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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**

STATE OF IDAHO,

Plaintiff,

v.

LORI NORENE VALLOW DAYBELL,

Defendant.

Case No.: CR22-21-1624

**RESPONSE TO DEFENDANT'S
SUPPLEMENTAL DISCOVERY
REQUEST**

COMES NOW, The State of Idaho, and pursuant to Idaho Criminal Rule 16, hereby responds to the Defendant, Lori Vallow Daybells' Supplemental Discovery Request, dated January 23, 2023, as follows:

1. Any and all audio and/or video taken from doorbell cameras or other surveillance systems taken from apartments facing Lori Daybell and or Melanie 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.

RESPONSE NO. 1: All audio and/or video surveillance at 565 Pioneer Road Apartments in the possession of the State has previously been disclosed to defense.

2. Any and all video evidence seized in conjunction with any doorbell cameras at 565 Pioneer Road regardless of the apartment number, for the month of September 2019.
- RESPONSE NO. 2: All audio and/or video surveillance at 565 Pioneer Road Apartments in the possession of the State has previously been disclosed to defense.

DATED this 27th day of January, 2023

/s/ Lindsey A. Blake

Lindsey A. Blake
Prosecuting Attorney for Fremont County

/s/ Rob H. Wood

Rob H. Wood
Prosecuting Attorney for Madison County

CERTIFICATE

I HEREBY CERTIFY that on this 27th day of January, 2023, that a copy of the foregoing RESPONSE TO DEFENDANT’S SUPPLEMENTAL DISCOVERY REQUEWT was served as follows:

R. James Archibald
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- U.S. Mail
- Hand Delivered
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By: /s/ Jodi L. Thurber