

1 Mr. Mark L. Means (ISB 7530)  
2 Means Law and Mediation  
3 Means – Law  
4 429 SW 5<sup>th</sup> Ave. Suite 110  
5 Meridian, ID 83642  
6 Telephone: 2087943111  
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8 Email: [meanslawoffice@gmail.com](mailto:meanslawoffice@gmail.com)  
9 lcourt: [icourtlaw@gmail.com](mailto:icourtlaw@gmail.com)  
10 Attorney for MRS. LORI DAYBELL

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**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT STATE  
OF IDAHO COUNTY OF FREMONT**

STATE OF IDAHO,  
Plaintiff

CASE NO. CR22-21-1624

Vs.

**DECLARED MOTION TO SHOW CAUSE RE:  
CONTEMPT FOR FAILURE TO COMPLY WITH  
LAWFULLY SERVED SUBPOENA**

LORI NORENE VALLOW  
AKA LORI NORENE DAYBELL

COMES NOW THE DEFENDANT, Mrs. Lori Norene Daybell, and move this Court, pursuant to Idaho Criminal Rule 17, and all other applicable rules, laws, and or statutes, to order State Essential Witness Ms. Melanie Gibb (hereafter Ms. Gibb) to show cause as to why she should not be held in contempt for failure to comply with a lawfully served subpoena.<sup>1</sup>

To date, no response whatsoever, has been received by Ms. Gibb and or by a legal representative of Ms. Gibb regarding the properly served subpoena.<sup>2</sup> At the time of service, Ms. Gibb stated she would "...refuse service and was calling Prosecutor Wood...".

<sup>1</sup> See attached filed Affidavit of Service and Subpoena.

<sup>2</sup> See Fremont County, State of Idaho Case Number: CR 22-20-0838/CR 22-20-0755. This Court has "taken" Judicial notice of other filings, hearings, orders and the like from the above-mentioned cases and is requested to do the same in this matter.

1 Ms. Gibb was lawfully served with the attached subpoena while Ms. Gibb was physically  
2 present in the State of Idaho and allowed ample time to comply with said subpoena. Ms. Gibb  
3 has chosen to ignore the rules of law and as such should be ordered by this Court to show  
4 cause as to why she should not be held in Contempt. Any such order by this Court should be  
5 drafted to allow out of state service regarding said Order as Ms. Gibb is believed to be a  
6 residence of the State of Arizona.  
7

8 The Defense believes that Ms. Gibb has possibly evaded criminal prosecution regarding  
9 incidents relevant to that above case(s), has engaged in inappropriate private communications  
10 including phone calls, emails, and text messages with the above said Prosecution, other  
11 essential witnesses, possibly destroyed evidence and or electronic devices in this matter, and  
12 has made multiple conflicting statements regarding her personal knowledge, actions, in actions,  
13 in regard to the above case(s), and compliance with the subpoena is the initial first step to  
14 address these concerns.  
15

16 Defendant further moves this Court for an award of fees, costs, and sanctions as  
17 allowed by law in address this contempt behavior by Ms. Gibb.  
18

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

21 DATED this 2 day of November 2021.  
22

23 Mark L. Means  
24 Mark L. Means  
25  
26

1 CERTIFICATE OF SERVICE: I hereby certify that the above aforementioned document  
2 was served as identified below DATED this 27 day of November 2021.

3 Ms. Lindsey A. Blake  
4 Office of the Fremont County  
5 Prosecuting Attorney  
6 22 W. 1<sup>st</sup>. N.  
7 St. Anthony, ID 83445  
8 Telephone: 208.624.4418  
9 Service email: [prosecutor@co.fremont.id.us](mailto:prosecutor@co.fremont.id.us)

x \_\_\_\_\_ Email

7 Mr. John Prior  
8 Prior Law  
9 Service email: [john@jpriorlaw.com](mailto:john@jpriorlaw.com)

x \_\_\_\_\_ Email

10 DATED this 2 day of November 2021.

11  
12  
13 By

*M.L. Means*

\_\_\_\_\_  
14 Mark L. Means  
15 Attorney Advocate for the Defendant  
16 Mrs. Lori Daybell  
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**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 19, 2021 at 7:42 PM**, I Personally served a true and correct copy of the **Subpoena Duces Tecum**

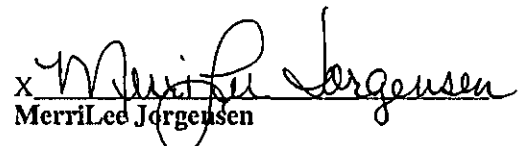
in the above entitled matter upon: **Melanie Gibb** at: **1177 S Yellowstone Hwy. (Spring Hill Suites) , Rexburg, ID 83440.**

**Comments: Melanie refused to take the subpoena from my hand so I advised her she had been served regardless and I left the subpoena anyway.**

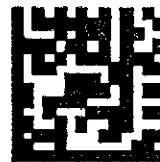
I am over the age of 18, a resident of the State of Idaho, I am not a party to or related to any of the parties in the above entitled action and I am a Process Server, in good standing, in the judicial district in which the process was served.

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

Date: 21st day of May, 2021

X   
MerriLee Jorgensen

Bulldog Legal Support, Inc.  
P.O. Box 176  
Blackfoot, ID 83221-0176  
208-782-3530  
Our Job # 27465  
Client File:



1 Mark L. Means (ISB 7530)  
2 MEANS LAW and MEDIATION  
3 Means Law Office, PLLC  
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7 Facsimile: 1.866.228.3429  
8 Email: [mlm@means-law.com](mailto:mlm@means-law.com)  
9 Icourt Email: [icourtlaw@gmail.com](mailto:icourtlaw@gmail.com)  
10 Website: [www.means-law.com](http://www.means-law.com)  
11 Attorney for LORI NORENE DAYBELL

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 CR22-20-0755

18 Vs.

19 **SUBPOENA DUCES TECUM**

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

23 **THE STATE OF IDAHO TO:**  
24 **Ms. MELANIE GIBB**

25 YOU ARE HEREBY COMMANDED to produce or permit inspection and copying of the  
26 following documents, records, communications, images, videos, journals, reports, summaries,  
or objects (all requested are to be produced regardless of current or previous form whether  
that be tangible/intangible), including electronically stored information at the place, date and  
time specified below:

27 **STATE OF IDAHO TO MS. MELANIE GIBB** to produce the following:

- 28 1. All communications, text, emails, voice mails, SMS messages, chat records, social  
29 media communications, podcasts, recordings, and the like (tangible or intangible)  
30 between you Ms. Melanie Gibb and the following Individuals, agencies,  
31 departments, and the like from January 1, 2019 to Present:

- 1 a. Lori Vallow Daybell
- 2 b. Chad Daybell
- 3 c. Melani Pawlowski (formerly known as Melanie Boudreaux)
- 4 d. Ian Pawlowski
- 5 e. Zulema Pastenes
- 6 f. Summer Shiflet
- 7 g. April Raymond
- 8 h. Charles Vallow
- 9 i. Tylee Ryan
- 10 j. Jason Mow
- 11 k. Gabe Bonilla
- 12 l. Alex Cox
- 13 m. Zac Cox
- 14 n. Adam Cox
- 15 o. Colby Ryan
- 16 p. Tammy Daybell
- 17 q. Julie Rowe
- 18 r. Christopher Parrett
- 19 s. Michael James
- 20 t. Nancy James
- 21 u. Brandon Boudreaux
- 22 v. Thor Furuseth
- 23 w. Heather Daybell, spouse of Matthew Daybell
- 24 x. Matthew Daybell, spouse of Heather Daybell
- 25 y. Robert Wood, Prosecutor of Madison County, State of Idaho
- 26 z. Any and all News, Journalists, and or Reporters including but not limited to:
  - i. Nate Eaton, East Idaho News and or East Idaho News Agencies
  - ii. ABC
  - iii. NBC

- iv. Dateline
- v. MSNBC
- vi. Keith Morrison
- vii. Shane Bishop
- viii. Color My Media
- ix. Latter Day Media
- x. Preparing a People
- xi. Book of Mormon Evidence
- xii. The Firm Foundation
- xiii. Any and all media agencies, companies, corporations, regarding your dealings and the like with Lori Daybell and or Chad Daybell

aa. Deputies, Detectives, Police Officer(s), Prosecutors, and the like for the following Agencies:

- i. Rexburg Police Department, State of Idaho
- ii. Madison County Sheriff's Department, State of Idaho
- iii. Robert Wood, Prosecutor Madison County State of Idaho
- iv. Fremont County Sheriff's Department, State of Idaho
- v. St. Anthony (Idaho) Police Department
- vi. Federal Bureau of Investigation (FBI) Federal Agency
- vii. Fremont Prosecutor Office (State of Idaho)
- viii. Madison Prosecutor Office (State of Idaho)
- ix. Chandler Arizona Police Department/Sheriff Departments
- x. Gilbert Arizona Police Departments/Sheriff Departments
- xi. Please identify each and every location, date and time, and person(s) present for said communications whether in persons, telephonic, zoom, or the like.

2. Telephone Records for ALL telephone numbers owned or used by you from date above to present including but not limited to:

- a. Text Records

- b. Telephone Call Records
- c. Identify all telephone numbers you have used personally, professionally, temporarily (aka "burner" telephones, or permanently in regard to identified person(s) above.
- d. Identify all telephone number/service providers.
- e. Names, dates, and times of service provider for any and all telephone number used by you as requested above. Please include and identify each, in its entirety, the telephone numbers of all phones whether personal, business, or "burner" telephone. In identifying each and every telephone number please further identify the dates of use of said telephone/telephone number and the telephone carrier or company providing telephone service(s).
- f. Travel Records for all travel (vehicle) and or airline flights between the dates of January 1, 2018 to present:
  - i. All travel between Utah, Arizona, Idaho, and Hawaii
  - ii. Any other travel locations within the specified dates

3. Social Media:

- a. All social media memberships or associations and forum site memberships, usernames and password(s) associated with identified usernames, posts, communications, chats, and or emails from date above to present including not limited to:
  - 1. Facebook
  - 2. AVOW (Another Voice of Warning) Website
  - 3. Yahoo! Groups (email list)
  - 4. Twitter
  - 5. Instagram
  - 6. Any of the like
  - 7. If you refuse to produce the password, please identify each date of communications (and the like) associated with said



1 social media account and produce all accompanying  
2 communications, statements, opinions, religious speech,  
3 emails, chat records, etc.

4 4. Internet Provider: Please identify your internet provider, whether professional or  
5 personal from dates above to present whether this be home, business, or the like.

6 5. COMPUTERS and or ELECTRONIC DEVICES: Please identify each and every  
7 computer, laptop, desktop, tablet, iPad, cell telephone, wearable smart devices, or  
8 the like you have used or owned since said date to present.

9 a. Please identify provider/seller or seller of said device.

10 b. Current location of said device if not in your personal possession. If device  
11 was destroyed, sold, discarded please advise of purchase/acquisition date of  
12 said device and date of destruction, sell, discarded, of said device.

13 c. If you sold or discarded an identified device, please identify what mechanism  
14 of advertising was used by you or your agent and buyers contact  
15 information, name, address, telephone number, email, and the like. If  
16 discarded please identify the date and time of discarding identified device  
17 and mechanism for discard.

18 d. PODCASTS: Produce all PODCAST and the like including all formally  
19 shared/posted podcasts as well as all recorded materials, communications,  
20 edits, recordings associated with identified podcasts/or the like in your  
21 possession. If you are aware of the like and identified is not in your  
22 possession, please identify your opinion or belief as to where identified  
23 recording/podcast (material(s)) is located

24 i. Series – Feel the Fire Podcast

25 ii. Series – Time to Warrior Up Podcast

26 iii. Series – Preparing A People Podcast

e. Books, Publications, Appearances:

i. Feel the Fire – Book

ii. Preparing a People Events

- iii. Book of Mormon Evidence Events
- iv. Firm Foundation Events
- v. Or the like
- vi. If not in your possession, please identify where abouts of said documents and or records.
- vii. All communications between you and above individuals regarding creation of publications, books, articles, speeches, appearances, etc.

6. Any and all records, data, communications, calendars, event records, statement records, videos, photographs, books, speeches, talks, papers, documents, correspondence, notes, financial records, payments, transfer of monetary funds, between you and any and all person(s) identified above from said date(s).

7. All recordings as identified previously, of your misrepresentations to any and all police agencies and or the like from Jan. 1, 2017 to Present.

8. Copy of any and all police records regarding charges, convictions, plea agreements, immunity agreement(s) regarding your “involvement” in this matter.

**PLACE, DATE and TIME:**

**PLACE:** Means Law Office, PLLC  
429 SW 5<sup>th</sup> Ave. Suite 110  
Meridian, ID 83642

**Telephone:** 2087943111

**Facsimile:** 18662283429

**Date:** June 1, 2021

**Time:** 1:00 P.M.

*If any of this subpoena is objected to be the served/obligatory party, it is hereby requested that any above that is unobjected to by served/obligatory party be responded to in timely manner as set out above without delay.*

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

DATED this 17 day of May 2021.

Mark L. Means  
Mark L. Means

DATE: \_\_\_\_\_

TIME SERVED: \_\_\_\_\_

PLACE OF SERVICE: \_\_\_\_\_  
\_\_\_\_\_

PERSON OF SERVICE: \_\_\_\_\_  
\_\_\_\_\_