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*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**

STATE OF IDAHO,

Plaintiff,

v.

CHAD GUY DAYBELL AND LORI  
NORENE VALLOW AKA LORI NORENE  
DAYBELL,

Defendant.

Case No.: CR22-21-1623

Case No.: CR22-21-1624

**DISCOVERY DISCLOSURE**

COMES NOW, The State of Idaho, by and through the Fremont County Prosecuting Attorney's Office and pursuant to Idaho Criminal Rule 16, hereby notifies the Defendant of the following:

1) STATEMENT OF THE DEFENDANT:

The substance of any statements made by the Defendant are contained in the reports of law enforcement that were provided to the Defendant Lori Daybell in Madison County Case CR33-20-302, and to both Defendants in Fremont County Cases CR22-20-838 and CR22-20-755. The State will provide the Defendant with another copy of said reports and with any further reports of law enforcement received by the State. The recordings of the officers' body and/or dash cameras, interview recordings and Defendant's jail phone calls and visits, all of which have either previously been provided or will be provided by July 15, 2021.

2) STATEMENT OF CO-DEFENDANT:

The substance of any statements made by the Co-Defendant are contained in the reports of law enforcement that were provided to the Defendant Lori Daybell in Madison County Case CR33-20-302, and to both Defendants in Fremont County Cases CR22-20-838 and CR22-20-755. The State will provide the Defendants with another copy of said reports and with any further reports of law enforcement received by the State. The recordings of the officers' body and/or dash cameras, interview recordings and Defendant's jail phone calls and visits, all of which have either previously been provided or will be provided by July 15, 2021.

3) DEFENDANTS' PRIOR RECORDS:

Defendants' prior records have either previously been provided or will be provided by July 15, 2021.

4) DOCUMENTS AND TANGIBLE OBJECTS

Defense counsel can inspect and copy or photograph the items or material described in Idaho Criminal Rule 16(b)(4) by simply making prior arrangements with the Fremont County Prosecutor's Office, the Madison County Prosecutor's Office, or the Law Enforcement Agency holding such items or evidence;

5) REPORTS OF EXAMINATION AND TESTS

- a) The substance of any examinations and tests are contained in the discovery disclosures that were provided to the Defendant Lori Daybell in Madison County Case CR33-20-302, and to both Defendants in Fremont County Cases CR22-20-838 and CR22-20-755. The State will provide the Defendants with another copy of said examinations and reports and with any further reports of law enforcement received by the State. The recordings of the officers' body and/or dash cameras, interview recordings and Defendant's jail phone calls and visits, all of which have either previously been provided or will be provided by July 15, 2021.

6) STATE'S WITNESSES:

- a) The State incorporates any witness lists that were provided to the Defendant Lori Daybell in Madison County Case CR33-20-302, and to both Defendants in Fremont County Cases CR22-20-838 and CR22-20-755. The State will provide the Defendants with another copy of said lists supplemented with any other witnesses the State intends to call by July 15, 2021. The State reserves the right to supplement said witness list as any new information is provided to the State.

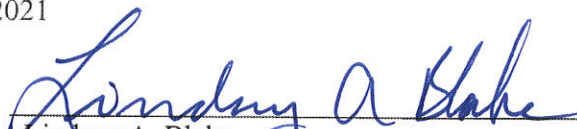
7) EXPERT WITNESSES


- a) The State incorporates any expert witness lists that were provided to the Defendant Lori Daybell in Madison County Case CR33-20-302, and to both Defendants in Fremont County Cases CR22-20-838 and CR22-20-755. The State will provide the Defendants with another copy of said lists supplemented with any other witnesses the State intends to call by July 15, 2021. The State reserves the right to supplement said witness list as any new information is provided to the State.

8) POLICE REPORTS

- a) Law Enforcement Reports have been provided to the Defendant Lori Daybell in Madison County Case CR33-20-302, and to both Defendants in Fremont County Cases CR22-20-838 and CR22-20-755. The State will provide the Defendants with another copy of said reports and with any further reports of law enforcement received by the State. The recordings of the officers' body and/or dash cameras, interview recordings and Defendant's jail phone calls and visits, all of which have either previously been provided or will be provided by July 15, 2021.

DATED this 10<sup>th</sup> day of June, 2021

  
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Lindsey A. Blake  
Prosecuting Attorney for Fremont County

  
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Rob H. Wood  
Prosecuting Attorney for Madison County

CERTIFICATE

