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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

SUBPOENA DUCES TECUM

LORI NORENE VALLOW
AKA LORI NORENE DAYBELL
Defendant

I Certify,

1. I am a resident of Ada County, State of Idaho, over the age of (18) years, and not a party to the above- entitled action.

2. On the 4TH Day of NOVEMBER 2021, I personally served copies of the above listed documents on State of Idaho, the above-named Plaintiff,

at (address) 700 W Jefferson St #210 Boise Idaho 83720 (The Office of the Attorney General)

CERTIFICATION UNDER PENALTY OF LAW

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

Date 11/4/2021

Typed/Printed Name SCOTT MORGAN

Signature 

1 Mr. 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: 2087943111
7 Facsimile: 18662283429
8 Email: meanslawoffice@gmail.com
9 Icourt: icourtlaw@gmail.com
10 Website: www.meanslawoffice.com
11 Attorney for MRS. LORI DAYBELL

**OFFICE OF THE
ATTORNEY GENERAL**

INTERNAL RECORD RECEIPT

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Chief Deputy

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

8 STATE OF IDAHO,
9 Plaintiff

CASE NO. CR22-21-1624

10 Vs.

SUBPOENA DUCES TECUM

11 LORI NORENE VALLOW
12 AKA LORI NORENE DAYBELL
13 DEFENDANT

THE STATE OF IDAHO TO:

14 Idaho Department of Health and Welfare¹
15 700 W Jefferson St. #210
16 Boise, ID 83720
17

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

21 STATE OF IDAHO: Idaho Department of Health and Welfare, State of Idaho the entire file
22 (books, papers, documents, communications, correspondence, photographs, videos,
23 recordings, notes, charts, emails, texts, telephone records, telephone calls and records,
24 telephone recordings, and or other objects tangible/intangible) and its contents (whether
25

26 ¹ Hereafter referred to as Idaho Department of Health and Welfare or IDHW.

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11 Attorney for MRS. LORI DAYBELL

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

8 STATE OF IDAHO,
9 Plaintiff

CASE NO. CR22-21-1624

10 Vs.

SUBPOENA DUCES TECUM

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12 AKA LORI NORENE DAYBELL
13 DEFENDANT

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15 **Idaho Department of Health and Welfare¹**
16 **700 W Jefferson St. #210**
17 **Boise, ID 83720**

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

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22 (books, papers, documents, communications, correspondence, photographs, videos,
23 recordings, notes, charts, emails, texts, telephone records, telephone calls and records,
24 telephone recordings, and or other objects tangible/intangible) and its contents (whether

25 _____
26 ¹ Hereafter referred to as Idaho Department of Health and Welfare or IDHW.

1 tangible or intangible) in regards to the custody, control, treatment, criminal legal and the like
2 of current inmate Mrs. Lori (Daybell) Vallow by no later than: May 8, 2020.

3 **By way of this subpoena, we seek the following records related to Ms. Lori N. Vallow**
4 **(Daybell) (whether tangible or intangible, unredacted, and or transmitted by means of**
5 **personal or professional electronic devices, email servers, etc., or the like):**

- 6 1. All records, reports, notes, charts, communications, correspondence, exhibits,
7 evidence, data, recordings, deleted records, deletion records, partial files, voice
8 mails, recordings, photographs, texts, emails, notes, contract for services (if not an
9 employee of IDHW) and the like between the Idaho Department of Health and
10 Welfare and or its agents and the following Person(s) and or Agencies:
- 11 a. Madison County Prosecution and or its agent(s);
 - 12 b. Fremont County Prosecution and or its agent(s);
 - 13 c. The Corporation of the Church of Jesus Christ of Latter-Day Saints, The
14 Church of Jesus Christ of Latter-Day Saints, AKA the LDS Church, Mormon
15 Church, and or its agent(s);
 - 16 d. Mr. Robert Wood, Madison County Prosecutor/Current or Former LDS
17 Bishop;
 - 18 e. Rexburg Police Department and or its agent(s);
 - 19 f. Madison Sheriff's Department and or its agent(s);
 - 20 g. Fremont Sheriff's Department and or its agent(s);
 - 21 h. Dr. Craig W. Beaver, Ph. D and or his agent(s);
 - 22 i. Dr. Thadeus Koontz, M.D. and or his agent(s);
 - 23 j. Clinician Nicole Cleveland and or her agent(s);
 - 24 k. Utah Attorney Mr. Daniel McConkie and or his agents, employer or the like;
 - 25 l. Any and all clinicians, nurses, attendants, cna, psychologists, psychiatrists
26 and or the like employed by IDHW and or its agent(s);
 - m. All supervising officers, employees and or agents of IDHW regarding and
associated with clinician Nancy Cleveland;

- n. All Preapplication and application documentation, records, statements, education, professional experience, interview notes, contract for services, employee agreement(s) between IDHW and Clinician Ms. Nicole Cleveland.
2. All records, dates/times, person(s) spoke with, and the like associated with the Madison and or Fremont County and or its agent(s) regarding in person visits to the Idaho Department of Health and Welfare Treatment Facility relevant to this matter;
3. Detailed list of all persons(s) and or agents associated with the Idaho Department of Health and Welfare previously, currently and or future anticipated (if possible) related to the custody, control, and “treatment” of said Defendant;
4. If any communications/records are unable to be produced, please identify said co
5. All communications, associated records, (tangible/intangible) and the like regarding any and all statements by the Defendant to the IDHW and or its agent(s) regarding and or related to the alleged crimes associated with Defendant’s incarceration;
6. Any and all documents, records, communications, emails, directives, instructions, guidelines, etc. illustrating or associated in any way whatsoever with the “homework” assignments given or instructed to Defendant
7. All electronic records, website history/activity, internet search inquiry, telephonic records, telephone calls, recorded telephone calls or the like associated with Defendant’s obtaining the telephone number of the LDS Church/Corporation, the actual “call” to the LDS Church/Corporation. This includes but is not limited to any and all evidence/records/documents associated with how Defendant acquired said telephone number of said corporation, the duration of the telephone call (telephone records) recordings and or notes associated with this call, list of person(s) present for said telephone call or with knowledge of said telephone call before and or after telephone call occurred.
8. Any and all investigation records, witness statements, recordings, (tangible/intangible) etc., and or the like gathered in regard to the Defendant and the IDHW regarding the treatment of defendant and the telephone call between the Defendant and the LDS Church/Corporation.

1 9. Details, documentation, records, notes, charts, of the “restorative program”
2 including but not limited to:

- 3 a. Program description and outline
- 4 b. Program administrator
- 5 c. Clinician(s) administrator
- 6 d. Clinician(s)
- 7 e. Method to determine restoration (i.e., committee members, clinicians,
8 medications, programs, etc.)
- 9 f. Restoration Records including but limited to intake documentation, legal
10 documents regarding placement into the relevant specific State Hospital,
11 consent(s), releases, other notifications, and progress notes
- 12 g. Treatment records paralleling restoration efforts including but limited to
13 intake documentation, legal documents regarding placement into the
14 relevant specific State Hospital, consent(s), releases, other notifications, and
15 progress notes

16 10. Providers: CV, degrees, license(s) certificates, LPC, MSW, etc. accompanying job
17 descriptions, employment recordings indicating discipline, experience and training in
18 the restorative program

19 11. Ethical Code(s) (communications, notes, rules and the like) related to and including
20 but not limited to:

- 21 a. Ethics code implemented and or in force regarding treatment of Defendant
22 for all person(s), professionals, clinicians, Psychologists, Psychiatrists, etc.
- 23 b. Rule
- 24 c. Clinician violated restoration role
- 25 d. Clinicians providing legal advice/counsel;
- 26 e. Clinicians exercising undue influence;
- f. Clinicians causing harm
- g. Impact on Defendant
- h. Instructions to Defendant not to inform or consult Defense Counsel

- 1 i. All alienating, disparaging, insulting, libel, defamatory statements by IDHW
2 regarding Defendant and or Defense Counsel.

3 Please note that if any portion of this subpoena is "objected" to by the recipient please
4 comply with all other requests as the objecting matter is resolved.

5 Furthermore, please note that we provide notice that all matters, documents, and the
6 like referenced above or in relation to this matter are requested to be preserved and not
7 destroyed.

8 **PLACE, DATE and TIME:**

9 **PLACE:**

10 Means Law Office, PLLC
11 429 SW 5th Ave. Suite 110
12 Meridian, ID 83642

13 **Telephone:** 2087943111

14 **Facsimile:** 18662283429

15 **Date:** Dec. 1, 2021

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

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

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

24 DATED this 4 day of November 2021.

25 *M.L. Means*

26 _____
Attorney/Agent of the Court(s)

Mark L. Means, Advocate for Ms. Lori Daybell