

# Exhibit “8”

## DECLARATION OF Jane Doe 4

I, Jane Doe 4 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 about the age of five, when **Perpetrator** married my mother, to the time of their separation and divorce when I was about 12 years old, <sup>Perp.</sup> physically and sexually abused me and my siblings. I was sexually assaulted and raped two to three times a week on average.
3. About 90% of the time, <sup>Perp.</sup> was a great parent and a role model. The other 10% of the time, he was a monster. Most of the sexual assaults occurred in the upstairs bathroom. <sup>Perp.</sup> sexually assaulted and raped me in that upstairs bathroom too many times to remember. This included fondling, vaginal rape and anal rape. <sup>Perp.</sup> vaginally and anally raped me with his finger as well as with objects, like brush handles. He also made me put my mouth on his penis and suck it.
4. When <sup>Perp.</sup> would rape me with objects, this was not a gentle insertion, but something meant to stab, to cut, and to hurt. Looking back on it now, I would call it genital mutilation. I believed it was a type of punishment.
5. There were times when <sup>Perp.</sup> would make me watch porn with him. This porn seemed to feature only females, who would often use dildos on themselves and on one another. I remember the porn being disturbing because the people on the screen seemed to like what was going on, while I could only think of how much it hurt every time he did it to me.
6. When <sup>Perp.</sup> would make me perform oral sex on him, he typically wasn't naked but wearing his temple garments. He would expose himself and make me perform oral sex on him.

When he was finished, he would often ejaculate on me.

7. <sup>Perp.</sup> seemed to use the sexual assaults and rapes as a form of punishment for bad behavior. I remember thinking that I was the bad child and wishing that I could be as good as <sup>Jane Doe 3</sup> was, so that I wouldn't keep being hurt. I thought that <sup>Jane Doe 3</sup> was good, and so I never imagined that he was hurting her in a similar fashion as well.

8. I remember one occasion when the missionaries came over for dinner. I was asked to say the prayer at dinner. I prayed for <sup>Jane Doe 3</sup> to stop peeing the bed that I shared with her at the time. <sup>Perp.</sup> was mad at me for this. That night, <sup>Perp.</sup> took me to the bathroom, and inserted a pencil into my vagina, which he stabbed repeatedly and with such force that the pencil broke inside of me. <sup>Perp.</sup> was panicked. Fearing that he would have to take me to the hospital, he dug until he was able to retrieve the pencil. While this was very painful, I remember thinking that at least as long as the pencil was in me, <sup>Perp.</sup> would have stop.

9. At age 15, I had to have reconstructive surgery performed on my vaginal canal because there was too much scar tissue, and I couldn't use a tampon without excessive pain.

10. Later, I also had to have part of my cervix removed because of the excessive scar tissue. Due to having this part of my cervix removed, all my children have been premature births.

11. While I never witnessed <sup>Perp.</sup> sexually abuse <sup>John Doe 2</sup>, I saw enough signs that make me believe that it happened. Even as a toddler, <sup>John Doe 2</sup> would freak out, and become hysterical at the thought of being left alone with <sup>Perp.</sup> or having to shower with <sup>Perp.</sup> <sup>Jane Doe 3</sup> and I ended up holding that child for just about the first three years of his life to keep him away from <sup>Perp.</sup> While I didn't witness sexual abuse, I did witness <sup>Perp.</sup> getting mad and literally throwing <sup>John Doe 2</sup> across the room. As <sup>John Doe 2</sup> grew and developed, he had a speech impediment and learning disabilities.

*Signature on following page*

Signed on the \_\_\_\_\_ day of August, 2018, at \_\_\_\_\_ (city or county),  
\_\_\_\_\_ (state).

Jane Doe 4

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Signature

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