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12 Attorney for LORI NORENE VALLOW (DAYBELL)

13 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF**
14 **THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MADISON**

15 STATE OF IDAHO,
16 PLAINTIFF

Case No: CR 33-20-0302

17 Vs.

REQUEST FOR DISCOVERY

18 LORI NORENE VALLOW,
19 AKA LORI NORENE DAYBELL
20 DEFENDANT

21 PLEASE TAKE NOTICE that the undersigned, pursuant to Rule 16 of the Idaho Criminal
22 Rules (and all corresponding subsections) requests discovery and inspection of the following
23 information, evidence, and materials:

- 24 1. Any and all written/verbal statements of Defendant, witness(es) and or person(s) of
25 knowledge and the like;
- 26 2. Defendant's Prior Record(s);
3. Reports of Examinations and tests;
4. State Witnesses;
5. Police Reports/Records;

- 1 6. All affidavits and or statements issued, created, drafted, written, stated by any and all
2 police agencies investigating or involved in the above matter.
- 3
4 7. Police/investigating entity's: emails, text messages, voice messages, records, telephone
5 call/text records, or the like to any persons contacted/communicated with regarding the
6 above case, whether on police issued communication device(s) or personal device(s)
7 (for example: computer, cellular phone, text device, etc.) from Jan. 2019 to present or
8 before said date if such communication occurred.
- 9
10 8. Cellular and internet provider contact information regarding all police
11 authority/investigating entity for both personal and city/agency/employment
12 communication device(s) for each and every person(s) involved in the child welfare
13 check relevant to this matter and or assigned an investigative duty regarding the above
14 case.
- 15
16 9. List of any and all person(s) full name, address, telephone number, email address, and
17 any other corresponding contact information for any and all person(s) contacted by the
18 Rexburg City Police, Madison County Sheriff's Department, or any other agency/entity
19 in regards to the above matter. Please include the following: detailed dates of said
20 contact/communications, contents of communications, statements made by
21 officers/entity/attorneys, description of how communication was conducted
22 (telephone, cell phone, email, text message, facsimile or the like, etc.).
- 23
24 10. Copy of any and all contact/communications (emails, text, facsimiles, telephone
25 records, call logs, text logs, or the like) between investigating entity, police, deputy, or
26 the like and persons identified in these requests.

1 11. Copies of any and all audio or videos recordings, documents, records, etc.,
2 associated/related too/relevant to the incidents alleged and or associated incidents and
3 or events of which Prosecution alleged/mentioned at the 3/6/20 arraignment/bond
4 hearing before this Court;

5
6 12. Furthermore, any and all records, recordings, documents, written evidence,
7 photographs, videos, records, reports, text, emails, financials, computer
8 stored/obtained records, computer forensic report of any and all electronic devices
9 related to persons of interests¹ or defendant, or investigation related to persons of
10 interests or defendant;

11
12 13. Toxicology reports/autopsy reports and any and all corresponding/associated
13 documents, records, testing results, procedures used, expert reports, notes, charts,
14 chemical analysis, expert opinions, persons involved (identifying information, role of
15 involvement, employment title/position, education of persons) or the like regarding the
16 autopsy of the following:

- 17
18 a. Deceased, Mr. Charles Vallow, former husband of Defendant.
19 b. Deceased, Mr. Alex Cox, brother of Defendant.
20 c. Deceased Mrs. Tami Daybell, former spouse of Mr. Chad Daybell.
21 d. Deceased Mr. Joe Ryan, former husband of Defendant.

22
23 14. Any and all records related to the following:

24 1 Include but not limited to: Mr. Adam Cox, Mr. Charles Vallow, Mr. Alex Cox,
25 Mrs. Tami Daybell, Mrs. Ethel K. Vallow, Mr. Larry Woodcock, Mr. Brandon
26 Boudreaux, Mrs. Melani Pawlowski (FKA Melani Boudreaux), Mrs. Melanie Gibbs,
Mrs. Christina Atwood, Mr. Jack Daybell, Mrs. Shelia Daybell, Mr. Jason
Gwilliam, Mrs. Samantha Gwilliam, Mrs. Summer Shiflet, Mrs. Ruth Mortensen,
Detective Hope of the Rexburg police, Mrs. Heather Daybell, Mr. Matt Daybell

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- a. Investigation (including any and all requested “records” etc., above) materials, files, records, reports, regarding Mr. Charles Vallow, deceased husband of Defendant; Please include all emails for past two years from Mr. Vallow’s “Gmail” email account, all social media postings, dating/romantic website information/communications, all financial records including but not limited to life insurance policy records, Chase credit accounts, UFCU credit union (Austin, Texas); US Bank Credit Card, Chandler, Arizona Police department records, reports, etc. All records from Mr. Charles Vallow items (which belong to Defendant) cellular telephone and laptop and or other items/properties in the possession of the Chandler Arizona Police Department.
 - b. Investigation (including any and all requested records, etc., above) regarding Mr. Alex Cox, deceased brother of Defendant;
 - c. Investigation (including any and all requested etc., above) regarding Mrs. Tami Daybell, deceased;
 - d. Investigation (including any and all requested etc., above) regarding Mr. Joe Ryan, deceased;
 - e. All the above related to or concerning the allegations made against Defendant in this case.
 - f. Any and all of the above provided previously or in the future to the Prosecution of the above case by and any all law enforcement agency whether said agency be local, county, state, or federally associated. Including but not limited to City/County Police/Sheriff’s departments, and or the Federal Bureau of Investigation (FBI).
 - g. All audio presentation/broadcasts, podcast, presentation, or the like regarding Defendant, involving defendant, or mentioning defendant.
 - h. All records, text, email, documents, records, forensic computer/electronic analysis/records, school and education records, financial institutional records, communications, videos, pictures tangible/intangible of minor child Joshua “JJ” Vallow and Tylee Ryan.
 - i. Any and all other documents, records, exhibits, evidence, etc., that the Prosecution intends to offer as evidence at the trial of this matter.

1 The right is reserved to requests further disclosure by Order of the Court if necessary
2 and upon motion.

3 The undersigned further requests that you provide discovery to our office within fifteen
4 (15) days form the service thereof.
5

6 The right is hereby resolved to make a request for such other and additional discovery
7 as may be determined at a later date to be necessary and or required.

8 These requests are ongoing and require timely supplementation by the Prosecution in
9 this matter.

10 Pursuant to Rule 16 of the Idaho Criminal Rules, this requests relates to information in
11 the possession or control of members of the prosecuting attorney's staff and to others who
12 have participated in the investigation or evaluations of the case who either regularly report, or
13 with reference to this particular case have reported, to the office of the Prosecuting Attorney.
14

15 ***** Please note that all above requests include requests for tangible/intangible
16 exhibits/evidence/records, etc., of the above requested. *****

17 DATED this 2 day of April 2020.

18 _____
19 Mr. Mark L. Means

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this 2 day of April 2020, I caused a true
3 and correct copy of the FOREGOING document to be forwarded by the method(s) indicated
4 below, to the following:

5 MADISON COUNTY PROSECUTING ATTORNEY
6 159 E. Main St.
7 P.O. Box 350
8 Rexburg, ID 83440
9 Email: rwood@co.madison.id.us

x Efile

10 DATED this 2 day of April 2020.

11 By _____
12 Mr. Mark L. Means