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11 Attorney for LORI NORENE VALLOW (AKA DAYBELL)

12 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF**
13 **THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MADISON**

14 STATE OF IDAHO,
15 PLAINTIFF

Case No: CR 33-20-0302

16 Vs.

AMENDED MOTION FOR BOND REDUCTION

17 LORI NORENE VALLOW,
18 AKA LORI NORENE DAYBELL
19 DEFENDANT

20 COMES NOW DEFENDANT, Mrs. Lori Vallow (Daybell), by and through her Attorney of
21 Record, Mark L. Means of Means Law and Mediation and hereby move this Court pursuant to
22 Idaho Title 19 Criminal Procedure, Chapter 29 Idaho Bail Act, including 19-2903, 19-2904, 19-
23 2912, Idaho Criminal Rule 46, relevant Idaho case law/precedent, the Constitution for the
24 United States of America as well as due process rights, and the like, for a reduction in bond.

25 Defendant, by and through her Attorney of Record, asserts new facts have come to light
26 to support this motion since the previous motion bond hearing. Furthermore, this Declared
Motion is supported by a brief declaration filled concurrently with this Motion.

**The Defendant respectfully requests oral argument on this motion before the
Honorable Judge Mallard.**

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

1 DATED this 2 day of April 2020.

2 *MLMeans*
3 Mr. Mark L. Means
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1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this 2 day of April 2020, I caused a true
3 and correct copy of the FOREGOING document to be forwarded by the method(s) indicated
4 below, to the following:

5 MADISON COUNTY PROSECUTING OFFICE x Efile
6 159 E. Main St.
7 P.O. Box 350
8 Rexburg, ID 83440
9 Email: rwood@co.madison.id.us

10 DATED this 2 day of April 2020.

11 By *Mark L Means*
12 Mr. Mark L. Means
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