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11 Advocate for LORI NORENE (DAYBELL) VALLOW

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

14 STATE OF IDAHO,
15 PLAINTIFF

Case No: CR22-20-0838

16 Vs.

MOTION FOR TRANSFER OF CASE (Venue)

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

20 DOB: 1973

21 COMES NOW THE DEFENDANT LORI NORENE VALLOW (AKA LORI NORENE DAYBELL) by
22 and through her Attorney of Record, Mark L. Means of Means-Law and hereby moves this
23 Court for an order transferring the case (venue) because a fair and impartial jury trial cannot be
24 had in Fremont County, State of Idaho. This motion is brought pursuant to Idaho Criminal Rules
25 (hereafter I.C.R.) 21 (a) and is based upon the Sixth (6th) and Fourteenth (14th) Amendments to
26 the Constitution of the United State of America, Article 1 and 7 of the Idaho State Constitution,
and any and all other applicable law. It shall be supported by the papers and pleadings of/in
this case, the memorandum of law to be filed, evidence to be submitted and the evidence to be
adduced at the hearing of this Motion. Further, Defendant requests a briefing schedule to

1 allow both parties to submit to the Court their memorandums, evidence, list of potential
2 witnesses (if any) in regard to this Motion. Defendant respectfully requests oral arguments on
3 this Motion as well as a hearing date on this Motion.
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6 DATED this 17 day of September 2020.

7 *M.L. Means*
8 Mark L. Means
9 Advocate for the Defendant
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1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this 17 day of September 2020, I caused a
3 true and correct copy of the FOREGOING document to be forwarded by the method(s)
4 indicated 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: mcpo@madison.id.us

x Efile

10 DATED this 17 day of September 2020.

11 Mark L. Means
12 Mark L. Means
13 Advocate for the Defendant
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