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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,

Petitioner,

vs.

LORI NORENE VALLOW, AKA LORI  
NORENE DAYBELL,

Defendant.

Case No.: CR33-20-0302

**OBJECTION TO DEFENDANT'S  
DECLARED MOTION FOR BOND  
REDUCTION**

COMES NOW, the State of Idaho, by and through the Madison County Prosecuting Attorney's Office and hereby objects to the Defendant's Declared Motion for Bond Reduction on the following grounds:

1. The Defendant asked for her bail to be lowered to \$10,000.00, or in the alternative \$50,000.00 on March 6<sup>th</sup>. Since that time the Defendant disqualified the sitting judge on the case. It has been less than one month since the Court reduced the Defendant's bail to \$1,000,000.00 and it appears to be an abuse of the Court Rules for the Defendant to disqualify the Judge on the case and then to request the same or similar relief so soon thereafter.
2. The Defendant has yet to comply with the valid Court Order to produce her children in the related Child Protection Action. This Court should make obedience to said Order or a show of good cause for why the Defendant cannot obey said Order a condition for any further bail reduction.

3. In the Declaration in Support of Defendant's Amended Motion for Bond Reduction, Paragraph 3, the Defendant describes the large volume of received and anticipated discovery and the difficulty in providing the Defendant with that discovery. It is important to note that the reason for the current visitation restrictions currently in place at the Madison County jail are a response to the recent COVID-19 outbreak. The safety of both the inmates and employees is of the utmost importance to Madison County, the Sheriff's Department, and the Prosecutor's Office.
4. Upon receipt of the Defendant's Amended Motion, the State has discussed visitation protocols with the Madison County Jail. The State has been informed that what the Defendant has called the public visitor room is no longer open to the public and that all public visitation is currently done electronically. What was the public visitation center is now being used for attorneys to visit their clients in a safe manner, which does not allow for the spread of the COVID-19 virus into the jail.
5. In regards the Defendant's claim that the attorney's visitation being recorded, the State has learned that one conversation between the Defendant and he attorney was accidentally recorded. The Jail promptly deleted the recording of that conversation and has placed a block on all recordings in the current attorney/client visiting area to preclude any other accidental recordings.
6. The State takes the rights of the Defendant to receive and review discovery very seriously. As such the State has visited with the jail and believes that there are options to provide the Defendant with adequate access to discovery which the State will discuss at a hearing on this matter.

RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of April, 2020.

/s/ Rob H. Wood

Rob H. Wood

Madison County Prosecuting Attorney

CERTIFICATE

I HEREBY CERTIFY that on this 7<sup>th</sup> day of April, 2020, that a copy of the foregoing –  
OBJECTION was hand delivered, emailed, faxed or mailed to the following party as indicated:

Mark L. Means  
[mlm@means-law.com](mailto:mlm@means-law.com)

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

By: /s/ Jodi L. Thurber \_\_\_\_\_