Electronically Filed 8/5/2021 3:06 PM Seventh Judicial District, Fremont County Abbie Mace, Clerk of the Court By: Shannon Cook, Deputy Clerk

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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,

Case No. CR22-21-1623 Case No. CR22-21-1624

VS.

CHAD GUY DAYBELL AND LORI NORENE VALLOW AKA LORI NORENE DAYBELL NOTICE OF INTENT TO SEEK DEATH PENALTY

Defendants.

The State of Idaho, by and through the Fremont County Prosecutor's Office, hereby puts the Court and the Defendant on notice pursuant to Idaho Code §18-4004(A) that the State will seek the death penalty against Chad Guy Daybell in the event of the Defendant's conviction for any of the three counts of First Degree Murder and/or any of the counts of Conspiracy to Commit First Degree Murder as charged in the Indictment.

Further, the State will rely on one or more of the following statutory aggravating circumstances as the basis for seeking the death penalty under Idaho Code §19-2515(9) as follows:

- a. The murder of Tylee Ryan was committed for remuneration (Idaho Code § 19-2515(9)(d)) and/or
- b. The murder of J.J. Vallow was committed for remuneration (Idaho Code § 19-2515(9)(d)) and/or

- c. The murder of Tammy Daydell was committed for remuneration (Idaho Code § 19-2515(9)(d)) and/or
- d. The murder of Tylee Ryan was especially heinous, atrocious or cruel, manifesting exceptional depravity (Idaho Code § 19-2515(9)(e)) and/or
- e. The murder of J.J. Vallow was especially heinous, atrocious or cruel, manifesting exceptional depravity (Idaho Code § 19-2515(9)(e)) and/or
- f. The murder of Tammy Daybell was especially heinous, atrocious or cruel, manifesting exceptional depravity (Idaho Code § 19-2515(9)(e)) and/or
- g. By the murder(s), or circumstances surrounding their commission, the defendant exhibited utter disregard for human life (Idaho Code § 19-2515(9)(f)) and/or
- h. The defendant, by his conduct, whether such conduct was before, during or after the commission or the murder(s) at hand, has exhibited a propensity to commit murder which will probably constitute a continuing threat to society. (Idaho Code § 19-2515(9)(i).)

DATED this ______ day of August 2021.

Lindsay A. Blake

Fremont County Prosecuting Attorney

Finsky a. Blake

Rob H. Wood

Madison County Prosecuting Attorney

CERTIFICATE

I HEREBY CERTIFY that on this <u>5</u> day of August, 2021, that a copy of the foregoing NOTICE OF INTENT TO SEEK THE DEATH PENALTY was served as follows:

John Prior

john@jpriorlaw.com

U.S. Mail

Hand Delivered

Courthouse Box

Facsimile:

✓ File & Serve

Email

Mark L. Means

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By: Jon L THURBER