

Exhibit “6”

DECLARATION OF Mother 1 C

I, Mother 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. In late January or early February of 1986, my children identified Doe 1, Male Defendant and Doe 2, Female Def. as having sexually assaulted and raped them. This was shortly after identifying their teenage babysitter CW, two of her friends, and an older, "yellow haired man," as perpetrators. After naming these perpetrators, they disclosed that my ex-husband ~~Doe 1, Male Def.~~ ^{Perp.} and his mother, LS were also perpetrators of horrible crimes against them.

3. Within days of the initial disclosure, I had a meeting with the Bishop of my ward, Bishop G, and his first counselor, Dr. B. Dr. B and his wife, CB, had a young son who had recently been sexually abused by Arden Brett Bullock. When Bishop G and Dr. B found out about the allegations, they believed my children were telling the truth about being sexually assaulted by the babysitter and her friends. The Bishop's second counselor was D1D who was noticeably absent from the meeting. After D1D, D2D and my ex-husband, Perp. (who was the ward clerk at the time), were named as perpetrators. I didn't hear again from the Bishop until many months later.

4. It was a Sunday morning, either the end of January 1986, or beginning of February 1986, when my two oldest daughters disclosed some of the despicable acts that D1D & D2D committed during the so called "touching parties." This Sunday morning, Perp. was already at Bishopric meeting and I was getting my children ready to go to Church. Jane Doe 5 was very upset. She was crying and saying, "I don't want to go, I don't want to go." Then Jane Doe 1 chimed in

screaming, “I don’t want to go either, I don’t want to see D1D This was followed up with, “I don’t want to see D2D either.” I remember being confused as to why they were calling these adult church leaders by their first names instead of Brother D1D and Sister D2D . Then, Jane Doe 1 and Jane Doe 5 told me about the “touching parties.”

5. When I asked them about what happened at the “touching parties” the girls had a huge outburst, ripping up papers, disposable diapers, baby wipes, and anything they could get their hands on. They were frantic. They were screaming. Intermittently during this outburst, they would explain to me about what happened at the “touching parties” that were led by D1D and

D2D , The adults would encourage the kids to do a performance, like a dance. Then there was a race to see who could take their clothes off the fastest amongst the children. This was accompanied by enthusiastic applause from the pedophile adults present. Then the performances would continue. The adults got undressed sometimes, and sometimes not. The kids explained how D1D would sometimes be in his garments and sometimes in his clothes and that he would just take off his bottoms while leaving the top on. D2D would sometimes take her top off and make my daughters and others touch her breasts. Other details included how D1D would point his penis at the child that was supposed to get up and dance or perform. I learned from my two oldest daughters of how D1D and D2D along with the babysitter and others committed unspeakable sexual assaults and rapes (with a finger or an object). When I asked my children when this happened, they explained that it happened when CW was babysitting them at my home, when they were playing at D1D & D2D’s residence, or playing at the B family residence.

6. A few days after my two oldest daughters identified D1D & D2D as perpetrators, my youngest daughter Jane Doe 2 told me, “ D1D & D2D lied. They didn’t kill us.” This prompted a discussion with all three of my daughters about what this meant. My daughters explained that

D1D & D2D had threatened to kill them if they told anybody. They explained how D1D had shown them the guns that he kept in his house and could use to kill them. D1D also threatened to kill them by drowning them. They explained that D1D also threatened to kill me, their mother, if they told anybody. He threatened that he would run me over with his big truck.

7. This discussion continued, and my children had another outburst. Jane Doe 2 had her "Fisher Price" toy camera and she was pretending to videotape as my older daughters pretended to kill D1D and D2D. This prompted further discussion and question about whether D1D & D2D had videotaped them. My daughters then disclosed that most of the time the "touching parties" were videotaped. They explained that only D1D and D2D did the videotaping.

8. In April of 1986, at the request of the investigating police department, I took my children to Dr. MP, a pediatrician at Primary Children's Hospital. I sat in on the examinations of my children. This was horrific. Dr. P confirmed that all of my children, including John Doe 1 were sexually assaulted. This included the fact that my daughters had vaginal and anal scarring. And, that John Doe 1, my toddler, had anal scarring. He then proceeded to ask my kids, while I sat in the room with them, if the people that sexually assaulted them had ever given them shots. My girls explained how D1D and D2D would give them shots in their upper thighs, so it wouldn't hurt when they stuck a finger or an object in them.

9. I learned that in addition to my children, D1D & D2D's children and the B family children, there were other children from our ward that, from time to time, would be sexually victimized at these touching parties. This included BD, the daughter of JD and LD and another girl named JS.

10. D2D is the daughter of the Apostle, who was called to be one of the twelve Apostles in 1984. D1D is the Apostle's son-in-law. Prior to D1D & D2D

being identified as perpetrators of these terrible crimes against my children and other children, Apostle had never visited our ward.

11. Within a week or two of D1D & D2D being identified as perpetrators of these crimes and the police starting an investigation, we went to church and the Apostle himself was there, along with his wife, sitting with D2D (his daughter) and her children in sacrament meeting. Instead of sitting on the stand, the Apostle was sitting in the pews with the normal members. I recall the Bishop standing up and acknowledging the Apostle sitting with his family in the congregation.

12. Shortly after the Apostle visit, around mid-February 1986, I took my children to my mother's condo in Hawaii to get away from this nightmare. When we left, I firmly believed that there would be justice; that D1D, D2D, and Perp. would be excommunicated from the Church and criminally prosecuted. When I returned however, everything seemed to change.

13. Prior to the Apostle appearance in the ward, the police had been dogged in investigating the abuse. They had interviewed me, my mother, MS, and the children's therapist at ISAT, Dr. Barbara Snow. After his appearance however, they went eerily silent, and stopped telling me what was happening with the investigation.

14. When I spoke to Bishop G again in July of 1986, the tone was different. Instead of believing my kids, Bishop G told me that Perp. was the priesthood holder and that I needed to believe him over my own children. I told Bishop G that I absolutely believed my children and that Perp. had just been released from Johns Hopkins University where he had admitted to the sexual crimes against my children and other children and his involvement in the touching parties with D1D and D2D. Perp. was diagnosed as a pedophile upon his discharge from

Johns Hopkins. Attached hereto as Exhibit A are records from Johns Hopkins showing the diagnosis.

15. My mother and father were good friends with Apostle Neil A. Maxwell. After ^{D1D} **D2D** and ^{Perp.} were all identified as perpetrators, my mother, **MS**, contacted Elder Maxwell and told him what had happened. Elder Maxwell visited our house, where he gave me and my children a special priesthood blessing, an apostolic blessing. I recall that he blessed me with comfort. He further stated that the Lord will have his justice, but that it was his to take, and that I should forgive and leave it to the Lord. I recall him blessing my children in a similar fashion.

16. While Elder Maxwell was at our house, ^{Jane Doe 1} asked him if she could be rebaptized. She said she didn't think her original baptism (which was performed by ^{Perp.} counted, because ^{Perp.} was bad. Apostle Maxwell agreed to allowing her to be rebaptized. Elder Maxwell knew of the allegations being made against **D1D** **D2D** and ^{Perp.} yet the Church refused to ever take any disciplinary action against them.

Signed on the 23 day of August, 2018, at Redwood City, CA (city or county), Utah.

Mother 1



Signature

Exhibit “A”

to Declaration of
Mother 1

THE JOHNS HOPKINS HOSPITAL

FINAL PROGRESS NOTE ~~Page 5~~

NO ABBREVIATIONS FOR DIAGNOSES AND PROCEDURES

b 174 19 95
Perpetrator
08/25/52 H

DATE: 30 June 1986

CONDITION ON DISCHARGE: Improved DISCHARGE ATTENDING: Fred Berlin, MD

PRINCIPAL DIAGNOSIS: (Diagnosis established after study to be chiefly responsible for admission):

Pedophilia (302.20)

OTHER DIAGNOSES: (All conditions existing at time of admission or developing subsequently affecting treatment received and/or length of stay).

Adjustment Disorder with mixed emotional features (309.28)

OTHER DIAGNOSES NOT RELATING TO THIS ADMISSION:

PRINCIPAL (Performed for definitive treatment PROCEDURE: or significant diagnostic procedure.) DATE: OPERATING PHYSICIAN ATTENDING SURGEON

OTHER PROCEDURES:

BRIEF HISTORY, MAJOR FINDINGS, HOSPITAL COURSE:

33-year old w/d attorney from Utah who was implicated in several incidents of ~~child~~ sexual abuse of young children (his son, daughters, & nieces). Pt did not deny these incidents might have occurred but did say he was unable to remember them. Through treatment he became more effective in

Exhibit 6 to Complaint, page 8 of 9

THE JOHNS HOPKINS HOSPITAL
MEDICAL RECORDS
NOTE PAPER, "T"

OK OK
BY 5

6 17⁴ 19 95 A
Perpetrator
08/25/52 H

(PLEASE DATE EACH ENTRY)

Physician notes begin here

Nonphysician notes begin here

Perpetrator

5-21-86 1500 NPN — The pt. discussed the content of the sodium amytal interview to the nurse. He admits to remembering many inappropriate sexual acts that he was involved in to his children & mother. He denies however, being sexually aroused by his children but does state that he had an erection during the time of the instances. He also denies ever climaxing when demonstrating sexual acts on his children. He explains the incidents by stating that he has a great need to be in control & he connects control to sexual control. He states that not climaxing is a form of maximal control. He states also that he showed control over his sexual life to his wife by not complying to having sex when she wanted it but doing it only when he wanted it & initiated the act. When asked why wasn't that bit of control enough, He stated that he wanted to have that same type of control over his children like his mother has over him. He also admits that the "tabooness" of it was a real turn on just being able to get away & cheating on my wife. He also state that doing this to his children

Exhibit 6 to Complaint, page 9 of 9