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11 Attorney for LORI NORENE VALLOW (AKA DAYBELL)

12 **IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT OF**  
13 **THE STATE OF IDAHO, IN AND FOR THE COUNTY OF MADISON**

14 STATE OF IDAHO,  
15 PLAINTIFF

16 Vs.

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

Case No: CR 33-20-0302

**DECLARATION IN SUPPORT OF**  
**DEFENDANT'S AMENDED MOTION FOR**  
**BOND REDUCTION**

20 COMES NOW DEFENDANT, Mrs. Lori Vallow (Daybell), by and through her Attorney of  
21 Record, Mark L. Means of Means Law and Mediation hereby declare in support of her Motion for  
22 Amended Motion for Bond Reduction as follows: Attorney Mark L. Means, being first duly sworn upon oath,  
23 deposes, declares and says as follows:

- 24 1. I am the Attorney of Record for the Defendant Mrs. Lori Vallow (Daybell).
- 25 2. That on or about or about 3/24/20 I caused to be filed with this Court her *Declared Motion*  
26 *for Bond Reduction*. To date no response/objection has been filed with the Court and despites  
request for an oral in court hearing on the above motion, no notice of availability of the Court  
to hear such has been provided.
3. That on or about 3/16/20 my office received approximately 1600 pages documents/records  
as well as approximately 14.6 gigabytes of videos, photographs, electronic/intangible

1 production and the like from the Madison County Prosecutor's office. It is reasonable  
2 anticipated that future production of documents, records, tangible/intangible records will be  
3 produced to Defendant as acquired by the Prosecution totaling over 200 gigabytes/10,000+  
4 pages of tangible records, etc.

- 5
- 6 4. That on or about 3/30/20 I travelled to the Madison County Female Detention Center to meet  
7 with my client in preparation for the forthcoming preliminary hearing and to review said  
8 documents/records.
- 9
- 10 5. That upon arriving at said Detention Center, I was required, with no attorney/client option,  
11 to the sole option of communicating with my client in the public visitor meeting room, wall of  
12 glass between attorney and client, over a recorded telephone line, upon which my client was  
13 required to enter her inmate number for charges and consent to recording of said phone call  
14 prior to connection of the telephone lines. In addition, that I was told that the ONLY way that  
15 my client could review documents was to pass possibly sensitive documents/records by and  
16 through a Detention Center Officer from the public (my side) room "...round and about..."  
17 through multiple security doors to the inmate (client's side). All of which would be out of  
18 sight of the Attorney and Client.
- 19
- 20 6. This procedure is unreasonable and in direct violation of the Regulations, Law and  
21 Constitution of the State of Idaho and the United States of America.
- 22
- 23 7. This Detention Center procedure/unlawful restrictions have made it impossible to prepare for  
24 said hearings, to communicate with my client in a confidential/privileged manner, and to  
25 simple review productions of documents/records with my client to assist in her defense of  
26 the pending charges/criminal complaint.
8. That these unlawful restrictions, as well as no hearing allowed to date, on the previously filed  
Motion to Reduce Bond, are in violation of my client's basic due process rights specifically but

1 not limited to: (1) defendant's rights to effective assistance counsel; (2) Idaho Rules of  
2 Criminal Procedure; (3) Constitution of the State of Idaho; (4) Attorney Client Privilege; (5)  
3 Code of Federal Regulations Title 28 Judicial administration, Chapter V Bureau of Prisons,  
4 Department of Justice; (6) as well as violations of the Constitution of the United States  
5 included but not limited to: Amendment V, VI, VIII, and IX.

6  
7 *Again, we respectfully request oral argument on this motion before the Honorable Judge*  
8 *Mallard.*

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

11  
12 DATED this 2 day of April 2020.

*ML Means*

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14 Mr. Mark L. Means  
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1 **CERTIFICATE OF SERVICE**

2 The undersigned certifies that on this  2  day of April 2020, I caused a true  
3 and correct copy of the FOREGOING document to be forwarded by the method(s) indicated  
4 below, to the following:

5 MADISON COUNTY PROSECUTING OFFICE x   Efile  
6 159 E. Main St.  
7 P.O. Box 350  
8 Rexburg, ID 83440  
9 Email: [rwood@co.madison.id.us](mailto:rwood@co.madison.id.us)

10 DATED this  2  day of April 2020.

11 By  *Mark L Means*   
12 Mr. Mark L. Means  
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