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Attorneys for Defendant

**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,)	Case No. CR22-21-1624
vs.)	
)	FIRST SPECIFIC REQUEST FOR
LORI VALLOW DAYBELL,)	DISCOVERY
)	
Defendant.)	
_____)	

COMES NOW the Defendant, through her attorneys, and pursuant to Idaho Criminal Rule 16, makes this first specific request for discovery:

1. A written Request for Discovery was filed by co-counsel with the court on 4/18/2022. Paragraph 7 of that document states that the defendant seeks “any statements made by co-defendants, prosecution witnesses or prospective prosecution witnesses to the prosecuting attorney or the prosecuting attorney’s

agents or to any official involved in the investigative process of the case.” Upon information and belief, the Defendant has reason to believe that many of the witnesses and prospective witnesses living in Arizona, Utah, Texas and elsewhere have been having regular contact with the prosecution and/or agents thereof. None of these witness statements have been disclosed. The Defense is concerned about ongoing issues of discovery violations. The Defendant sees this as an issue of non-disclosure. The Idaho Criminal Rules require ongoing discovery disclosures.

2. The Defense also requests copies of, and detailed notes regarding, any and all immunity agreements that the state has proffered to witnesses or potential witnesses.
3. The Defense also requests the current names and addresses of each witness the State intends to call at trial. While the State has named 104 potential witnesses in its Addendum (B) to its first supplemental discovery response, there were no addresses or other contact information given. Our investigative team is in need of contact information for trial preparation.

DATED this 2 day of September, 2022.

_____/s/_____
John Thomas

_____/s/_____
R. James Archibald

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2 day of September, 2022, I served a true and correct copy of the document described below on the party listed below, by email.

Lindsey A. Blake

Efile and serve

Robert H. Wood

Efile and serve

_____/s/_____
R. James Archibald