

Lindsey A. Blake, ISB #7920  
Rob H. Wood ISB #8229  
OFFICE OF THE FREMONT COUNTY  
PROSECUTING ATTORNEY  
22 W. 1<sup>st</sup> N.  
St. Anthony, ID 83445  
Tel: 208-624-4418  
Email: [prosecutor@co.fremont.id.us](mailto:prosecutor@co.fremont.id.us)

*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**

<p>STATE OF IDAHO,</p> <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>LORI NORENE VALLOW AKA LORI NORENE DAYBELL,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No. CR22-21-1624</p> <p><b>NOTICE OF INTENT TO SEEK DEATH PENALTY</b></p>
---	---

The State of Idaho, by and through the Fremont County Prosecutor's Office, hereby puts the Court and the Defendant on notice pursuant to Idaho Code §18-4004(A) that the State will seek the death penalty against Lori Norene Vallow, aka Lori Norene Daybell in the event of the Defendant's conviction for any of the counts of First Degree Murder and/or any of the counts of Conspiracy to Commit First Degree Murder as charged in the Indictment.

Further, the State will rely on one or more of the following statutory aggravating circumstances as the basis for seeking the death penalty under Idaho Code §19-2515(9) as follows:

- a. The murder of Tylee Ryan was committed for remuneration (Idaho Code § 19-2515(9)(d)) and/or
- b. The murder of J.J. Vallow was committed for remuneration (Idaho Code § 19-2515(9)(d)) and/or

- c. The murder of Tammy Daydell was committed for remuneration (Idaho Code § 19-2515(9)(d)) and/or
- d. The murder of Tylee Ryan was especially heinous, atrocious or cruel, manifesting exceptional depravity (Idaho Code § 19-2515(9)(e)) and/or
- e. The murder of J.J. Vallow was especially heinous, atrocious or cruel, manifesting exceptional depravity (Idaho Code § 19-2515(9)(e)) and/or
- f. The murder of Tammy Daybell was especially heinous, atrocious or cruel, manifesting exceptional depravity (Idaho Code § 19-2515(9)(e)) and/or
- g. By the murder(s), or circumstances surrounding their commission, the defendant exhibited utter disregard for human life (Idaho Code § 19-2515(9)(f)) and/or
- h. The defendant, by her conduct, whether such conduct was before, during or after the commission or the murder(s) at hand, has exhibited a propensity to commit murder which will probably constitute a continuing threat to society. (Idaho Code § 19-2515(9)(i).)

**DATED** this 2<sup>nd</sup> day of May 2022.

**Lindsay A. Blake**  
Fremont County Prosecuting Attorney

**Rob H. Wood**  
Madison County Prosecuting Attorney

\_\_\_\_/S/ Lindsey A. Blake \_\_\_\_\_

\_\_\_\_/S/ Rob H. Wood \_\_\_\_\_

CERTIFICATE

I HEREBY CERTIFY that on this 2<sup>nd</sup> day of May, 2022, that a copy of the foregoing NOTICE OF INTENT TO SEEK THE DEATH PENALTY was served as follows:

James Archibald  
Jimarchibald21@gmail.com

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

John Thomas  
jthomasserve@co.bonneville.id.us

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

By: \_\_\_\_\_

