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**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  
AKA LORI NORENE DAYBELL,

Defendant.

Case No.: CR22-21-1624

**MEMORANDUM REGARDING EXCLUSION OF  
VICTIMS**

The State of Idaho, by and through the Fremont County Prosecuting Attorney's Office, submits the following Memorandum Regarding Exclusion of Victims.

**FACTS**

Joshua Jaxon "JJ" Vallow was seven years old at the time of his death. One of his accused murderers is his adoptive mother, Lori Vallow-Daybell. JJ Vallow was born to Dennis Todd Trahan and Mandy Leger on May 25, 2012. When Todd and Mandy were unable to care for JJ, he was provided a home by his paternal grandmother Kay Woodcock. JJ lived with Kay and her husband Larry for the first several months of his life. During this time, the Woodcock's had temporary custody and guardianship of JJ. Charles Vallow, Kay's brother, was married to Lori Vallow, who had other young children from another marriage. When Dennis and Mandy elected to give up their parental rights in an effort to provide JJ with a better upbringing than they could provide, Charles and Lori Vallow began adoption proceedings. After the adoption was finalized,

Kay Woodcock now found herself in the interesting position of being both the biological grandmother and the adoptive aunt of JJ. Kay Woodcock continued in her role as a grandmother, frequently having JJ visit her and Larry both at their home or where JJ lived. Although she may have legally held the familial title of “aunt,” Kay was considered by JJ and his adoptive family as JJ’s grandmother. When law enforcement first made contact with the Defendant on November 26, 2019, regarding JJ’s whereabouts, the Defendant referred to Kay as JJ’s Grandma.

In early 2019, Charles Vallow – recognizing Kay as JJ’s grandmother and desiring that JJ be taken care of by a loving family member – designated Kay to stand in his place as the provider for JJ, by making Kay Woodcock the beneficiary of his life insurance policy.

Although Charles Vallow had two other sons, Cole Vallow, who was an adult and Zach Vallow, who was an older teenager, at the time he adopted JJ, Charles considered Kay to be the person who would take his place as caretaker and provider for JJ in the event of his untimely demise. After Charles’ death, Kay Woodcock sought to act in the role Charles intended for her by reaching out repeatedly to assist JJ. As evidence of Kay’s dedication to JJ, it was she who first contacted police in late 2019, to express her concerns about JJ’s location and welfare. Over the ensuing days and weeks, as JJ’s whereabouts remained unknown and when the Defendant (now Lori Vallow-Daybell) refused to provide information, Kay became frantic. She frequently called law enforcement and her sister-in-law, the Defendant Lori Vallow-Daybell, in an effort to ascertain JJ’s location and determine if he was ok. After several months of worry, her greatest fears were realized when JJ’s body was found buried in the backyard of the Defendant’s new husband Chad Daybell.

Summer Shiflet, is the Defendant Lori Vallow-Daybell’s biological sister, biological aunt to Tylee Ryan and adoptive aunt to JJ Vallow. Tylee Ryan is the biological daughter of the Defendant Lori Vallow-Daybell and adoptive half-sister of JJ Vallow. Colby Ryan is the biological son of Lori Vallow-Daybell and adoptive half-brother of JJ Vallow.

## **ARGUMENT**

### **I. Victims have Both a Constitution and Statutory Right to Attend Court Proceedings.**

In an acknowledgement that the State of Idaho has long protected the rights of criminal defendants but had failed to protect the rights of crime victims, in 1994 the Idaho Constitution









