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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.)	RESPONSE TO REQUEST FOR
)	DISCOVERY
LORI NORENE VALLOW, aka LORI)	
NORENE VALLOW DAYBELL)	
Defendant.)	

TO: LINDSEY BLAKE, ROB WOOD, Fremont County Prosecuting Attorneys office.

PLEASE TAKE NOTICE that counsel for LORI NORENE VALLOW, HEREINAFTER referred to as LORI DAYBELL, R. JAMES ARCHIBALD and JOHN THOMAS hereby respond to the State's Request for Discovery and Demand for Notice of Intent to Rely upon Defense of Alibi.

Request 1: Books, papers, documents, photographs, tangible objects or portions thereof.

RESPONSE 1: The defendant intends to admit as exhibits various photographs, papers and documents. These items will be listed on an exhibit list and will be provided to the State upon completion. All of the photos, documents, and papers have come from discovery items turned over to the defense by the State.

Request 2: Reports of examinations and tests.

RESPONSE 2: No reports of physical, mental, or scientific tests are anticipated to be used in the “guilt phase” of the trial. Should the Defendant be convicted of First-Degree Murder, Conspiracy to commit First-Degree Murder and Grand theft, or Conspiracy to commit First degree Murder as outlined in the indictment, the Defense will revisit the issue for the “punishment phase” of the trial.

Request 3: Defense witness.

RESPONSE 3: The defense intends to call the following witnesses:

Any and all witnesses listed on the State Witness List

Any and all witnesses listed on Co- Defendant, Chad Daybell’s Witness List

The Defendant may testify at trial. If and when this response shall change it shall be supplemented a reasonable time before trial. The names and addresses of each witness are in the possession of the State at this time.

Request 4: Intent to rely on alibi.

Response 4: The Defendant, Lori Daybell was in her apartment #175 at 565 Pioneer Road, Rexburg, Idaho, when J.J. Vallow and Tylee Ryan died in the apartment of Alex Cox, apartment #107, 565 Pioneer Road, Rexburg, Idaho. Defendant Lori Daybell, was with Melanie Gibb, David

Warwick, and/or Chad Daybell. The addresses of the witnesses are known to the State as Melanie
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Gibb and David Warwick are both on the States witness list. Chad Daybell is in the Fremont County Jail, St. Anthony Idaho.

Lori Daybell was in Kauai, Hawaii when Tammy Daybell died at the home of Chad and Tammy Daybell, 202 North 1900 East, Rexburg , Idaho. Lori Daybell was with Melanie Powlowski and Audrey Barattiero. Mrs Powlowski's and Ms. Barattiero's addresses are known to the State as both are on States witness list.

Request 5: Expert Witnesses.

Response 5: the Defense does not intend to call any expert witnesses at the guilt phase of the trial. Should the Defendant be convicted of First-Degree Murder, Conspiracy to commit First-Degree Murder and Grand theft, or Conspiracy to commit First degree Murder as outlined in the indictment, the Defense will call Mark Cunningham, (CV is attached hereto), and Dale Watson, (CV is attached hereto).

Request 6: Facts, Data, articles etc that Experts relied upon.

Response 6: (A) Expert witnesses have been told to generate a response to this request. A report will be provided upon receipt.

(B) Expert witnesses have been told to generate a response to this request. A Report will be provided upon receipt.

(C) Expert witnesses have been told to generate a response to this request. A Report will be provided upon receipt.

(D) Expert witnesses have been told to generate a response to this request. A Report will be provided upon receipt.

Request 7: Mental Condition as a defense.

Response 7: The Defendant does not intend to raise Mental Condition as a defense pursuant to Idaho
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Code § 18-207 at the guilt phase of the trial. Defendant objects to the request to depose any expert witness for purposes of punishment phase of the trial unless and until the Defendant is found guilty of First-Degree Murder, Conspiracy to commit First-Degree Murder and Grand theft, or Conspiracy to commit First degree Murder, as outlined in the indictment. At that time the Defense will revisit the idea of deposing the experts, should the court find it necessary.

Dated this __30_ day of January, 2023.

_____/s/_____
R. James Archibald, Lead Counsel for
Lori Daybell

_____/s/_____
John Thomas, Co-Counsel for
Lori Daybell

