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Seventh Judicial District, Fremont County  
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IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR FREMONT COUNTY

<p>STATE OF IDAHO,  Plaintiff,  vs.  LORI VALLOW DAYBELL,  Defendant.</p>	<p><b>Case No. CR22-21-1624</b></p> <p><b>BRIEF TO CLARIFY FAMILIAL RELATIONSHIPS</b></p>
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Comes now the Defendant, through her attorneys, and pursuant to the Court's inquiry and Order Excluding Witnesses dated March 30, 2023, submits the following:

1. Canaan Todd Trahan was born on May 25, 2012, in Lake Charles, Louisiana. His parents were Dennis Todd Trahan and Mandy Nicole Leger. See Exhibit 1.

2. The mother of Dennis Todd Trahan is Ethel Kay Vallow. Ethel Kay Vallow was not married to Larry Woodcock on May 25, 2012. Larry Woodcock is not the father of Dennis Todd Trahan or Mandy Nicole Leger.
3. Canaan Todd Trahan was adopted by Leland Charles Anthony Vallow and Lori Norene Cox Vallow on July 25, 2014, in Lake Charles, Louisiana. See Exhibit 2.
4. At the adoption hearing, the name of Canaan Todd Trahan was changed to Joshua Jaxon Vallow. The legal parents of Joshua Jaxon Vallow are Charles Vallow and Lori Vallow. See Exhibit 3.
5. Charles Vallow and Kay Vallow Woodcock are brother and sister. Since July 25, 2014, that would make Kay Woodcock an aunt to JJ Vallow, and Larry Woodcock has no familial relationship to JJ Vallow. It is understood that Larry Woodcock and Kay Woodcock are divorced.
6. Kay Woodcock and Larry Woodcock are on the witness list. They have requested to be considered victims under Idaho law and have requested to remain in the courtroom prior to their testimony.
7. An aunt and someone formerly married to an aunt are not victims under Idaho law.
8. The government has consistently stated to the public that Larry and Kay Woodcock are grandparents of JJ Vallow. This is not true. As such, they should be excluded from the courtroom.

Dated: March 31, 2023

/s/ Jim Archibald  
R. James Archibald, Esq.

Dated: March 31, 2023

/s/ John Thomas  
John Thomas, Esq.

Certificate of Service

I hereby certify that on this day I served a true and correct copy of this document on the following by the method of delivery indicated:

Lindsey Blake, Esq. efile and serve

Robert H. Wood, Esq. efile and serve

Dated: March 31, 2023

/s/ Jim Archibald  
R. James Archibald, Esq.

EXHIBITS SEALED PURSUANT TO

I.C.A.R. 32(d)(9)

And

I.C.A.R. 32(g)(12)