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

STATE OF IDAHO,	)	Case No. CR22-21-1624
Plaintiff,	)	
v.	)	DEFENDANTS SUPPLIMENTAL
	)	DISCOVERY REQUEST
LORI NORENE VALLOW, aka LORI	)	
NORENE VALLOW DAYBELL	)	
Defendant.	)	
_____	)	

TO: LINDSEY BLAKE, FREMONT COUNTY PROSECUTORS OFFICE; ROB  
WOOD, MADISON COUNTY PROSECUTORS OFFICE

The Defendant in the above-entitled proceeding requests the right to be furnished or to examine, inspect and copy the following, which are either within your possession, custody or control, or by the exercise of due diligence may become known to you:

1. Any and all audio and/or video taken from doorbell cameras or other surveillance

systems taken from apartments facing Lori Daybell and or Melnie Boudreaux's apartment at 565 Pioneer Road Apartments 175 and 174 for the month of September 2019. The defense acknowledges discovery of Ring doorbell camera footage for October, November and December 2019 which was provided in an August 9, 2021 discovery response under Addendum A, folder 4, but is in possession of only one video in September of 2019. That video was taken on September 19, 2019. We request all video from September 2019 of the previously mentioned ring video camera.

2. Any and all video evidence seized in conjunction with any doorbell camera's at 565 Pioneer Road regardless of the apartment number, for the month of September 2019.

DATED this \_\_\_23\_\_\_ day of January, 2023.

\_\_\_\_\_/s/\_\_\_\_\_  
JOHN THOMAS  
Co- Counsel for Lori Vallow Daybell

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the \_\_23\_ day of January, 2023, I served a true and correct copy of the document described below on the party listed below, by eserve.

DOCUMENT: SUPPLEMENTAL REQUEST FOR DISCOVERY

PARTIES SERVED: Lindsey Blake  
Prosecuting Attorney's Office  
Fremont County

Rob Wood  
Prosecuting Attorney's Office  
Madison County

\_\_\_\_\_/s/\_\_\_\_\_  
JOHN THOMAS