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10 Website: [www.means-law.com](http://www.means-law.com)  
11 Attorney 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

16 Case No: CR22-20-0838  
17 CR22-20-0755

18 Vs.

19 **DECLARED MOTION TO COMPEL**

20 LORI NORENE VALLOW (AKA LORI NORENE  
21 VALLOW DAYBELL)  
22 DEFENDANT  
23 DOB: 1973

24 CHAD GUY DAYBELL  
25 DEFENDANT  
26 DOB: 1968

27 COMES NOW DEFENDANT LORI NORENE VALLOW (DAYBELL) by and through her attorney of  
28 Record, Mark L. Means of Means Law Office, PLLC, and pursuant to Idaho Criminal Rule 16. Discovery  
29 and Inspection subsection (f) and move this Court for an order compelling the State to provide full and  
30 complete responses to said DEFENDANT's Specific Request of Discovery Pursuant to Idaho Criminal Rule  
31 16 which was served upon the State on or about December 17, 2020.1 Subject to said rule, the State  
32 had an obligation to provide written response within fourteen (14) days from date of service. To date  
33 the State has failed to provide any written response whatsoever. ICR 16 (f)(2) states failure to comply  
34

35  
36 \_\_\_\_\_  
1 Please see attached true and correct filed and served copy of said request served upon the State.

1 with ICR 16(f) "...constitutes a waiver of any objection to the requests and is grounds for the imposition  
2 of sanctions by the Court."2

3 WHEREFORE said DEFENDANT request this Court order the following:

- 4 1. Plaintiff requests a hearing on this matter as soon as the Court is available.
- 5 2. PLAINTIFF be ordered to provide full and complete responses in an expedited manner.
- 6 3. PLAINTIFF be imposed with sanctions by this Court for costs, fees, and other appropriate  
sanctions including as the Court seems fit, but not limited to a dismissal of this matter.

7 **That I Certify (or Declare) under penalty of perjury pursuant to the Law of the State of Idaho  
that the foregoing is true and correct**

8 DATED this 8 day of January 2021.

9 *Mark L. Means*

10 \_\_\_\_\_  
Mark L. Means

11 Advocate for Mrs. Lori Norene Vallow (Daybell)

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2 See ICR 16 Subsection (f).

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this 8 day of January 2021, 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 x\_\_\_\_\_ Efile  
6 Email: [mcpo@madison.id.us](mailto:mcpo@madison.id.us)

7 Mr. John Prior x\_\_\_\_\_ Efile  
8 Email: [john@jpriorlaw.com](mailto:john@jpriorlaw.com)

9 DATED this 16 day of January 2021.

10 Mark L. Means  
11 Mark L. Means  
12 Advocate for Mrs. Lori Norene Vallow (Daybell)

1 Mark L. Means (ISB 7530)  
2 MEANS LAW and MEDIATION  
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9 Icourt Email: [icourtlaw@gmail.com](mailto:icourtlaw@gmail.com)  
10 Website: [www.means-law.com](http://www.means-law.com)  
11 Attorney 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: CR22-20-0755

CR22-20-838

16 Vs.

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

17 LORI NORENE VALLOW AKA LORI NORENE  
18 DAYBELL  
19 DEFENDANT  
20 DOB: 1973

21 MR. CHAD DAYBELL  
22 DEFENDANT  
23 DOB: 1968

24 PLEASE TAKE NOTICE that the undersigned, pursuant to RULE 16 of the Idaho Criminal  
25 Rules request discovery and inspection of the following information, evident and materials:

- 26
1. List of all person(s), witness(es), potential witness(es), person(s) of knowledge, or the like, that You, *Special Prosecuting Attorney Mr. Robert Wood*, have spoken (conversed with) with regarding this case.
-

1 Please include, but not limited to the person(s) full name, date and time of  
2 conversation(s), specific statement(s) of said conversation, location of said  
3 conversation(s), substance of conversation(s), method of conversation(s) (ex. i.e.,  
4 telephone, text, email, facetime, face to face, etc.), duration of said conversation,  
5 and person(s) in attendance and or involved in said conversations.  
6

7 Please produce all records of said communications, tangible, or intangible,  
8 included but not limited to recordings, text messages, emails, phone records, voice  
9 mails, pictures, videos, or the like.  
10

11 Also include any and all identifying information for person(s) present and or  
12 included in said conversation or in proximity of said conversation. Please identify  
13 the attending person(s) full name, address, employment position, telephone  
14 number, and other identifiable information.  
15

16 **This requests specifically includes the following, but not limited to said persons:**

- 17 i. Lori Vallow Daybell
- 18 ii. Chad Daybell
- 19 iii. Alex Cox
- 20 iv. Zulema Pastenes
- 21 v. All Daybell Children
- 22 vi. Tami Daybell
- 23 vii. Adam Cox (and children of Adam Cox)
- 24 viii. Colby Ryan
- 25 ix. Kelsee Ryan
- 26 x. Parents of Chad Daybell
- xi. Parents of Tami Daybell
- xii. Parents of Lori Vallow Daybell
- xiii. Melanie Gibb
- xiv. Summer Shiflet (and any of her family members)
- xv. David Warrick
- xvi. Larry Woodcock
- xvii. Ethel K. Vallow Woodcock (Kay Woodcock)

- 1 xviii. April Raymond  
2 xix. Annie Cushing  
3 xx. Melani (Boudreaux) Pawlowski  
4 xxi. Ian Pawlowski  
5 xxii. Brandon Boudreaux  
6 xxiii. Heather Daybell (sister-in-law of Chad Daybell)  
7 xxiv. Matthew Daybell (brother of Chad Daybell)  
8 xxv. Persons associated with the group entitled "Preparing a People"  
9 xxvi. Persons associated with the Avow website  
10 xxvii. Any and all person(s) subject to description above

11 DATED this 17 day of December 2020.

12 *M.L. Means*

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14 Mr. Mark L. Means  
15 Advocate for the Defendant  
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1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this 17 day of December 2020, I caused  
3 a 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 x\_\_\_\_\_ Efile  
6 Email: [mcpo@madison.id.us](mailto:mcpo@madison.id.us)

7 Mr. John Prior x\_\_\_\_\_ Efile  
8 Email: [john@jpriorlaw.com](mailto:john@jpriorlaw.com)

9 DATED this 17 day of December 2020.

10 Mark L. Means  
11 Mark L. Means  
12 Advocate for Mrs. Lori Norene Vallow (Daybell)