

1 Mark L. Means (ISB 7530)  
2 MEANS LAW and MEDIATION  
3 Means Law Office, PLLC  
4 429 SW 5<sup>th</sup> Ave. Suite 110  
5 Meridian, ID 83642  
6 Telephone: 208.794.3111  
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 VALLOW

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

16 STATE OF IDAHO,  
17 PLAINTIFF

18 Vs.

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

Case No: CR 33-20-0302

**SUBPOENA DUCES TECUM**

(Madison County (State of Idaho) Sheriff's  
Department)

22 **THE STATE OF IDAHO TO:**  
23 **Madison County Sheriff Department**  
24 **Sheriff Rick Henry**  
25 **145 E. Main**  
26 **Rexburg, Idaho, 83445**  
**Telephone: 208.356.5426**

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:

1 STATE OF IDAHO: Madison County Sheriff Department, State of Idaho the entire file  
2 (books, papers, documents, communications, correspondence, photographs, videos, or other  
3 objects tangible/intangible) and its contents (whether tangible or intangible) in regards to the  
4 communications and the like of current inmate Mrs. Lori (Daybell) Vallow by no later than: May  
5 8, 2020.

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

- 8 1. All records, reports, notes, charts, communications, correspondence, exhibits,  
9 evidence, data, recordings, deleted records, deletion records, partial files, and the  
10 like from the above sheriff's department and or its agents regarding Defendant Mrs.  
11 Lori (Daybell) Vallow and or the stated self-identified "...investigation".<sup>1</sup>  
12 2. Detailed list identifying each and every person(s) employed with Madison County  
13 Sheriff's Department and or its agents in regard to the above  
14 recordings/investigation including but not limited to the following:  
15 a. Full name and employee/badge number/identification employee number of  
16 persons employed/associated with the Sheriff's department that were  
17 involved in any way whatsoever regarding and any all recordings of the  
18 communications (and the like) of Mrs. Lori (Daybell) Vallow at any time while  
19 in your custody<sup>2</sup> or supervision to present;  
20 b. Employment/Work Schedule for each and every Deputy/Agent of Madison  
21 County Sheriff's Department in regard to subsection "a." from date of taking  
22 custody of Mrs. Lori (Daybell) Vallow to present;  
23 3. All communications<sup>3</sup>, whether be by email, text, facsimile, voicemail, US postage, or  
24 the like, regarding Mrs. Lori (Daybell) Vallow by and or between the Madison County  
25 Sheriff Department (and or Madison County Sheriff's Department's

25 <sup>1</sup> See statement by Sheriff's Spokesperson identified as Deputy Isaac Payne  
26 <sup>2</sup> Feb. 20, 2020;

<sup>3</sup> Please note that all records and the like, are requested whether they be in  
tangible or intangible, formal or informal, personal, or professional emails,  
text, voicemails, phone records, etc., format.

1 agents/employees) (from date of taking Mr. Lori (Daybell) Vallow into custody (Feb.  
2 20, 2020) to present) and:

- 3 a. Any and all persons associated/employed with the Madison County Court;  
4 b. Any and all persons associated with the Madison County Prosecutor's Office;  
5 c. Any and all persons associated with the City of Rexburg (State of Idaho)  
6 Police Department;  
7 d. Any and all persons associated with Fremont County, State of Idaho;  
8 e. Any and all persons associated with Fremont Prosecutor's Office (State of  
9 Idaho)  
10 f. Any and all internal communications between/involving the Madison County  
11 Sheriff's Department and its employees/agents, etc.);  
12 g. Any and all persons associated with the legal representation of Mrs. Lori  
13 (Daybell) Vallow;  
14 h. And any and all investigative authorities/agencies/personnel;
- 14 4. All emails, records, memorandums, statements, voice mails, text, guidelines,  
15 directives, or the like regarding the public/attorney client communication procedure  
16 associated with the Madison County Sheriff's Department and the Madison County  
17 Detention Center and Covid-19 pandemic.
- 18 5. All emails, records, memorandums, statements, voice mails, text, guidelines,  
19 directives, or the like regarding the public/attorney client communication procedure  
20 associated with the Madison County Sheriff's Department and the Madison County  
21 Detention Center pre-covid-19 pandemic.
- 22 6. Any and all documents, records, communications, emails, directives, instructions,  
23 guidelines, etc. illustrating or associated in any way whatsoever with the  
24 preservation and or deletion of recordings of communications between Mrs. Lori  
25 (Daybell) Vallow and her Attorney Mark L. Means (any other persons associated with  
26 Mrs. Lori (Daybell) Vallow legal representation; *This includes all communications and  
or the like between any person(s), agency, or the like, and or that*

1 *includes/incorporates the Madison County Sheriff Department or its agents in said*  
2 *communications, whether that be by legal or illegal means/manner;*

- 3 7. Any and all recordings, exhibits, records, memorandums, directives, emails, voice  
4 mails, communications, statements, telephone conversations, text messages, or the  
5 like regarding Mrs. Lori (Daybell) Vallow and or between Mrs. Lori (Daybell) Vallow  
6 and any and any other person(s) from date of taking custody (Feb. 20, 2020) of Mrs.  
7 Lori (Daybell) Vallow to present;
- 8 8. Any and all dates, records, emails, instructions, directives, recordings,  
9 communications, employment records (illustrating what person(s) (by name) were  
10 engaged in employment with Madison County Prosecutor's Office at the time of  
11 recording or involved with any and all recordings deletion/preservation of  
12 communications of Mrs. Lori (Daybell) Vallow) and or the like in regards to  
13 communications/statements or the like of Mrs. Lori (Daybell) Vallow from date of  
14 custody (Feb. 20, 2020) to present;
- 15 9. All computer/electronic records/emails/communications, etc., or the like (digital  
16 media unredacted/redacted) associated with any and all communications (or the  
17 like) or incarceration (Feb. 20, 2020) of Mrs. Lori (Daybell) Vallow and said  
18 "investigation";
- 19 10. Any records, documents, exhibits, etc. related to or intended for use and or  
20 discovered by the Madison County Sheriff Department to allege/prove innocents  
21 and or to attempt to show/illustrate "accidentally" recording any and all  
22 communications or the like between legal counsel for Mrs. Lori (Daybell) Vallow and  
23 Mrs. Lori (Daybell) Vallow from February 20, 2020 to present.

24 **PLACE, DATE and TIME:**

25 **PLACE:**

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

**Telephone:** 2087943111

**Facsimile:** 18662283429

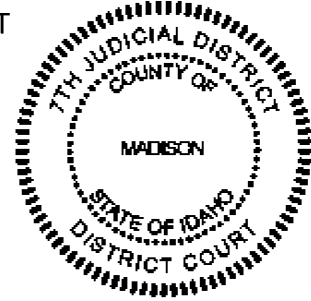
**Date:** May 8, 2020  
**Time:** 1:00 P.M.

*If any of this subpoena is objected to by 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.*

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 21st day of April 2020.

Deputy Angie Wood  
CLERK OF COURT



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

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

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

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