

**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: CR22-21-1624

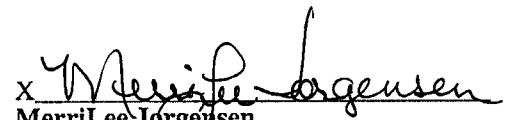
I, **MerriLee Jorgensen**, hereby declare as follows: On **November 09, 2021 at 5:36 PM**, I Personally served a true and correct copy of the **Subpoena Duces Tecum**

in the above entitled matter upon: **William John Dalling as Stake President at: 3091 N 500 E , Rexburg, ID 83440.**

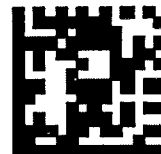
I am over the age of 18, a resident of the State of Idaho, I am not a party to or related to any of the parties in the above entitled action and I am a Process Server, in good standing, in the judicial district in which the process was served.

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

Date: 9th day of November, 2021

X   
MerriLee Jorgensen

**Bulldog Legal Support, Inc.  
P.O. Box 176  
Blackfoot, ID 83221-0176  
208-782-3530  
Our Job # 28309  
Client File:**



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  
7 Facsimile: 18662283429  
8 Email: [meanslawoffice@gmail.com](mailto:meanslawoffice@gmail.com)  
9 lcourt: [icourtlaw@gmail.com](mailto:icourtlaw@gmail.com)  
10 Website: [www.meanslawoffice.com](http://www.meanslawoffice.com)  
11 Attorney for MRS. LORI DAYBELL

12  
13  
14 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT STATE**  
15 **OF IDAHO COUNTY OF FREMONT**

16 STATE OF IDAHO,  
17 Plaintiff

CASE NO. CR22-21-1624

18 Vs.

**SUBPOENA DUCES TECUM**

19 LORI NORENE VALLOW  
20 AKA LORI NORENE DAYBELL  
21 DEFENDANT

22  
23  
24 **THE STATE OF IDAHO TO:**

25 The Church of Jesus Christ of Latter-Day Saints<sup>1</sup>  
26 Stake President Mr. William John Dalling  
Rexburg Henry's Fork State  
State of Idaho  
3091 N. 500 E.  
Rexburg, ID 83440

&

Mr. William John Dalling, personally.

<sup>1</sup> Hereafter LDS Church or Mormon Church.

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

4 STATE OF IDAHO: To Stake President Mr. William John Dalling and to the person, Mr.  
5 William John Dalling you are hereby commanded to provide as instructed below the entire file  
6 (books, papers, documents, communications, correspondence, photographs, videos,  
7 recordings, notes, charts, emails, texts, telephone records, telephone calls and records,  
8 telephone recordings, and or other objects tangible/intangible) and its contents, witness  
9 identification<sup>2</sup>, participating member(s) of "council", witness(es) identification present for  
10 "council" (whether tangible or intangible) in regards to the Withdrawal of Membership and or  
11 "Excommunication"<sup>3</sup> of Defendant Chad Daybell, alleged evidence of apostacy and the like.<sup>4</sup>

12 By way of this subpoena, we seek the above/following records related to Defendant Mr.  
13 Chad Daybell's withdrawal of membership (excommunication) from The LDS Church, whether  
14 tangible or intangible, unredacted, and or transmitted (if transmitted) by means of personal,  
15 religious, or professional electronic devices, email servers, etc., or the like:

- 16 1. All records, reports, notes, charts, communications, correspondence, exhibits,  
17 evidence, data, recordings, deleted records, deletion records, partial files, voice  
18 mails, recordings, photographs, texts, emails, notes, statements, witness  
19 statements, person(s) identification who participated or attended said council or  
20 make up said "council", telephone records, text messages, emails, and the like.

21  
22 <sup>2</sup> When seeking identification of Witness(es) and or Council Member(s) we seek  
23 their full names, address(es), telephone number(s), LDS church corresponding  
24 email address(es) and other identifying information.

25 <sup>3</sup> More recently rephrased withdrawal of membership by the LDS Church. See:  
26 [After changes to handbook terminology LDS church members no longer  
'excommunicated' | KUTV](#)

<sup>4</sup> Please see attached correspondence from you dated 7/14/2020 and August 9,  
2020.

- 1 2. All dates, times and or locations of meetings regarding this council and its task of  
2 "consider evidence of apostacy".
- 3 3. All evidence of attempts of service or actual service of this correspondence upon  
4 Defendant Chad Daybell.
- 5 4. All "Evidence" of alleged "apostacy."
- 6 5. All factors, evidence and the like related to/supporting the "council" decision to:
  - 7 a. Withdraw membership in the LDS Church;
  - 8 b. Defendant "conduct contrary to the laws and order of the Church,  
9 specifically for apostasy and for promulgating teachings and doctrines  
10 contrary to those of the Church."
- 11 6. All communications and the like between you personally, professionally, and or in  
12 your religious "calling" capacity with the and following individuals related to this  
13 Defendant:
  - 14 a. Mr. Robert Wood, Prosecutor of Madison County, Former and or Current  
15 Bishop of LDS Church;
  - 16 b. Defendant Mr. Chad Daybell bishop and or Bishopric at time of alleged  
17 "apostacy";
  - 18 c. Mrs. Heather Daybell, Fremont County, Sister-in-law of Defendant Mr. Chad  
19 Daybell;
  - 20 d. Any and all persons regarding the "membership council."
  - 21 e. Any and all council members of said "membership council."
  - 22 f. Any and all witness(es) associated with related to "membership council" and  
23 or present (physically or virtually) for the "holding a membership council."
  - 24 g. Any and all individuals associated with the prosecution of Defendant Mr.  
25 Daybell and or Defendant Mrs. Lori N. Vallow (Daybell)
  - 26 h. Any and all person(s) associated with the LDS Church and or LDS Church  
Legal Church Counsel.

- 1
- 2 i. Madison County Prosecution and or its agent(s);
- 3 j. Fremont County Prosecution and or its agent(s);
- 4 k. The Corporation of the Church of Jesus Christ of Latter-Day Saints, The
- 5 Church of Jesus Christ of Latter-Day Saints, AKA the LDS Church, Mormon
- 6 Church, and or its agent(s);
- 7 l. Mr. Robert Wood, Madison County Prosecutor/Current or Former LDS
- 8 Bishop;
- 9 m. Rexburg Police Department and or its agent(s);
- 10 n. Madison Sheriff's Department and or its agent(s);
- 11 o. Fremont Sheriff's Department and or its agent(s);
- 12 p. Utah Attorney Mr. Daniel McConkie and or his agents, employer or the like;

13 Please note that if any portion of this subpoena is "objected" to by the recipient please

14 comply with all other requests as the objecting matter is resolved.

15 Furthermore, please note that we provide notice that all matters, documents, and the

16 like referenced above or in relation to this matter are requested to be preserved and not

17 destroyed.

18 **PLACE, DATE and TIME:**

19 **PLACE:**

20 Means Law Office, PLLC  
21 429 SW 5<sup>th</sup> Ave. Suite 110  
22 Meridian, ID 83642

23 **Telephone:** 2087943111

24 **Facsimile:** 18662283429

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

26 **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.*

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

5 DATED this 4 day of November 2021.

6 *M.L. Means*

7 Attorney/Agent of the Court(s)

8 Mark L. Means, Advocate for Ms. Lori Daybell

THE CHURCH OF  
**JESUS CHRIST**  
OF LATTER-DAY SAINTS

REXBURG ID HENRY'S FORK STAKE

**PERSONAL & PRIVATE**

July 14, 2020

Dear Brother Daybell

This letter is to notify you that the stake presidency is holding a membership council in your behalf. The membership council will be held on August 2, 2020 at 10:00 a.m. at the Rexburg Idaho Stake Center located at 1508 W 3000 N Rexburg, Idaho.

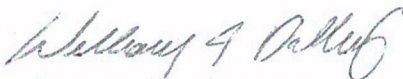
This council will consider evidence of apostasy including promulgating teachings and doctrines which are contrary to those of The Church of Jesus Christ of Latter-day Saints.

You are invited to provide a written statement to the council in your behalf. You may also provide written statements from other persons who could provide relevant information. You may invite such persons to speak to the council in your behalf if approved by me in advance. Anyone who attends must be willing to comply with the respectful nature of the council, including its procedures and confidentiality. Legal counsel and supporters beyond those referred to above may not be present. Any written statements should be provided directly to me at the address noted below prior to the date of the council. If additional time is needed to provide written statements, please notify me.

Any questions regarding this council can be directed to me at the following address and phone number:

President William J. Dalling  
3091 N 500 E  
Rexburg, ID 83440  
Phone: 208-243-1896

Sincerely,



President William J. Dalling  
Rexburg Idaho Henry's Fork Stake

**PERSONAL & PRIVATE**

