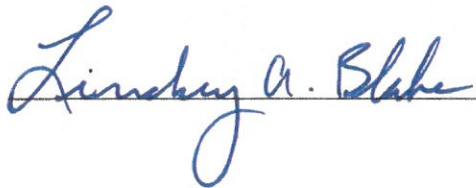




- c. The murder of Tammy Daydell was committed for remuneration (Idaho Code § 19-2515(9)(d)) and/or
- d. The murder of Tylee Ryan was especially heinous, atrocious or cruel, manifesting exceptional depravity (Idaho Code § 19-2515(9)(e)) and/or
- e. The murder of J.J. Vallow was especially heinous, atrocious 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 his 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 5<sup>th</sup> day of August 2021.

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



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



CERTIFICATE

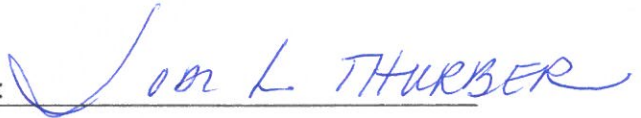
I HEREBY CERTIFY that on this 5 day of August, 2021, that a copy of the foregoing NOTICE OF INTENT TO SEEK THE DEATH PENALTY was served as follows:

John Prior  
[john@jpriorlaw.com](mailto:john@jpriorlaw.com)

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

Mark L. Means  
[meanslawoffice@gmail.com](mailto:meanslawoffice@gmail.com)

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

By:  Jon L. THURBER