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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 MADISON**

14 STATE OF IDAHO,
15 PLAINTIFF

16 Vs.

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

20 Case No: CR 33-20-0302

21 **SUBPOENA DUCES TECUM**
22 **(Fremont County Prosecutor)**

23 **THE STATE OF IDAHO TO:**
24 **Fremont County Prosecutor Office**
25 **22 W 1st North**
26 **St. Anthony, ID 83445**

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

STATE OF IDAHO: Prosecutor for Fremont County, State of Idaho the entire file (books, papers, documents, communications, correspondence, or other objects tangible/intangible) and its contents (whether tangible or intangible) in regards to the investigation of "**Chad Daybell, Lori Daybell/Conspiracy, Attempted Murder, Murder**" as identified in the

1 correspondence/letter from the State of Idaho Office of Attorney General Lawrence G. Wasden
2 dated April 9, 2020.

3 **By way of this subpoena we seek the following records (whether tangible or**
4 **intangible):**

- 5 1. All records, reports, notes, charts, communications, correspondence, exhibits,
6 evidence, data, and the like from the above prosecutorial office and or its agents
7 regarding the investigation of "***Chad Daybell, Lori Daybell/Conspiracy, Attempted***
8 ***Murder, Murder***" as identified in the correspondence/letter from the State of Idaho
9 Office of Attorney General Lawrence G. Wasden dated April 9, 2020.¹
- 10 2. All communications (tangible/intangible, whether formal or informal, personal or
11 professional obtain within scope of employment/position or personally
12 obtained/created) recordings, electronic mail(s), text messages, online/internet
13 communications ("chat", blogs, podcasts, internet postings, or the like) transcripts,
14 voicemails, or the like in regards to the above investigation between:
- 15 a. Fremont County Prosecutor and or its Agents;
 - 16 b. Fremont County Prosecutor and or its Agents and the State of Idaho Office
17 of Attorney General;
 - 18 c. Officers/Deputies/Agents and Fremont County Prosecutor or other
19 Investigative Authorities (Federal Bureau of Investigation (FBI), State of
20 Idaho Office of Attorney General, Madison County (State of Idaho)
21 Prosecutor's office, Madison County State of Idaho, Rexburg Police, Madison
22 County Sheriff's department, Fremont County Sheriff's department, etc.);²

23 1 Term "Agent(s)" include but not limited to: Officers of the State of Idaho,
24 County of Fremont, City officials, employees, or the like associated with
25 Fremont County, employees/elected personal of prosecutorial office of
26 Fremont County, City of Rexburg, private investigators associated with above
investigation, deputies, sheriff, sheriff's department(s), any and all
investigative personnel, and or the like.

2 Not subject to ICR 16 (g) (B). If any materials, records or the like are
withheld, please identify such correspondence, or the like, and grounds for
withholding said records.

1 d. Persons of interests, witnesses, (or the like) and/or Chad Daybell and or Lori
2 Daybell and or associated with this "investigation";

- 3 3. All photographs, recordings, videos, screen shots, or the like related to said
4 "investigation";
- 5 4. Statements, or the like, of Lori Daybell (Vallow) and or Chad Daybell, or any other
6 person(s) related to the above investigation;
- 7 5. Materials, objections, documents, records, etc. regarding the above "investigation"
8 related to proposed prosecution/investigation and or in preparation of the defense
9 of said "investigation";
- 10 6. All reports, examinations and or tests (including but not limited to physical or
11 mental examinations, scientific tests or experiments, autopsies, etc.) related to Mr.
12 Chad Day Bell, Mrs. Lori Daybell (Vallow), and or the deceased Tami Daybell. This
13 request includes but not limited to results of said testing/examinations, all testing
14 documentation/records or the like, expert/professional opinions, recommendations,
15 reports, data, supporting/unsupporting records/documents, results, etc.;
- 16 7. All computer/electronic records, or the like (digital media unredacted/redacted)
17 associated with any confiscated electronic device from or in regard to said
18 "investigation" taken from the possession and or home of Mr. Chad Daybell and
19 Mrs. Lori Daybell (Vallow). "Home" hereby identified as *202 North 1900 East,*
20 *Rexburg, Idaho 83440;*
- 21 8. Any and all records, tangible/intangible related to/in reference to the above said
22 investigation of "...Chad Daybell, Lori Daybell/Conspiracy, Attempted Murder,
23 Murder";
- 24 9. Any records, documents, exhibits, etc. related to or intended for use by the
25 prosecutor as evidence at trial;
- 26

1
2 **PLACE, DATE and TIME:**

3 **PLACE:**

4 Means Law Office, PLLC
5 429 SW 5th Ave. Suite 110
6 Meridian, ID 83642

7 **Telephone:** 2087943111

8 **Facsimile:** 18662283429

9 **Date:** May 6, 2020

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

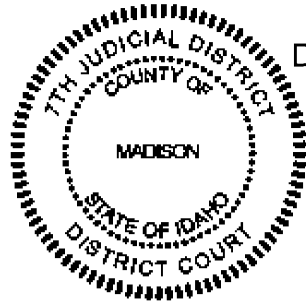
11 *If any of this subpoena is objected to by the served/obligatory party, it is hereby*
12 *requested that any above that is unobjected to by served/obligatory party be responded to in*
13 *timely manner as set out above without delay.*

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

18 DATED this 16th day of April 2020.

19 *Angie Wood*

20 Deputy CLERK OF COURT



DATE: _____

TIME SERVED: _____

PLACE OF SERVICE: _____

PERSON OF SERVICE: _____