

## **DECLARATION OF DAVID HARDY**

I, David Hardy, 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 1984, at the suggestion of my law partner, I hired Dick Miles to build a new home for my family. I was happy with the home he built for us. During my association with Mr. Miles, I became aware that he was married to Brenda Nelson Miles, the daughter of Russell M. Nelson, who was called to be an Apostle of the Church of Jesus Christ of Latter-Day Saints (“the Church”).
3. In the spring of 1986, someone from my office told me that Dick Miles had been implicated in a pedophile ring in Bountiful, Utah. At the time, I didn’t want to believe it. I checked the local newspapers and found no coverage of the allegations.
4. About 2-3 days later I received a call from an attorney in Washington, D.C. with whom I was very familiar. He asked me if I could do him a favor relating to a very sensitive subject involving one of the Apostles. I obliged.
5. This attorney asked if I would receive a letter via fax and hand deliver it to Apostle Russell M. Nelson at the Church Office Building. That Elder Nelson would be waiting for it. When the fax came through, I read it, curious of the contents. I recall the opening paragraph saying “Dear Elder Nelson, I am so sorry this tragedy has befallen your family. This needs to be kept out of the public eye.” I remember having my interest piqued because of the allegations I heard days earlier about Dick Miles.
6. While I do not recall the specifics of the rest of approximately four-page letter, I do recall the clear intent and sense of the letter; which was to protect the good name of the

Church and that of Elder Nelson by making sure that these allegations against Dick and Brenda Miles were kept quiet.

7. My office was in downtown Salt Lake City, near the Church Office Building. After receiving the letter via fax and quickly reading it, I put the letter in a plain white legal-size envelope and sealed the envelope. I did not make a copy. Following the instructions from this attorney for whom I was doing a favor, I walked this letter to Elder Nelson's office at the Church Office Building and hand-delivered it.

8. When I delivered this letter, I did not know who the alleged victims were. At the time, I was a temple recommend holder. A devout member of the Church. I did not want to believe that these allegations could be true.

9. When I delivered this letter to Russell M. Nelson, I was simply a courier, doing a favor that was requested of me. At no point during this process did I have an attorney-client relationship with the attorney for whom I was doing this favor, nor at any point did I have an attorney-client relationship with the Church.

10. A few weeks after delivering this letter, I found out that Bill Carstensen had been identified as an additional perpetrator in this Bountiful child sex ring. I remember being shocked at this news, as Bill and Sharon Carstensen were family friends. My wife and Sharon had been good friends since high school, had lived in the same neighborhood, and were part of the same Ward growing up.

11. There have been certain events since 1986 that have caused me to remember the letter that I delivered to Russell M. Nelson in the spring of 1986. These incidents include:

a. Sometime in the early 1990's, shortly after the book "Paperdolls – Surviving Sexual Abuse in Mormon Neighborhoods" was released, I purchased this book. It was a

horrifying read. Even though the names of the perpetrators and survivors were changed, from the description and the story, I knew who the principal perpetrators and some of the victims and other persons described were.

b. Sometime in 1995, I learned that Bill Carstensen committed suicide following allegations that he continued to sexually assault other children.

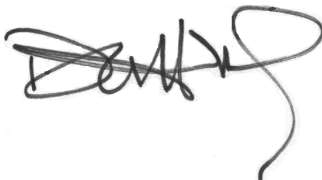
c. In April 2018 I conducted an Internet Google search of “Richard L. Miles” and learned that Dick Miles had been called to be a mission president in 2011. The picture of Dick and Brenda Miles in the March 2011 Church News announcing this important, high level, calling brought back memories of the letter to Russell M. Nelson

d. Recently, I listened to the recording of the former MTC President who admitted to molesting a sister missionary and a history of sexual predation against women before he was called to be the MTC President. The fact that this former MTC President was never disciplined and still a member of the Church in good standing made me again think of the letter and Dick and Brenda Miles

12. Further your declarant sayeth not.

Signed on the 18th day of September, 2018, at Draper, Salt Lake County, State of Utah.

David Hardy  
(Printed name)

A handwritten signature in black ink, appearing to read 'David Hardy', with a long, sweeping tail extending downwards and to the right.

Signature