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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

17 Vs.

**SUPPLEMENTAL EXPERT WITNESS  
DISCLOSURE RE: IRON WOOD**

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

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 16<sup>1</sup> and provides notice her expert  
25 witness(es) disclosures as follows:

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

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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 report<sup>2</sup>, 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 This expert is expected to testify (virtually) in regard to the Motion for Transfer of Trial. Report  
13 regarding this expert is still in process of finalization and will be provided upon receipt by  
14 Counsel to all parties.

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

20 DATED this 1 day of March 2021.

21  
22 *Mark L. Means*

23 \_\_\_\_\_  
24 Mark L. Means  
25 Advocate for Mrs. Lori Norene Vallow (Daybell)

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



# David A. Bryant

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davebryant@ironwoodinsights.com

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## Career Summary

Forty years of senior management experience in marketing research in the public sector with increasing levels of strategic planning, business consulting, project management, staff development and budgetary responsibility. Project director, principal investigator, and analyst on over 500 research studies in the public sector, economics, health policy, marketing, education and politics. Expertise in:

- Brand value and barriers analysis consulting
- Predictive modeling, data-mining, and advanced statistical marketing analytics
- Mediation and moderation analysis using a regression-based approach to evaluate the mechanisms by which effects operate and the conditions that might affect those mechanisms.
- Develop and refine member segmentation models to assist client strategic planning for growth
- Public sector contracting requirements
- Security requirements and HIPAA regulations
- Customer/member loyalty and trust attribute identification and improvement consulting
- Health benefits design and price sensitivity consulting
- Consulting on the strategic impact of healthcare reform and various public policies

## Professional Experience

**Ironwood Insights Group, LLC.** Chandler, Arizona October 2018 to Present

### **Vice President, Analytics**

Specifically responsible for all analysis and reporting using advanced analytic techniques to assist our clients better understand opportunities for growth and expansion. Many of the advanced techniques we utilize include attributable effects, graphical modeling, and biplot analysis.

**Economic Systems Group, Inc.** Falls Church, Virginia May 2018 to September 2018

### **Vice President, Analytical Services and Products**

I was hired specifically to work on the economic evaluation of the Cybersecurity Workforce Management Support program within the National Protection and Programs Directorate (NPPD) within the U.S. Department of Homeland Security. The project involved collecting information about the cybersecurity retention efforts within NPPD over the past 3 years to determine if the program was having a positive impact on reducing attrition among cybersecurity specialists. The research developed several different models that justified the incentive pay program to increase retention.

**Blackstone Group, Inc.** Chicago, Illinois January 2018 to May 2018

### **Vice President**

Responsible for expanding sales and marketing into the public-sector marketplace by preparing government procurement filings, developing, and documenting companywide security and privacy protection systems and nurturing strategic teaming relationships with other companies that are heavily involved in public sector survey research.

**Thoroughbred Research Group, Inc.** Sterling, Virginia December 2012 to March 2017

### **Vice President**

Managed a business team that developed several teaming arrangements with larger organizations that allowed us to bid on multi-million-dollar contracts as a subcontractor. Through these teaming arrangements we were able to increase company revenue by 100%.

- Teamed with Truven Health Analytics, an IBM Company and prepared final submission filing information for SAMHSA IDIQ procurement vehicle.
- Teamed with The Lewin Group and prepared final submission filing information for CMS RMADA procurement vehicle. Continue to bid with Lewin on several RMADA task orders.
- Developed pricing and contracting on the winning multi-million-dollar subcontract to conduct Medicaid patient satisfaction surveys for The Centers for Medicare and Medicaid Services (CMS) in all 50 states.
- Entered several teaming agreements with other research firms to bid on large research opportunities for the Veterans Health Administration (VHA), CMS, Patient Centered Outcomes Research Institute (PCORI), SAMHSA and numerous state health agencies.
- Improved the analysis and reporting capabilities of the company by utilizing several advanced analytical techniques, e.g., principal components analysis, structural equation modeling, partial least squares, mediation, moderation, and conditional process analysis using a regression-based approach, and graphical modeling.

**Synovate, Inc. / Ipsos Public Affairs** Falls Church, Virginia September 2001 to December 2012  
**Senior Vice President and Director of Health Policy Institute U.S.**

Had oversight of the Synovate healthcare services satisfaction and new product evaluation project team. Responsible for new client sales and marketing, new market identification, and promotion development. Worked with clients to develop project scope, objectives, and budget. Manage cross-functional project teams for successful completion and profitability.

- Developed an infrastructure of project portfolio management, proposal creation and reporting to optimally utilize resources creating more actionable insights and observations for clients.
- Developed best practices in the areas of trend identification, concept development, insight identification and project management planning.
- Helped Synovate become more client/customer focused through projects that spanned new opportunity and product development, services and communications.
- Trained and utilized team-based creative problem solving to achieve greater organizational alignment and employee engagement.
- Significantly increased project productivity and profitability – left a project portfolio of \$40 million.
- Managed a team of 45 project managers, programmers, analysts, and statisticians.

**Patient Satisfaction Plus** Atlanta, Georgia February 2000 to September 2001  
**Chief Operating Officer**

Responsible for all phases of research operations including: project management, letter shop, survey scanning, CATI, analytics and information systems support. I was responsible for over 100 full and part-time employees and a \$5 million annual operating budget. In 12-month period, significantly reduced the percentage of cost-of-goods sold through an aggressive expansion in technology and the implementation of audit and cost control monitoring systems.

- Built research processes to support cross-functional teams with advanced research techniques and concept-writing skills to increase business development.
- Led creative problem-solving processes and ideation for the development of new operational structures and workflow.
- Chaired the firm's Executive Strategy Team to increase innovation through an effective idea portfolio process.

**UltraLink (a Division of Allianz Life Insurance)** Costa Mesa, California 1997-2000  
**Vice President of Research Services**

Specialized in the measurement of quality in the healthcare industry. Worked with large employers and health plans to develop research on improving the quality of healthcare to employees

throughout the country. Focused on matching health plan strengths with the preferred care attributes and preferences of the employer and employee.

**Quality Monitoring Services, Inc.** Salt Lake City, Utah 1994-1997  
**President**

After the acquisition of FHP by PacifiCare, I formed Quality Monitoring Services to provide healthcare quality measurement and patient satisfaction research to many former divisions of FHP. Responsible for marketing, sales, business and strategic planning, especially: new product attribute analysis, demand forecasting, new market feasibility, competitor analysis, critical issues analysis, benchmarking, and process re-engineering. Developed a full-service market research firm that specialized in measuring quality in the health care industry.

**FHP, Inc.** Fountain Valley, California 1989-1994  
**Vice President, Chief Strategy Officer**, 1991-1994

Developed, implemented, and monitored strategic plans as part of the executive team of a \$4.0 billion Health Maintenance Organization. Was responsible for reviewing demographic and economic trends and preparing long range economic, membership, and financial forecasts.

**Associate Vice President, Corporate Market Research**, 1989-1991

Responsible for all market research, competitor financial, and new product analysis; as well as, analyses of demographic and economic trends. I worked with marketing and advertising agencies to evaluate promotional campaign effectiveness. Participated in the design, implementation and analysis of several ongoing clinical outcomes research projects and quality improvement teams.

**Kaiser Foundation Health Plan** Pasadena, California 1985-1989  
**Director Forecast Modeling**, 1986-1989

Responsible for development of strategic computerized systems that aid the direct analysis of factors affecting growth, revenue, and staffing requirements. Oversaw the forecasting of membership in existing groups and potential membership of new products for strategic plans.

**Senior Market Research Analyst**, 1985-1986

Developed micro-computer-based industry trend tracking systems and statistical model for forecasting long-term membership growth. Analyzed new advertising effectiveness and development of media response tracking systems.

**Pepperdine University** Santa Monica, California 1983-1985  
**Market Research Manager**, School of Business and Management

Managed market research department, organized structure and implementation of all databases, and created report generation programs. Developed and maintained forecasting models for advertising effectiveness and new student enrollment.

**Wirthlin Worldwide** Santa Ana, California 1980-1983  
**Project Manager**

Working with the Project Executive and client representatives, I worked to establish research objectives and key performance indicators. I supervised the administration, key findings output structure, and statistical reporting of scores of political polling studies. I also consulted with several western states' Republican election committees to use the research results to formulate a candidate's story that would resonate with voters.

#### **Education:**

MA, Economics, University of California, Los Angeles, 1985  
BA, Economics, Brigham Young University, 1980

## Articles and Papers:

“What is Driving Your Patients’ Experience Rating? – An Analytical Approach Using Attributable Effects and Graphical Modeling,” Bryant, D.A., Thoroughbred Research Group Newsletter, May 2016.

“How Are You Doing Compared to the Competition? – Using Biplot Analysis,” Bryant, D.A., Thoroughbred Research Group Newsletter, January 2015.

“Validation of the modified 1-week recall version of the Pediatric Quality of Life Inventory 3.2 (PedsQL™) Type 1 Diabetes Module,” Naegeli, A.N., Curtis, B.H., Bryant, D.A., Hayes, R.P., Ph.D., Presentation at International Society for Quality of Life Research (ISOQOL); London, England; Oct 27-30, 2010.

“Patient Safety – Where is it Going?” Bryant, D.A., Paper presented at the Disease Management Leadership Forum, San Diego, CA, October 17, 2005.

“Underwriting Cycle Driving Health Plan Premium Increases Says UltraLink,” Bryant, D.A., UltraLink Newsletter, March 12, 1998.

“UltraLink National HMO Survey Identifies the ‘Best of the Best’ HMOs by Region,” Bryant, D.A., UltraLink Newsletter, November 2, 1998.

“Methods and Benefits of Measuring Provider Quality,” Bryant, D.A., Algra, R.J., Stelpflug, S., The FHP Journal of Clinical Research, Volume V, Issue 11, pp. 49-55.

“Measuring Healthcare Quality in a HEDIS World,” Bryant, D.A., Paper presented at conference Utah Health Quality Forum, Park City, UT, November 15, 1996.

“Utilizing Market Research to Improve Quality of Customer Service,” Bryant, D.A., Paper presented at conference Re-Engineering Managed Care Customer Service, Washington, D.C., Sept 23, 1994.

“Monitoring Member Satisfaction to Understand the Expectations of Healthy Plan Participants,” Bryant, D.A., Paper presented at conference Measure and Ensure Member Satisfaction in Managed Care, Chicago, IL, November 15, 1994.

## Related Professional Experience:

Oct 1995- Instructor: Economics, Statistics and Research  
Dec 1996 Methods: University of Phoenix - Salt Lake City Campus.

Fall 1983- Associate Professor: Management of Information Systems; Economics:  
Winter 1990 Pepperdine University School of Business and Management.

1980-1981 Econometric Consultant and Programmer:  
Leamer Econometrics.