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11 Attorney for LORI NORENE (DAYBELL) VALLOW

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

15 STATE OF IDAHO,
16 PLAINTIFF

Case No: CR22-20-838

CR22-20-0755

17 Vs.

18 LORI NORENE VALLOW AKA LORI NORENE
19 DAYBELL,
20 DEFENDANT

**EXPERT WITNESS(ES) DISCLOSURE RE: IRON
WOOD INSIGHTS**

21 DOB: 1973

22 TO: STATE OF IDAHO and ATTORNEY FOR PLAINTIFF:

23 COMES NOW DEFENDANT LORI NORENE VALLOW (DAYBELL), by and through her Attorney of
24 Record, Mark L. Means and pursuant to Idaho Criminal Rule 161 and provides notice her expert
25 witness(es) disclosures as follows:

26 IRONWOOD INSIGHTS. See attached Expert information, expertise, contact information,
accreditations, awards, publications, etc.

1 Idaho Rules of Evidence 702, 703, and or 705.

1 IRONWOOD INSIGHTS has been retained by the above Defendant and is expected to
2 testify and offer factual and expert opinion in accordance with the relevant statutes, laws,
3 findings, recommendations, opinions, evidence, issues, errors and or omissions, ethical issues,
4 legal analysis, cultural, etc., regarding all aspects of this case and specifics into scientific survey
5 results of local areas regarding the public opinion towards Defendant(s), the pending criminal
6 case(s) and the like. They will offer reasonable inferences, opinions, scientific survey results, an
7 expert report², findings, or the like incorporated herein by reference. Their testimony will
8 include the nature and extent of errors, omissions, malpractice, misstatements, incorrect
9 assumptions, unfounded opinions, opinions, etc., or the like and the correlations of said
10 opinions relevant to the Motion to Transfer the Trial. DEFENDANT reserves the right to amend
11 this disclosure if necessary, to allow the full presentation of evidence/testimony by this Expert.
12
13

14 If counsel wishes for more information regarding said Expert, please advise Counsel for
15 Mrs. Lori Vallow (Daybell) at your earliest convenience.
16

17 DATED this 16 day of February 2021.

18 

19 _____
20 Mark L. Means
21 Advocate for Mrs. Lori Norene Vallow (Daybell)
22
23
24
25

26 _____
2 Report will be produced to Plaintiff and Defense Counsel Mr. John Prior upon receipt to Means Law Office, PLLC.

1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this 16 day of February 2021, I caused a
3 true and correct copy of the FOREGOING document to be forwarded by the method(s)
4 indicated below, to the following:

5 MADISON COUNTY PROSECUTING ATTORNEY x_____ Efile
6 159 E. Main St.
7 P.O. Box 350
8 Rexburg, ID 83440
9 Email: mcpo@madison.id.us

10 Mr. John Prior x_____ Efile
11 Email: john@jpriorlaw.com

12 DATED this 16 day of February 2021.

13 By *M.L. Means*
14 Mr. Mark L. Means

IRONWOOD INSIGHTS

WELCOME TO IRONWOOD INSIGHTS GROUP



Why Ironwood?

There are hundreds of ways to conduct market research. It takes experience, knowledge and dedication to know how to conduct the right type of research for your specific needs. No black boxes, no proprietary algorithms, just hard-nosed research using all the latest technology, methodologies and analytic techniques.

Insights that provide clarity and drive action.

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With a combination of time honored practices and modern technologies, we collect accurate data that leads to sound decisions.

LEARN MORE

Analytics & Reporting

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Ironwood Insights Group is a robust team of players that covers research design, strategy, implementation and analytics. Our seasoned group has worked together for years before coming together yet again in this exciting venture.

I have partnered with the Ironwood team for over 10 years and consider their contributions vital in the change of venue. Based on my past experiences and teaming together, we formed a strong team that is dedicated to helping our clients make informed strategic decisions. Their administration of the telephone surveys, the quality of their data they provide, and their assistance in presenting

We're a multi-faceted team, ready when you are.
 the results in a court of law are all paramount to my success as a jury expert.

Dr. Mykol Hamilton
Jury Consultant/Expert



BLUEBOOK
Marketing Research Services Directory



International Research



Tracking Research



Consumer Research



B2B Research



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Moderators



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We use a number of research solutions to collect the richest type of data that is always based around your needs.

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DATA COLLECTION



Qualitative Methods

Our Tried And True Methods

We offer a myriad of qualitative methodologies to meet the diverse needs of our clients, their targeted audience and the strategic objectives. As you design a qualitative research plan it's critical to consider the unique aspects of each study. A good qualitative researcher should have a variety of tools at hand – instead of depending on one methodology for every project.

Traditional Focus Groups

Focus groups continue to provide invaluable revelations to our clients in the back room, as they hear and see participants immediate reactions to their concepts, products and services.

Online Focus Groups

An ideal methodology when wanting to bring a small group together for a quick dive that results in actionable findings.

Online Bulletin Boards

Eliminates client and moderator travel, while gaining deep insights with an option of video/photo creative assignments to gain a complete understanding of preferences, usage, and emotions surrounding a product or service.

In-Depth Interviews

A preferred methodology when sharing sensitive information or views that may be unique across targeted participants.

What's The Best Method For Your Next Study?

Download our Qualitative Methodology Grid to get a better idea of where your efforts are best directed. Our qualitative grid compares the various methodologies across attributes like Scheduling, Duration, Travel, Number of Participants and more.

DOWNLOAD THE GUIDE



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Part Of Our Online Survey Process

Online surveys have become a staple of the research industry. They provide quick results and offer options not available via the phone, like measuring satisfaction levels while watching a video clip, viewing potential packaging options and ranking logos based on desirability. We use the latest in online survey technology to provide a respondent experience that is engaging, easy to use across all platforms (desktop, tablet, mobile) and simple to access.

Sample Management

Study Fielding

Begin With Soft Launch

Check Data For Accuracy And Integrity

Address Areas Of Concern

Stratify Sample Over Field Period

Exclusion Of Deceptive Responders

Pattern Recognition Traps For Straight Liners And Treeing

Timing – Variance From The Average Length

