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**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF  
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MADISON  
MAGISTRATE DIVISION**

STATE OF IDAHO,

Plaintiff,

v.

LORI NORENE VALLOW, AKA LORI  
NORENE DAYBELL,

Defendant.

Case No.: CR33-20-0302

**INITIAL DISCOVERY DISCLOSURE**

COMES NOW, The State of Idaho, by and through the Madison County Prosecuting Attorney's Office and hereby submits the following Response to the Request for Discovery:

The State has complied with the request by:

- a. Un-redacted Rexburg Police Department Incident Report No. 201905298 (1,402 pages) (Blue Paper);**
- b. Redacted Rexburg Police Department Incident Report No. 201905298 (1,402 pages) (Jump Drive);**
- c. RPD 2015242 Sidney Woodbury Schenk Interview 01302020 (Jump Drive);**
- d. RPD 20015242 Jack & Sheila Daybell Interview 12182019 (Jump Drive);**
- e. RPD 20016705 Yellowstone Security Video Received 01142020 (Jump Drive);**
- f. RPD 20032401 Idaho Falls Airport Security Video (Jump Drive);**
- g. RPD 20034004 Natalie & Ian Powlowski Interview 12052019 (Jump Drive);**
- h. RPD 20034147 Yellowstone Security Video Rec'd 01242020 (Jump Drive);**
- i. RPD 20034192 Melanie Bourdeaux Interview 12032019 (Jump Drive);**
- j. RPD 20038178 Larry & Kay Woodcock Interview 01062020 (Jump Drive);**

- k. RPD 20039331 Melanie Bourdeaux Interview 01142020 (Jump Drive);
- l. RPD 20039748 Ian Powlowski Recordings (Jump Drive);
- m. RPD 20021749 Storage Plus Security Video (Jump Drive);
- n. Five hundred seventy one RPD photographs (1-571) (Jump Drive);
- o. RPD Officer Kellen Whetten body camera footage November 26, 2019 (Jump Drive);
- p. RPD Detective David Stubbs body camera footage November 26, 2019 (2) (Jump Drive);
- q. RPD Detective David Stubbs body camera footage November 27, 2019 (2) (Jump Drive);

The State will comply with the request by: **Supplementing its discovery disclosure as materials become available to the State.**

DATED this 16<sup>th</sup> day of March, 2020.

/s/ Jodi L. Thurber  
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 Jodi L. Thurber, Paralegal  
 Madison County Prosecuting Attorney's Office

CERTIFICATE

I HEREBY CERTIFY that on this 16<sup>th</sup> day of March, 2020, that a copy of the foregoing INITIAL DISCOVERY DISCLOSURE was hand delivered, emailed, faxed or mailed to the following party as indicated:

Mark L. Means  
 429 SW 5<sup>th</sup> Avenue, Ste. 110  
 Meridian, Idaho 83642  
[mlm@means-law.com](mailto:mlm@means-law.com)

- X U.S. Mail
- Hand Delivered
- Courthouse Box
- Facsimile:
- X File & Serve
- Email

By: /s/ Jodi L. Thurber  
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