

**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

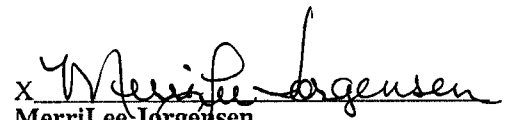
I, **MerriLee Jorgensen**, hereby declare as follows: On **November 09, 2021 at 5:36 PM**, I Personally served a
true and correct copy of the **Subpoena Duces Tecum**

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

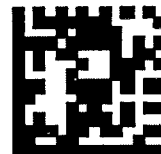
I am over the age of 18, a resident of the State of Idaho, I am not a party to or related to any of the parties in the above
entitled action and I am a Process Server, in good standing, in the judicial district in which the process was served.

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:**



Mr. Mark L. Means (ISB 7530)
Means Law and Mediation
Means – Law
429 SW 5th Ave. Suite 110
Meridian, ID 83642
Telephone: 2087943111
Facsimile: 18662283429
Email: meanslawoffice@gmail.com
lcourt: lcourtlaw@gmail.com
Website: www.meanslawoffice.com
Attorney for MRS. LORI DAYBELL

**IN THE DISTRICT COURT OF THE SEVENTH JUDICIAL DISTRICT STATE
OF IDAHO COUNTY OF FREMONT**

STATE OF IDAHO,
Plaintiff

CASE NO. CR22-21-1624

Vs.

SUBPOENA DUCES TECUM

LORI NORENE VALLOW
AKA LORI NORENE DAYBELL
DEFENDANT

THE STATE OF IDAHO TO:

The Church of Jesus Christ of Latter-Day Saints¹
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.

¹ 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 identification², 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"³ of Defendant Chad Daybell, alleged evidence of apostacy and the like.⁴

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 ² 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 ³ More recently rephrased withdrawal of membership by the LDS Church. See:
26 [After changes to handbook terminology LDS church members no longer
'excommunicated' | KUTV](#)

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

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

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

Please note that if any portion of this subpoena is "objected" to by the recipient please comply with all other requests as the objecting matter is resolved.

Furthermore, please note that we provide notice that all matters, documents, and the like referenced above or in relation to this matter are requested to be preserved and not destroyed.

PLACE, DATE and TIME:

PLACE:

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

Telephone: 2087943111

Facsimile: 18662283429

Date: Dec. 1, 2021

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
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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.

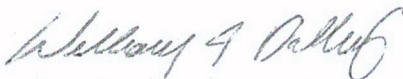
This council will consider evidence of apostasy including promulgating teachings and doctrines which are contrary to those of The Church of Jesus Christ of Latter-day Saints.

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

THE CHURCH OF
JESUS CHRIST
OF LATTER-DAY SAINTS

REXBURG ID HENRY'S FORK STAKE

August 9, 2020

Dear Brother Daybell,

This letter is to notify you of the decision of the membership council held for you on August 2, 2020. The council decision was to withdraw your membership in The Church of Jesus Christ of Latter-day Saints for conduct contrary to the laws and order of the Church, specifically for apostasy and for promulgating teachings and doctrines contrary to those of the Church.

This decision means that you may not enjoy any privileges of Church membership. You may not enter a temple or wear temple garments. You may not exercise the priesthood or pay tithes and offerings. When possible, you are invited to attend public Church meetings and activities as long as your conduct is orderly, but you may not give a talk or lesson, offer a prayer in Church settings, partake of the sacrament, lead an activity in church, serve in a Church calling or participate in the sustaining of Church officers.

You have the right to appeal this decision within 30 days, if so desired. An appeal should be delivered to me in writing (3091 N 500 E Rexburg, ID 83440) specifying the alleged errors or unfairness in the procedure or decision. Any questions regarding the decision of the council can be directed to President William J. Dalling (208-243-1896).

Sincerely



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