

Exhibit “4”

DECLARATION OF Jane Doe 5

I, **Jane Doe 5**, 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 3-6 years old, my siblings and I were sexually assaulted on numerous occasions by my father, **Perpetrator**, our family friends, **D1D** and **D2D**, my grandmother, **LS**, our teenage babysitter **CW**, and a few times by friends of **CW** and a man I believe was named **DM**.

3. I recall the sexual assaults taking place at my house, the **D1D & D2D** house, and our paternal grandmother, **LS**'s house. The sexual assaults seemed to happen anytime we were being babysat, our mom was not at home, or whenever we would go to **D1D & D2D** house.

4. I recall being forced to participate in "touching parties", typically with **Perp.** and the **D1D & D2D** present. My babysitter, my paternal grandmother, and others were occasionally present at these "touching parties". It seemed like **D1D & D2D**, especially **D1D**, were in charge at these parties. I recall being told, along with my sister **Jane Doe 1**, to put on dances. At the end of the dances we were told to pull up our dresses and then undress. This is when the applause by the adults who were present would be the loudest. After we were naked, the adults would touch us and fondle us in our genital areas. We were told that all the touching was for the purpose of making us ready for marriage and motherhood.

5. On occasion, I recall the touching going further. There were times when **Perp.** and **D1D** would take turns penetrating my vagina and with their fingers. While **Perp.** and **D1D** would do this most frequently, there were times when **D2D** did this as well as my babysitter. There were times when I was also penetrated with objects like a crayon.

6. I was also forced, along with Jane Doe 1, and D1D and D2Ds daughter, to touch the men's genitals. Sometimes, this was just Perp. and D1D. Sometimes there were others. The men would expose themselves and we were forced to touch them. There were also occasions when we were forced to suck on their penises. There were times when we were forced to touch the bare breasts of D2D and of our babysitter. There were times when the adults would also make the kids touch each other.

7. The touching parties would occasionally include other activities, such as swimming, where we would be told to swim nude for the adults. We had an indoor pool in our house. While at one of these parties, we were forced to watch our Perp. have sex with our babysitter. Another time, we saw him having sex with our grandmother LS as well.

8. I also recall being touched on multiple occasions while getting ready for a gymnastics class I was in with C.M., D1D & D2D's oldest daughter. Frequently, D2D or D1D would make up some excuse, like that my underwear was showing, in order to get me to take off my leotard. They would then "help" me to take off my leotard. I remember always wanting to keep my underpants on, but both D1D and D2D would want me to take them off. They would then proceed to touch me in my genital area. This seemed to happen every time they took me to gymnastics with C.M. :

9. My younger sister, Jane Doe 2, began being involved in the touching parties as she got older. Then, my younger brother John Doe 1 became involved as well. They were touched, sexually assaulted and objectified in a similar fashion that me and my older sister Jane Doe 1 were subjected to.

10. These "touching parties" were frequently videotaped. While it seems that all the adults took turns behind the camera, I recall D2D doing most of the videotaping. I believe this

video camera belonged to D1D and D2D I don't believe our family had a video camera back then.

11. In order to get us to keep the touching parties a secret, I recall being threatened and punished. For example, one time my maternal grandmother, LS, made us drink coffee. She and the other adults told us that we were bad, and that even if we told others what happened, no one would believe us because we drank coffee.

Signed on the 22 day of August, 2018, at Salt Lake (city or county),
Utah (state).

Jane Doe 5

A large black rectangular redaction box covering the signature area.

Signature