

ROB H. WOOD # 8229  
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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,

vs.

LORI NORENE VALLOW, AKA LORI  
NORENE DAYBELL,  
Defendant.

Case No.: CR33-20-0302

**MOTION TO AMEND COMPLAINT**

The State of Idaho, by and through the Madison County Prosecuting Attorney's Office, and hereby moves the Court for its Order allowing the State to amend the Complaint in the above entitled case to dismiss Counts I and II, to wit: Desertion and Nonsupport of Children or Spouse, a Felony, without prejudice. A copy of the proposed Amended Complaint is filed herewith.

RESPECTFULLY SUBMITTED this 2<sup>nd</sup> day of July, 2020.



Rob H. Wood  
Madison County Prosecuting Attorney

CERTIFICATE

I HEREBY CERTIFY that on this 2nd day of July, 2020, that a copy of the foregoing MOTION TO AMEND COMPLAINT 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)

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

By: Whitney Bee