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11 Attorney for LORI NORENE VALLOW (AKA DAYBELL)

7 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF**
8 **THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MADISON**

9 STATE OF IDAHO,
10 PLAINTIFF

Case No: CR 33-20-0302

11 Vs.

DECLARED MOTION FOR BOND REDUCTION

12 LORI NORENE VALLOW,
13 AKA LORI NORENE DAYBELL
14 DEFENDANT

15 COMES NOW DEFENDANT, Mrs. Lori Vallow (Daybell), by and through her Attorney of
16 Record, Mark L. Means of Means Law and Mediation and hereby move this Court pursuant to
17 Idaho Title 19 Criminal Procedure, Chapter 29 Idaho Bail Act, including 19-2903, 19-2904, 19-
18 2912, Idaho Criminal Rule 46, and relevant Idaho case law/precedent for a reduction in bond.

19 Defendant, by and through her Attorney of Record, asserts new facts have come to light
20 to support this motion since the previous motion bond hearing.

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

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

25 DATED this 24 day of March 2020.

Mark L. Means

26 Mr. Mark L. Means

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this 24 day of March 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 24 day of March 2020.

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