the University of Utah in May 2009 and was sworn into the Utah State Bar in October 2009.
3. I have been an attorney for almost seventeen years.

4. I began my legal career as a law clerk at the Utah Supreme Court.
5. From 2012-2015, I worked at Zimmerman Jones & Booher (“ZJB”), a boutique appellate law firm in Salt Lake City.
6. Subsequently, I was a vice-president at Goldman Sachs; Criminal Justice Advisory Council Director for Salt Lake County; and Senior Policy Advisor on Criminal Justice for Salt Lake County.
7. In 2019, I founded Sudbury Consulting, and in 2022, I founded RASA Public Benefit Corporation. I currently serve as the CEO of RASA Public Benefit Corporation.
8. Some of the honors I have received for my work include: 2025-26 Obama Foundation Leader; the Salt Lake Chamber’s 2024 Pathfinder Award; CLIO’s 2023 Reisman Award for Legal Innovation; the 2022 Utah State Bar Distinguished Service Award; Utah Business Magazine’s 2019 Utah Woman of the Year; the 2018 University of Utah S.J. Quinney College of Law Young Alumna of the Year; and the 2018 Unified Police Department of Greater Salt’s Citizen Service Award.
9. I have also been named a Pioneer of the National Clean Slate Movement, from the National Clean Slate Initiative, and as one of the Top 200 Female Founders to Watch by Inc. Magazine.
10. While at Zimmerman Jones and Booher (“ZJB”), along with Linda Jones and Troy Booher, I was a named attorney in Eugene Christopher Wright’s (“Wright”) appeal. Wright was appealing his 2010 conviction for first-

degree murder and first-degree aggravated assault. *See State v. Wright*, Appellate Case No. 20100655-CA.

11. I began working on Wright's appeal by reviewing the trial court record and trial counsels' file. As I recall, this included listening to the CDs of witness interviews the District Attorney's Office provided in discovery.
12. I do not believe that any of the materials I reviewed specified that Kenneth Dolezsar ("Dolezsar"), the victim, was cooperating in an FBI investigation or was conducting and financing his own investigation into Tom, Tommy and Darick Mower ("the Mowers") and their illegal activities in Eastern Europe.¹
13. Although some references to the Mowers' involvement with the Russian mafia may have appeared in the records I reviewed, I do not recall anything in the records that indicated the State developed, pursued, or investigated those minimal references.
14. Post-conviction counsel recently provided me with a transcript of the May 20, 2008, interview of Leslie DeeAnn Mower ("Disc 11") at which her attorney, Bart Bailey ("Bailey"), was present.² After reviewing that transcript, I do not recall seeing the majority of the relevant and exculpatory information it contains.

¹ I also do not believe that any of the materials I reviewed specified that anyone else related to the case was involved in a government or private investigation of Tom, Tommy or Darick Mower.

² Transcript of Disc 11 is attached as Exhibit A.

15. In particular, I do not recall any of the materials I reviewed discussing the government and private investigations outlined in the Disc 11 interview.³
16. Further, I do not recall reviewing anything in trial counsel's or the trial court files that included the following statement or reference to it:
- Bailey: Ken [Dolezsar] got killed, and we just put a stop on all of it, because we couldn't tell if that was somebody trying to send us a message if they -- if that was what it was, we got the message. And we just stopped the investigation.⁴
17. I also do not recall seeing the letter from Bailey to Dolezsar dated April 7, 2007, which post-conviction counsel provided to me, and which includes additional information about the investigations.⁵
18. Had the materials I reviewed as Wright's appellate attorney included information about the FBI and private investigations in which Dolezsar was involved, I believe that information would have caught my attention as both material and exculpatory.
19. Had the materials I received at ZJB included information about the government and private investigations, I believe I would have made my supervising attorneys aware of it for use in Wright's appeal.
20. ZJB withdrew from Wright's case on May 14, 2015, after the trial court

³ Exhibit A, pp.20-22.

⁴ *Id.* at 21.

⁵ Letter from Bailey to Dolezsar dated April 7, 2007, is attached as Exhibit B.

denied Wright's 23B claims of ineffective assistance of trial counsel.⁶

21. My understanding is that the Salt Lake Legal Defender's Association ("SLLDA") completed Wright's appeal after ZJB withdrew and that one of the attorneys who worked on that appeal was Nathalie Skibine.
22. I have reviewed the letter dated September 6, 2017, Nathalie Skibine sent to Wright, indicating her copy of Disc 11 "stopped working" at around nineteen (19) minutes which corroborates my recollection that I did not receive all of the information on Disc 11.⁷
23. I have also reviewed Todd Gabler's Affidavit which also corroborates my recollection about the interview on Disc 11.⁸
24. Specifically, Gabler indicates Disc 11 was clearly "altered" but he was not provided with "necessary metadata to begin to verify the lineage of this generation of the recorded interview."⁹

Pursuant to Utah Code Ann. § 78B-5-705 (2007), I declare under penalty of perjury under the laws of the State of Utah that the foregoing is true and correct.

Dated this 2 day of April, 2026.

s/s Noella Sudbury (signed with permission)
Noella Sudbury

⁶ R.2136-2138. See also *Order Granting Motion to Withdraw as Counsel* dated May 18, 2015. R.2146.

⁷ Ms. Skibine's letter is attached as Exhibit C.

⁸ Gabler's affidavit dated July 22, 2020, attached as Exhibit D

⁹ *Id.*