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**IN THE FIFTH JUDICIAL DISTRICT COURT**  
**WASHINGTON COUNTY, STATE OF UTAH**

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WALLACE JEFFS, individually and as natural parent and legal custodian of his minor children: Charity Jeffs, Hope Jeffs, Naomie Jeffs and the natural father of his minor children: Daniel Nielsen Jeffs, Faith Jeffs, Isaiah Nielsen Jeffs, Sharon Jeffs, Skkye Jeffs and Seneca Jeffs,

Plaintiff,

vs.

WARREN JEFFS, LYLE JEFFS, MERRILL JESSOP, WENDELL NIELSEN and AMY JEFFS,

Defendants.

**COMPLAINT**

Civil No.

Judge

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Plaintiff, Wallace Jeffs, individually and as the natural father and legal custodian of his minor children, Charity Jeffs, Hope Jeffs, Naomie Jeffs and as the natural father of his minor children, Daniel Nielsen Jeffs, Faith Jeffs, Isaiah Nielsen Jeffs, Sharon Jeffs, Skkye Jeffs and Seneca

Jeffs, alleges, by and through counsel, the following against Defendants Warren Jeffs, Lyle Jeffs, Merrill Jessop and Wendell Nielsen (collectively "the leaders").

### **PARTIES, JURISDICTION AND VENUE**

1. Wallace Jeffs, who is the half-brother of Warren Jeffs and Lyle Jeffs, is a resident of Washington County, Utah.

2. Warren Jeffs is a resident of and incarcerated in Schleicher County, Texas.

3. Lyle Jeffs is a resident of Washington County, Utah, residing at 875 North Maple Street, Hildale, Utah.

4. Merrill Jessop is a resident of Texas, but because he is in hiding, his exact location is not known.

5. Wendell Nielsen is a resident of Texas, but because he is in hiding, his exact location is not known.

6. JoAnn Jeffs, who is not a party to this action, is the natural parent of Charity Jeffs, Hope Jeffs, and Naomie Jeffs and a resident of Clark County, Nevada. In 1978, JoAnn Jeffs was legally married to Wallace Jeffs. In 2004, they were legally divorced in the Fifth Judicial District Court in Washington County, Utah, at which time, Wallace Jeffs received legal custody of their children.

7. Amy Jeffs is the natural parent of Daniel Nielsen Jeffs, Faith Jeffs, Isaiah Nielsen Jeffs, Sharon Jeffs, Skkye Jeffs and Seneca Jeffs, is a resident of Washington County, State of Utah, residing at 875 North Maple Street, Hildale, Utah. In 1991, Amy Jeffs was married to Wallace Jeffs

spiritually, and in 2005 they were married legally. They are the parents of Daniel, Faith, Isaiah, Sharon, Skyye and Seneca Jeffs.

8. Charity Jeffs is 16-years-old, the natural daughter of Wallace Jeffs and is a resident of Washington County, Utah.

9. Hope Jeffs is 14-years-old, the natural daughter of Wallace Jeffs and is a resident of Washington County, Utah.

10. Naomie Jeffs is 12-years-old, the natural daughter of Wallace Jeffs and is a resident of Washington County, Utah.

11. Daniel Nielsen Jeffs is 17-years-old, the natural son of Wallace Jeffs and is a resident of Washington County, Utah.

12. Faith Jeffs is 16-years-old, the natural daughter of Wallace Jeffs and is a resident of Washington County, Utah.

13. Isaiah Nielsen Jeffs is 14-years-old, the natural son of Wallace Jeffs and is a resident of Washington County, Utah.

14. Sharon Jeffs is 10-years-old, the natural daughter of Wallace Jeffs and is a resident of Washington County, Utah.

15. Skkye Jeffs is 8-years-old, the natural daughter of Wallace Jeffs and is a resident of Washington County, Utah.

16. Seneca Jeffs is 8-years-old, the natural daughter of Wallace Jeffs and is a resident of Washington County, Utah.

17. Charity, Hope, Naomie, Daniel, Faith, Isaiah, Sharon, Skkye and Seneca Jeffs reside at 875 North Maple Street in Hildale Utah and are referred to herein as Wallace Jeffs' "Minor Children."

18. Since 2002, Wallace Jeffs, JoAnn Jeffs and Amy Jeffs have resided within their legal marital relationships with their Minor Children almost exclusively in homes located in Utah.

19. This Court has jurisdiction pursuant to Utah Code sections 78A-5-102, 78B-3-205, 78B-13-101, et seq., 78B-6-401 and venue is proper in this Court pursuant to Utah Code section 78B-3-307.

20. Wallace Jeffs reserves the right to amend this Complaint to name additional defendants and to add additional facts and claims as necessary to effect the return of his family.

#### **GENERAL ALLEGATIONS**

21. Wallace Jeffs was born and raised in the Fundamentalist Church of Jesus Christ of Latter Day Saints ("FLDS Church") and has been a faithful and obedient member of the FLDS Church all of his life. He is also the son of Rulon Jeffs, the former FLDS Church Prophet.

22. After Rulon Jeffs' death in 2002, Warren Jeffs eventually proclaimed that he was the prophet of the FLDS Church and the holder of all priesthood keys, including the keys to command and perform "spiritual marriages" based on the Celestial Law of Marriage.

23. As did virtually all of the FLDS people, Wallace Jeffs fully and without question accepted Warren Jeffs as the prophet of God, the holder of sacred priesthood keys and a pure and righteous man, who was guided in all things by direct revelation from God.

24. Notwithstanding the fact that Warren Jeffs represented and held himself out in this manner, Warren Jeffs knew that he was not the prophet, that he was a fraud, and that, in his own words, "he was the most evil man on the face of the earth since the days of father Adam."

25. Warren Jeffs did not disclose this information to Wallace Jeffs or to the FLDS people and continued to conceal these facts from them until January of 2007 when he first denounced himself to several FLDS Church leaders.

26. Beginning at that time, Warren Jeffs admitted in several recorded conversations with FLDS Church leaders that he was a fraud and was destroying the lives of the FLDS people. One of those recordings is on the DVD attached hereto as Exhibit A.

27. In the attached recording, Warren Jeffs instructs his brother, Nephi Jeffs, to tell all the "priesthood [FLDS] people" and all those who want to see it including, the apostates and the gentiles who want to see it, that he, Warren Jeffs, is not and never was the prophet, that he is a liar, that the truth is not in him and that he had brought a great evil upon them by destroying families.

28. Rather than do as instructed, Nephi Jeffs, and, on information and belief, FLDS Church leaders, including Lyle Jeffs, Merrill Jessop, Wendell Nielsen, William Timpson aka William Jessop and others, decided not to tell the FLDS people that the FLDS people were being defrauded and that their families were being destroyed by Warren Jeffs.

29. Instead, the FLDS people, including Wallace Jeffs, were instructed by FLDS leaders not to discuss, listen to or watch the recordings, of which most FLDS people had no knowledge or knew very little.

30. By March 28, 2007, Warren Jeffs was frustrated by the refusal of the other FLDS Church leaders to inform the priesthood people that he was not and never had been the prophet, and as a result, he attempted to tell the media and the world.

31. On that day, while Warren Jeffs was in court in Washington County, Utah for a hearing related to his role in the illegal underage marriage and repeated rape of a 14-year-old girl, he stood in the courtroom with a written statement in his hands ready to read it to the judge, dozens of FLDS people and the media.

32. Before Warren Jeffs could deliver his statement he was stopped---his criminal defense lawyers swarmed, returned him to his seat, took control of his written statement and prevented him from speaking.

33. Before this was done, however, a Deseret News photographer was able to capture a part of the written statement with his camera. The news article and photographs---revealing the words "I have not been a prophet and am not the prophet"---appeared a few days later in the Deseret News and are attached hereto as Exhibit B.

34. Warren Jeffs' criminal defense lawyers nonetheless prevented the FLDS people from hearing Warren Jeffs in March of 2007 declare that he is a fraud and that he had been destroying their families and the FLDS as a people.

35. Indeed, since January of 2007, various attorneys for the FLDS Church and associations of FLDS members have, on information and belief, likewise withheld information about the FLDS fraud from the FLDS people whom they represent and have thereby facilitated the fraudulent conduct and deception of the leaders and others.

36. At the behest of FLDS Church leaders and others, Warren Jeffs eventually relented and withdrew his instruction to alert the FLDS people that he does not hold priesthood keys, is not the prophet and is, in fact, an evil man who has injured or destroyed hundreds of FLDS families.

37. To this day, the vast majority of FLDS people do not know the truth about Warren Jeffs' self denunciation, nor do most of the FLDS have knowledge of the extent to which he and other FLDS Church leaders have engaged in and promoted systematic child rape through the vehicle of illegal spiritual marriages with girls as young as 12-years-old.

38. To further his aggressive practice of spiritually marrying large numbers of minor girls and women to select FLDS men, Warren Jeffs has used his absolute power as the FLDS prophet to (a) expel or "encourage out" thousands of FLDS boys; (b) expel hundreds of FLDS men from their families and homes so that their wives and children could be reassigned to other men; and (c) command the illegal marriages of scores of increasingly younger underage girls.

39. In this manner, Warren Jeffs has systematically injured thousands of FLDS children living in closed and isolated FLDS communities where there is none of the law enforcement, judicial system and due process protections necessary to safeguard children in situations involving religious child abuse, divorces, adoptions and the severance of parental rights.

40. Wallace Jeffs is one of the FLDS men who have had their families taken from them as a result of the religious fraud being perpetuated by the leaders and others.

41. In September or October of 2004, Warren Jeffs instructed Wallace Jeffs, through FLDS Church leaders, that he had lost priesthood and his family and that he was to immediately leave Short Creek with his wife JoAnn and their children, leaving his wife Amy and their children in Short Creek.

42. In obedience to the prophet, Wallace Jeffs left his and Amy Jeffs' family in Short Creek and moved to the St. George, Utah area in order to prove his loyalty and to further prove himself worthy of priesthood and his entire family.

43. Approximately a year later, the children of Wallace Jeffs and JoAnn Jeffs were allowed to return to the FLDS to live with Lyle Jeffs, and did so without their parents.

44. In June of 2007, Warren Jeffs decided that Wallace Jeffs had proven himself worthy of priesthood, but not yet worthy to return to Short Creek or be reunited with his and Amy Jeffs' family.

45. In January of 2011, Warren Jeffs through Wendell Nielsen and Lyle Jeffs informed Wallace Jeffs that he had again lost his priesthood, could not regain his family, and was told to leave Short Creek.

46. Wallace Jeffs nevertheless continued to try to prove his faithfulness and asked Lyle Jeffs and Wendell Nielsen to be allowed some contact with his family, but was told by Lyle Jeffs that the prophet had instructed that he could have no contact or communications with them, except if requested by them and directed by the prophet.

47. This eventually lead Wallace Jeffs to see and hear the January 2007 recordings of Warren Jeffs denouncing himself as a complete fraud, and, from there, he was lead to see some of the vast evidence, which is gradually becoming public, of Warren Jeffs and other FLDS Church leaders' numerous underage spiritual marriages, child rapes and countless other abuses of the FLDS people.

48. During the years that the religious fraud prevented Wallace Jeffs from having contact with his family, the leaders moved Wallace Jeffs' family between states from one secret house of "refuge" to another in order to prevent Wallace Jeffs from knowing of his family's location.

49. Wallace Jeffs, who is opposed to underage marriage, has come to understand that he was commanded to leave his family so that Warren Jeffs and Lyle Jeffs could take full control over his Minor Children and his legal wife Amy Jeffs.

50. Wallace Jeffs has also recently learned that Warren Jeffs' purported priesthood keys to perform underage marriages, pursuant to the Celestial Law of Marriage, have been or will soon be given by Warren Jeffs to Lyle Jeffs or some other elder so that spiritual marriages can be resumed in Short Creek while Warren Jeffs is in prison.

51. In the last two months, Wallace Jeffs' Minor Children and his wife, Amy Jeffs, have been secretly moved by FLDS Church leaders into the home of Lyle Jeffs in Hildale, Utah, where they now reside.

52. Based on the evidence of crimes he has seen, Wallace Jeffs is concerned that his Minor Children are in eminent danger--his daughters are at high risk of being required to enter into underage marriages and sexual relations with spiritual husbands and his sons are at risk of being abused by expulsion from their family.

53. Although Wallace Jeffs believes that Amy Jeffs is a very good mother, she is not aware that she is caught up in the FLDS fraud, and, as a result, would very likely be unable to effectively oppose the underage marriage of her daughters or the expulsion of her sons.

54. Although, Wallace Jeffs has twice written to Warren Jeffs in Texas asking to be allowed to reunite with his family, Warren Jeffs has not responded, requiring this legal action.

55. The leaders' actions in perpetuating the FLDS fraud, expelling Wallace Jeffs from the FLDS community, severing him from his family, hiding his family and preventing him access to his family have alienated him from his Minor Children and Amy Jeffs and have deprived him of the ability to support his Minor Children financially and raise them.

**FIRST CAUSE OF ACTION  
FRAUD  
(AGAINST ALL DEFENDANTS EXCEPT AMY JEFFS)**

56. Plaintiff incorporates by reference the other allegations in this Complaint as if fully set forth herein.

57. At all times material hereto, Warren Jeffs has represented that he is the prophet of God, which representation he knows to be false.

58. After January 2007, the leaders and others also represented that Warren Jeffs was the prophet of God, which representation they also knew to be false.

59. The leaders and others made and maintained this fraud for the purpose of inducing FLDS people, including Wallace Jeffs, to comply with the commands of Warren Jeffs and other FLDS Church leaders so that Warren Jeffs, aided by Lyle Jeffs, could wield absolute power over the FLDS people in order to (a) expel or "encourage out" FLDS boys; (b) expel FLDS men from their families and homes so that their wives and children could be reassigned to other men; and (c) command the illegal marriages of increasingly younger underage girls.

60. Wallace Jeffs, having been born and raised in the FLDS Church, and being a faithful and obedient member, acted reasonably and in ignorance of the fraud, and in fact relied upon the false representations that Warren Jeffs was the prophet of God by taking numerous actions,

including, but not limited to, leaving Short Creek and his family when he was commanded by Warren Jeffs through Wendell Nielsen and Lyle Jeffs to do so.

61. As a proximate result of the FLDS fraud, as alleged herein, Wallace Jeffs was induced to take numerous actions, including leaving Short Creek and his family and has suffered injury and general and special damages in amounts to be determined at trial.

**SECOND CAUSE OF ACTION  
NEGLIGENT MISREPRESENTATION  
(AGAINST ALL DEFENDANTS EXCEPT AMY JEFFS)**

62. Plaintiff incorporates by reference the other allegations in this Complaint as if fully set forth herein.

63. At all times material hereto, Warren Jeffs has represented that he is the prophet of God, which representation he knew or should have known was false.

64. After January 2007, the leaders and others also represented that Warren Jeffs was the prophet of God which representation they also knew or should have known to be false.

65. The leaders and others made and maintained these misrepresentations for the purpose of inducing FLDS people, including Wallace Jeffs, to comply with the commands of Warren Jeffs so that Warren Jeffs, aided by Lyle Jeffs, could wield absolute power over the FLDS people in order to (a) expel or "encourage out" FLDS boys; (b) expel FLDS men from their families and homes so that their wives and children could be reassigned to other men; and (c) command the illegal marriages of increasingly younger underage girls.

66. Wallace Jeffs, having been born and raised in the FLDS Church, and being a faithful and obedient member, acted reasonably and in ignorance of this misrepresentation, and in fact

relying upon the misrepresentations that Warren Jeffs was the prophet of God by taking numerous actions, including, but not limited to, leaving Short Creek and his family as commanded.

67. As a proximate result of these misrepresentations, as alleged herein, Wallace Jeffs was induced to take numerous actions, including leaving Short Creek and his family and has suffered injury and general and special damages in amounts to be determined at trial.

**THIRD CAUSE OF ACTION  
CONSPIRACY TO COMMIT FRAUD  
(AGAINST ALL DEFENDANTS EXCEPT AMY JEFFS)**

68. Plaintiff incorporates by reference the other allegations in this Complaint as if fully set forth herein.

69. Warren Jeffs and Lyle Jeffs needed the FLDS people to believe that Warren Jeffs was the prophet of God so that Warren Jeffs, aided by Lyle Jeffs, could wield absolute power over the FLDS people in order to (a) expel or "encourage out" FLDS boys; (b) expel FLDS men from their families and homes so that their wives and children could be reassigned to other men; and (c) command the illegal marriages of increasingly younger underage girls.

70. At some point after March 28, 2007, the leaders and others had a meeting of the minds at which Warren Jeffs was talked out of telling the FLDS people the truth so that they could continue to (a) expel or "encourage out" FLDS boys; (b) expel FLDS men from their families and homes so that their wives and children could be reassigned to other men; and (c) command the illegal marriages of increasingly younger underage girls.

71. In furtherance of their conspiracy, the leaders held Warren Jeffs out as the prophet of God so that they could wield absolute power over the FLDS people in order to engaged in unlawful acts, including, but not limited to (a) expelling or "encouraging out" FLDS boys; (b)

expelling FLDS men from their families and homes so that their wives and children could be reassigned to other men; and (c) commanding the illegal marriages of increasingly younger underage girls.

72. As a proximate result of this conspiracy, as alleged herein, Wallace Jeffs was induced to take numerous actions, including leaving Short Creek and his family and has suffered injury and general and special damages in amounts to be determined at trial.

**FOURTH CAUSE OF ACTION  
ALIENATION OF AFFECTIONS AND  
INTERFERENCE WITH PARENTAL OBLIGATIONS  
(AGAINST ALL DEFENDANTS EXCEPT AMY JEFFS)**

73. Plaintiff incorporate by reference the other allegations in the Complaint as if fully set forth herein.

74. Wallace Jeffs asserts this cause of action based on the leaders' alienation of the affection between Wallace Jeffs and his Minor Children, and do so based on a good faith belief that under these circumstances, the law of Utah should be extended to recognize this cause of action.

75. Wholly ignoring the natural and loving parent-child relationship existing between Wallace Jeffs and his Minor Children, the leaders intentionally cut Wallace Jeffs off from his Minor Children, and alienated the relationship he and his Minor Children enjoyed with each other causing them to suffer a loss of parent-child relationship, financial support, obligations, companionship, comfort, society, consortium, nurturing, guidance, support, duty and affection.

76. The leaders' conduct was the controlling cause of the injury to the parent-child relationship and outweighs the combined effect of all other causes, if any, including the actions of Wallace Jeffs and his wives because Warren Jeffs and Lyle Jeffs have prevented them from becoming aware of the fraud being perpetrated against them.

77. As a direct and proximate result of the alienation of affections alleged herein, the leaders severely injured Wallace Jeffs and his Minor Children and are liable for both general and special damages in amounts to be determined at trial.

**FIFTH CAUSE OF ACTION  
INFLICTION OF EMOTIONAL DISTRESS  
(AGAINST ALL DEFENDANTS EXCEPT AMY JEFFS)**

78. Plaintiff incorporate by reference the other allegations in the Complaint as if fully set forth herein.

79. The leaders intentionally and purposefully expelled Wallace Jeffs from his family, home and community and have separated him from his Minor Children, on information and belief, in order to further expel or "encourage out" his male Minor Children and command the illegal marriages of his female Minor Children.

80. Any reasonable person would have known that expelling Wallace Jeffs from his family, home and community and separating Wallace Jeffs from his Minor Children would result in Wallace Jeffs and his Minor Children experiencing serious emotional distress.

81. The leaders' conduct, as alleged herein, is outrageous and intolerable in that it offends society's generally accepted standards of decency and morality in at least the following respects:

a. Despite knowing the natural and obvious bond and affection that exists between Wallace Jeffs and his Minor Children, the leaders cut off Wallace Jeffs from his family and expelled Wallace Jeffs from his community;

b. The leaders expelled Wallace Jeffs and have maintained physical custody and control over Wallace Jeffs' Minor Children;

c. On information and belief, the leaders' sole purpose in expelling Wallace Jeffs and in preventing him from reuniting with his Minor Children was to facilitate their practice of (a) expelling or "encouraging out" FLDS boys; (b) expelling FLDS men from their families and homes so that their wives and children could be reassigned to other men; and (c) commanding the illegal marriages of increasingly younger underage girls, which practices are condemned in society as offending basic standards of morality, and decency.

82. At the very least, the leaders should have known that their conduct in expelling Wallace Jeffs and separating him from his family would result in Wallace Jeffs and his family experiencing serious distress, which might result in illness or bodily harm, and therefore acted negligently in carrying out the expulsion and maintaining the separation.

83. As a direct and proximate result of the leaders' negligent and intentional actions, as alleged herein, Wallace Jeffs and his family have suffered severe emotional distress, and the leaders are liable for both general and special damages in amounts to be determined at trial.

**SIXTH CAUSE OF ACTION  
INVASION OF PRIVACY  
(AGAINST ALL DEFENDANTS EXCEPT AMY JEFFS)**

84. Plaintiff incorporates by reference the other allegations in the Complaint as if fully set forth herein.

85. As alleged more fully above, the leaders have intentionally and substantially intruded upon the solitude and seclusion of Wallace Jeffs and his family by tearing them away from each other and in maintaining their separation.

86. The leaders thus aggressively interjected themselves into and disrupted the most private of personal affairs: one's home and family.

87. Such an intrusion would be highly offensive to any reasonable person.

88. As a direct and proximate result of the invasion of privacy alleged herein, the leaders have severely injured Wallace Jeffs and his family and are liable for both general and special damages in amounts to be determined at trial.

**DECLARATORY RELIEF  
(AGAINST ALL DEFENDANTS)**

89. Plaintiff incorporates by reference the other allegations in the Complaint as if fully set forth herein.

90. Wallace Jeffs and his Minor Children have legally protected interests in being able to reestablish and continue their parent-child relationships.

91. This Court has jurisdiction over the parties to this action and authority, pursuant to Utah Code section 78B-6-401, to declare their rights and legal relations, and this Court's determination is necessary to terminate the controversy as to Wallace Jeffs and his Minor Children's legally protected right to parent-child relationships.

92. Specifically, this Court should declare that the leaders have no right to prevent or interfere with the legally protected relationships between Wallace Jeffs and his Minor Children.

93. The actions of the leaders have created justiciable controversies in that they have prevented and interfered with the relationships between Wallace Jeffs and his Minor Children and have exercised physical custody of the Minor Children.

94. The actions of the leaders have further created justiciable controversies between them and others in that the leaders' expulsion of men from their homes and children results in injuries capable of repetition, yet evading review because minors, like Wallace Jeffs' Minor Children, lose

the relationships, financial support, obligations, companionship, comfort, consortium, support, duty and affection of their fathers and are not capable of petitioning for and obtaining relief.

95. The interests of Wallace Jeffs and his Minor Children in parent-child relationships and the interests of Wallace Jeffs in having physical custody of his Minor Children are adverse to the interests of the leaders in preventing the same and outweigh the leaders' interests, which are contrary to law.

96. These issues are ripe for determination because the leaders have and continue to prevent and interfere with the relationship between Wallace Jeffs and his Minor Children and continue to withhold from Wallace Jeffs his Minor Children.

97. Wallace Jeffs and his Minor Children are entitled to a declaratory judgment, pursuant to Utah Code section 78B-6-401 *et seq.* and Rule 57 of the Utah Rules of Civil Procedure, that:

a. The leaders have no right to prevent or interfere with the legally protected relationships between Wallace Jeffs and his Minor Children.

b. The leaders have no right to prevent or withhold from Wallace Jeffs the physical custody of his Minor Children.

c. The leaders must not interfere with the legally protected relationship between Wallace Jeffs and his Minor Children.

d. The leaders must provide Wallace Jeffs with physical custody of his Minor Children.

98. Wallace Jeffs has the right, as provided in Utah Code section 78B-6-406, to petition this Court for supplemental relief and court orders as may be necessary.

**PUNITIVE DAMAGES  
(AGAINST ALL DEFENDANTS EXCEPT AMY JEFFS)**

99. Plaintiff incorporates by reference the other allegations in the Complaint as if fully set forth herein.

100. The leaders' conduct, as alleged in this Complaint, was willful and malicious and/or manifested a knowing and reckless indifference toward, and a disregard of, the rights of Wallace Jeffs and his Minor Children, therefore, Wallace Jeffs is entitled to punitive damages from the leaders in an amount to be awarded at trial.

**PETITION FOR PROTECTIVE ORDER AND CUSTODY  
(AGAINST ALL DEFENDANTS)**

101. Plaintiff incorporates by reference the other allegations in the Complaint as if fully set forth herein and alleges the following involving Amy Jeffs and the other Defendants.

102. In 2005, Wallace Jeffs was awarded legal physical custody of Charity Jeffs, Hope Jeffs and Naomie Jeffs, but, as alleged herein, he has been deprived of their actual physical custody, and has likewise been deprived of the physical custody of his other Minor Children.

103. At this time, Wallace Jeffs is the only natural parent that is capable of protecting his Minor Children from the leaders' power over his Minor Children, and the only person who can petition this Court to prevent his girls from being placed in illegal marriages in which they will be required to have sexual relations, and the only person who can petition this Court to assure that his boys will not be expelled from their family or sent away as construction laborers on FLDS work crews.

104. In addition to being extremely concerned about the physical and emotional well being of his Minor Children, Wallace Jeffs is also concerned that his Minor Children have been and are being deprived of a basic education.

105. At this time, Wallace Jeffs is the only natural parent that is capable of assuring that his Minor Children are able to pursue a basic education and is the only person who can petition this Court to require that his Minor Children attend school so that they do not lose the opportunity to receive an education.

106. Accordingly, Wallace Jeffs seeks a protective order from this Court that awards him, on an emergency basis, sole physical custody of all of his Minor Children.

107. Wallace Jeffs further seeks a protective order from this Court that his Minor Children be allowed liberal visitation with their mothers, provided that the visitation is supervised by him and occurs in the St. George Area.

108. Finally, Wallace Jeffs petitions this Court for an emergency protective order prohibiting FLDS Church leaders including the leaders from directly or through others harassing, intimidating, or contacting Wallace Jeffs, the Minor Children and Amy Jeffs.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, Wallace Jeffs, individually and as natural parent of his Minor Children requests separate judgments in his favor against Warren Jeffs, Lyle Jeffs, Merrill Jessop and Wendell Nielsen for the following:

- a. Damages in the amount commensurate with injuries to person, property and relations, including all special and general damages.
- b. Punitive damages in an amount to be awarded at trial.
- c. A declaratory judgment, pursuant to Utah Code section 78B-6-401, *et seq.* and Rule 57 of the Utah Rules of Civil Procedure, that:

i. The leaders have no right to prevent or interfere with the legally protected relationship between Wallace Jeffs and his Minor Children.

ii. The leaders have no right to prevent or withhold from Wallace Jeffs the physical custody of his Minor Children.

iii. The leaders must not interfere with the legally protected relationship between Wallace Jeffs and his Minor Children.

iv. The leaders must provide Wallace Jeffs with the physical custody of his Minor Children.

d. Costs, expenses and post-judgment interest.

e. Any other relief that the Court deems just and equitable.

WHEREFORE, Plaintiff, Wallace Jeffs, individually and as natural parent of his Minor Children requests judgment in his favor against Warren Jeffs, Lyle Jeffs, Merrill Jessop, Wendell Nielsen and Amy Jeffs for the following:

a. A protective order awarding Wallace Jeffs, on an emergency basis, sole physical custody of all of his Minor Children.

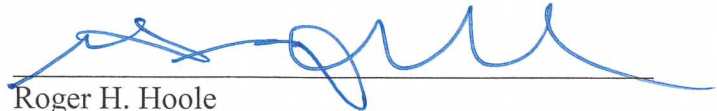
b. A protective order that Wallace Jeffs' Minor Children be allowed liberal visitation with their mothers.

c. A protective order that the visitation be supervised by Wallace Jeffs and occur in the St. George Area.

d. Any other relief that the Court deems just and equitable.

Dated this 1 day of July, 2011.

HOOLE & KING, L.C.

A handwritten signature in blue ink, appearing to be 'R. Hoole', written over a horizontal line.

Roger H. Hoole  
Gregory N. Hoole  
Attorneys for Wallace Jeffs