

ROB H. WOOD # 8229  
Madison County Prosecuting Attorney  
[rwood@co.madison.id.us](mailto:rwood@co.madison.id.us)

159 East Main Street  
P. O. Box 350  
Rexburg, Idaho 83440  
(208) 356-7768  
(208) 356-7839

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

STATE OF IDAHO,

Plaintiff,

v.

LORI NORENE VALLOW AKA LORI  
NORENE DAYBELL,

DOB: 1973,

Defendant.

Case No.: CR22-20-0838

**AMENDED CRIMINAL COMPLAINT**

The Madison County Prosecuting Attorney's Office, having been appointed as Special Prosecutor on behalf of Fremont County and having submitted, pursuant to Idaho Criminal Rule 3, the sworn affidavit of Detective Ron Ball of the Rexburg Police Department, who complains and alleges the Defendant, LORI NORENE VALLOW AKA LORI NORENE DAYBELL, (hereinafter LORI VALLOW), committed the following crimes:

**COUNT I.**

**CONSPIRACY TO COMMIT DESTRUCTION,  
ALTERATION OR CONCEALMENT OF EVIDENCE, a Felony  
Idaho Code § 18-2603, 18-1701  
(Punishment: Up to 5 years imprisonment and/or up to a \$10,000 fine.)**

The Defendants, Chad Guy Daybell, Lori Vallow, and/or another person or persons, on or between the 22nd day of September, 2019, and the 9th day of June, 2020, in the County of Fremont, State of Idaho, and elsewhere, did willfully and knowingly combine, conspire, confederate, and agree to commit Destruction, Alteration, or Concealment of Evidence in a felony proceeding, inquiry and/or investigation authorized by law, with the intent to prevent it from being so produced, used and/or discovered, to wit: the human remains of JJ Vallow, which is in violation of Idaho Code Sections 18-2603 and 18-1701.

### OVERT ACTS

In furtherance of the conspiracy to commit Destruction, Alteration or Concealment of Evidence and to effect the objects thereof, one or more of the following overt acts were committed by one or more of the subjects of the conspiracy within Fremont County or elsewhere in the State of Idaho.

1. On or about November 26, 2019, Chad Guy Daybell misrepresented the nature of his relationship with Lori Vallow while questioned by the Rexburg Police Department during a lawful investigation regarding the whereabouts of JJ Vallow.
2. On or about November 26, 2019, Chad Guy Daybell contacted Melanie Gibb via phone, for the purpose of requesting and/or encouraging noncooperation with law enforcement's lawful investigation regarding the whereabouts of JJ Vallow.
3. On or about November 26, 2019, Lori Vallow provided a false and/or misleading physical location of JJ Vallow to law enforcement during a lawful investigation.
4. On or about November 26, 2019, Lori Vallow contacted Melanie Gibb via phone, for the purpose of requesting and/or encouraging noncooperation with law enforcement's lawful investigation regarding the whereabouts of JJ Vallow.
5. On or about November 26, 2019, Lori Vallow contacted Melanie Gibb via phone, for the purpose of requesting and/or encouraging Melanie Gibb to prepare and/or present false evidence to law enforcement regarding the whereabouts of JJ Vallow during a lawful investigation.
6. On or between the dates of January 30, 2020, and June 9, 2020, Lori Vallow refused and/or did fail to comply with a court order to produce her minor child, to wit: JJ Vallow,

to the Rexburg Police Department or the Idaho Department of Health and Welfare in Madison County Case No. CV33-20-0045.

## COUNT II.

### CONSPIRACY TO COMMIT DESTRUCTION, ALTERATION OR CONCEALMENT OF EVIDENCE, a Felony Idaho Code § 18-2603, 18-1701

(Punishment: Up to 5 years imprisonment and/or up to a \$10,000 fine.)

The Defendants, Chad Guy Daybell, Lori Vallow, and/or another person or persons on or between the 9<sup>th</sup> day of September, 2019, and the 9th day of June, 2020, in the County of Fremont, State of Idaho, and/or elsewhere, did willfully and knowingly combine, conspire, confederate, and agree to commit Destruction, Alteration, or Concealment of Evidence in a felony proceeding, inquiry and/or investigation authorized by law, with the intent to prevent it from being so produced, used and/or discovered, to wit: the human remains of Tylee Ryan, which is in violation of Idaho Code Sections 18-2603 and 18-1701.

## OVERT ACTS

In furtherance of the conspiracy to commit Destruction, Alteration or Concealment of Evidence and to effect the objects thereof, one or more of the following overt acts were committed by one or more of the subjects of the conspiracy within Fremont County and/or elsewhere.

1. On or about September 9, 2019, Chad Guy Daybell sent text messages to another for the purpose of disguising the Destruction, Alteration and/or Concealment of the human remains of Tylee Ryan on his property.
2. On or about November 26, 2019, Lori Vallow provided false information to law enforcement regarding Tylee Ryan's attendance at BYU-Idaho and/or her current housing situation.
3. On or between the dates of January 30, 2020, and June 9, 2020, Lori Vallow refused and/or did fail to comply with a court order to produce her minor child, Tylee Ryan, to the Rexburg Police Department or the Idaho Department of Health and Welfare in Madison County Case No. CV33-20-0045.

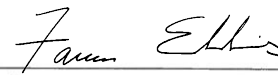
All of which is contrary to the form, force and effect of the Statute in such cases made and provided and against the peace and dignity of the State of Idaho. Said complainant therefore prays that a WARRANT be issued for the arrest of the said Lori Vallow, and that she may be dealt with according to the law.

DATED this 30<sup>th</sup> day of June, 2020.

  
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Rob H. Wood  
Special Prosecuting Attorney for Fremont County

Signed: 6/30/2020 10:59 AM

SUBMITTED TO ME this \_\_\_\_\_ day of June, 2020.

  
\_\_\_\_\_  
Magistrate

