

# Exhibit “5”

**DECLARATION OF PAUL L. WHITEHEAD, M.D.**

I, PAUL L. WHITEHEAD, M.D., do declare under criminal penalty under the law of the State of Utah that the following is true and correct:

1. That I am over the age of 18 years and competent to testify to the statements made herein.

2. I am a medical doctor, specializing in psychiatry and neurology-psychiatry. I have been practicing since 1967. I retired from the practice of medicine in approximately 2011. I was board certified in general psychiatry and child and adolescent psychiatry.

3. I treated the children of Mother 1 for trauma each of them suffered from being sexually abused and assaulted in a group setting by numerous PLW adults including Perpetrator, D1D and D2D.

4. I started treating Jane Doe 1 on a regular basis a few months after the horrific sexual abuse ended. Jane Doe 1 was 8 years old when her treatment started. Treatment continued until she was approximately 18 years old.

5. Like Jane Doe 1, I started treated Jane Doe 5 a few months after the sexual abuse ended. Jane Doe 5 was 6 years old when treatment began, and I treated her until she was approximately 13 years old.

6. I started treating Jane Doe 2 when she was 3 years old and treated her until she was approximately 16 years old.

7. I started treating **John Doe 1** when he was 3 years old and treated him until he was approximately 18 years old.

8. All the [REDACTED] children were badly damaged as a result of the horrific sexual abuse. Each required prolonged and extensive treatment.

9 [REDACTED]

Signed on the 12<sup>th</sup> day of September, 2018, at Holladay, Utah.

  
PAUL L. WHITEHEAD, M.D.