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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.

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

19 LORI NORENE VALLOW AKA LORI NORENE
20 DAYBELL
21 DEFENDANT
22 DOB: 1973

23 MR. CHAD DAYBELL
24 DEFENDANT
25 DOB: 1968

26 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 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)

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

DATED this 17 day of December 2020.

M.L. Means

Mr. Mark L. Means
Advocate for the Defendant

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

7 Mr. John Prior x_____ Efile
8 Email: 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)