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Attorney for the State of Idaho

**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 DAYBELLA
LORI NORENE DAYBELL,

Defendant.

Case No. CR22-21-1624

STATE'S PROPOSED JURY
INSTRUCTIONS AND VERDICT
FORM

The State of Idaho hereby files the following Proposed Jury Instructions and Verdict Form.

RESPECTFULLY SUBMITTED this 20th day of March, 2023.

/s/ Lindsey A. Blake

Lindsey A. Blake
Prosecuting Attorney for Fremont County

/s/ Lindsey A. Blake

Rob H. Wood
Prosecuting Attorney for Madison County

CERTIFICATE

I HEREBY CERTIFY that on this 20th day of March, 2023, that a copy of the foregoing STATE'S PROPOSED JURY INSTRUCTIONS AND VERDICT FORM was served as follows:

R. James Archibald
Jimarchibald21@gmail.com

- U.S. Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & Serve
- X Email

John Kenneth Thomas
jthomasserve@co.bonneville.id.us

- U.S. Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- File & Serve
- X Email

By: /s/ Jodi L. Thurber

Requested pre-voir dire instruction (proposed) previously supplied:

ICJI 001 OPENING COMMENTS AND VOIR DIRE (STRUCK JURY) with other ICJI instructions (modifications by the State in **bold** and underline.)

Requested ICJI, non-edited

Preliminary

001, 002, 003

Pre-Proof

101, 102, 103, 104, 105, 1702 (Death Penalty instruction) 107, 108, 110

Post-Proof

201, 202, 204, 205, 206, 207, 208, 232

Evidence and Witness

301, 303, 308, 311, 312 language incorporated into instructions stating elements of the crime as required, 340, 344, 345,

Conspiracy

1103, 1104

Homicide

701, 702,

Taking of Property/Theft

570, 571, 572, 573, 574,

Mental Illness Defense

1505

Death Penalty

1702 (listed above), 1703, 1704, 1705, 1706, 1708, 1709, 1710, 1713, 1714, 1715, 1716, 1717,

