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10 Attorney for MRS. LORI DAYBELL

11 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT STATE**
12 **OF IDAHO COUNTY OF FREMONT**

13 STATE OF IDAHO,
14 Plaintiff

CASE NO. CR22-21-1624

15 Vs.

**SPECIFIC DISCOVERY PURSUANT TO IDAHO
CRIMINAL RULE 16**

16 CHAD GUY DAYBELL and
17 LORI NORENE VALLOW
18 AKA LORI NORENE DAYBELL

19 PLEASE TAKE NOTICE that the undersigned, pursuant to RULE 16 of the Idaho Criminal
20 Rules request discovery and inspection of the following information, evident and materials:¹

- 21 1. All autopsy reports, medical examiner reports, coroner reports, lab testing
22 results/reports, documents, records, reports, communications, exhibits, testing
23 results/procedures, DNA, or the like regarding all exhumed bodies related to this case.
- 24 2. List of all persons of knowledge and or witnesses, including name, address, email,
25 telephone number of which the State has taken a formal or informal statement
26 regarding this case.

¹ Please ensure all records or the like are legible copies for the Defense.

1 3. Any and all statements, formal or informal, tangible or intangible, electronic or
2 nonelectronic, written or unwritten of all persons of knowledge and or witnesses to this
3 matter. Please include, but not limited to the person(s) full name, date and time of
4 conversation(s), specific statement(s) of said conversation, location of said
5 conversation(s), substance of conversation(s), method of conversation(s) (ex. i.e.,
6 telephone, text, email, facetime, face to face, etc.), duration of said conversation, and
7 all person(s) in attendance and or involved in said conversations.
8

9 Please produce all records of said communications, tangible, or intangible,
10 included but not limited to recordings, text messages, emails, phone records, voice
11 mails, pictures, videos, reports, police reports, or the like.
12

13 Also include any and all identifying information for person(s) present and or
14 included in said conversation or in proximity of said conversation. Please identify the
15 attending person(s) full name, address, employment position, telephone number, and
16 other identifiable information.
17

18 **This requests specifically includes the following, but not limited to said persons:**

- 19 i. Lori Vallow Daybell
- 20 ii. Chad Daybell
- 21 iii. Alex Cox
- 22 iv. Zulema Pastenes
- 23 v. All Daybell Children
- 24 vi. Tami Daybell
- 25 vii. Adam Cox (and children of Adam Cox)
- 26 viii. Colby Ryan
- ix. Kelsee Ryan
- x. Parents of Chad Daybell
- xi. Parents of Tami Daybell
- xii. Parents of Lori Vallow Daybell
- xiii. Melanie Gibb

- xiv. Summer Shiflet (and any of her family members)
- xv. David Warrick
- xvi. Larry Woodcock
- xvii. Ethel K. Vallow Woodcock (Kay Woodcock)
- xviii. April Raymond
- xix. Annie Cushing
- xx. Melani (Boudreaux) Pawlowski
- xxi. Ian Pawlowski
- xxii. Brandon Boudreaux
- xxiii. Heather Daybell (sister-in-law of Chad Daybell)
- xxiv. Matthew Daybell (brother of Chad Daybell)
- xxv. Robert Wood, Special Prosecutor
- xxvi. All investigators/detectives/police officers' communications whether they be by formal or informal/personal or professional conduits of communications. I.E., persons cellular phone/tablet/computer and or professional cellular phone/Tablet/Computer(s).
- xxvii. All Persons identified by the state as witnesses or persons of knowledge
- xxviii. All witnesses that participated in the Grand Jury that convened in regard to this case;

With each witness or persons of knowledge please include all forms of statements including recordings, reports, text messages, emails voice mails and the like. If any recording or report is not complete, please identify incomplete form of statement and location, if known, of complete statement. In regard to each statement please identify presence of all individuals/persons and the like present during acquisition/creation of statement.

The right is hereby reserved to make a request for such other and additional discovery as may be determined at a later date to be necessary and required. Furthermore, this requests by no way intends to limit the duty of production owed by the Prosecution to produce all evidence, records, notes, charts, reports, photographs, videos, recordings, text, communications, emails, data, gps reports, financial records, or the like (tangible or intangible) to those identified above.

1 Pursuant to Rule 16 of the Idaho Criminal Rules, this request relates to information in the
2 possession or control of members of the Prosecuting Attorney's Staff and to others who have
3 participated in the investigations or evaluations of the case who either regularly report, or with
4 reference to this particular case have reported, or aided the office of the Prosecuting Attorney.
5

6 DATED this 28 day of June 2021.

7 By Mark L. Means
8 Mark L. Means
9 Attorney

1 CERTIFICATE OF SERVICE: I hereby certify that the above aforementioned document
2 was served as identified below DATED this 28 day of June 2021.

3 Lindsey A. Blake
4 Office of the Fremont County
Prosecuting Attorney
5 22 W. 1st. N.
6 St. Anthony, ID 83445
Telephone: 208.624.4418
7 Service email: prosecutor@co.fremont.id.us

x _____ Email

8 DATED this 28 day of June 2021.

9
10 By Mark L. Means
11 Mark L. Means
12 Attorney