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**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 AND LORI NORENE VALLOW AKA LORI NORENE DAYBELL Defendants.	Case No. CR22-21- <u>1624</u> AMENDED INDICTMENT
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CHAD GUY DAYBELL AND LORI NORENE VALLOW, are accused by the Grand
Jury of Fremont County, by this indictment, as follows:

COUNT I
CONSPIRACY TO COMMIT FIRST DEGREE MURDER
AND GRAND THEFT BY DECEPTION, a Felony
Idaho Code §§ 18-1701, 18-4003(a), 18-2403(1), 18-2403(2)(a), 18-2407(1)(b)(3)

The Defendants, Chad Guy Daybell, Lori Norene Vallow, and Alex Cox (deceased) and other co-conspirators, both known and unknown, on or between the dates of October 26, 2018, and continuing until January 15, 2020, in the County of Madison, State of Idaho, and elsewhere, including Fremont County, Idaho, and as part of a continuing criminal transaction and common scheme or plan in Madison and Fremont Counties, Idaho, did willfully and knowingly combine, conspire, confederate, and agree to commit Murder in the First Degree of Tylee Ryan, and to commit Grand Theft by Deception.

OVERT ACTS

In furtherance of the conspiracy to commit Murder in the First Degree of Tylee Ryan and Grand Theft by Deception, and to affect the objects thereof, one or more of the following overt acts were committed by one or more of the subjects of the conspiracy as part of a continuing criminal transaction and common scheme or plan within Madison and Fremont Counties or elsewhere in the State of Idaho.

1. On or between October 26, 2018 and June 9, 2020, Chad Guy Daybell (and Lori Norene Vallow) did endorse and espouse religious beliefs for the purpose of encouraging and/or justifying the homicide of Tylee Ryan.
2. On or about August 16, 2019, Lori Norene Vallow did change the deposit of Tylee Ryan's Social Security benefits from Tylee Ryan's JP Morgan Chase Account to deposit money directly into Lori Norene Vallow's personal BBVA bank account.
3. On or about September 1, 2019, Lori Norene Vallow did move from Chandler, Arizona to Rexburg, Idaho with Alex Cox, Tylee Ryan, and Joshua Jaxon Vallow (hereinafter "JJ Vallow").

4. On or about September 8, 2019, Chad Guy Daybell Googled "ssw wind" and visited a website entitled "What is the definition of SSW wind direction?"
5. On or about September 9, 2019, Alex Cox did go to 565 Pioneer Road, Apt. 175, Rexburg, Idaho.
6. On or between September 9, 2019 and February 1, 2020, Lori Norene Vallow failed or refused to contact the Social Security Administration as required by law to inform the Social Security Administration of Tylee Ryan's death.
7. On or between September 25, 2019 and January 22, 2020, Lori Norene Vallow did wrongfully continue to collect five monthly Social Security Survivor benefits on behalf of Tylee Ryan.

COUNT II
FIRST DEGREE MURDER, a Felony
Idaho Code §§ 18-4001 18-4002, 18-4003(a), 18-4004

The Defendants, Chad Guy Daybell, and Lori Norene Vallow, on or between the 8th and 9th day of September, 2019, in the County of Madison, State of Idaho, and as part of a common scheme or plan or continuing criminal transaction between Madison and Fremont Counties in Idaho were concerned in the commission of a first degree murder, and did aid and abet in its commission, or, not being present, advised and encouraged its commission, or by command compelled another to commit the crime and did so with malice aforethought and did so willfully, deliberately and with premeditation, which resulted in the death of a human being, to wit: did either kill Tylee Ryan and/or assist in the killing of Tylee Ryan, and/or did encourage the killing of Tylee Ryan and/or did command another to kill Tylee Ryan in violation of Idaho Code Sections 18-4001; 18-204; 18-4003(a).

COUNT III
CONSPIRACY TO COMMIT FIRST DEGREE MURDER
AND GRAND THEFT BY DECEPTION, a Felony
Idaho Code §§ 18-1701, 18-4003(a), 18-2403(1), 18-2403(2)(a), 18-2407(1)(b)(3)

The Defendants, Chad Guy Daybell, Lori Norene Vallow, and Alex Cox (deceased) and other co-conspirators, both known and unknown, on or between the dates of October 26, 2018, and continuing until January 15, 2020, in the County of Madison, State of Idaho, and elsewhere, including Fremont County, Idaho, and as part of a continuing criminal transaction and common scheme or plan in Madison and Fremont Counties, Idaho, did willfully and knowingly combine, conspire, confederate, and agree to commit Murder in the First Degree of Joshua Jaxon Vallow, (hereinafter "JJ Vallow") and to commit Grand Theft by Deception.

OVERT ACTS

In furtherance of the conspiracy to commit Murder in the First Degree of JJ Vallow and Grand Theft by Deception, and to affect the objects thereof, one or more of the following overt acts were committed by one or more of the subjects of the conspiracy as part of a continuing criminal transaction and common scheme or plan within Madison and Fremont Counties or elsewhere in the State of Idaho.

1. On or between October 26, 2018 and June 9, 2020, Chad Guy Daybell (and Lori Norene Vallow) did endorse and teach religious beliefs for the purpose of justifying the homicide of JJ Vallow.
2. On or about September 1, 2019, Lori Norene Vallow did move from Chandler, Arizona to Rexburg, Idaho with Alex Cox, Tylee Ryan, and Joshua Jaxon Vallow.
3. On or about September 23, 2019, Alex Cox did take possession of JJ Vallow.
4. On or about November 26, 2019, Lori Norene Vallow provided a false and/or misleading physical location of JJ Vallow to law enforcement during a lawful investigation.
5. On or between September 23, 2019 and February 1, 2020, Lori Norene Vallow failed or refused to contact the Social Security Administration as required by law to inform the Social Security Administration of JJ Vallow's death.

6. On or between the dates of September 9, 2019 and February 1, 2020, Lori Norene Vallow did wrongfully continue to collect four monthly Social Security Survivor benefits on behalf of JJ Vallow and four monthly Social Security Child-in-Care payments.

COUNT IV
FIRST DEGREE MURDER, a Felony
Idaho Code §§ 18-4001 18-4002,18-4003(a),18-4004

The Defendants, Chad Guy Daybell and Lori Norene Vallow, on or between the 22nd and 23rd day of September, 2019, in the County of Madison, State of Idaho, and as part of a common scheme or plan or continuing criminal transaction between Madison and Fremont Counties in Idaho, was concerned in the commission of a first degree murder, and did aid and abet in its commission, or, not being present, advised and encouraged its commission, or by command compelled another to commit the crime and did so with malice aforethought and did so willfully, deliberately and with premeditation, which resulted in the death of a human being, to wit: did either kill JJ Vallow and or assist in the killing of JJ Vallow, and or did encourage the killing of JJ Vallow and/or did command another to kill JJ Vallow in violation of Idaho Code Sections 18-4001; 18-204; 18-4003(a).

COUNT V
CONSPIRACY TO COMMIT FIRST DEGREE MURDER
Felony, I.C. §§ 18-4001, 18-4003(a), 18-1701

That the Defendants, Chad Guy Daybell, Lori Norene Vallow, and Alex Cox (deceased) on or about October 1, 2018 – January 15, 2020, in the County of Fremont, State of Idaho, and elsewhere, including Madison County, and as part of a continuing transaction and common scheme or plan in Fremont Counties, Idaho, did willfully and knowingly combine, conspire, confederate, and agree to commit Murder in the First Degree of Tamara “Tammy” Daybell, did combine or conspire to commit murder, and one or more of such persons did an act to affect the object of the combination or conspiracy.

OVERT ACTS

In furtherance of the conspiracy to commit Murder in the First Degree of Tamara "Tammy" Daybell, and to affect the objects thereof, one or more of the following overt acts were committed by one or more of the subjects of the conspiracy as part of a continuing criminal transaction and common scheme or plan within Madison and Fremont Counties or elsewhere in the State of Idaho.

1. On or about or between the dates of October 26, 2018 and June 9, 2020, Chad Guy Daybell (and Lori Norene Vallow) did encourage and espouse religious beliefs for the purpose of justifying and/or encouraging the homicide of Tamara "Tammy" Daybell.
2. On or about September 1, 2019, Lori Norene Vallow did move to Rexburg, Idaho with Alex Cox, Tylee Ryan, and Joshua Jackson (hereinafter JJ) Vallow.
3. Text messages between Chad and Lori regarding death percentages for Tammy and JJ in messages on July 30, 2019.
4. Chad Daybell obtained a burner phone on September 18, 2019.
5. Alex Cox obtained a burner phone on October 9, 2019.
6. Text messages between Chad Guy Daybell and Lori Norene Vallow about Tamara "Tammy" Daybell being in Limbo, and Tammy being possessed by a spirit named Viola.
7. September 8, 2019, Chad Guy Daybell signed application along with Tamara "Tammy" Daybell to increase her LifeMap insurance to the maximum allowed under her policy.
8. Alex Cox attempted to shoot Tamara "Tammy" Daybell on October 9, 2019.
9. Alex Cox conducted multiple internet searches between the dates of October 8, 2019 and October 12, 2019 including searches related to Grendel drop and shooting through a Dodge Dakota.
10. Alex going to gun range in the month before October 9, 2019 when the attempted shooting of Tamara "Tammy" Daybell takes place.

11. Alex traveled from Sportsman's Warehouse to the vicinity of the Daybell residence on October 9, 2019.
12. Alex was in the church parking lot approximately 2.5 miles from the Daybell residence on the night of October 18, 2019.

COUNT VI
FIRST DEGREE MURDER
Felony, I.C. §§ 18-4001, 18-204, 18-4003(a)

That the Defendant, Chad Guy Daybell, on or about October 18-19, 2019, in the County of Fremont, State of Idaho, was concerned in the commission of a first degree murder, and did aid and abet in its commission, or, not being present, advised and encouraged its commission, or by command compelled another to commit the crime and did so with malice aforethought and did so willfully, deliberately and with premeditation, which resulted in the death of a human being, to wit: did either kill Tamara "Tammy" Daybell and/or assist in the killing of Tamara "Tammy" Daybell, and or did encourage the killing of Tamara "Tammy" Daybell and or did command another to kill Tamara "Tammy" Daybell in violation of Idaho Code Sections 18-4001; 18-204; 18-4003(a).

COUNT VII
GRAND THEFT, Felony
I.C. §§ 18-2403(1), or 18-2403(2)(a), 18-2407(1)(b)(3)

That the Defendant, Lori Norene Vallow, on or between the dates of October 1, 2019 and January 22, 2020, in the County of Madison, State of Idaho, did, as a common scheme or plan or continuing criminal transaction between Madison and Fremont Counties, Idaho, by deceit and with the intent to deprive another of property or to appropriate the same to herself or to a third person, wrongfully take, obtain or withhold, or aid and abet another to take, obtain or withhold, the property of another, to-wit:

Social Security Survivor benefits allocated for Tylee Ryan and JJ Vallow, and Social Security child-in-care benefits allocated for Lori Norene Vallow, in an amount exceeding \$1,000.00, which said funds Lori Norene Vallow was not entitled, and which did belong to the Government of the United States of America.

COUNT VIII
INSURANCE FRAUD
Felony, I.C. § 41-293

That the Defendant, Chad Guy Daybell, on or about October 19, 2019 – October 30, 2019, in the County of Madison, State of Idaho, did with the intent to defraud or deceive an insurer for the purpose of obtaining any money or benefit, presented or caused to be presented to an insurer, or other person, a statement as part of, or in support of, a claim for payment or benefit, knowing that such statement contained false, incomplete, or misleading information concerning any fact or thing material to such claim, to wit: did present and or cause to be presented an Insurance Beneficiary Form to LifeMap Assurance Company in violation of Idaho Code Section 41-293.

COUNT IX
INSURANCE FRAUD
Felony, I.C. § 41-293

That the Defendant, Chad Guy Daybell, on or about October 19, 2019 – October 31, 2019, in the County of Madison or Fremont County, State of Idaho, did with the intent to defraud or deceive an insurer for the purpose of obtaining any money or benefit, present or caused to be presented to an insurer, or other person, a statement as part of, or in support of, a claim for payment or benefit, knowing that such statement contained false, incomplete, or misleading information concerning any fact or thing material to such claim, to wit: did present and/or cause

to be presented a Claimant Statement to Primerica Life Insurance Company in violation of Idaho
Code Section 41-293.

TRUE BILL

Presented in open court this 24 day of May, 2021.

Batz M. Sa
DEPUTY PRESIDING GRAND JUROR
ACTING PRESIDING GRAND JUROR
FREMONT COUNTY, STATE OF IDAHO

WITNESS LIST

MONDAY MAY 17, 2021

NAME
Ray
Ron
Randy Reese
Stubbs
*Joe Powell
*Bruce Mattingly
Vinnie
Rylene Nolen
Tara Martinez
Angela Yancey
Hailey
Taylor Ballard

TUESDAY MAY 18, 2021

NAME
Katie Dace
Chuck
Mark Sari
Joe Powell
Bruce Mattingly
Helania Kaaiakamanu
Colter Cannon
Garth Daybell
Joe Murray
Melanie Pawlowski
David Warwick
*Zulema Pastenes

WEDNESDAY MAY 19, 2021

NAME
Zulema cont.
David Warwick
Melanie Gibb
Steve Daniels
Gary Lu
Brenda Dye
Erik Christensen

THURSDAY MAY 20, 2021

NAME
Ricky Wright
Garth Warren
Melanie Pawlowski
Ian Pawlowski
Audrey Barattiero
Ben Dean
BYU – I Lane
Kinghorn
Emma Moss
Heather Daybell
Sandra Briggs
Shanna Miller
MacKay Abeglan
Ricky Wright (cont.)
Jarrold Willmore

MONDAY MAY 24, 2021

NAME
Audrey Batterio (recall)
911 Dispatcher Chris
Ally Greenhalgh
Cammy Willmore
Ray Hermosillo
Brenda Dye
Vinnie K.
Mike Douglass
Doug Hart