

**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(s),

vs.

**LORI NORENE VALLOW aka LORI NORENE
DAYBELL,**

Defendant(s).

**DECLARATION OF
PERSONAL SERVICE**

**Case Number:
CR22-20-0838/CR22-20-0755**

I, **MerriLee Jorgensen**, hereby declare as follows: On **May 24, 2021 at 2:34 PM**, I Personally served a true and correct copy of the Subpoena Duces Tecum

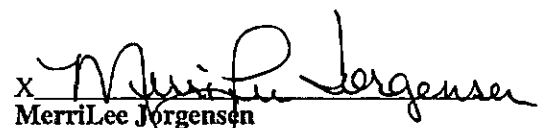
in the above entitled matter upon: **Sheriff Rick Henry Madison County Sheriff Dept. at: 145 E Main St. , Rexburg, ID 83440-1911.**

Hearing Date: 06/09/2021 at 9:00 AM

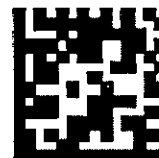
I am over the age of 18, a resident of the State of Idaho, I am not a party to or related to any of the parties in the above entitled action and I am a Process Server, in good standing, in the judicial district in which the process was served.

I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

Date: 24th day of May, 2021

X 
MerriLee Jorgensen

**Bulldog Legal Support, Inc.
P.O. Box 176
Blackfoot, ID 83221-0176
208-782-3530
Our Job # 27520
Client File:**



1 Mark L. Means (ISB 7530)
2 MEANS LAW and MEDIATION
3 Means Law Office, PLLC
4 429 SW 5th Ave. Suite 110
5 Meridian, ID 83642
6 Telephone: 208.794.3111
7 Facsimile: 1.866.228.3429
8 Email: mlm@means-law.com
9 Icourt Email: icourtlaw@gmail.com
10 Website: www.means-law.com
11 Attorney for LORI NORENE DAYBELL VALLOW

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

16 STATE OF IDAHO,
17 PLAINTIFF

18 Vs.

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

22 Case No: CR 33-20-0302

23 **SUBPOENA DUCES TECUM**

24 (Madison County (State of Idaho) Sheriff's
25 Department)

26
27 **THE STATE OF IDAHO TO:**
28 **Madison County Sheriff Department**
29 **Sheriff Rick Henry**
30 **145 E. Main**
31 **Rexburg, Idaho, 83445**
32 **Telephone: 208.356.5426**

33 YOU ARE HEREBY COMMANDED to produce or permit inspection and copying of the
34 following documents or objects, including electronically stored information at the place, date
35 and time specified below:
36

1 STATE OF IDAHO: Madison County Sheriff Department, State of Idaho the entire file
2 (emails, text, voice recordings, books, papers, documents, communications, correspondence,
3 photographs, videos, discipline records, notes, or other objects tangible/intangible) and its
4 contents (whether tangible or intangible) in regard to the communications and the like of
5 current inmate Mrs. Lori (Daybell) Vallow Daybell and the attached article citing Madison
6 Sheriff's Deputies involvement, statements, or the like regarding Mrs. Lori Daybell and her
7 behavior while in detainment in the Madison Detention Center by no later than. 5:00 pm of
8 June 1, 2021, to the above address for Means Law Office, PLLC.

9 **By way of this subpoena, we seek the following records (whether tangible or**
10 **intangible):**

- 11 1. All records, reports, notes, charts, communications, texts, emails, correspondence,
12 exhibits, evidence, data, recordings, deleted records, partial files, any and all
13 discipline files records, dates and times, persons full names involved and or
14 regarding Deputies and their statements to media regarding Mrs. Lori Daybell, the
15 like from the above sheriff's department and or its agents to any media
16 source/company. Please see attached Article with highlighted quote from multiple
17 Madison sheriff deputies.
- 18 2. Detailed list identifying each, and every person(s) employed with Madison County
19 Sheriff's Department and or its agents in regard to the above
20 recordings/investigation including but not limited to the following:
 - 21 a. Full name and employee/badge number/identification employee number of
22 persons employed/associated with the Sheriff's department that were
23 involved in any way whatsoever regarding attached article.
 - 24 b. Any and all communication(s) between you and Madison Prosecutor's office
25 or agents, Fremont Prosecutor's office or agents, any and all media company,
26 media company for Madison County Prosecutor's office, Dateline, MSNBC,
20/20, etc. regarding attached quote/article.

1 **PLACE, DATE and TIME:**

2 **PLACE:**

3 Means Law Office, PLLC
4 429 SW 5th Ave. Suite 110
5 Meridian, ID 83642

6 **Telephone:** 2087943111

7 **Facsimile:** 18662283429

8 **Date:** June 1, 2021

9 **Time:** 5:00 P.M.

10 *If any of this subpoena is objected to be the served/obligatory party, it is hereby*
11 *requested that any above that is unobjected to by served/obligatory party be responded to in*
12 *timely manner as set out above without delay. If objected is filed/served please advise*
13 *specifically what you object to producing. **Please note that we attempted to obtain these***
14 ***records from the Madison Prosecutor's office through discovery and their office refused to***
15 ***comply with the requests. Said Office's refusal to comply/produce make this subpoena***
16 ***necessary to be served upon you.***

17 You are further notified that if you fail to appear at the place and time specified above,
18 or to produce or permit copying or inspection as specified above, that you may be held in
19 contempt of Court and that the aggrieved party may recover from you the sum of \$100.00 and
20 all damages which the party may sustain by your failure to comply with this subpoena.

21 DATED this 24 day of May 2021.

22 

23 _____
24 Mark L. Means, Advocate and Attorney of
25 Record for Mrs. Lori Daybell.

