

Exhibit “1”

DECLARATION OF Jane Doe 1

I, Jane Doe 1, declare under criminal penalty under the law of Utah that the foregoing is true and correct:

1. I am over the age of eighteen and competent to testify to the statements herein.
2. From approximately 1983 to 1986, while I was 5-8 years old, my siblings and I were sexually assaulted on numerous occasions by my father, Perpetrator, ^{Doe 1, Male Def. & Doe 2, Female Def.}, who were in our local ward, my grandmother, LS, and a teenage babysitter, who was also in our ward. There were also other teenagers and adults involved from time to time.
3. The abuse included “touching parties”, which were gathering of adults, teenagers and children. The adults involved were primarily Perpetrator, and D1D & D2D. My teenage babysitter, who also babysat the ^{Doe Defs.} children, was named CW. When the “touching parties” first started, my younger sister, ^{Jane Doe 5}, and the daughter of D1D & D2D, who was ^{Jane Doe 5}'s age, were involved. As I got older, the younger daughter of ^{D1D & D2D} became involved as did my younger siblings, ^{Jane Doe 2} and ^{John Doe 1}. I also remember seeing BD, another young girl from the ward, at some of the parties. These parties would happen frequently; sometimes on a weekly basis, sometimes 1-2 times a month. I remember having “touching parties” on Saturday and then going to Church on Sunday and having D2D, aka “Sister D2D”, be our primary chorister and having her husband, D1D, sit up on the stand since he was in the Bishopric.

4. Typically, the “touching parties” would start with the adults telling us to “put on a show” for them. These shows were usually “dances” that me, ^{Jane Doe 5} and the oldest daughter of D1D & D2D would perform. These dances would always end with us undressing. I remember this is when the applause from the adults and our babysitter would get the loudest. After

we were naked, the adults (and teenage babysitter) would sexually assault us.

5. This included touching our private parts and penetrating us vaginally and anally with their finger and sometimes using objects like crayons or candy to penetrate us. I recall D1D being the meanest of the adults. He seemed to encourage the others to participate. There were usually treats and bribes involved at every stage of the parties. The fondling included the adults masturbating me and the other children.

6. The adults also forced me and the other children to touch and masturbate them. The adults would refer to the touching as "marriage lessons." I was forced to touch and lick D1D and Perp.'s genitals. D1D and Perp. did not always get completely naked but would expose their penises and make me touch and suck them. I was also forced to touch the bare breasts of D2D as well as my teenage babysitter, CW

7. It seemed to me that D1D was in charge of the parties and would encourage all of the kids to perform. He would also encourage involvement of the adults. At one of these parties, I saw my father Perp. having sex with our babysitter, CW. At another, I saw him having sex with our grandmother, LS.

8. These parties would take place at my house, at D1D & D2D's house, and at my grandmother's house. These parties seemed to happen nearly every time the babysitter would watch us, or when our mom was out of town or away from the house. There were times when my mom and Perp. were on a date and the parties would happen at my house with just D1D & D2D, CW and sometimes another older adult man and/or friends of CW being present.

9. When I became older, Jane Doe 2 and John Doe 1 were also present at these parties. I remember Jane Doe 2 being touched. Similar to what happened to Jane Doe 5 and me, there were times when each of these adults penetrated Jane Doe 2's vagina with their fingers. There were other times

when Jane Doe 2 was penetrated with objects.

10. When John Doe 1 was just over a year old, he became an object at these parties as well. The adults would get John Doe 1 naked and touch him. They seemed to delight in the fact that they could make John Doe 1 erect at such a young age. They would put candy on John Doe 1's erect penis and make me and the other kids lick candy off him.

11. The adults started to video tape some of the "touching parties". I recall when we were doing our "dance" and then being undressed that we were being videotaped. The videotaping would continue during the sexual assaults and rapes that I have described above.

12. There were often threats or punishments so that we wouldn't tell anyone what was happening. Some of these threats or punishments included making us drink a concoction containing urine and feces. Other times we were forced to drink coffee. After drinking the coffee, the adults proceeded to shame us for being bad since we were breaking the Word of Wisdom. They explained that since we were wicked, nobody would believe us, so we better not tell anyone.

13. Throughout the years of abuse by my dad, D1D, D2D, and others, I prayed to Heavenly Father for the hurting to stop. After we disclosed the names of our abusers, my mom kicked my dad out of the house. We then spent some time with my Belle and Boppa, my maternal grandparents, at their condo in Hawaii.

14. While I was in Hawaii, my maternal grandmother typed a poem that I wrote about the abuse I suffered at the hands of Perp, D1D & D2D. The poem is attached as Exhibit A.

15. After returning from Hawaii, I remember being visited by Apostle Neil A. Maxwell. Elder Maxwell was a friend of my maternal grandparents. Elder Maxwell gave me and each of my younger siblings a blessing by laying his hands on my head. During that blessing he said something to the effect that the abusers had made "horrible choices". He talked about how God

would be the judge of these adult abusers and that I needed to forgive.

16. Perp. baptized me when I turned 8 years old, during the time period that he, D1D & D2D and others were doing these terrible things to me. After disclosing the abuse, I expressed a desire to be re-baptized as I believed that my original baptism was tainted and should not count because Perp. was not a worthy priesthood holder. This request for a rebaptism was granted sometime after Elder Maxwell gave me a blessing.

17. As part of my upbringing, I wrote in a journal on an almost weekly basis. In some of my entries, I wrote about the abuse I suffered. Some of the relevant pages are attached as Exhibit B.

Signed on the 22 day of August, 2018, at Derwood (city or county),
Maryland (state).

Jane Doe 1

A large black rectangular redaction box covering the signature area.

Signature

Exhibit “A”

to Declaration of

Jane Doe 1

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Exhibit “A”

Exhibit “A”

Exhibit “A”

March 1986 by 8 year

Jane Doe 1

Prudential Bache Securities
Feb. 128

To Daddy

Daddy I hate you. Daddy I do.
You have done wicked things
And D2D has too.

You have made me suck on your penis
And took me to your awful mom's
She worse than you
You have tricked Mommie.
And lied to her too.
You took me to ^{D1D & D2D}
And I'd like to hit you.
I truly do hate you
Way worse than I would hate to eat mud.
Daddy I would like to strike you dead
But the good part of you I love more than my own head.
We're in Hawaii, I miss you so much.
We've truly had such great, great fun
And read so many stories and had so many treats
But Daddy I miss you the most when we're on the beach.

I have not gone snorkling
* With Boppa but twice
And then we fed the fish
Cakes made of rice.
I have a new swimming suit
~~like~~ Light purple with straps
That go across my shoulders
And then down my back.
It also has a frilly skirt
Made of two white ruffles that when I play
They twirl like a dress on a holliday.

Boppa was here for a week or two
And Belle has helped me
To tell things about you.
We know that D1D & D2D, the Ws and the Ss'
Put together would not equal you and Grandma put together.
I hated those parties
They weren't any fun
Even though the treats were quite mummy and fun.
I hated the games you forced us to play
And the way that you made us
Touch your penis olay.

We've rented some movies
And popped us some corn
And watched the videos
With no note of scorn.
John Doe 1 threw his glass down
And of Belle's dishes broke
A glass full of water, and ice on her porch.
We've gone on some picnics
And played in the waves
And gone shopping for games.
On the last day that Boppa was here in Hawaii
We went shopping and Boppa ran away.

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We finally found him
With ^{John Doe 1} and an ice cream cone
And ^{John Doe 1} was all happy
And we ate the chicken to the bone.

Prudential-Bache
Securities

Public Finance
Daddy I truly miss you.
And I can't wait til we're home,
But for now I'm just writing you
This ^(Little) poem!

THE END

Jane Doe 1

by

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Exhibit “B”

to Declaration of

Jane Doe 1

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Exhibit “B”

Exhibit “B”

Exhibit “B”

great thing fancy lights that the snack bar, even there was
I did a piano recital

March 11, 1986

Thursday

so angry at Dad and I loved it. Part
of. ~~so angry at Dad and I loved it. Part~~ of the people who touched
us. ~~so angry at Dad and I loved it. Part~~ of the people who touched

John Doe 1

D1D

CW

I feel bad
I think Shadow is pregnant again
when she made this going to be so far to be away
from this horrible roller coaster stinking people.

March 16, 1986

Morning is Spring or total brot

All the I love

you sentences in this book I wish I could cross out
We went and saw Kiki's play. We think Shadow is

Jane Doe 2

Jane Doe 5

going to have kittens again. And I went to
Goin up to the dress that Grandma gave to
Mama is being a little nar now. And we are going
to burn up everything for wicked people gear us
I feel...

kind of sad to be going to a new school where I don't know anybody. Cause I know some but Mommy's putting me in the dumb class. We went to the cabin + had a fun time. We saw our 2nd cousins.

R.W.

I feel sad about growing up because I have to leave behind my toys + I start paying more attention to my books. But growing up is fun too. Cause your body start changing so you start changing + you get smarter.

It was good we told. Even though our prayers weren't answered the way we wanted them to be. Because we wanted the wicked people to just stop without us telling. And I told the State President the articles of Faith + he told me what they meant. He kept telling me that I had to have Faith. I felt better after I talked to him. It was like throwing up.

Why don't you drive me out to Dr. Whitehead whenever I'm feeling bad. I hope Daddy will get better so that Mommy won't get married to some body else.

I had a fun time at my party. I had a party with my my new friends + I found out that there is only one girl going to be in my class maybe. Probably she'll be in the other class.

Aug 17
Hmmm
Probably I'm going to be in the fourth grade but Mommy was saying the prince will but she talked to the
to put me in it
it is because
who

And at Raging Waters I had fun especially in the wave pool.

I had an excellent apt. at Dr. Whitehead. I talked + I talked + I talked + I talked + Dr. Whitehead said if I'd talk '10 that good wife really see sim changes. In feelings. So our hand will change color inside.

Yeah, D1D

Doesn't get to bear his testimony or be that important thing any more. It used to make me feel awful. Grandmother was scaredy cat! She has a far side sign in front of her house + is trying to know it for a way. This scares of us! She's got an ounce of brains. It makes me feel + triumphant! One day will put her in our car + shove her in our wood burning stove + keep her there until the police come.

Aug 24

Tomorrow we are going to the Alps. I had a car we were to call + I had a car we were to call. Was a typo +. And falling in a bear. And the and tonight. I had a car we were to call. Dam bridge of tonight. I had a car we were to call. Appen 19. I had a car we were to call.

we saw
have
more
fun
you

our
wished
And if
the
ing
after

and
tomorrow
don

DATE _____

PAGE 13

John Doe 1

John Doe 2

It's good that they would have made a boy. Otherwise

Don't you feel sorry for [redacted] put his penis in him.

He'll be raised with this - and thing in fake it out

on their own kids even more since they don't have

so many kids to do it to.

I got a blessing from the state president. He

said it's all right to get mad at him.

Sept 13th

Shogool has been fun late 13 and MK

Teacher said I'm doing good.

We want to the state fair. I was fun. The

[redacted]

went on a treat for kids. We exchange

a pizza a treat & I got a beautiful little glass

blown unicorn. She's per white with a pink

man - trail. I'm doing great cut Dr. Whitehead! So far