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IN THE THIRD JUDICIAL DISTRICT COURT, SALT LAKE COUNTY

STATE OF UTAH

M. J.,

Plaintiff,

vs.

WARREN JEFFS, THE FUNDAMENTALIST
CHURCH OF JESUS CHRIST OF LATTER
DAY SAINTS, formerly known in part as The
Work or The Priesthood Work and also known
as the CORPORATION OF THE PRESIDENT
OF THE FUNDAMENTALIST CHURCH OF
JESUS CHRIST OF LATTER DAY SAINTS,
THE CORPORATION OF THE PRESIDING
BISHOP OF THE FUNDAMENTALIST
CHURCH OF JESUS CHRIST OF LATTER
DAY SAINTS, THE UNITED EFFORT PLAN
TRUST, and DOES 1 THROUGH 20,

Defendants.

DECLARATION OF
JANE BLACKMORE

Civil No. 070916524

Judge Sandra N. Peuler

I, Jane Blackmore, declare as follows:

1. I have personal knowledge of the facts stated herein.

2. I was raised as a Mormon Fundamentalist in British Columbia, Canada as part of a religious movement known as the “Work” or “Priesthood Work,” which is now also known as the FLDS Church.

3. In 1974, I graduated from Hope Private School which was owned and operated by the Work in Bountiful, B.C. In 1988, I graduated from Selkirk Collage in Castlegar, B.C. as a registered nurse. In April of 2000, I registered with the collage of Midwives British Columbia and became a licensed midwife.

4. In April of 2000 I began delivering babies in an FLDS medical clinic that was built on FLDS/UEP land which had previously been consecrated to the Work.

5. Beginning in 2000 and continuing through 2004, when I decided to leave the Work, I delivered approximately 50 babies each year for FLDS mothers. Since leaving the Work, I have continued to deliver babies for some FLDS mothers.

6. My practice in British Columbia as an FLDS midwife has primarily involved providing pre- and postnatal care for FLDS mothers, as well as delivering their babies and providing care to their babies following delivery.

7. As a part of the healthcare I provide to these mothers, it has always been my practice to do a physical examination and to obtain a detailed medical history from each of them for purposes of my diagnosis and treatment of the patient and, if necessary, for consultation with physicians and other medical proessionals. I am therefore familiar with the medical history of my patients,

including, for example, their age, marital status, husband, dates of conception, past pregnancies, symptoms and complications.

8. Based on the histories I have taken from these FLDS women, I estimate that approximately 70-75% of them were Canadians and that 25-30% were visiting from Hildale, Utah, Colorado City, Arizona or elsewhere in the United States.

9. Based on the histories taken from my FLDS patients, I can also estimate that 30-40% of the FLDS women I delivered were under the age of 18 at the time that their first child was delivered. The ages of the underage mothers at the time they first gave birth ranged from 15 to 17.

10. In addition to these underage mothers whose babies I delivered, over the years, I have also taken histories and physicals from and treated several FLDS girls younger than 18 whose pregnancies terminated in miscarriages. Elissa Wall was one of these girls.

11. Based on their histories, all of these FLDS mothers were married at their first conception and many of them became pregnant, miscarried or gave birth to their first child as early as the 1980's.

I declare under criminal penalty of the State of Utah that the foregoing is true and correct.

DATED this ___ day of June, 2008.

JANE BLACKMORE