

Lindsey A. Blake, ISB #7920
Rob H. Wood ISB #8229
OFFICE OF THE FREMONT COUNTY
PROSECUTING ATTORNEY
22 W. 1st N.
St. Anthony, ID 83445
Tel: 208-624-4418
Email: prosecutor@co.fremont.id.us

Attorneys for the State

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

<p>STATE OF IDAHO, Plaintiff, vs. CHAD GUY DAYBELL AND LORI NORENE VALLOW AKA LORI NORENE DAYBELL Defendants.</p>	<p>Case No. CR22-21- <u>1623</u> INDICTMENT</p>
---	--

CHAD GUY DAYBELL AND LORI NORENE VALLOW, are accused by the Grand
Jury of Fremont County, by this indictment, as follows:

COUNT I
CONSPIRACY TO COMMIT FIRST DEGREE MURDER
AND GRAND THEFT BY DECEPTION, a Felony
Idaho Code §§ 18-1701, 18-4003(a), 18-2403(1), 18-2403(4)(a), 18-2407(1)(b)(3)

The Defendants, Chad Guy Daybell, Lori Norene Vallow, and Alex Cox (deceased) and other co-conspirators, both known and unknown, on or between the dates of October 26, 2018, and continuing until January 15, 2020, in the County of Madison, State of Idaho, and elsewhere, including Fremont County, Idaho, and as part of a continuing criminal transaction and common scheme or plan in Madison and Fremont Counties, Idaho, did willfully and knowingly combine, conspire, confederate, and agree to commit Murder in the First Degree of Tylee Ryan, and to commit Grand Theft by Deception.

OVERT ACTS

In furtherance of the conspiracy to commit Murder in the First Degree of Tylee Ryan and Grand Theft by Deception, and to affect the objects thereof, one or more of the following overt acts were committed by one or more of the subjects of the conspiracy as part of a continuing criminal transaction and common scheme or plan within Madison and Fremont Counties or elsewhere in the State of Idaho.

1. On or between October 26, 2018 and June 9, 2020, Chad Guy Daybell (and Lori Norene Vallow) did endorse and espouse religious beliefs for the purpose of encouraging and/or justifying the homicide of Tylee Ryan.
2. On or about August 16, 2019, Lori Norene Vallow did change the deposit of Tylee Ryan's Social Security benefits from Tylee Ryan's JP Morgan Chase Account to deposit money directly into Lori Norene Vallow's personal BBVA bank account.
3. On or about September 1, 2019, Lori Norene Vallow did move from Chandler, Arizona to Rexburg, Idaho with Alex Cox, Tylee Ryan, and Joshua Jaxon Vallow (hereinafter "JJ Vallow").

4. On or about September 8, 2019, Chad Guy Daybell Googled "ssw wind" and visited a website entitled "What is the definition of SSW wind direction?"
5. On or about September 9, 2019, Alex Cox did go to 565 Pioneer Road, Apt. 175, Rexburg, Idaho.
6. On or between September 9, 2019 and February 1, 2020, Lori Norene Vallow failed or refused to contact the Social Security Administration as required by law to inform the Social Security Administration of Tylee Ryan's death.
7. On or between September 25, 2019 and January 22, 2020, Lori Norene Vallow did wrongfully continue to collect five monthly Social Security Survivor benefits on behalf of Tylee Ryan.

COUNT II
FIRST DEGREE MURDER, a Felony
Idaho Code §§ 18-4001 18-4002,18-4003(a),18-4004

The Defendants, Chad Guy Daybell, and Lori Norene Vallow, on or between the 8th and 9th day of September, 2019, in the County of Madison, State of Idaho, and as part of a common scheme or plan or continuing criminal transaction between Madison and Fremont Counties in Idaho were concerned in the commission of a first degree murder, and did aid and abet in its commission, or, not being present, advised and encouraged its commission, or by command compelled another to commit the crime and did so with malice aforethought and did so willfully, deliberately and with premeditation, which resulted in the death of a human being, to wit: did either kill Tylee Ryan and/or assist in the killing of Tylee Ryan, and/or did encourage the killing of Tylee Ryan and/or did command another to kill Tylee Ryan in violation of Idaho Code Sections 18-4001; 18-204; 18-4003(a).

