

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.: CR22-20-838

**PROBABLE CAUSE AFFIDAVIT OF  
DETECTIVE RON BALL**

**STATE OF IDAHO**            )  
  ss.  
**County of Madison**        )

I, Lt. Ron Ball, of the Rexburg Police Department, being first duly sworn under oath, depose and state as follows:

1. The information contained herein is true and correct to the best of my knowledge and belief.
2. I am a Detective with the Rexburg Police Department and have been employed in Law Enforcement for more than 27 years. I am currently the lieutenant over investigations for the Rexburg Police Department. I currently hold an Advanced Certificate and a Management Certificate from the Idaho Peace Officers Standards and Training Academy

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and have over 2500 hours of training. I have attended multiple trainings and classes throughout my career, including graduating from the FBI National Academy in 2015. I have received multiple hours of specialized training in investigations. I have also conducted numerous investigations and interviews with suspects, victims and witnesses involving narcotics, sex crimes and fraud. I have also received numerous hours of training on traffic stops and detection of criminal behavior.

3. Since November 26, 2019, the Rexburg Police Department has been involved in the search for JJ Vallow, DOB: 5/25/2012, (hereinafter JJ) and Tylee Ryan, DOB: 9/24/2002 (hereinafter Tylee). The search for these children began when Kay Woodcock, JJ's grandmother, called Gilbert Arizona Police to report that she had not had any contact with JJ for several months. Gilbert Police contacted the Detective Ray Hermosillo of the Rexburg Police Department (RPD) due to the RPD helping the Gilbert Police with an investigation in which JJ's and Tylee's mother, cousin, and uncle were persons of interest.
4. JJ and Tylee's mother, Vallow, (hereinafter Vallow) has been charged with two felony counts of Desertion of a Minor Child, one misdemeanor count of Resisting and Obstructing, one misdemeanor count of Solicitation to Commit a Crime and one misdemeanor count of Contempt. The Contempt charge is for failing to comply with an Order in a child protection action in Madison County, Idaho to produce JJ and Tylee to the Rexburg Police or the Department of Health and Welfare. Vallow was required to produce the children by January 30, 2020 and refused to do so.
5. Tylee was 16 years old at the time she went missing and JJ was 7 years old when he went missing. Until this time law enforcement has stated that Tylee was 17 at the time she went missing because we were not aware she was missing until several months after her seventeenth birthday. However, we now have reason to believe she was killed before her seventeenth birthday.
6. Chad Daybell (hereinafter Daybell) was present in Kauai, Hawaii on February 20<sup>th</sup>, 2020 when Vallow was arrested on the felony desertion charges. I was present at that arrest. Daybell was also present at Vallow's March 6<sup>th</sup> initial appearance in Madison

County, Idaho. As such, I know that Daybell was aware of felony charges directly related to the location, health, and well-being of the minor children named above.

7. Daybell and Vallow were married on November 5, 2019. Daybell's first wife, Tamara (Tammy) Daybell, died the night of October 19, 2019 in Fremont County, Idaho. Tammy's death is still under investigation.
8. The last verifiable sighting of Tylee was on September 8, 2019, in Yellowstone National Park. The last verifiable sighting of JJ was September 22, 2019, in his mother's apartment, located at 565 Pioneer Road, #175, Rexburg, Idaho, by Lori's friend, Melani Gibb (Gibb) and David Warwick (Warwick.) While the Rexburg Police and FBI have received many tips of alleged sightings since the beginning of the case, none of these tips have led to any verifiable or actionable information regarding the health, safety or location of the minor children.
9. Vallow moved to Rexburg on or about September 1, 2019, with Tylee and JJ and her brother, Alex Cox (Cox). Vallow resided with her children at 565 Pioneer Road, Unit #175, Rexburg, Idaho. Cox resided in the same complex, initially living in the same unit as Vallow and then moving into his own unit at 565 Pioneer Road, Unit #107, Rexburg, Idaho.
10. On November 26, 2019, Detective Hermosillo and Detective Hope from the RPD went to Vallow's home located at 565 Pioneer Road, #175, Rexburg, Idaho, to conduct a welfare check. Detectives Hermosillo and Hope met with Cox and Daybell outside the residence. Daybell acted as if he didn't know Vallow very well and stated he didn't know her phone number. Cox told the detectives that JJ was with his grandma, Kay Woodcock, in Louisiana, which was not likely to be true due to the fact that Kay was the individual who first called in a missing child report to the Gilbert Police Department. Cox said Vallow may be in apartment #107. Hermosillo and Hope went to apartment #107, but the apartment was completely empty and vacant. At this time, they called me and Detective David Stubbs and asked me to come to the premises to help search for JJ.

11. Shortly after calling me, Detective Hermosillo called me again and indicated that he saw Daybell driving a black Chevrolet Equinox away from the residence. Detective Hermosillo stopped Daybell and asked him again if he had seen JJ. Chad responded that the last time he had seen JJ was in apartment #107 in October. He also admitted he knew Vallow's phone number and provided it to Detective Hermosillo.
12. On that same day, myself and Detective Stubbs located and spoke with Vallow in her apartment, #175. We identified ourselves as RPD officers. Vallow told us that JJ was in Gilbert, Arizona with a friend named Melanie Gibb. We obtained Gibb's phone number from Vallow. This encounter was recorded on body-cam. We ended our contact with Vallow and immediately attempted to call Gibb. We were unable to contact or speak with her at that time. Vallow also informed RPD that Tylee was attending BYU-Idaho and living with Vallow.
13. Because Detective Stubbs and I were unable to contact Gibb we immediately contacted Vallow again and we requested that she call Gibb. At this time Vallow told us that Gibb and JJ were at the movie "Frozen 2" so it was unlikely Gibb would answer the phone. We instructed Vallow to call Gibb and have Gibb contact us so we could verify the location of JJ.
14. By the evening of November 26, 2019, we had still not heard from Gibb, so RPD informed Detective Ryan Pillar of the Gilbert Police Department of the information we had received regarding the children being with Gibb. Detective Hermosillo was informed later that evening around 9:30 p.m. that Gilbert Police went to the home of Gibb. Gibb was not home but Detective Pillar contacted her by phone and she stated that JJ was not staying at her Arizona house and had not been there for several months.
15. On December 6, 2019, Detective Hermosillo was contacted by Gibb and she informed us that both Daybell and Vallow called Gibb on November 26, 2019 at separate times. She was contacted first by Daybell who told her that she would probably be contacted by the police in regards to JJ's location and he then asked her to not answer the call. Gibb informed RPD that she was confused by this request because she had been told by Vallow

in late September or early October that JJ was living with Kay Woodcock, who is JJ's grandmother. Gibb asked Daybell if JJ was living with Kay and he told her that JJ was not with Kay.

16. Gibb was soon thereafter contacted by Vallow on her phone. Vallow asked Gibb to tell the police that she had JJ and asked Gibb to tell the police that she had taken JJ to the movie "Frozen, 2." Vallow further asked Gibb to take a picture of some children in a manner that would make it appear that Gibb had JJ with her and to send that picture to the police. Gibb informed Vallow that she would not lie to the police and Gibb did not comply with Vallow's request.
17. Gibb first met Vallow in the fall of 2018. Gibb introduced Vallow to Daybell in St. George Utah at a "Preparing a People" conference.
18. In early 2019, Gibb was present with Vallow during a telephone conversation between Vallow and Daybell. This conversation was in response to a "vision" of Vallow that her husband Charles Vallow and her son JJ were going to die in a car accident by January 1 or 2 of 2019, which did not happen. During and after the conversation, Vallow told Gibb that Daybell had informed her that while Charles had not physically died in an accident, his spirit had left his body and been replaced by another spirit which was a dark spirit. The dark spirit was named Ned Schneider.
19. Gibb has informed law enforcement that the word "zombie" was introduced weeks after the initial conversation to describe an individual whose spirit has left their body and been replaced by another spirit. The new spirit inhabiting a person's, or "zombie's" body was always a "dark spirit."
20. At some point after Gibb first learned this doctrine from Vallow and Daybell, she was informed by Vallow and Daybell that they believed it was their mission to rid the world of zombies. When Vallow initially spoke to Gibb about getting rid of zombies she spoke about saying prayers to remove dark spirits from the human bodies they had inhabited. This

information has been corroborated by electronic communications made by Vallow and Daybell.

21. After the death of Daybell's wife on October 19, 2019, Gibb was informed by Vallow that when a person became a "zombie," their original spirit left their body and entered "limbo" and is trapped and cannot progress to "paradise." Vallow then informed Gibb that for the person's original spirit to be freed from limbo the person's physical body had to die. Despite the teaching that a physical body needed to die, Gibb reports she was never told by Vallow or Daybell that they planned to carry out a physical killing themselves. At the time Gibb was told this information by Vallow, she was still under the belief that JJ was with his grandma Kay Woodcock and that Tylee was at BYU-Idaho.
22. Melani Gibb has further informed RPD that sometime in the spring of 2019, before the death of Charles Vallow, that Lori Vallow called Tylee a zombie. Gibb was on the phone with Lori and heard Lori call Tylee a zombie to which Tylee responded "not me, mom." (Upon the unsealing of my probable cause affidavit in State v. Daybell CR22-20-0755, Gibb spoke with me and clarified that Lori herself told Gibb that Tylee responded to being called a zombie by saying "not me, mom." Gibb did not hear Tylee say these words herself.) This arose out of Lori requiring Tylee to babysit JJ and Tylee did not want to. Lori Vallow also told Gibb that Tylee had turned into a zombie when she was 12 or 13, which was approximately the same time Tylee had become "difficult" to deal with.
23. Gibb has further informed me that she was told by Daybell and Vallow that they held the religious belief that they were a part of the "Church of the Firstborn" and their mission in that Church was to lead the "144,000" mentioned in the Book of Revelation.
24. On January 26, 2020, a search warrant was served on Chad Daybell and Lori Vallow in Kauai, Hawaii where they were living and on their vehicle. The children were not found with Chad and Lori in Hawaii and no evidence was found to suggest they were living with Chad and Lori.

25. Through this investigation, we have discovered that JJ Vallow was registered at Kennedy Elementary School in Rexburg, the first week of September, 2019. Kennedy School was informed that JJ had an individual education plan, (IEP) due to his autism. Kennedy Elementary was in the process of creating a new IEP for JJ. On September 23, 2019, JJ had an unexcused absence. (It should be noted that originally in our investigation we believed that JJ was in school on September 23<sup>rd</sup>, but upon review of his school records we found that he was not and had the unexcused absence.) On September 24, 2020, Lori Vallow called Vickie Barton of the Madison School District and informed her that JJ was going to Louisiana with his grandparents and wouldn't be home until the end of October or maybe later. On October 29, Madison School District records indicate that JJ would be homeschooled. During searches of Vallow's apartment in Rexburg and subsequent searches of her apartment in Kauai, no homeschooling materials were ever found.
26. As mentioned, the last verifiable sighting of Tylee was in Yellowstone National Park on September 8, 2019. Photographs establish she was there with her mother Lori Vallow, her brother JJ Vallow, and her uncle Alex Cox. They drove there in Alex's silver Ford F-150. This trip was further established by tracking the GPS, cell tower connections, and Google account information on Alex Cox's phone.
27. The Cellular Analysis Survey Team (hereinafter CAST), is an FBI unit that provides analyses of cellphone records and presents the information to law enforcement. CAST has analyzed Alex Cox's phone and provided the location information mentioned in paragraph 25. The CAST analysis provides the location of Cox's phone. Due to my training and experience and common knowledge I am aware that most individuals now keep their cell-phones with them at all times and the location of an individual's phone can be used to establish the location of the owner of the phone. CAST uses a cellular devices' GPS data points, cell tower connections, wi-fi connections, and Google tracking information to establish the location of a cell phone. The GPS data points used by CAST are considered to be highly accurate and can place the device within a 6 meter radius.
28. CAST has further informed law enforcement that Cox's phone exited the west entrance of Yellowstone National Park at 18:40. His phone appeared to be at Buckaroo's BBQ grill in



West Yellowstone, Montana from 18:45 to 19:02. Cox then returned to Rexburg, Madison County Idaho, at approximately 20:37. The phone was then at Lori's Apartment number 175 until 21:35, at which time, Cox appeared to go to the Maverick on Main Street in Rexburg at 21:43 until 21:53. Cox then went back to Lori's apartment from 22:44 to 23:15. At 23:44 Cox's phone is located at his residence in Apartment 107.

29. On Monday, September 9, from 00:00 (12 a.m.) and 00:44 Cox's phone was located at his apartment (107.) However, at 02:42 (2:42 a.m.) to 03:37 (3:37 a.m.) Cox is located again at Vallow's apartment (175) where Vallow lived with Tylee and JJ. This is significant, not only because he is there in the middle of the night, but also because this is the only time in September he appears to go over to Vallow's apartment between midnight and 6 a.m.
30. At 04:37, Cox went back to his own apartment, unit 107, until 08:59. At 09:21 he was located at a property with the address 202 N 1900 E, Rexburg, which is the residence of Daybell. (It should be noted that while Chad Daybell's address is listed as Rexburg, it is actually located in Fremont County, Idaho.) The 09:21 reading is a GPS data point and places him behind the home on Daybell's property east of the barn.
31. Cox's phone was still at the Daybell residence at 10:39. At 10:47, his phone shows a hit at the City of St. Anthony. At this time, we are unable to tell if he was actually inside the city limits of St. Anthony, (St. Anthony is about a 5-minute drive from the Daybell residence) or if this was a cell tower ping on his phone while he was still at the Daybell residence. At 10:57 to 11:39 Cox is located at the Daybell property. At 11:52 to 12:02 he was at Dell Taco in Rexburg. He appears to spend most of the rest of the day in his apartment.
32. Through this investigation, the Rexburg Police Department and FBI have seized, searched, and analyzed multiple cellular devices pursuant to search warrants. On June 1, 2020, I was informed by Special Agent Ricky Wright of the FBI that the FBI had been examining a phone believed to be owned by Tamara (Tammy) Daybell. The FBI found a text conversation between Tammy and Daybell on September 9, 2019, which is the day after the last known sighting of Tylee in Yellowstone National Park.

33. That text conversation reads as follows:

a. Daybell to Tammy at 11:53 am:

1. "Well, I've had an interesting morning! I felt I should burn all of the limb debris by the fire pit before it got too soaked by the coming storms. While I did so, I spotted a big racoon along the fence. I hurried and got my gun, and he was still walking along. I got close enough that one shot did the trick. He is now in our pet cemetery. Fun times!"

b. Daybell to Tammy at 11:56:

1. "Gonna shower now and then go write for a while at BYU. Love you!"

c. Tammy to Daybell at 2:47 pm:

1. "Good for you!"

d. Daybell to Tammy at 2:48 pm:

1. "I'm back home now."

34. I found the text suspicious because raccoons are normally nocturnal animals and are not regularly out during the day. Matt and Reegan Price, Daybell's neighbors, have informed law enforcement that Daybell's son Garth told them that Daybell had shot a raccoon sometime between July and August of 2019 during the day. Garth told Matt Price about the raccoon in response to a question from Matt about hearing a gunshot. The Price's informed me that the fire pit in the back of the Daybell property was hardly ever used until the last few months. Reegan informed me that there appeared to be frequent bonfires in the pit on the Daybell property over the last few months and the first one she noticed was soon after Tammy's death on October 19, 2019.

35. On June 2, 2020, Detective Bruce Mattingly of the Fremont County Sheriff's Office contacted Samantha Gwilliam, who is the sister of Tammy Daybell. He asked her if she was aware of a pet cemetery on the Daybell's property in Idaho. She informed him that she was aware of the pet cemetery and stated that both she and Tammy were pet people and that they had both had pet cemeteries. When asked the location of the pet cemetery on the Daybell property she stated that it was east of the red barn and near the fire pit. On June 4, 2020, I spoke with Samantha and she informed me that she was aware of the location of

the pet cemetery on the Daybell property because Tammy had shown it to her. Samantha was then shown an aerial photograph of the Daybell property and she pointed to the same area near the fire pit where Alex Cox's phone pinged on September 9, 2019.

36. The above facts establish that Alex Cox appeared to be at the Daybell property on September 9, 2019, until at least 11:39. Chad sent the text to Tammy about burning debris and shooting and burying the raccoon in the pet cemetery only 14 minutes later at 11:53. The pet cemetery referenced by Chad Daybell is located at the same location as most of the pings on Alex Cox's phone on September 9, 2019.
37. On June 3, 2020, I again interviewed Gibb and her boyfriend David Warwick in Pleasant Grove Utah. We discussed in depth the weekend of September 22 and 23, 2019, due to the fact that both Gibb and Warwick stayed at Lori Vallow's residence in Rexburg that weekend. Gibb informed me (consistent with information she has previously given to law enforcement) that she arrived in Rexburg on September 19, 2019. Soon after she arrived Lori Vallow informed Gibb that JJ had become a "zombie" and pointed out behaviors such as sitting still and watching tv, claiming JJ said he loved Satan, and an increased vocabulary as evidence that JJ was now a zombie. Gibb observed JJ's behavior and felt it to be the same as she had always observed it.
38. The last time Gibb and Warwick verifiably saw JJ was the night of September 22, 2019. Warwick informed us that it was late and that Gibb, Vallow and Warwick were going to do a podcast. Warwick said that Vallow told him that JJ was acting up and so Cox took JJ to his apartment in the complex. When Cox returned later that night he was carrying JJ who appeared to be asleep with his head on Cox's shoulder. Warwick specifically remembered this because he saw it as a tender moment.
39. Warwick further informed us that when he woke up the morning of September 23, 2019, he asked Vallow where JJ was. This was between 8 and 9 am. Vallow informed Warwick and Gibb that JJ had been acting like a zombie and had been crawling on the kitchen cabinetry and had gotten on top of the cabinetry in the space between the cabinetry and the ceiling. She informed Warwick and Gibb that when JJ had climbed upon the cabinetry that

he had knocked a picture of Jesus off the refrigerator. Vallow then informed Warwick and Gibb that Cox had come and taken JJ. At no time during this interaction with Vallow did Gibb or Warwick believe that JJ was in danger. Vallow had not said anything about harming JJ or having Cox harm JJ.

40. Approximately one week after Gibb's September visit to Rexburg, Vallow informed Gibb that she had arranged for JJ to go live with his grandma, Kay Woodcock. Vallow further told Gibb she had told Kay that she had cancer in order to convince Kay Woodcock to take JJ. Vallow further elaborated to Gibb that she had traveled with JJ and handed him off to Kay in an airport.
41. The FBI CAST team has analyzed Alex Cox's movements the morning of September 23, 2019 by his cellphone GPS. At 09:55 Alex is again on Chad Daybell's property. He was there until 10:12. The pings on his phone locate Alex near the pond on Chad's property at the northern edge of his property. Chad Daybell's property is located in Salem, Idaho in Fremont County.
42. On June 3, 2020 I asked Special Agent Ricky Wright of the FBI to analyze the frequency of Alex Cox's visits to Chad Daybell's property during the month of September 2019. His response was:
  - a. "Per your request, I checked the visits by Alex to Chad's house again. There were only four visits by Alex during the month of Sept. These were on 9/6 (1241 – 1253), 9/9, 9/23, and 9/25 (1005 – 1022). During the two visits on 9/6 and 9/25, all the pings were in and around the house, and there were no pings anywhere in the backyard near the firepit or pond. As you can see, these visits were also short, about 11 minutes and 17 minutes, like the one on 9/23 (17 minutes). The visit on 9/9 was the only long visit, approximately 2.5 hours.
43. On June 9, 2020 a search warrant was executed at Daybell's residence and property. With the assistance of a local FBI ERT team we located at multiple sites of interest. These sites

were identified and corresponded to the cellular data of Alex Cox's phone when he was on the property, mentioned in paragraphs 12-16.

44. Additionally, one of the possible sites correlated to a location on the property Chad had texted his wife about, mentioned in paragraphs 17 and 18.
45. The first site of interest was located on the north side of the pond near the north edge of the property. This site corresponded with the two GPS pings from Alex Cox's phone on September 23, 2019. A patch of ground was located that appeared to be disturbed. The weed growth on top of the disturbed ground was shorter than the surrounding weed growth. What appeared to be sod etching was also noticed. The disturbed area was approximately 4 feet by 2.5 feet.
46. Members of the FBI ERT team removed the top layer of sod. Underneath the layer of sod were several large flat rocks. The rocks were removed and two pieces of flat paneling were found. The paneling was removed and investigators exposed a round object covered in black plastic. (Similar paneling was found in a barn located on the property.)
47. Upon exposing the round object covered in black plastic a strong odor was noticed. A FBI ERT member used a small sharp instrument and made a small incision in the plastic and a layer of white plastic was observed. An incision was made into the white layer of plastic exposing what appeared to be human remains, the crown of a head covered in light brown hair.
48. The remaining dirt around this object was methodically removed, exposing what appeared to be a body wrapped in black plastic. The plastic appeared to be tightly wrapped around the body and secured with gray duct tape.
49. Cheryl Anderson, associate professor of anthropology at Boise State University, was present on scene and advised the remains found near the pond appeared to be human.
50. As noted above, the GPS on Alex Cox's phone pinged twice on September 23, 2019 near the first site where human remains were found. The GPS records indicate that Cox was at

that location for a total of 17 minutes on September 23, 2019. Due to the depth and width of the “grave” the body was located in, and the rocks and paneling found in the grave, it would be impossible for one person to have dug that grave, placed a body in it, placed the rocks and paneling in the grave, and covered it back up in 17 minutes.

51. A second site of interest was located behind a red unattached out building located roughly in the center of the property near a fire pit. Next to the fire pit is an area used as a pet cemetery. This site correlated to several GPS pings of Alex Cox’s phone on September 9, 2019.
52. Ground in this area was probed with a steel pole and several areas of disturbed ground were located. During a search of this ground, a buried cat and dog remains were found. No raccoon remains were located. A backhoe was used to dig further layers of dirt. While doing this, bricks were located approximately a foot below the ground.
53. Once the bricks were discovered the soil was examined and what appeared to be two bones were located. Based on the condition of the first bones found, Cheryl Anderson was not able to determine whether the bones were human.
54. Methodically, the dirt in this area was searched and several other items of interest were found including other bones, charred tissue and charred bones. Cheryl Anderson indicated these additional bones, both charred and un-charred, and tissue found were human remains.
55. Investigators provided photos of some of the partial remains that were found at the pet cemetery to Sara Getz, Ph.D., a forensic anthropologist. Dr. Getz was able to identify those remains as being non-adult human remains.
56. Around the time the head mentioned in paragraphs 44 through 50 was discovered, Chad Daybell was observed leaving his daughter’s residence in a grey SUV. I and other officers pursued him in police vehicles, conducted a traffic stop and detained him due to the fact that human remains were discovered on his property.

57. On June 11, 2020, I observed the autopsy of the body described in paragraphs 44-50. The body had not yet been removed from the plastic covering it was found in. As the body was uncovered and the face exposed it was clear to me that this was the body of JJ Vallow. The body was well preserved. While I had never met JJ Vallow during his life, I was familiar with his face due to seeing many pictures and videos of him. I was further familiar with his haircut in the pictures I had seen of him in Yellowstone, which was shaved on the sides and back and longer on top. JJ was further identified by Brandon Boudreaux, who was shown an autopsy photograph of the body and face and was able to verify the remains were JJ.
58. On June 11, 2020, I also observed the autopsy of the human remains described in paragraphs 51-55. It was not possible to identify those remains by simply looking at them as they were too damaged by fire and dismemberment and no longer had any recognizable features. However, Dr. Glen Smith, an orthodontist and Deputy Coroner in the Ada County Coroner's Office was able to identify these remains as belonging to Tylee Ryan by matching an irregular jawline with an X-ray of Tylee when she was alive. Despite identifying Tylee, law enforcement was advised that it would still be wise to obtain a DNA verification. We were informed that sufficient soft tissue existed which was not burnt that we would be able to test the DNA. We are in the process of having said tests performed.
59. On January 16, 2020, a Child Protection Action was filed by the State of Idaho in Madison County on behalf of JJ and Tylee. The case number is CV33-20-0045. The Court ordered Vallow to produce JJ and Tylee within 5 days of service of the order to the Rexburg Police Department or the Idaho Department of Health and Welfare in Rexburg. Vallow was served that order on Saturday, January 25, 2020, by Detective Chad Cataluna of the Kauai Police Department. Vallow refused to produce the children and never complied with the order of the Court.
60. Alex Cox died on December 12, 2019 in Maricopa County, Arizona. His death has been ruled to have been caused by natural causes.

61. Due to the facts listed in this affidavit, probable cause exists that Chad Daybell, Lori Vallow, and Alex Cox conspired to commit the crime of concealing and destroying/altering evidence they knew would be produced, used, or discovered as evidence in a trial, proceeding, inquiry or investigation involving a felony.
  
62. Chad Daybell performed at least the following overt acts in furtherance of the aforementioned conspiracy:
  - a. Texted Tammy Daybell and told her about burning debris and burying a dead raccoon in the pet cemetery on September 9, 2019.
  - b. Deceptively acted as if he did not know Vallow very well and did not know Vallow's phone number when questioned by the Rexburg Police on November 26, 2019, despite the fact they were married at that time.
  
63. Alex Cox performed at least the following overt acts in furtherance of the aforementioned conspiracy:
  - a. Told Rexburg Police on or about November 26, 2019 that JJ was with his grandma Kay Woodcock in Louisiana.
  - b. Transported JJ Vallow from Madison County, Idaho to Chad Daybell's property in Fremont County on September 23, 2019.
  
64. Lori Vallow performed at least the following overt acts in furtherance of the aforementioned conspiracy:
  - a. Telephoned Melani Gibb and asked her to lie to the police about the location of JJ.
  - b. Asked Gibb to create false evidence of JJ's existence and location.
  - c. Falsely informed the Rexburg Police that JJ was in Arizona with Melani Gibb.
  - d. Falsely informed the Rexburg Police Department that Tylee was attending BYU-Idaho and living with Vallow.
  - e. Refused to produce the children to the Rexburg Police or the Idaho Department of Health and Welfare as required by a Court Order.



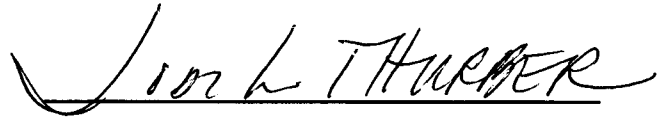
Further your affiant sayeth not.

DATED this 29<sup>th</sup> day of June, 2020.



Lt. Ron Ball  
Rexburg Police Department

SUBSCRIBED AND SWORN to before me this 29 day of June, 2020.



Notary Public

Residing at:

REXBURG, ID.

Commission Expires:

1/4/22

Pc Found.  
June 29, 2020  
Fam SM