

ROB H. WOOD # 8229  
Madison County Prosecuting Attorney  
[rwood@co.madison.id.us](mailto:rwood@co.madison.id.us)

159 East Main Street  
P. O. Box 350  
Rexburg, Idaho 83440  
Telephone: (208) 356-7768  
Facsimile: (208) 356-7839

**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, and,  
LORI NORENE DAYBELL,

Defendant.

Case No.: CR22-20-0755

Case No.: CR22-20-0838

**RESPONSE TO SPECIFIC REQUEST  
OF DISCOVERY PURSUANT TO  
IDAHO CRIMINAL RULE 16**

COMES NOW, The State of Idaho, by and through the Madison County Prosecuting Attorney's Office as a Special Prosecutor in the above captioned case, and pursuant to Idaho Criminal Rule 16 and a Court order dated March 2, 2021, hereby responds to the Defendant, Lori Norene Daybells' Specific Request of Discovery Pursuant to Idaho Criminal Rule 16 as follows:

- 1) The Special Prosecutor shall state whether he personally has met with the following witnesses:
  - a. Lori Daybell
  - b. Chad Daybell
  - c. Alex Cox
  - d. Zulema Pastenes
  - e. All Daybell Children
  - f. Tami Daybell
  - g. Adam Cox (and children of Adam Cox)
  - h. Colby Ryan
  - i. Kelsee Ryan
  - j. Parents of Chad Daybell
  - k. Parents of Tami Daybell

- l. Parents of Lori Daybell
- m. Melanie Gibb
- n. Summer Shiflet (any family members)
- o. David Warrick
- p. Larry Woodcock
- q. Ethel K. Woodcock (Kay Woodcock)
- r. April Raymond
- s. Annie Cushing
- t. Melani Pawlowski
- u. Ian Pawlowski
- v. Brandon Boudreaux
- w. Heather Daybell
- x. Matthew Daybell

RESPONSE

Please see the attached Memorandums, Police Reports and Messages.

- 2) For the individuals the Special Prosecutor identifies as having met or conversed with, the Special Prosecutor shall:
  - a. Identify to the best of his recollection, the date and time of such meeting/conversation with the specific witness and list the names of any other person present for, or party to, such conversation/meeting.
  - b. Furnish to the Defendant the statements made by the prosecution witnesses or prospective prosecution witnesses to the prosecuting attorney.
  - c. Furnish to the Defendant a copy of any written or recorded statements of the witnesses or prospective witnesses.

RESPONSE

Please see the attached Memorandums, Police Reports and Messages.

DATED this 3 day of March, 2021



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Rob H. Wood  
Special Prosecuting Attorney for Fremont County

CERTIFICATE

I HEREBY CERTIFY that on this 3 day of March, 2021, that a copy of the foregoing RESPONSE TO SPECIFIC REQUEST OF DISCOVERY PURSUANT TO IDAHO CRIMINAL RULE 16 was served as follows:

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

U.S. Mail  
Hand Delivered  
Courthouse Box  
Facsimile:  
 File & Serve  
Email

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

U.S. Mail  
Hand Delivered  
Courthouse Box  
Facsimile:  
 File & Serve  
Email

By: 