

Lindsey A. Blake, ISB #7920
Rob Wood, ISB #8229
OFFICE OF THE FREMONT COUNTY
PROSECUTING ATTORNEY
22 W. 1st N.
St. Anthony, ID 83445
Tel: 208-624-4418
Email: prosecutor@co.fremont.id.us

Attorneys for the State

IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF FREMONT

STATE OF IDAHO, Plaintiff, vs. CHAD GUY DAYBELL, Defendant	CASE NO. CR22-21-1623 STIPULATION ON INTRODUCTION OF SPECIFIC EVIDENCE
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The State of Idaho, by and through the Fremont County Prosecutor's Office, and the Defendant Chad Daybell, by and through his Counsel, John Prior, hereby stipulate to the following evidence to be introduced at trial:

- 1) Business Record Affidavits/Custodian of Record Affidavit and the admission of the records referenced by said exhibits. ¹
- 2) Tammy Daybell's phone and data and content retrieved from it and chain of custody; ²
- 3) Zulema Pastenas' phone and data and content retrieved from it and chain of custody;
- 4) Charles Vallow's phone and data and content retrieved from it and chain of custody;

¹ The State will still have the business records certificates for admission in relation to any exhibits and/or evidence not specifically spelled out. The exhibits and evidence listed within the stipulation is not an exhaustive list of all documents covered by business record affidavits, but the Parties are stipulating to the introduction of all exhibits which have an associated business record certificate. The Parties recognize the documents and/or evidence would generally be admitted with the business records certificates.

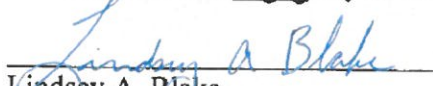
² Where all content and data recovered from the device or account is referenced it is meant to be inclusive of MSM, SMS, all other texts, emails, phone calls, voicemails, content of accounts on the device, contacts, data associated with the movements of the device, as well as any other content or data located on the device or related to the device or referenced account, including the content of Cellbrite reports associated with any device and/or account.

Parties' Stipulation on Introduction of Specific Evidence

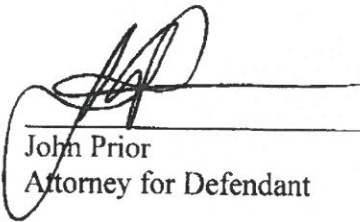
- 5) Lori Vallow's phone ending in 480-489-4652 and data and content retrieved from it and chain of custody;
- 6) Lori Vallow's phone ending in 480-692-9562 and data and content retrieved from it and chain of custody;
- 7) Chad Daybell's phone ending in 208-690-9374 and data and content retrieved from it and chain of custody;
- 8) Alex Cox's phone 334-744-4205 and all content and data retrieved from it and chain of custody;
- 9) Alex Cox's phone 480-351-9120 and all content and data retrieved from it and chain of custody;
- 10) Phone records for Cricket phone 515 & 401 and all content and data retrieved from and/or associated with them;
- 11) Lori4style@icloud.com and all content and data retrieved from it;
- 12) lollytime@icloud.com and all content and data retrieved from it;
- 13) Charles.vallow@icloud.com and all content and data retrieved from it;
- 14) Tammy.daybell@gmail.com and all content and data retrieved from it;
- 15) Charles Vallow's emails;
- 16) Banner Life Insurance documents related to Charles' life insurance;
- 17) Charles Vallow's autopsy;
- 18) Homerjmaximus online Google searches;
- 19) Daybell search scene photos from 06-09-2020 taken by Rachel Wright;
- 20) Daybell search scene photos from 01-10-2020 taken by Rachel Wright;
- 21) FBI sign-in sheet from 06-10-2020;
- 22) Photos of Daybell firepit taken by Julie Fowler;
- 23) Video of RPD searches of units 107 & 175;
- 24) Photos taken in unit 107 on 12-19-19 by Rachel Wright;
- 25) Photo sets taken by Nicole Heideman of search on 01-03-2020;
- 26) Tammy Daybell's Google searches on 10-09-2019;
- 27) Tammy Daybell's Facebook posts on 10-09-2019;
- 28) Audio of Garth & Chad Daybell's 911 call on 10-19-2019;
- 29) Audio of Tammy's Call to Dispatch/911 on 10-09-2019;
- 30) Audio of Joe Murray's Call to Dispatch/911 on 10-09-2019;
- 31) Audio of Alex Cox's 911 call on 07-11-2019 and/or reference to it;
- 32) Tammy Daybell's death certificate;
- 33) Teton Medical Group Records for Tammy Daybell;
- 34) Seasons Medical Records for Tammy Daybell;
- 35) Order for Exhumation of Tammy's body;
- 36) Photos of scene on 10-19-2019 of Tammy and scene;
- 37) Tammy's exhumation and autopsy photos;
- 38) FBI report of marks on Tylee's bones (stabbing marks);
- 39) Tylee Ryan autopsy photos;
- 40) Identity of remains found on Chad Daybell's property in the "pet cemetery" as those of Tylee Ryan;
- 41) DNA tests, results and reports which identify the remains as Tylee Ryan;

- 42) DNA tests, results and reports which identify Tylee Ryan's DNA being found on the shovel and pickaxe as found in ISP lab reports;
- 43) Tylee Ryan FBI laboratory report;
- 44) Identify of remains found on Chad Daybell's property in the black, plastic bag near the fence line as those of J.J. Vallow;
- 45) J.J. Vallow's autopsy photos;
- 46) DNA tests, results, and reports which identify the remains as J.J. Vallow;
- 47) ISP forensic reports on DNA and fingerprints;
- 48) Apollo Satellite images of Daybell property;
- 49) Additional Satellite (aerial) images of Daybell property provided in discovery;
- 50) Chad Daybell's Temple Records;
- 51) Lori Vallow's Temple Records;
- 52) Mountain America Credit Union Records;
- 53) Knott's berry Farm tickets purchased on 11-16-2019;
- 54) Bode Technology Case File regarding DNA including the Bode Lab report regarding hair found in duct tape, located on the bag wrapped around J.J. Vallow;
- 55) Astrea report on unidentified hairs, specifically the reports and findings of Dr. Eric Green regarding DNA testing of hairs located in the duct tape associated with J.J. Vallow;
- 56) Findings and reports of Tamara Martinez of the Idaho State Lab referencing fingerprints found on the bag and duct tape associated with J.J. Vallow;
- 57) Texas and Arizona finger print records for Alex Cox;
- 58) PACtech report by Bard; Example: tammy's deleted photos
- 59) Deleted Photo from Tammy's phone;
- 60) Seth Daybell Journals
- 61) McKayla Daybell Journals
- 62) Lori's former spouses' names and dates of marriage and divorce;
- 63) Mortuary call placed by Chad after Charles' death;
- 64) State's exhibits from Lori Vallow Daybell's trial 180 with 181 and 182 and relevant subparts regarding the bones and tool marks;
- 65) Chain of custody for transport of Tylee Ryan's remains;
- 66) Chain of custody for transport of JJ Vallow's remains;
- 67) Chain of custody for transport of Tammy Daybell's remains;
- 68) WalMart receipts for purchase of TracPhone;
- 69) Burger King video of Lori from 07-11-2019;
- 70) Death report for Tammy Daybell from Deputy Greenhaulgh;
- 71) Death certificate for Tammy Daybell;
- 72) Experts (Dr. Raven, Dr. Christensen and Dr. Marsden) may reference all reports, statements, etc. which reviewed in support of their findings;
- 73) Copies of original documents submitted as evidence in Fremont Count Case CR22-21-1624;
- 74) Lori's current charges in Arizona.

DATED this 26th day of February, 2024.


Lindsey A. Blake
Fremont County Prosecutor


Rob Wood
Madison County Prosecutor


John Prior
Attorney for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27 day of February, 2024, that a copy of the foregoing Stipulation on Introduction of Specific Evidence was hand delivered, emailed, faxed or mailed to the following party as indicated:

John Prior
Law Office of John Prior
429 SW 5th Street Ste 110
Meridian, Idaho 83462
john@priorlaw.com

U.S. Mail
Hand Delivered
Courthouse Box
x File and Serve
x Email

By: 

Tiffany Mecham
Legal Secretary