

1 Mark L. Means (ISB 7530)  
2 MEANS LAW and MEDIATION  
3 MEANS-LAW  
4 P.O. Box 544  
5 Caldwell, ID 83606  
6 Telephone: 208.794.3111  
7 Facsimile: 1.866.228.3429  
8 Email: [mlm@means-law.com](mailto:mlm@means-law.com)  
9 Website: [www.means-law.com](http://www.means-law.com)  
10 Attorney for LORI NORENE DAYBELL

11 **IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF**  
12 **THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MADISON**

13 STATE OF IDAHO,  
14 PLAINTIFF

15 Vs.

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

Case No: CR 33-20-0302

**ENTRY OF PLEA**  
**DEMAND PRETRIAL and JURY TRIAL**

**MOTION RE:**

**(1) MOTION RE: RESERVATION OF**  
**AFFIRMATIVE DEFENSES**

**(2) AMENDED MOTION RE: BOND**  
**REDUCTION; and**

**(3) MOTION RE: CHANGE OF VENUE**  
**(Reservation)**

19 HERE COMES DEFENDANT, Mr. Lori Norene Vallow (Daybell) (hereafter Defendant), by and  
20 through her attorney of record Mark L. Means of Means Law Office, PLLC, (having submitted  
21 previous notice of appearance) requests that all filings, etc. be served on her ATTORNEY as set out  
22 above.

23 DEFENDANT enters a plea of NOT GUILTY to Count I, II, and III of the Amended Complaint  
24 filed in this matter.

25 DEFENDANT demands this case be set for a Pretrial and Jury Trial.  
26



1 29 Idaho Bail Act, including 19-2903, 19-2904, 19-2912, Idaho Criminal Rule 46, and all other  
2 relevant Idaho case law/precedent for a reduction in current bond.

3 Defendant asserts felony charges regarding previous bond setting were dismissed and  
4 as such Bond should be reset to reflect current charges evident in the newly filed Amended  
5 Criminal Complaint. Defendant requests this Court to review applicable criteria under Criminal  
6 Statute and Criminal Rule as it pertains to bond reduction.

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

9  
10 **MOTION RE: CHANGE OF VENUE (Reservation)**

11 COMES NOW THE DEFENDANT, Mrs. Lori Vallow (Daybell), by and through her Attorney  
12 of Record and given the very recent amendment to charges (dismissal of felony charges), the  
13 requests for a pretrial (requests via email on or about 6/13/20) to occur on 6/17/20, Defendant  
14 reserves the right to file at a later time a Motion to Change Venue.

15 DATED this 14 day of July 2020.

16  
17 By Mr. Mark L. Means  
18 Mr. Mark L. Means

