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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 (State of Idaho Office of Attorney General)

23 **THE STATE OF IDAHO TO:**
24 State of Idaho
25 Office of Attorney General
26 Criminal Law Division
27 700 W. Jefferson Street Ste. 210
28 P.O. Box 83720
29 Boise, ID 83720-0010

30 YOU ARE HEREBY COMMANDED to produce or permit inspection and copying of the
31 following documents or objects, including electronically stored information at the place, date
32 and time specified below:
33
34
35
36

1 STATE OF IDAHO: Prosecutor for Fremont County, State of Idaho the entire file (books,
2 papers, documents, communications, correspondence, or other objects tangible/intangible)
3 and its contents (whether tangible or intangible) in regards to the investigation of "**Chad**
4 **Daybell, Lori Daybell/Conspiracy, Attempted Murder, Murder**" as identified in the
5 correspondence/letter from the State of Idaho Office of Attorney General Lawrence G. Wasden
6 dated April 9, 2020.

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

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

25 1 Term "Agent(s)" include but not limited to: Officers of the State of Idaho,
26 County of Fremont, City officials, employees, or the like associated with
Fremont County, employees/elected personal of prosecutorial office of
Freemont 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.

1 Madison County State of Idaho, Rexburg Police, Madison County Sheriff's
2 department, Fremont Sheriff's department, etc.);²

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

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

26

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 9. Any records, documents, exhibits, etc. related to or intended for use by the
2 prosecutor as evidence at a trial;

3
4 **PLACE, DATE and TIME:**

5 **PLACE:**

6 Means Law Office, PLLC
7 429 SW 5th Ave. Suite 110
8 Meridian, ID 83642

9 **Telephone:** 2087943111

Facsimile: 18662283429

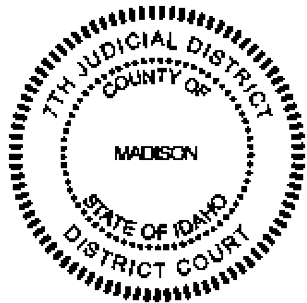
Date: May 6, 2020

Time: 1:00 P.M.

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

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

17 DATED this 16th day of April 2020.



22 *Angie Wood*
23 Deputy CLERK OF COURT

24 DATE: _____

25 TIME SERVED: _____

26 PLACE OF SERVICE: _____

PERSON OF SERVICE: _____