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

STATE OF IDAHO,
Plaintiff

CASE NO. CR22-21-1624

Vs.

**THIRD DECLARED MOTION
TO COMPEL**

LORI NORENE VALLOW
AKA LORI NORENE DAYBELL

COMES NOW DEFENDANT LORI NORENE VALLOW (DAYBELL), by and through her attorney of Record, Mark L. Means of Means Law Office, PLLC, and pursuant to Idaho Criminal Rule 16. Discovery and Inspection subsection (f) and further moves this Court for an order compelling and granting sanctions against the state, the State to provide full and complete responses to said DEFENDANT's Requests of Discovery and Specific Request of Discovery Pursuant to Idaho Criminal Rule 16 which was served upon the State on or about June 28, 2021.¹ In addition, on or about 7/20/21 a detailed list of discovery violations, missing documents, records exhibits, recordings, reports and the such was provided to the State. To date no response to either the discovery requests or good faith letter.

Subject to said rule, the State had an obligation to provide full and complete written response within fourteen (14) days from date of service and, again, failed to do such.

WHEREFORE said DEFENDANT request this Court order the following:

1. Defendant requests a hearing (1st through 3rd Motion to Compel) on this matter as soon as the Court is available.
2. PLAINTIFF be ordered to provide full and complete responses in an expedited manner.

¹ See attached true and correct copies of the following: Certificate of Service, Specific Set of Discovery Requests, 7/20/21 Good Faith Letter to State.

1 3. PLAINTIFF be imposed with sanctions by this Court for costs, fees, and other appropriate
2 sanctions including as the Court seems fit, but not limited to a dismissal of this matter.

3 **That I Certify (or declare) under penalty of perjury pursuant to the Law of the State of Idaho**
4 **that the foregoing is true and correct.**

5 DATED this 9 day of August 2021.

6 *M.L. Means*

7 Mark L. Means

8 Advocate for Mrs. Lori Norene Daybell

1 CERTIFICATE OF SERVICE: I hereby certify that the above aforementioned document
was served as identified below DATED this 9 day of August 2021.

2
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
Service email: prosecutor@co.fremont.id.us

x _____ Email

7
8 DATED this 9 day of August 2021.

9 *M.L. Means*

10 _____
Mark L. Means
Advocate for Mrs. Lori Norene Daybell

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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.

**CERTIFICATE OF SERVICE RE: SPECIFIC
DISCOVERY PURSUANT TO IDAHO CRIMINAL
RULE 16**

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

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

21 Lindsey A. Blake
22 Office of the Fremont County
23 Prosecuting Attorney
24 22 W. 1st. N.
25 St. Anthony, ID 83445
26 Telephone: 208.624.4418
Service email: prosecutor@co.fremont.id.us

x _____ Email

DATED this 28 day of June 2021.

By *M.L. Means*
Mark L. Means
Attorney

CERTIFICATE OF SERVICE RE: SPECIFIC DISCOVERY PURSUANT TO IDAHO CRIMINAL RULE 16

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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
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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

MEANS-LAW

MARK L. MEANS

Attorney At Law



July 20, 2021

Ms. Lindsey A. Blake
Mr. Robert Wood
Fremont County Prosecutor
22 West 1st North
Saint Anthony, ID 83445

Re: 7/15/21 Incomplete Discovery Responses (to date)

Dear Prosecutors,

After a review of the 7/15/21 Discovery the following is inadequate, lacking, or missing regarding the above dated production. Given your unilateral selection of an extension from the original due date in June 2021 to July 15, 2021, I am requesting complete discovery responses by no later than: 5:00 pm July 21, 2021. Additional Motion(s) to Compel will follow if any or all the following as well as any other evidence withheld and not produced in its entirety.

1. Tamara Daybell Autopsy Report please see 2nd Motion to Compel. Production lacked reports, notes, photographs, from date of exhumed to present.
2. 10/20/20 (Produced 7/15/21) interview with Melanie Gibb clearly identifies prior conversation with Mr. Wood to this interview. Please identify all parties of the prosecution/policy present for this interview. Also please provide any and all records, reports, notes, communications, etc. involving Ms. Gibb, Mr. Wood, investigators, detectives etc. regarding this interview and or any other interview/communications/text/emails, etc. involving Ms. Gibbs. Furthermore, Ms. Gibb states that Mr. Wood recommended she put “out a video” that it was a “good video. Please identify and produce this video and the communications, dates, times, locations, persons present and or privy to the communications regarding this “video.”

Please produce all communications between Ms. Gibb and the following individuals: All detectives, investigators, prosecutors, other persons of witness(es), persons of witness(es), etc. If there were verbal statements without corresponding written communications please

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identify location of communications, persons present, notes, reports, etc. Also, Detectives identified they “called” Ms. Gibb routinely. Please provide corresponding reports, notes, phone records, text messages, emails, etc regarding all communications with Ms. Gibb and anyone associated with the State’s investigation in this matter. It is further identified that Ms. Gibb has communicated on Mr. Wood’s personal cellular telephone. Please provide phone records illustrating phone calls, text messages, emails and all telephone numbers, telephone carriers associated with these communications and any corresponding reports, notes, records resulted from this communication.

3. Journal: What appears to be a journal/diary of various persons does not identify the author and withholds the journal in its entirety. Please identify author(s) of the journals and produce the entire journal/diary.
4. Please identify any and all persons, communications, records, and the like of investigators, prosecutors, detectives etc. that have engaged in any disparaging remarks regarding any and all defense attorneys, the defendant(s) and or “off record” communications with witness(es)/persons of interest.
5. Regarding Ms. Reegen Price (6/9/20 interview produced on 7/15/21): Please produce prior interview(s) and or reports cited in interview. Please produce any and all reports, records, text, voice mails, emails, videos, photographs, etc. regarding produced report. Identify all persons’ identity involved in “taking” of said interview(s). Identify all previous and post communications, statements, records, reports, notes, with this witness(es) to this interview (written/verbal/tangible/intangible) between law enforcement and this person(s). Identify all, previous to recording, communications (written/verbal) between law enforcement and this person(s). She refers to previous interviews with “Ron” of law enforcement and Mr. Robert Wood. Please provide. (*She makes statements regarding hearing a gun shot on day of “raccoon” shooting*). Please identify any and all records identify her physical location at the time of the shooting.
6. Regarding Mr. Colter Cannon (6/10/20 interview produced on 7/15/21): Please produce prior interview(s) and or reports cited in interview. Please produce any and all reports, records, text, voice mails, emails, videos, photographs, etc. regarding produced report. Identify all persons’ identity involved in “taking” of said interview(s). Identify all previous and post communications, statements, records, reports, notes, with this witness(es) to this interview (written/verbal/tangible/intangible) between law enforcement and this person(s). Identify all, previous to recording, communications (written/verbal) between law enforcement and this person(s). Please identify who took the recording of this interview and stated in front of Mr. Cannon the interview is “regarding the attempted shooting of Tami Daybell”. Any previous interview, statements, records, communications between Mr. Cannon and any person associated with the Prosecution in this matter. Please produce the on body camera, car camera recordings associated with the day this person was on the scene of the paint ball shooting. Please produce this person’s report/notes/records/communications, etc. associated

with this persons statements/records. Please provide dispatch recording of Tami Daybell statements regarding the paint ball incident. Please produce any and all tangible/intangible evidence regarding “attempted shooting of tami” and or paint ball gun shots. Any interviews, reports, records, notes, videos, or the like of any persons of knowledge regarding this alleged “shooting” incident. Record of interview of older “gentlemen” referenced in interview. Record of interview with “Joe” chopping wood across street at time of alleged shooting.

All FBI and or law enforcement documents, records, etc. of investigation regarding this incident.

7. Regarding Kathy Brown (6/10/20 interview produced on 7/15/21): Please produce prior interview(s) and or reports cited in interview. Please produce any and all reports, records, text, voice mails, emails, videos, photographs, etc. regarding produced report. Identify all persons’ identity involved in “taking” of said interview(s). Identify all previous and post communications, statements, records, reports, notes, with these witness(es) to this interview (written/verbal/tangible/intangible) between law enforcement and this person(s). Identify all, previous to recording, communications (written/verbal) between law enforcement and this person(s). Please produce the interview, records, and the like etc. of Jan. 2020 “first search warrant” regarding search of Mr. Daybell’s property. Interview with “Jeff” Brown. References “ERT” investigation? Please produce all associated with this “ert”. All records, text messages, and the like regarding persons of “paintball” activity in the area. She references a text message she gave to law enforcement. Interview cuts off midstream at 7:01 after discussion of text message of kid in area with paint ball gun.
8. Regarding Matt and Heather Daybell (6/11/20 interview produced on 7/15/21): Please produce prior interview(s) and or reports cited in interview. Please produce any and all reports, records, text, voice mails, emails, videos, photographs, etc. regarding produced report. Identify all persons’ identity involved in “taking” of said interview(s). Identify all previous and post communications, statements, records, reports, notes, with these witness(es) to this interview (written/verbal/tangible/intangible) between law enforcement and this person(s). Identify all, previous to recording, communications (written/verbal) between law enforcement and this person(s). Please produce prior interview(s) and or reports cited in interview. Please produce any and all reports, records, text, voice mails, emails, vidoes, photographs, etc. regarding produced report. All persons’ identity involved in “taking” of said interview(s). Identify all previous and post communications (to this interview), statements, records, reports, notes, with these witness(es) to this interview (written/verbal/tangible/intangible) between law enforcement and Matt and/or Heather Daybell. All communications, records, texts, voice mails, emails and the like between Detective Hope and these witness(es) evidence by statements of Mr. Daybell. All evidence, records, reports, videos, etc. that supports the interviewer’s stated theory of that “they” can prove “Chad” is guilty of alleged murder of Tamara Daybell. All emails allegedly to have been sent by Mr. Chad Daybell in the possession of Mr. Daybell that was provided to law enforcement by Mr. Daybell. Please produce the recording/records of interview of Daybell children by this interviewer on or about 6/10/20. All medication, medical, counseling

psychological/depression records of Ms. Tamara Daybell at least two years prior to death. Identify all medical professional/treating professionals for Ms. Tamara Daybell. Previous interview, records, reports, videos, text, emails, etc. with a “detective” with Heather Daybell. All communications between Detective Hope (Rexburg PD) and his statements and records of statements to Daybell including but not limited too “protecting them (Daybells).” Detective Ball’s interview and records with “Samantha”. All communications between Detective Dave Hope and Matthew and Heather Daybell, as stated in interview. Again, interview cut off midsentence, please provide interview in its entirety.

9. Regarding Ryan Bradshaw, Jodie, Whitney, Aspen, (6/11/20 interview produced on 7/15/21): Please produce prior interview(s) and or reports cited in interview. Please produce any and all reports, records, text, voice mails, emails, videos, photographs, etc. regarding produced report. Identify all persons’ identity involved in “taking” of said interview(s). Identify all previous and post communications, statements, records, reports, notes, with these witness(es) to this interview (written/verbal/tangible/intangible) between law enforcement and this person(s). Identify all, previous to recording, communications (written/verbal) between law enforcement and this person(s). Interview starts and ends midsentence. A second interview for 1.45 minutes is, as previous interview, started and ends midsentence. Please produce in its entirety and or explain why portions of interview are missing/not produced.

10. Regarding Jack and Sheila Daybell (6/16/20 interview produced on 7/15/21): Please produce prior interview(s) and or reports cited in interview. Please produce any and all reports, records, text, voice mails, emails, videos, photographs, etc. regarding produced report. Identify all persons’ identity involved in “taking” of said interview(s). Identify all previous and post communications, statements, records, reports, notes, with these witness(es) to this interview (written/verbal/tangible/intangible) between law enforcement and this person(s). Identify all, previous to recording, communications (written/verbal) between law enforcement and this person(s).

Please produce all statements, verbal/nonverbal, written/not written, recorded, and or the like, (i.e. jail house recordings) etc. of Chad Daybell regarding, but not limited too, the death of Tamara Daybell prior to arrest of, arrest, and or post arrest of Mr. Chad Daybell. Interview ends midsentence. Please produce in it entirety.

Please produce all unauthorized/nondisclosed recordings, notes, records, photograph, videos, and the like of this witness(es) and any other witness/person of interests created by investigative authorities. Please identify the specific device used to create these record(s), the person(s) creating said records and the like.

Please produce all statements to persons of interests and or witness(es) by Rexburg police, Fremont, Madison County, Idaho Attorney General, and or any other investigative authority expressing their opinions, facts, disparaging comments/allegations regarding the Defendants.

Please produce all Fremont County Coroner and or Fremont County Reports, evidence, records, videos, notes charts, and or the like regarding the passing of Tamara Daybell.

Please produce any and all records of payments “cash” payments to Daybell children by Chad Daybell.

Please produce all statements of Daybell children regarding the timing and effectuation of the funeral of Ms. Tamara Daybell.

Please identify each and every “burner” telephone, telephone number, cell phone carrier, suspected/alleged owner/purchaser of said phone, any and all GPS information acquired from said phone, telephone records, and each and every communication(s) from said burner telephone.

11. Regarding Fay Harris (7/29/20 interview produced on 7/15/21): Please produce the interview in its entirety as it ends midsentence.
12. Regarding John Ochs (7/29/20 interview produced on 7/15/21): Any and all emails/text sent by Mrs. Tamara Daybell regarding relationship with Mr. Chad Daybell and or current charges. (for example, an email the night before passing of Mrs. Daybell).
13. Regarding Margaret Brown (7/29/20 interview produced on 7/15/21): Interview begins midsentence. Please produce in its entirety. Any and all other evidence of spiritual visitation of Mrs. Tamara Daybell to this witness.
14. Regarding Melanie Gordon (7/29/20 interview produced on 7/15/21): This witness makes references to four (4) “odd” gentleman attending the memorial of Mrs. Tamara Daybell. These individuals attended without their wives did not appear to be friends of family, per witness. Please identify these individuals and produce and any and all evidence of these individuals. Interview, again, ends midsentence. Please produce this in its entirety.
15. Regarding Stephanie Peralta (7/29/20 interview produced on 7/15/21): Interview appears to end midsentence with a question for Witness. Please produce in its entirety.

Please produce data, log files, exercise files, step records and the like from Mrs. Tamara Daybell “Fitbit” watch, program, and or device similar used by Mrs. Tamara Daybell. As well as any medical records/physical exams at least two years prior to her passing. List of all medical providers from date of relocation to Sugar/Rexburg Idaho from Springville, Utah.

Please produce any and all records, notes, communications and the like involving persons of knowledge/witness Julie Rowe.

16. Regarding Angela Johansen (7/29/20 interview produced on 7/15/21): Any and all communications between this witness and Mrs. Tamara Daybell.

17. Regarding Shanna Miller (7/29/20 interview produced on 7/15/21): Please produce the previous interview of this witness by "Bruce" as identified in this interview. Interview ends midsentence. Please provide entire interviews.

All exercise/attendance records from gym entitled "high fitness" referenced in interview for Mrs. Tamara Daybell.

All communications, records, and the like from the Parents and or siblings of Mrs. Tamara Daybell. Please produce any and all records of homeopathic type medicine or treatments engaged by Mrs. Tamara Daybell.

Therapist identification and records of Mrs. Tamara Daybell.

Please produce any and all evidence that is supportive or contrary of the multiple witness statements of "paintball gun" incident with Mrs. Tamara Daybell that would support your theory of attempted shooting of Mrs. Tamara Daybell with a lethal weapon (i.e. gun).

In reviewing previous discovery production the following is requested to be produced in working format (If you wish for my office to provide you a hard drive or to pick up this information please advise upon receipt of this letter.

Missing audio or video recordings from key interviews or event

Within the various police summary compilations are several interviews and interactions that do not have accompanying audio or video segments. They are listed below, grouped according to the provide report the appear in.

*RPD Original Report Unredacted. 3-13-2020 (Bates #1-1402) Addendum A, p.4, bullet 30

P.37 12-7-19 Melanie Gibb phone call with Ray Hermosillo

P.38 11-26-19 Dave Hope assisting in questioning Cad Daybell at 565 Pioneer Road, Rexburg

P.39 12-6-19 Dave Hope interviewing Garth Daybell at Madison Jr. High, Rexburg

P.39 12-13-19 Dave Hope interviewing Joseph and Emma Murray at Central Elementary, Sugar City

P.45 12-17-19 Ron Ball and Rick Schmitt meeting with Jason Gwilliam at Springsville Police Department

P.66 2-5-20 Ron Ball, Ray Hermosillo and others meeting with Matt and Heather Daybell at Rexburg PD

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P.71 1-8-20 Randy Reese interviewing April Raymond via phone call

P.72 1-9-20 Randy Reese interviewing Annie Cushing via phone call

P.73 2-20-20 Bodycam footage of Lori Daybell's arrest in Princeville, Hawaii

P. 73 2-20-20 Bodycam footage of Ron Ball, Rob Wood confronting Cad Daybell after Lori's arrest

P.75 12-7-19 Dave Hope interviewing Principal Williams at Kennedy Elementary

P.77 3-3-20 Rick Schmitt interviewing Matt Daybell about storage unit footage

P.81 1-26-20 Bodycam of Chad and Lori being detained and questioned in separate police cars in Hawaii

*RPD Report 11.20.20 (Bates # 018696-019628) 933 pages. Addendum A p.9 bullet 3

P.117 8-13-20 David Stubbs interviewing Heather Daybell and Maggy Daybell Hope

P.125 9-28-20 Chuck Kunsaitis interviewing Craig Huff via phone call

*RPD Report 4.14.21 (Bates #40568-41009) Addendum E, p.2, bullet 5

P.6 2-3-21 Melanie Gibb phone call with Ray Hermosillo about "casting out spirits"

P.15 12-7-20 Chuck Kunsaitis interviewing Mike and Nancy Jones, founders of "Preparing A People"

*Unredacted FBI Records (Bates #1909-2162) Addendum A, p.4, bullet 33

P.17 12-2019 Seth Bernard of 565 Pioneer Rd. #176 mentions in an interview that he and his wife Leah had previously been interviewed by David Stubbs

*Addendum D, p.14, bullet 5 (Bates #39275-39276)

7-28-20 Matt and Reagen Price interview about fires in Daybells' field

States AG interview on 7-29-20 with Shanna Miller at Central Elementary

Shanna Miller mentions being previously interviewed by Fremont County detective Bruce Mattingly. There is no record of that interview, or any others he any have conducted with school employees.

Preliminary hearing transcript—August 2 and 3, 2020

P.250 Melanie Gibb testifies she met with Rob Wood and other officers on Saturday, 8-1-2020, in Wood's office before the preliminary hearing. Please provide detailed conversation notes, records, presence of person(s) at this conversation.

P.252 Melanie Gibb talked to the FBI “two or three times” in early 2020 (please provide) No reports given

*6-9-20 Dave Hope stood nearby using a bodycam pointed at Chad Daybell and Emma Murray as they talked while Chad was handcuffed in a police car (video, report, notes, etc).

*2-18-21 Garth Daybell was detained and questioned for a half-hour in his classroom at Madison Jr. High by Vincent Kaniekamann and Rickey Wright. (video, report, notes, etc).

*5-17-21 Garth Daybell was detained and questioned at Rexburg PD for six hours (8 am to 2pm) by Ron Ball, Vincent K, Hermosillo and Mattingly. His wife Kaira was also detained and not allowed to leave. (video, report, notes, etc).

<u>Bates #</u>	<u>Discovery items with missing information/records</u>	<u>Addendum- Page-Bullet point</u>
5357-5363	Adam Cox interview Summary is there, but video is missing	A-1-13
5364-5379	Zachary Cox interview Summary is there, but video is missing	A-1-14
78-270	102ND610 RPD Photos Files won't open. "PDF is corrupted"	A-3-26
423-510	20035693 Photos of storage Unit Content "PDF is corrupted"	A-4-4
271-379	20014935 565 Pioneer Rd. #107 Search warrant photos "PDF is corrupted"	A-4-2
380-422	20023846 Kauai search warrant photos of property seized "PDF is corrupted"	A-4-3
1-77	20014849 Jeep Wrangler search warrant photos "PDF is corrupted"	A-4-1
20683-21854	2020-6-10 Rexburg PD drone images of Daybell property by Dave Hope won't open. FBI photos of Faybell firepit have a written log, but the actual photo not included	C-2-17

Audio issues (files not working properly or not provided)

Add. C, p.7, #21 Angeline Law 9-15-20 interview contains Natalie McGee audio instead

Add. D, p.9 #22 Tammy Gee interview doesn't work, no transcript provided

Add. C, p.7, #23 Craig Huff 9-9-20 interview by Ball and Wood doesn't have a transcript

Add. C, p.7 #24 Melanie Gibb's 6-3-20 interview is labeled 6-4-20 and is only 20 minutes long. Missing 1st section.

If you have any questions or issues of which you wish to discuss please contact my office upon receipt of this letter. Please provide full and complete working files, records, and the like by no later than 5:00 pm July 27, 2021

Regards,
Mark L. Means
Mark L. Means
Attorney

MEANS-LAW

MARK L. MEANS

Attorney At Law



July 20, 2021

Ms. Lindsey A. Blake
Fremont County Prosecutor
22 West 1st North
Saint Anthony, ID 83445

Re: 7/15/21 Discovery Hard drive Failure

Dear Ms. Blake,

Hope this letter finds you doing well. Included in this package is the hard drive from your office received on or about 7/15/21. This hard drive has “failed” in some way. It will not register on my desktop or laptops. I can provide a new hard drive if you would like but given the previous discussions/correspondence your office seems to want to provide its own hard drive. I am “ok” either way I just need to know asap.

Please let me know if you can provide another hard drive of the discovery for 7/15/21 or if would like me to provide a new hard drive.

Regards,
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Attorney

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