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Attorney for LORI NORENE (DAYBELL) VALLOW

**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

Case No: CR22-20-0755

Vs.

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

LORI NORENE VALLOW AKA LORI NORENE
DAYBELL
DEFENDANT
DOB: 1973

MR. CHAD DAYBELL
DEFENDANT
DOB: 1968

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

1. List of all Deputies (Deputy), "Authorities", and or "Jailers" for Madison Sheriff's Department, Madison County Detention Center, Rexburg Police, Madison County Prosecutor's Office, and or any other agency identified in (attached/highlighted) article as "authorities" "jailers" including but not limited to the full name and specific employment title (ex. Deputy, Sergeant, shift manager, etc.) of said

1 “authorities” or “jailers” that have made any comment/statement regarding
2 Defendant Lori Norene Vallow (Daybell) as cited and highlighted in attached article.¹

- 3
4 2. Please include, but not limited to the person(s) full name, date and time of
5 conversation(s), specific statement(s) of said conversation, location of said
6 conversation(s), substance of conversation(s), method of conversation(s) (ex. i.e.,
7 telephone, text, email, facetime, face to face, etc.), duration of said conversation,
8 and all person(s) in attendance and or involved in said conversations.
9
10 3. Please produce all records (tangible/intangible) of said communications, comments,
11 tangible, or intangible, included but not limited to reports, recordings, text
12 messages, emails, phone records, voice mails, pictures, videos, and or the like.

13
14 DATED this 8 day of March 2021.

15 *M.L. Means*

16 _____
17 Mr. Mark L. Means
18 Advocate for Mrs. Lori Norene Vallow (Daybell)

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25 _____
26 1 Please note that this request is not limited to statements made by
authorities or jailers to Mr. Keith Morison, but statements or comments
made to any individual, company, news organization, reporter,
investigator, or the like. See page 7 of 12 for highlighted paragraph.

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CERTIFICATE OF SERVICE

The undersigned certifies that on this 8 day of March 2021, I caused a true and correct copy of the FOREGOING document to be forwarded by the method(s) indicated below, to the following:

MADISON COUNTY PROSECUTING ATTORNEY Efile
Email: mcpo@madison.id.us

Mr. John Prior Efile
Email: john@jpriorlaw.com

DATED this 8 day of March 2021.

M.L. Means
Mark L. Means
Advocate for Mrs. Lori Norene Vallow (Daybell)

NEWS SHOWS WATCH



MEG CRITIC! KA BACH P V NE!

EXCLUSIVE

Even Keith Morrison Is Shocked By the Lori Vallow Podcast Revelations

Keith Morrison spoke exclusively to E! News about his chart-topping podcast *Mommy Doomsday*, which details the strange circumstances that led to deaths of siblings J.J. and Tylee Vallow.

By CYDNEY CONTRERAS MAR 02, 2021 9:49 PM TAGS

NEWS SHOWS WATCH



| MEG CRITIC: KA BACH P V NE'

Watch: The Truth Behind Our Obsession With True Crime Stories

When it comes to true crime, it's no exaggeration to say **Keith Morrison** has seen it all.

For nearly 30 years, the *Dateline* correspondent has investigated events as tragic as the 1999 Columbine High School massacre, as chilling as the **Robert Durst** murder trial and as head-scratching as the tale of convicted killer **Pam Hupp**.

And yet, Keith tells E! News he's shocked by the [events that have unfolded](#) since siblings **Joshua "J.J." Vallow**, 7, and **Tylee Vallow**, 17, went missing in September 2019, as detailed in the NBC *Dateline* podcast *Mommy Doomsday*.

"Shock has become a big word in my vocabulary," he explains. "I mean, people are capable of doing the most horrific things that don't make any sense. And you don't understand why and what makes people think and behave the way they do."

Even so, Keith says he and the *Dateline* team knew something was afoot when police showed up at the home of **Lori Vallow** on Nov. 26, 2019 with questions regarding the whereabouts of her two kids. Keith reveals, "From the moment we first heard about it, it was pretty clear from the start that something very bad had happened to these children."

PHOTOS

Craziest True Crime TV Moments

"For a little while, I think that there was some hope that those children would be found alive. And certainly, anybody who cared about them, as obviously their families did—what was left to their families—was desperately hoping that they were okay," he continues. "But, you know, there was certainly an understanding as well, that the outcome of this was probably not going to be good."

The journalist adds, "I think just how awful it was, how shocking—nobody foresaw."

NEWS SHOWS WATCH



| MEG CRITIC! KA BACH P V NE!

REXBURG POLICE DEPARTMENT

For the past year, Keith has spoken to investigators, as well as those closest to Lori, to uncover what he describes is a "story with deep tentacles."

As *Mommy Doomsday* reveals, Lori is a complicated woman, who, from the outside looking in, dedicated her life to raising a family motivated by the teachings of the Church of the Latter Day Saints. Then, she met her fifth and now-husband **Chad Daybell**, an alleged leader of an extremist religious group who believed the end-times were coming. Chad is said to have convinced Lori of their intertwined past lives, seemingly setting off a series of unfortunate events that concluded with the deaths of J.J. and Tylee.

Since Lori and Chad's fateful introduction, five people connected to the couple have died.

Lori's fourth husband, **Charles Vallow**, died in July 2019 when her brother, **Alex Cox**, allegedly shot him in self-defense. This was witnessed by Lori and Tylee, who

According to *Mommy Doomsday* backed up Alex's claims that Charles was hell-bent on attacking him with a baseball bat.

NEWS SHOWS WATCH



| MEG CRITIC! KA BACH P V NE!

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