

1 Mark L. Means (ISB 7530)
2 MEANS LAW and MEDIATION
3 MEANS-LAW
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 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF**
13 **THE STATE OF IDAHO, IN AND FOR THE COUNTY OF FREMONT**

14 STATE OF IDAHO,
15 PLAINTIFF

16 Case No: CR22-20-0838
17 CR 22-20-0755

18 Vs.

19 LORI NORENE VALLOW AKA LORI NORENE
20 DAYBELL,
21 CHAD GUY DAYBELL
22 DEFENDANTS

23 **SUPPLEMENTAL DECLARATION OF MARK L.**
24 **MEANS IN SUPPORT MOTION FOR ORDER**
25 **DIRECTING ATTORNEY CLIENT PRIVILEGE**
26 **COMMUNICATIONS**

27 COMES NOW DEFENDANT, Mrs. Lori Vallow (Daybell), by and through her counsel of
28 record, Mr. Mark Means of Means Law Office, PLLC and declare as follows: The 3rd week of
29 January 2021 I drove to Madison County to meet with my client at the Madison Detention Center
30 in Rexburg Idaho. I again was denied access to my client in the Attorney Client room. When
31 asked why I was told by a deputy that I need a Court Order to such access. There was no further
32 explanation, and I was denied communications with my client other than on the public phone of
33 which has been an issue with recordings/violations of attorney client privilege communications
34 by the State and its agents in this matter.

1 I am unable to prepare a defense in this matter, provide an effective and adequate
2 defense for my Client given the tremendous restraints imposed upon me by a bias and motivated
3 Sheriff's office that seems to be undermining and interfering with my Constitutional obligation
4 to provide said defense to my client.
5

6 **That I Certify (or Declare) under penalty of perjury pursuant to the Law of the State of Idaho**
7 **that the foregoing is true and correct.**

8 DATED this 16 day of February 2021.

9 *M.L. Means*

10 Mark L. Means

11 Advocate for Mrs. Lori Norene Vallow (Daybell)
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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 Email: mcpo@madison.id.us

7 Mr. John Prior x_____ Efile
8 Email: john@jpriorlaw.com

9 DATED this 16 day of February 2021.

10 Mark L. Means
11 Mark L. Means
12 Advocate for Mrs. Lori Norene Vallow (Daybell)