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13 Attorneys for Plaintiffs, JANE DOE I,
14 JANE DOE II, and JOHN DOE

15 **SUPERIOR COURT OF THE STATE OF ARIZONA**
16 **IN AND FOR THE COUNTY OF COCHISE**

17 JANE DOE I; JANE DOE II; and JOHN
18 DOE, by and through conservator, Fleming
19 and Curti PLC,

20 Plaintiffs,

21 vs.

22 THE CORPORATION OF THE
23 PRESIDENT OF THE CHURCH OF
24 JESUS CHRIST OF LATTER-DAY
25 SAINTS, a Utah corporation sole; THE
26 CORPORATION OF THE PRESIDING
27 BISHOP OF THE CHURCH OF JESUS
28 CHRIST OF LATTER-DAY SAINTS,
Utah corporation sole; LENZNER
MEDICAL SERVICES LLC, an Arizona
limited Liability Company, DR. JOHN
HERROD AND SHERRIE
FARNSWORTH HERROD, individually
and as a jointly married couple; ROBERT
KIM MAUZY AND MICHELLE
MORGAN MAUZY, individually and as a
jointly married couple; SHAUNICE
WARR, individually; JOHN ROE I-X;
JANE ROE I-X; and ROE
CORPORATIONS I-X;

Defendants.

Case No. _____

COMPLAINT FOR:

- (1) NEGLIGENCE,
- (2) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS,
- (3) NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS,
- (4) BREACH OF FIDUCIARY DUTY,
- (5) MEDICAL MALPRACTICE/ MEDICAL NEGLIGENCE,
- (6) MEDICAL NEGLIGENCE/ NEGLIGENCE HIRING/RETENTION/ SUPERVISION
- (7) RATIFICATION,
- (8) PUNITIVE DAMAGES.

Honorable: _____

Division: _____

1 _____
2
3 For their Complaint, Plaintiffs Jane Doe I, Jane Doe II, and John Doe (collectively “Plaintiffs”)
4 allege as follows:

5 **INTRODUCTION**

6 1. This case involves horrible sexual, physical and emotional abuse of children
7 between the ages of six (6) weeks and twelve (12) years old that went on for seven (7) years. The
8 biological father of these victims made videos of his rapes and now these videos are everywhere
9 on the world wide web. The perpetrator admitted his abuse and crimes to his Mormon Church, and
10 received counseling for his crimes. The Mormon Church leaders knew about the abuse and yet no
11 one reported these crimes to the authorities. The Mormon Church leaders gave guidance and care
12 to these children for seven (7) years, sat next to them in Church and allowed these vicious crimes
13 to continue.

14 2. The Mormon Church recognizes that Bishops act as a “fathers” to their members.
15 Members of the Mormon Church community are “sisters” and “brothers” to each other. Yet these
16 fathers, sisters and brothers failed to protect these children from hideous abuse. The Mormon
17 Church promises to protect their children from abuse, yet allowed the rape of Plaintiffs to continue.
18 The leaders of the Church were responsible for the safety of these children in their care, and they
19 chose to do nothing and hide the abuse from the authorities. The handbook of the Mormon Church
20 states that “Church leaders and members should fulfill all legal obligations to report abuse to civil
21 authorities. No Church leader should ever dismiss a report of abuse or counsel a member not to
22 report criminal activity. Bishops, branch presidents, and stake presidents should call the Church’s
23 ecclesiastical help line immediately each time they learn of abuse for assistance in helping victims
24 and meeting reporting requirements.” See Protecting Members and Reporting Abuse
25 ([https://www.churchofjesuschrist.org/get-help/abuse/protecting-members-and-reporting-](https://www.churchofjesuschrist.org/get-help/abuse/protecting-members-and-reporting-abuse?lang=eng)
26 [abuse?lang=eng](https://www.churchofjesuschrist.org/get-help/abuse/protecting-members-and-reporting-abuse?lang=eng), accessed September 1, 2019), attached hereto as **Exhibit A**.

1 in Arizona and has systemic as well as continuous contact with Arizona. The COPB's headquarter
2 address is 50 West North Temple Street, Salt Lake City, Utah, 84510, United States.

3 7. The Mormon Church, which consists of COP and COPB, is registered to do business
4 in Arizona, and the presiding Bishop serves at the pleasure of and subject to the direct and absolute
5 control of the Mormon Church. The Mormon Church operates temples and other houses of worship
6 in Arizona. The divisions of the Mormon Church are the wards, stakes and areas. COP and COPB
7 Wards, Areas and Stake leaders are hereinafter referred to collectively as the Mormon Church.

8 8. The Bishops are appointed to control each ward by the Mormon Church and subject
9 to their control. The Bishop of the ward is the "father" or "caretaker" of the ward, responsible for
10 the wellbeing of all of the members of the ward (Handbook, Book 2 note 45 at 122). At all relevant
11 times, Bishop Herrod, Bishop Mauzy, teacher Shaunice Warr and the other leaders, whose names
12 are unknown at this time, in the local Arizona Stake and Bisbee Ward were acting as agents of the
13 Mormon Church. The unknown defendants include the Area President, the Stake President and the
14 President of the Relief Society, and their names will be added upon discovery. These unknown
15 defendants and the defendant Bishops and teachers are all collectively referred to as Church
16 Leaders, and hereinafter included in the term Mormon Church.

17 9. The Mormon Church Defendants, Individual Defendants and Unnamed Defendants
18 each assumed responsibility for the wellbeing of Church member, whether as clergy or volunteers
19 appointed by the Mormon Church. In their capacities as Bishop, and other positions such as Stake
20 President, Relief Society President, visiting teacher, Sunday School and Primary School teacher,
21 the individual Defendants were held out by the Church as its agents and placed in positions of
22 responsibility and authority over Church members. As a result, they each had a special relationship
23 with members of the congregation, including the minor Plaintiffs. This relationship gave rise to a
24 duty to protect members of the congregation, including the minor Plaintiffs from a foreseeable risk
25 of harm. At all relevant times, the Church assumed special responsibilities towards its members
26 including having a disciplinary and red flagging system meant to identify and track sexual predators
27 and other dangerous individuals within the membership in order to protect innocent child members
28 from the harm they might inflict.

1 10. The Mormon Church’s income comes from member tithes which is turned over to
2 the Mormon Church for investment and other uses, including support of the administrative
3 expenditures of the Mormon Church’s wards, stakes and areas. The Church does not provide
4 information about their finances to their members or the public. Upon information and belief, the
5 Church receives five to seven (5-7) billion dollars a year in tithing from members. Upon
6 information reported publicly in the media the Mormon Church owns financial assets and real estate
7 in excess of 100 billion.

8 11. Defendants Dr. John Herrod (“Herrod”) and Sherrie Farnsworth Herrod are married.
9 Herrod and Sherrie Farnsworth Herrod resided in Cochise County, Arizona, at all times relevant to
10 this Complaint. All of Herrod’s acts referenced in this Complaint were performed in furtherance
11 of, and for the benefit of, the Herrods’ marital community. Herrod was appointed by the Mormon
12 Church as the Bishop of the Bisbee Ward of the Arizona Stake of the Church of Jesus Chris of
13 Latter-day Saints from in or around 2009 to 2012. Herrod was acting as an agent of the Mormon
14 Church and Lenzner Medical Clinic with respect to all acts and omissions alleged herein, and those
15 entities are responsible for his actions.

16 12. Herrod was also the Adams family physician. Herrod administered to the health of
17 the Adams family, including Plaintiffs, at all relevant times. Herrod closed his medical practice
18 when the allegations of abuse described herein, and his failure to report these allegations, became
19 known.

20 13. Defendant Lenzner Medical Services LLC, (hereinafter Lenzner) is an Arizona
21 Limited Liability Company that was formed in 2008 to operate a private medical practice for Dr.
22 John Herrod. The Adams family including the Plaintiffs were patients of Dr. Herrod and Lenzner
23 Medical Services.

24 14. Defendants Kim Mauzy (“Mauzy”) and Michelle Morgan Mauzy are married. Upon
25 information and belief, Mauzy and Michelle Morgan Mauzy resided in Cochise County, Arizona
26 at all times relevant to this Complaint. All of Mauzy’s acts referenced in this Complaint were
27 performed in furtherance of, and for the benefit of, the Mauzys’ marital community. Mauzy was
28 appointed by the Church as the Bishop of the Bisbee Ward of the Arizona Stake of the Church of

1 Jesus Christ of Latter-day Saints after Herrod’s tenure as Bishop ended in 2012 and continued act
2 as a “father” to care and administer to the needs of the Plaintiffs and their family. Upon information
3 and belief, Mauzy was Bishop of the Bisbee War from in or around 2012 to 2017.

4 15. Defendant Shaunice Warr (“Warr”) resided in Cochise County, Arizona, at all times
5 relevant to this Complaint. Warr was a United States Border Patrol Agent and a member of the
6 Church at all times relevant to this Complaint. Warr was selected and assigned by the Church to
7 mentor and watch over the Adams family as a “visiting teacher,” and was the Plaintiffs’ Sunday
8 school teacher and primary teacher at the Church. Warr acted as a mentor, teacher, counselor, and
9 leader to Plaintiffs in all areas of their lives and stood in *locos parentis* with the minor Plaintiffs.
10 Warr acted as an agent of the Mormon Church with respect to all of her acts and omissions at all
11 relevant times in this complaint.

12 16. The individually named Defendants were acting within the course and scope of their
13 employment and/or agency relationship with the Church at all relevant times, so as to render the
14 Church vicariously liable for their conduct under general agency law, or *respondeat superior*.

15 17. John Roe I-X, Jane Roe I-X, and Roe Corporations I-X are fictitious names of parties
16 whose names are currently unknown. At such time as their names are discovered, Plaintiffs will
17 amend this Complaint to state their true identities.

18 **JURISDICTION AND VENUE**

19 18. This Court has jurisdiction over the subject matter of this action, pursuant to Article
20 VI, § 14 of the Arizona Constitution and A.R.S. § 12-123.

21 19. This Court has personal jurisdiction over the parties in this lawsuit.

22 20. Defendants caused acts or events to occur within Cochise County, Arizona, out of
23 which Plaintiffs’ claims arise.

24 21. Venue is proper in this Court pursuant to A.R.S. § 12-401.

25 **FACTUAL ALLEGATIONS**

26 22. Paul Adams (“Paul”) was Plaintiffs’ biological father. Paul and Leizza Adams
27 (“Leizza”) had six (6) total children, born over the period of around 2005 to 2015. The Adams
28

1 family were members of the Mormon Church, and they belonged to the Bisbee Ward of the Church
2 in Cochise County, Arizona. The Bisbee Ward is very small, with approximately 138 members.

3 23. During their membership in the Bisbee Ward, the Adams family regularly attended
4 Church functions and sent their children to Sunday school at the Church. Leizza played the piano
5 for the Church's primary classes where all Adams children, including Plaintiffs, attended. The
6 Adams family had a special relationship with the Church and its leaders.

7 24. Over the course of many years, until his arrest in February 2017, Paul physically,
8 sexually, and emotionally abused Plaintiffs and his family.

9 25. Paul's sexual abuse and rape of Jane Doe I commenced when she was approximately
10 six (6) or seven (7) years of age, including but not limited to oral, anal, and vaginal rape, while
11 forcing Jane Doe I to videotape these heinous acts.

12 26. Paul forced John Doe to masturbate Paul and watch pornography. Paul sexually
13 abused the other Adams children in John Doe's presence, and routinely physically abused John Doe
14 by kicking and throwing him against the walls of the Adams family home.

15 27. Paul threatened and abused Leizza and made it impossible for Leizza to leave the
16 abusive home. The Defendants were aware that Leizza was unable to leave and that she was fully
17 dependent on Paul. The Defendants knew Leizza was unable to protect herself or her children from
18 Paul's abuse. The Defendants knew that Leizza suffered from battered woman syndrome but did
19 nothing to protect her or the children in their care.

20 28. Paul often forced Leizza to beat the children and if she refused, Paul would beat
21 them more severely. The Defendants knew that both Leizza and Paul abused the children, that the
22 children lived in a dangerous household and did nothing to protect the children.

23 29. The Mormon Church, through its appointed members in various positions,
24 maintained a close relationship with the Adams family and Plaintiffs, as the Mormon Church
25 typically maintains with its members. Mormon Church doctrine establishes that the various
26 appointed members are responsible for ensuring the welfare of their member families. Warr would
27 observe and help the Adams family at least once a week, paying bills, offering advice, providing
28 counseling and general care.

1 30. The Relief Society is a women’s organization within the Mormon Church that exists
2 “to help prepare women for the blessings of eternal life as they increase faith in Heavenly Father
3 and Jesus Christ and His Atonement; strengthen individuals, families, and homes through
4 ordinances and covenants; and work in unity to help those in need.”

5 31. At all relevant times, the Relief Society supervised and implemented the “visiting
6 teaching program” throughout the Mormon Church, whereby certain female members (“visiting
7 teachers”) were selected and assigned to families within their congregation with at least one adult
8 female family member. The Relief Society instructed these “visiting teachers” to visit their assigned
9 families regularly, assist them in their needs and share a spiritual message with them from Church
10 leaders.

11 32. According to the Mormon Church’s official website, “visiting teaching in the ward
12 is determined by the bishop and Relief Society presidency after consideration.” *See The Purpose*
13 *of Visiting Teaching* ([https://www.churchofjesuschrist.org/callings/relief-society/visiting-](https://www.churchofjesuschrist.org/callings/relief-society/visiting-teaching-training/purpose-is-to-minister?lang=eng)
14 [teaching-training/purpose-is-to-minister?lang=eng](https://www.churchofjesuschrist.org/callings/relief-society/visiting-teaching-training/purpose-is-to-minister?lang=eng), accessed March 13, 2020), attached as **Exhibit**

15 **B.**

16 33. The Mormon Church’s official website lists “visiting teacher” duties as follows:

- 17 • “Pray daily for [the sister you visit] and her family.”
- 18 • “Seek inspiration to know her and her family.”
- 19 • “Visit her regularly to learn how she is doing and to comfort and strengthen her.”
- 20 • “Stay in frequent contact through visits, phone calls, letters, e-mail, text messages,
21 and simple acts of kindness.”
- 22 • “Greet her at Church meetings.”
- 23 • **“Help her when she has an emergency, illness, or other urgent need.”**
- 24 • “Teach her the gospel from the scriptures and the visiting teaching messages.” *Id.*

25 34. The Mormon Church’s official website explains that the Relief Society utilizes
26 “visiting teachers” to accomplish the following purposes:

- 27 • “Increase faith and personal righteousness.”
- 28 • “Strengthen families and homes.”

- **“Help those in need,”** including “individuals and families in need.” *Id.*

35. The Mormon Church’s official website provides instructions for those who assign visiting teachers to families, including: “[Asking the visiting teacher] to report back to the Relief Society presidency any special needs of the sisters and any service rendered. Leaders instruct visiting teachers to maintain confidentiality.” The website also provides that “confidential information should be reported only to the Relief Society president, who reports it to the bishop. The Relief Society president gives the bishop a monthly visiting teaching report . . . [i]f a sister and her family have urgent needs, the Relief Society president reports this information to the bishop immediately.” *Id.*

36. The Mormon Church and Herrod selected and assigned Warr to the Adams family as a “visiting teacher” on or about 2010 after learning of the sexual abuse of Plaintiff by Paul Adams. Warr was also Plaintiffs’ Sunday school teacher at the Church. The ward was so small that the only children in Warr’s Sunday school class were Plaintiffs and their siblings. Warr taught the children how to shoot, how to play piano and many other things. Warr became Leizza’s best friend and was very concerned about taking care of her. Warr had frequent contact and responsibility for the family, and developed a special relationship with the Adams family pursuant to the Defendant’s mandates. Warr stood in *locus parentis* with the Plaintiffs and the family, in a trusting fiduciary and protective duty of care to the Plaintiffs.

37. Warr was routinely in the Adams family home as a “visiting teacher,” and agent of the Mormon Church, to carry out the duties and purposes described above. In accordance with the “visiting teacher” duties and purposes described above, Warr discussed the well-being of the Adams family with various Mormon Church agents, including the Relief Society leadership and the Bishops.

38. Warr knew that Paul was a violent, unstable, and dangerous person, and upon information and belief communicated this to the Relief Society leadership and the Bishops. Upon information and belief, the Mormon Church leadership was fully aware of the danger that Paul and Leizza posed to the Plaintiffs from 2010 onwards.

1 39. During the state’s criminal proceedings against Leizza, Warr testified that as Paul’s
2 fellow agent in the U.S. Border Patrol, upon information and belief, Warr knew that Paul was
3 terminated twice for improper conduct at work. While a U.S. Border Patrol agent, Paul was caught
4 conspiring with his girlfriend to transport drugs across the border in his vehicle, and made terroristic
5 threats to the agency. Warr shared information about Paul’s abusive and dangerous behavior with
6 her fellow Border agents.

7 40. Paul was so dangerous, upon information and belief, Warr noted she would have
8 shot him if he were to “go postal” at work or if Paul were to stop Leizza and the children from
9 leaving. Paul would show Warr and others at work the inappropriate images and pornography that
10 he had on his phone. Everyone knew Paul had these images on his phone as he shared them with
11 impunity.

12 41. The Adams home was an obvious place of abuse. There were sex toys, lube and
13 pornography throughout the home, out in the open and clearly visible, including blowup dolls in
14 Jane Doe I’s bedroom. Anyone, including Warr, who came into the home could see the sex toys
15 and lube in the kitchen, next to the couch in the living room, and in any of the common rooms. *See*
16 Transcript of Recorded Interview of Paul Adams (February 9, 2017) in *United States v. Paul*
17 *Adams*, 6:2-10; 10:1-7; 24:17-22; 25:14-19, attached hereto as **Exhibit C**.

18 42. Warr spent a lot of time at the home helping the children and visiting with them.
19 Warr played with the children, taught them to shoot guns, taught them scripture and counseled
20 Leizza on the problems of abuse at home. Warr would babysit the children on a regular basis. Warr
21 was aware Leizza and the children were being abused, and had reasonable suspicions that Paul was
22 extremely dangerous and harmful to the family. Warr had an obligation to report this abuse as a
23 teacher and caretaker of the children pursuant to the special relationship at the direction of the
24 Mormon Church and its leaders.

25 43. Warr observed stark differences in Plaintiffs’ behavior when Paul was in town
26 versus when Paul was out of town. When Paul was in town, Plaintiffs were extremely combative,
27 tense, silent, and restrained. When Paul was out of town, the kids were kids, and Plaintiffs would
28 relax.

1 44. Warr’s observations of Plaintiffs led her to believe that Plaintiffs were abused and
2 lived in fear. Upon information and belief, Warr was so concerned over this situation, Warr testified
3 that she would have shot Paul if he did not allow the children and Leizza to leave.

4 45. Leizza became pregnant with Jane Doe II, and Warr realized the situation had
5 become increasingly dangerous for the children. Paul Adams would punish the children by killing
6 the family cats in front of them. Paul threatened to shoot up the federal agency he worked at. Paul
7 was involved in illegal drug trafficking as a federal agent. Warr was fully aware of just how
8 dangerous and abusive Paul was. Warr told Leizza to leave Paul and take the kids to San Diego,
9 California, to live with Leizza’s family. Upon information and belief, Warr even obtained her
10 fellow Border Patrol agents’ assistance in offering to get Leizza and Plaintiffs to safety, as everyone
11 at Border Patrol knew just how dangerous Paul could be.

12 46. Despite the overwhelming evidence of Paul’s abusive and psychotic behavior
13 toward his children and wife, Warr failed to report Paul’s abuse of Plaintiffs to any government
14 authorities on the instructions of Church leadership. Everyone at the Mormon Church knew about
15 the abuse, including but not limited to the Relief Society, Herrod, and Mauzy. Upon information
16 and belief, Warr, Herrod, Mauzy and the other Church leaders were instructed not to report the
17 abuse by the Mormon Church, and the Defendants, consistent with their policy of concealing sexual
18 abuse. What is even more heinous is that Warr continued to conceal the abuse and even helped
19 Leizza shred documents and get rid of anything related to Paul after his arrest. *See Free Talk*
20 *(August 31, 2017)*, 38:12-13, 38:25-33, 38:43-46, attached as **Exhibit D**.

21 47. The State of Arizona took away the children from Leizza after the arrest of Paul
22 Adams, and she was charged with child abuse. Warr had Leizza move in with her once the children
23 were removed, and acting in *loco parentis* attended the meetings with the Minor Plaintiffs and their
24 case managers to help determine the best course of action for the children. Warr did all this at the
25 direction of the Mormon Church, consistent with her obligations to care for the children.

26 48. Warr and the Defendants did not report Paul’s abuse of Plaintiffs to any government
27 authorities. As a result, Plaintiffs were left in the care of a violent, dangerous pedophile who
28 continually abused them for years.

1 49. The Mormon Church maintains a pattern and practice of concealing abuse from the
2 authorities, and signals that its members should conceal and/or fail to report abuse so as to keep
3 “the Church from being inappropriately implicated in legal matters.” *See* President Russell M.
4 Nelson Letter (August 4, 2020), attached hereto as **Exhibit E**. Through this policy of concealment,
5 the Church ratifies abusive conduct, perpetuating a culture of concealment and encouraging a lack
6 of cooperation among Church members with law enforcement.

7 50. Upon information and belief, Paul was counseling with the Bishop of the Church
8 about his addiction to pornography. Later, at some point in or around 2010, Paul revealed the sexual
9 abuse of Jane Doe I to Herrod in his role as Bishop during a “counseling session.” *See* Presentence
10 Hearing and Sentencing Transcript (August 13, 2018) in State of Arizona v. Leizza Adams, at 42:2-
11 13, attached hereto as **Exhibit F**.

12 51. Upon information and belief, Herrod stated in his interview with Agent Robert
13 Edwards that Paul admitted to making videos of Jane Doe I’s sexual acts on Paul. Defendants knew
14 that this was consistent with his pornography addiction. The Defendants knew that “[a]buse tends
15 to become more severe over time” *See* 2008 Letter of Guidance from the First Presidency of the
16 Mormon Church, attached hereto as **Exhibit G**. The Defendants were aware that any alleged
17 “privilege” was waived by Paul when he disseminated the videos and pictures on the internet and
18 shared with others. Defendants were also aware that “Church leaders should never disregard a
19 report of abuse or counsel a member not to report criminal activity to law enforcement personnel”
20 *See* **Exhibit G**.

21 52. Herrod then immediately brought Leizza into the room and instructed Paul to repeat
22 his admissions of sexual abuse to Leizza. Paul complied.

23 53. In an interview with law enforcement, following Paul’s arrest years later, Herrod
24 stated that the reason for bringing Leizza into the room was that “he wanted the children to be safe,
25 and he thought . . . that Leizza would either remove the children from the situation or at least, very
26 least, keep the kids away from Paul.” *See* **Exhibit F** at 43:23-44:3.

27 54. Herrod warned Paul and Leizza that if they did not separate, Herrod would report
28 Paul’s actions to authorities.

1 55. Paul and Leizza did not actually separate, but Paul began working and residing in
2 Tucson, Arizona, during the week and returning to the Adams family home on the weekends.

3 56. This lasted approximately four months before Paul fully returned to the Adams
4 family home. The Mormon Church and the Defendants knew that Paul was back with his family,
5 and knew that the abuse was continuing. The Defendants knew that Paul had access to the children
6 during this entire period.

7 57. During Herrod’s counseling sessions, Paul continued to talk to Herrod about the
8 ongoing abuse of his children, and Leizza attended the sessions “numerous times.” *Id.* at 44:13-
9 45:10. Herrod would counsel Leizza to forgive and forget.

10 58. Based on Paul’s continuing admissions of sexual abuse, Herrod knew that Leizza
11 was not keeping her children away from Paul and that abuse continued.

12 59. Herrod’s attempts to convince these obviously mentally ill parents to stop abusing
13 their children were unsuccessful. Herrod diagnosed his patient, Leizza, as having battered woman
14 syndrome. Herrod called Church leadership in Salt Lake City, Utah, and requested permission to
15 report the abuse. Bishops are instructed to call the Helpline first, before calling any legal authorities
16 such as the police or child protective services. Herrod called the Church “Helpline” and was
17 instructed to not report the abuse to the legal authorities as is the pattern and practice of the
18 Defendant Mormon Church.

19 60. The Stake Presidents and Bishops Handbook states as follows: “[i]n instances of
20 abuse, the first responsibility of the Church is to assist those who have been abused, and to protect
21 those who may be vulnerable to future abuse.”

22 61. In conjunction with this doctrine, Utah’s Supreme Court has characterized the
23 Helpline as “a 1-800 number that bishops and other Church clergy can call when they become
24 aware of possible abuse. The Help Line is available 24 hours a day, 365 days a year and is staffed
25 by legal and counseling professionals who ‘provide guidance to the bishop on how to protect the
26 [victim] from further abuse, and how to deal with the complex emotional, psychological, and legal
27 issues that must be addressed in order to protect the victim.’” *MacGregor v. Walker*, 2014 UT 2 ¶2,
28 322 P.3d 706, 707 (2014) [internal citation omitted in original].

1 62. In reality, the Mormon Church primarily staffs the Helpline with attorneys of Kirton
2 McConkie, one of the largest law firms in the State of Utah.

3 63. Rather than notifying law enforcement or other government authorities when
4 Bishops and other Mormon Church clergy members call the Helpline regarding sexual abuse within
5 the Mormon Church, Helpline operators transfer these calls to the Kirton McConkie attorneys.

6 64. Indeed, Herrod later informed DHS that when he called the Helpline, he was advised
7 “that he needs to continue counseling sessions, and that there’s no duty to report to authorities due
8 to the clergy-penitent privilege.” See **Exhibit F** at 45:19-25.

9 65. Herrod followed the directive to conceal the abuse, did not notify the authorities,
10 and took no other action whatsoever to protect Plaintiffs from further abuse for over seven (7) years.

11 66. In another sexual abuse-related civil lawsuit against the Mormon Church and its
12 agents, a Kirton McConkie attorney “acknowledged during a pretrial deposition that the firm uses
13 information gleaned from helpline calls to identify cases that pose a high financial risk to the
14 Mormon Church.” See The Mormon Church Has Been Accused of Using a Victim’s Hotline to
15 Hide Claims of Sexual Abuse ([https://www.vice.com/en_us/article/d3n73w/duty-to-report-the-](https://www.vice.com/en_us/article/d3n73w/duty-to-report-the-mormon-church-has-been-accused-of-using-a-victims-hotline-to-hide-sexual-abuse-claims?utm_medium=vicenewstwitter)
16 mormon-church-has-been-accused-of-using-a-victims-hotline-to-hide-sexual-abuse-
17 claims?utm_medium=vicenewstwitter, accessed March 9, 2020), attached hereto as **Exhibit H**.

18 67. In other words, the Mormon Church implements the Helpline not for the protection
19 and spiritual counseling of sexual abuse victims, as professed in Mormon Church doctrine and
20 literature, but for Kirton McConkie attorneys to snuff out complaints and protect the Mormon
21 Church from potentially costly lawsuits. This is consistent with the instructions set forth in
22 President Russell M. Nelson Letter, dated August 4, 2020, and attached hereto as **Exhibit E**,
23 encouraging congregants to avoid cooperating with authorities asking for information on abuse.

24 68. Herrod left his position as Bishop in 2012 and turned over the horrific situation
25 involving the Adams family to incoming Bishop Mauzy, informing Mauzy of Paul’s sexual
26 depravity and heinous crimes against Plaintiffs.

27
28

1 69. Upon information and belief, Mauzy also called the Helpline for legal advice
2 regarding his obligations to report Paul to authorities, and Mauzy was also advised that the clergy-
3 penitent privilege and Mormon Church doctrine prohibited him from reporting the abuse.

4 70. Like Herrod, Mauzy followed the directive to conceal the abuse, Mauzy did not
5 notify the authorities, and took no other action whatsoever to protect Plaintiffs from further abuse.
6 As a result, Paul’s abuse of Plaintiffs continued.

7 71. Numerous members of the Mormon Church who held various offices knew of Paul’s
8 abuse of Plaintiffs, as they would be apprised at weekly meetings of various ongoing issues with
9 members within the Bisbee Ward.

10 72. The Plaintiffs continued to attend Church functions and Sunday school. Paul, upon
11 information and belief, occasionally visited Church to receive assistance from Church leaders,
12 including Bishop Herrod. Defendants and other Church members told Leizza to “forgive and
13 forget” Paul’s ongoing crimes against her children. Leizza followed these instructions, as she was
14 compliant with the Defendants authority and afraid of Paul’s threats and abuse. Paul’s abuse of
15 Plaintiffs continued and even escalated, becoming more frequent, brutal, and grotesque.

16 73. In or around July 2013, the Church excommunicated Paul for the molestation of
17 Jane Doe I. Defendants took no action to report Paul’s abuse or otherwise intervene against Paul
18 after his excommunication, which emboldened Paul to continue physically, sexually, and
19 emotionally abusing Plaintiffs with impunity.

20 74. Paul Adams continued communicating with members and leaders of the Mormon
21 Church even after his excommunication, and continued to be treated by Dr. Herrod as a patient,
22 along with his family at home and at the Lenzner Medical Services Clinic.

23 75. Paul Adams would publicly brag about his abusive conduct, going so far as to “boast
24 [] on a group chat that he has the perfect lifestyle where he can have sex with his two daughters and
25 his wife doesn’t care and she knows.” See **Exhibit F** at 26:13-18.

26 76. Leizza gave birth to Jane Doe II in 2015, approximately five (5) years after Herrod
27 learned of the sexual abuse of Jane Doe I and approximately three (3) years after Mauzy assumed
28 Herrod’s prior position as Bishop.

1 77. Although Jane Doe II was barely born, Paul’s sexual abuse and rape of Jane Doe II
2 tragically commenced when she was less than six (6) months of age.

3 78. Paul’s abuse of Jane Doe II was no less heinous than that of Jane Doe I. Indeed, Paul
4 admitted in an interview with law enforcement that “he found it hard to have vaginal sex with [Jane
5 Doe II] because her body was so small, and his penis would not fit into her vagina.” *Id.* at 25:7-14.

6 79. Paul abused Leizza, physically and emotionally, and Paul sexually abused all of his
7 children (including Plaintiffs), even the boys, by making them masturbate him, watch pornography
8 and engage in other sexual acts, throwing them against the wall, and hitting them. Paul would
9 punish the children by forcing them to watch him run over the family cat with his car until it died.

10 80. John Doe was beaten, forced to drink vinegar, forced to watch pornography, forced
11 to masturbate his father, and forced to witness the serious abuse of all of the other children.

12 81. The Defendants were aware of the abuse of the children, including Plaintiffs, for
13 over a period of seven (7) years. Despite knowing about the ongoing abuse and harm being inflicted
14 on these helpless children, including Plaintiffs, the Defendants did nothing to protect them. The
15 Defendants, and each of them, knew the abuse was ongoing and pervasive; knew that Paul was
16 addicted to pornography, violence, and pedophilia; yet did not report any of his many heinous
17 crimes to the authorities.

18 82. The Defendants did not offer these victims therapy, nor provide them with help of
19 any kind. The Defendants would sit next to these children in Church, visit them in their home,
20 provide medical care, pray with them, bring food and other assistance, yet allowed them to be raped,
21 beaten, abused, and severely damaged.

22 83. On February 8, 2017, the United States Department of Homeland Security (“DHS”)
23 received a tip relating to an approximately nine (9) minute pornographic video that was uploaded
24 to the internet from New Zealand. DHS forwarded the tip to the National Center for Missing and
25 Exploited Children in Washington, D.C., and was able to identify Paul having sexual intercourse
26 and engaging in other sexual conduct with then nine-year-old Jane Doe I in the video.

27
28

1 84. DHS promptly arrested Paul while he was on duty at a U.S. Border Patrol station in
2 Naco, Arizona. While in custody, Paul confessed to making the video, and Paul also conferred to
3 sexually assaulting Jane Doe I and Jane Doe II over the course of their lives.

4 85. DHS served a search warrant of the Adams family home and seized thousands of
5 pieces of child pornography, many which included Plaintiff Jane Doe I and Plaintiff Jane Doe II.

6 86. Paul was charged with fourteen (14) felonies. *See Paul Adams Indictment*, attached
7 hereto as **Exhibit I**. After confessing his crimes to DHS and waiving his rights, Paul committed
8 suicide by hanging in his cell at Central Arizona Correctional Complex on December 16, 2017.

9 87. Leizza pled guilty to two (2) felony counts of child abuse. She was sentenced to two
10 and a half (2.5) years in prison and four (4) years of supervised probation on August 13, 2018.

11 88. Plaintiffs were adopted by three (3) separate families who had no previous
12 connection to the Adams family, and the remaining three Adams children were adopted by relatives
13 of the Adams family.

14 89. Ultimately, Plaintiffs were sexually, physically, and emotionally abused in heinous
15 ways beyond comprehension. This abuse led to Plaintiffs suffering severe physical and emotional
16 damage, which they will continue to suffer for the rest of their lives.

17 90. Jane Doe I and Jane Doe II have permanent emotional and physical damage as the
18 result of the repeated rapes and abuse. John Doe I has severe emotional and physical damage as a
19 result of the years of abuse. These children lived in hell for seven (7) years, and the Defendants did
20 nothing to stop the abuse.

21 91. The adoptive parents of Jane Doe I and Jane Doe II have been notified by the Internet
22 Crimes Against Children Task Force (“ICAC”) that their pornographic images are “everywhere”
23 on the dark web, that they are in danger of being stalked, and that they cannot appear anywhere on
24 public social media, due to safety concerns that the child pornography will be tied to their likeness.

25 92. John Doe will also suffer the rest of his life from the sexual, physical, and emotional
26 abuse he suffered. John Doe was forced to watch pornography in the home, endure sexual abuse by
27 Paul, and was often forced to remain in the vicinity of the active sexual abuse of his siblings. After
28

1 placement in foster case, John Doe began suffering from night terrors and hygiene issues that
2 ostracized him from his foster siblings.

3 93. Arizona’s mandatory child abuse reporting statute, as codified in A.R.S. § 13-3620,
4 provides that “any person who reasonably believes that a minor is or has been the victim of physical
5 injury, abuse, child abuse, [or] a reportable offense . . . shall immediately report or cause reports to
6 be made of this information to a peace officer . . . ‘person’ means: any peace officer, child welfare
7 investigator, child safety worker, member of the clergy, priest or Christian Science practitioner.”

8 94. Bishops of the Mormon Church, including Herrod and Mauzy, are mandatory
9 reporters as “member[s] of the clergy,” and as persons who have the care of children under A.R.S.
10 § 13-3620(A).

11 95. Under A.R.S. § 13-3620(A)(5), mandatory reporters include “[a]ny other person
12 who has responsibility for the care or treatment of a minor.” As Warr is not a man, she is not a
13 member of the Mormon Church clergy. However, as a Sunday school teacher, “visiting teacher,”
14 and caretaker, Warr was mandated by the Defendant Mormon Church and the Bishops to care for
15 Leizza and her children, including Plaintiffs and to stand in *locus parentis* in relations to the
16 children. Warr’s responsibilities included reporting to the Mormon Church on the care, needs, and
17 welfare of the Plaintiffs and meeting those needs, rendering Warr a “mandatory reporter” under
18 Arizona law.

19 96. Each of the Defendants had personal observations of the abuse, and also knew of
20 the abuse outside of any confidential communication, as the abuse was discussed by the Church
21 leaders, visiting teachers, Bishops and others in routine meetings. Upon information and belief, the
22 Church leadership knew Paul Adams had child pornography addictions as early as 2009. Paul
23 Adams told Bishop Herrod that he made pornography of him forcing Jane Doe I to do sexual acts
24 on him. The Defendants knew Paul was sharing the pornography of the abuse online, had
25 knowledge and personal observations of the abuse from outside any confidential communication,
26 so any “privilege” is not applicable and or is waived.

27 97. Dr. Herrod, as the family physician, and the Lenzner Medical clinic had no such
28 clergy privilege, and had a mandatory duty to report the abuse. Dr. Herrod treated the Plaintiffs and

1 their family regularly, and failed to report her abuse as mandated by the standard of care and the
2 law.

3 98. Warr’s personal observations of Plaintiffs that she shared with Herrod and other
4 Church leadership gave rise to a reasonable belief that Plaintiffs had been, and were continuing to
5 be, the victims of child abuse, which renders A.R.S. § 13-3620(A) “confidential communication or
6 confession” exception inapplicable.

7 99. Furthermore, once the penitent has waived the privilege through disclosures
8 inconsistent with its preservation, the clergy member can no longer invoke the privilege.

9 100. Paul waived the clergy-penitent privilege multiple times through disclosures
10 inconsistent with its preservation. Herrod, Warr and Mauzy had personal observational knowledge
11 of the abuse, leaving Herrod, Mauzy and Warr no statutory basis to withhold reporting of the abuse
12 from authorities, fulfilling their mandatory reporter responsibilities.

13 **COUNT ONE: NEGLIGENCE**
14 **(Against All Defendants)**

15 101. Plaintiffs incorporate the preceding paragraphs as though fully set forth herein.

16 102. Plaintiffs were minors under the supervision, care and control of the Defendants,
17 who provided care, counseling and guidance to the Adams family on a constant basis. Defendants
18 were in a special relationship with the Plaintiffs and the Adams family.

19 103. The Defendant Mormon Church’s rules and institutional power over the Adams’
20 family and its members required that Leizza follow their leader’s instructions and advice.
21 Defendant Herrod counseled Leizza to forgive and forget Paul’s horrific abuse. Leizza Adams was
22 unable to make any of her own decisions, which was known to the Defendants. Leizza as a faithful
23 member of the Mormon Church followed these instructions of the Defendants to forgive and forget,
24 and allowed the abuse to continue.

25 104. Defendants knew of Leizza’s mental decline, yet did nothing to protect her or the
26 children from the ongoing nightmare of abuse at the home.

1 105. Upon information and belief, the Defendants, as well as the local community, knew
2 of the deviant sexual behaviors of Paul Adams, as he had been banned from various sports areas
3 for touching children inappropriately.

4 106. Defendants, despite the community knowledge and their own actual knowledge of
5 the abuse, continually concealed and covered up the abuse so as to avoid shame and possible
6 litigation for the Mormon Church. This failure to prevent or report the abuse was part of the policy
7 of the Defendants, which was to block public disclosure to avoid scandal, to avoid the disclosure
8 of their tolerance of child sexual molestation and assault, to preserve a false appearance of
9 propriety, and to avoid investigation and action by public authority including law enforcement.
10 Plaintiffs are informed and believe that such actions were motivated by a desire to protect the
11 reputation of the Defendants while fostering an environment where such assaults could continue to
12 occur.

13 107. Defendants owed the Plaintiffs a special duty of care. The Plaintiffs as minors at all
14 relevant times herein were in the care and control of the Defendants, and Defendants owed the
15 Plaintiffs a special duty of care as they were entrusted with the Plaintiffs' safety, security and care.

16 108. Defendants were in a position of trust and authority with the Plaintiffs, and could
17 have counseled them, interviewed them and treated their emotional damage resulting from the
18 abuse. Instead, the Defendants deliberately turned a blind eye to the needs of their minor wards and
19 allowed the abuse to continue unchecked and untreated.

20 109. Arizona's legislature enacted the mandatory child abuse reporting statute, as
21 codified in A.R.S. § 13-3620, to protect a specific class of persons (minor children) against a
22 specific type of harm (child abuse).

23 110. Accordingly, Arizona law imposes a civil duty on mandatory reporters to report to
24 authorities when the mandatory reporter reasonably believes that a minor is or has been the victim
25 of child abuse.

26 111. Defendants, and each of them, had a statutory civil duty to report their knowledge
27 of Paul's physical, sexual, and emotional abuse of Plaintiffs to authorities.
28

1 112. Defendants and each of them undertook a special relationship and duty to exercise
2 ordinary care in the provision of these services, including: teaching primary classes, teaching
3 Sunday school, counseling the Adams family, providing medical services, conducting welfare
4 checks and visits to the Adams family home, teaching the minor Plaintiffs skills, caring for the
5 minor Plaintiffs, assisting in paying bills, giving directives on family life and overseeing the Adams
6 family's welfare. The Defendant Mormon Church and its leaders directed and supervised the care
7 of this family including the Plaintiffs. The Defendants stood in *locus parentis* with this family and
8 the Plaintiffs.

9 113. Defendants, and each of them, breached their duties to Plaintiffs in the following
10 ways:

- 11 (a) Failing to fulfill their statutory civil duty to report Paul's physical, sexual, and
12 emotional abuse of Plaintiffs to authorities, and otherwise completely failing to
13 intervene against Paul;
- 14 (b) Placing the responsibility for stopping or removing the children from Paul's abuse
15 entirely on Leizza's shoulders, while knowing that she was unable to do so, which
16 kept Plaintiffs in a violent and abusive household situation;
- 17 (c) Failing to provide adequate guidance and counseling to Paul, which led to the
18 continuation and escalation of Paul's abuse of Plaintiffs; and
- 19 (d) Failing to provide any guidance, counseling, and support whatsoever to Plaintiffs in
20 accordance with written Mormon Church doctrine pertaining to sexual abuse
21 victims.
- 22 (e) Failing to report these crimes to the authorities, which could have been done without
23 breaching any alleged privilege.
- 24 (f) Failing to conduct any kind of inquiry or investigation about the welfare of the
25 children while refusing to report the crimes against them.
- 26 (g) Failing to report as a medical doctor the abuse of the minor Plaintiffs who were his
27 patients, and the physical abuse of Leizza Adams his patient.
- 28

1 (h) Defendant Mormon Church and its leaders failed to properly supervise, train and
2 retain the lay volunteers who controlled the care and treatment of the Adams family
3 and the Plaintiffs.

4 (i) The Defendant Mormon Church and the defendants Herrod, Mauzy and Warr
5 represented to the members of the Mormon Church and to the Plaintiffs that they
6 were safe in their care, and represented that the Mormon Church and the Defendants
7 were the authorities on how to protect children, that the Mormon Church had
8 procedures and protocols to protect children from abuse. All of these representations
9 were negligently made, or in the alternative, intentionally made so that the Plaintiffs'
10 abuse remained a secret, and the abuse be concealed from the public and the
11 authorities. All of these false representations were made either grossly, negligently
12 or deliberately, to convince the members of the Mormon Church and the Plaintiffs
13 to rely on the Defendant's advice, and to allow the Mormon Church and its leaders
14 to control the safety and daily lives of its members so as to conceal abuse, scandals
15 and keep other crimes a secret from the authorities.

16 (j) The Defendant Mormon Church held themselves out as the highest authority on
17 family safety and abuse, published many instructional manuals about abuse, yet
18 negligently failed to advise their lay leaders Defendants Herrod, Mauzy and Warr
19 among others to follow the law and report abuse, and negligently failed to supervise
20 and direct these lay leaders to protect the Plaintiffs and other children in their care.

21 (k) The Defendants all failed to do the right thing and follow the moral mandate of their
22 Mormon Church, protect the Plaintiff children from abuse. This failure was either
23 grossly negligent, or intentional in attempts to protect the reputation of the Mormon
24 Church.

25 114. Defendants, and each of them, knew that Leizza was dependent on the Mormon
26 Church and was also mentally, physically, and emotionally incapable of intervening against Paul
27 or removing the children from Paul's abuse. The Defendants specifically placed Defendant Warr
28 with the family to help the children because they knew that Leizza was not able to do so. While

1 acting in *loco parentis* with the Plaintiffs, Warr failed to protect them from the abuse, and failed to
2 have authorities investigate and intervene for the Plaintiffs safety on the instructions of the Mormon
3 Church.

4 115. Warr was also placed with the family by the Defendants and the Mormon Church to
5 conceal and keep the abuse secret, rather than report the abuse to the authorities. The Defendants
6 and Warr knew that Paul had been excommunicated, yet allowed him to be around the children and
7 the Mormon Church premises. As a result of Defendants' breach of their duties to Plaintiffs,
8 Plaintiffs were left in a home with a violent, dangerous pedophile and his weak, abused spouse.
9 The Defendants sent Paul the message that he could continue to physically, sexually, and
10 emotionally abuse Plaintiffs without consequence because Paul knew Defendants would not report
11 him.

12 116. As a result, Paul continued to physically, sexually, and emotionally abuse Plaintiffs
13 with impunity for at least seven (7) years with Defendants' full knowledge and tacit acceptance.

14 117. Defendants' actions and omissions proximately caused Plaintiffs extreme physical,
15 sexual, and emotional harm giving rise to damages in an amount to be proven at trial.

16
17 **COUNT TWO: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
18 **(Against All Defendants)**

19 118. Plaintiffs incorporate the preceding paragraphs as though fully set forth herein.

20 119. Defendants, and each of them, knew that Plaintiffs were suffering from years of
21 abuse and did nothing to protect them. Instead of reporting the abuse, Defendants consciously
22 elected to withhold the reporting of the abuse, and otherwise completely failed to intervene against
23 Paul, thereby intentionally and/or recklessly creating circumstances in which Plaintiffs were
24 continually exposed to Paul's vicious and horrific abuse for years on end.

25 120. Defendants' conduct was so outrageous and extreme in degree and character that it
26 went beyond all possible bounds of decency and is conduct utterly intolerable in civilized society.

27 121. Defendants either intended to cause Plaintiffs emotional distress, or recklessly
28 disregarded the near certainty that such distress would result from their conduct.

1 122. Plaintiffs have suffered severe, permanent, and extreme emotional distress as a
2 direct and proximate result of Defendants’ conduct, and Plaintiffs have been damaged in an amount
3 to be proven at trial.

4
5 **COUNT THREE: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

6 **(Against All Defendants)**

7 123. Plaintiffs incorporate the preceding paragraphs as though fully set forth herein.

8 124. Each Plaintiff was not only sexually, physically, and emotionally assaulted by Paul,
9 but was also forced to witness the repeated sexual, physical, and emotional assault of each other
10 Plaintiff in the Adams family home for years.

11 125. Defendants consciously withheld reporting of the abuse and placed the
12 responsibility for stopping Paul or removing the children from Paul’s abuse entirely on Leizza, and
13 completely failed to otherwise intervene against Paul. This trapped Plaintiffs in the “zone of
14 danger” that was the Adams family home wherein Plaintiffs’ violent, dangerous pedophile of a
15 father abused with impunity.

16 126. Defendants’ conduct proximately caused extreme mental anguish and trauma to
17 Plaintiffs, which have affected and continue to affect each Plaintiff in the form of physical injuries
18 and maladaptive behavior in their new household placements.

19 127. As a direct and proximate result of Defendants’ conduct, Plaintiffs have suffered
20 damages in an amount to be proven at trial.

21
22 **COUNT FOUR: BREACH OF FIDUCIARY DUTY**

23 **(Against All Defendants)**

24 128. Plaintiffs incorporate the preceding paragraphs as though fully set forth herein.

25 129. By selecting Warr as the Adams family’s “visiting teacher” and Sunday school
26 teacher, the Mormon Church held Warr out as a trusted mentor, teacher, counselor, and leader to
27 Plaintiffs in all areas of their life, thereby creating and fostering a fiduciary relationship between
28 Plaintiffs and Warr.

1 130. Plaintiffs placed their trust and confidence in Warr as a teacher and caregiver, and
2 Warr presented herself to Plaintiffs as a trusted representative and appointee of the Mormon
3 Church. Based on the foregoing, Warr possessed a fiduciary duty to act in Plaintiffs' interests and
4 care for Plaintiffs' well-being.

5 131. Herrod possessed a fiduciary relationship with Plaintiffs as the Adams family's
6 physician and spiritual counselor, and Herrod had a fiduciary duty to act in Plaintiffs' interests and
7 care for Plaintiffs' well-being.

8 132. Mauzy, as successor to Herrod in the role of the Adams family's spiritual counselor,
9 possessed a fiduciary relationship with Plaintiffs, and Mauzy also had a fiduciary duty to act in
10 Plaintiffs' interests and care for Plaintiffs' well-being.

11 133. Defendants, and each of them, breached their fiduciary duties to Plaintiffs in the
12 following ways:

- 13 (a) Failing to report Paul's physical, sexual, and emotional abuse of Plaintiffs to
14 authorities.
- 15 (b) Instructing Leizza to forgive and forget the abuse, and failing to treat her medical
16 conditions of battered wife syndrome, which kept Plaintiffs in a violent and abusive
17 household situation.
- 18 (c) Failing to report the inability of Leizza to protect herself or her children to the
19 authorities that could remove the children.
- 20 (d) Failing to provide any guidance, counseling, and support whatsoever to Plaintiffs in
21 accordance with written Mormon Church doctrine pertaining to sexual abuse
22 victims.

23 134. As a direct and proximate result of Defendants' breaches of their fiduciary
24 obligations, Plaintiffs suffered physical and mental injuries and emotional pain and suffering in an
25 amount to be proven at trial.

26
27 **COUNT FIVE: MEDICAL MALPRACTICE/MEDICAL NEGLIGENCE**

28 **(Against John Herrod/Lenzner Medical Clinic)**

1 135. Plaintiff restates and incorporates by reference each and every allegation contained
2 in the prior paragraphs of this Complaint.

3 136. Defendant John Herrod (“Dr. Herrod”) was the Adam’s family physicians and
4 remained the Adam’s family physician until in or around 2019. Leizza would bring all of her
5 children, including Plaintiffs, to Dr. Herrod’s office, Lenzner Medical Clinic, and he would treat
6 all of them. Defendant Herrod and Lenzner are one and the same in this claim of negligence and
7 malpractice.

8 137. During the course of the physician-patient relationship between Defendant Herrod
9 and the Plaintiffs’ family, Defendant Herrod became aware that his patient, Plaintiff Jane Doe I
10 was the victim of physical and sexual abuse perpetrated by his patients, her parents. Defendant
11 Herrod was aware that such abuse continued unabated. Dr. Herrod was also aware that Leizza
12 Adams herself was a victim of spousal abuse. Dr. Herrod diagnosed Leizza Adams, upon
13 information and belief, as having battered woman syndrome, and Dr. Herrod was fully aware of
14 her inability to protect herself and her children, failed to report all of this abuse. Dr. Herrod’s
15 treatment of Leizza Adams and the Plaintiffs fell below the standard of care and as a result the
16 Plaintiffs suffered severe abuse and permanent damages.

17 138. Dr. Herrod and Lenzner Medical Clinic “lost” many of their files on the Plaintiffs
18 which is currently the subject of separate litigation. Dr. Herrod and Lenzner Medical Clinic
19 breached their duty of care to his patients by “losing their files.” Upon information and belief, Dr.
20 Herrod retired and sold his practice Lenzner Medical Clinic after the scandal of his failure to report
21 the abuse became public, and subsequently many of his files disappeared.

22 139. Pursuant to ARS 13-3620, as well as his general duty of care, Defendant Herrod was
23 required to report the abuse of Jane Doe I to appropriate legal authorities. Defendant Herrod also
24 had a duty to report to the authorities Leizza’s abuse and her inability to protect her children.

25 140. Despite his knowledge of the ongoing abuse in the household and despite the legal
26 requirement to report such abuse, Defendant Herrod failed to do so.

27 141. As a direct and proximate result of Defendant Dr. Herrod’s failure to fulfill his legal
28 duty to report the abuse, and to report Leizza Adams’ abuse and inability to protect her children

1 from abuse, the Plaintiffs continued to be sexually and physically abused for years, and Plaintiffs
2 suffered severe and permanent injuries.

3 142. Defendant Dr. Herrod owed Plaintiffs a duty to exercise reasonable care in his care
4 and treatment of Plaintiff.

5 143. Defendant Dr. Herrod failed to meet the required standard of care.

6 144. As a direct and proximate result of Defendant Dr. Herrod's failures, acts and
7 omissions, and the omissions of Lenzner Medical Clinic, Plaintiff Jane Doe I suffered severe and
8 permanent injuries.

9 145. Pursuant to A.R.S. 12-2603(A), Plaintiff hereby certifies that expert testimony is
10 necessary to prove the healthcare professional's standard of care.

11
12 **COUNT SIX: MEDICAL NEGLIGENCE/NEGLIGENT**

13 **HIRING/RETENTION/SUPERVISION**

14 **(Against Lenzner Medical LLC)**

15 146. Plaintiffs incorporate the above paragraphs as though fully set forth.

16 147. The Lenzner Medical Practice had a duty to authorize the hiring of employees who
17 are fit and competent to supervise and implement measures to protect patients from predictable and
18 foreseeable risks posed by their agent, contractors and employees. Defendant Lenzner's failure to
19 train supervise Dr. John Herrod, on his duties to report abuse, and keep records of his patients was
20 the direct and proximate cause of Plaintiffs injuries.

21 148. Plaintiffs have suffered pain anxiety depression, emotional distress, and severe and
22 permanent damages as a result of the Defendant Lenzner's failure to properly supervise and train
23 Dr. Herrod and the employees of Lenzner on their duties to report patient abuse, report ongoing
24 crimes against patients and maintain records.

25
26 **COUNT SEVEN: RATIFICATION**

27 **(Against All Defendants)**

28 149. Plaintiffs incorporate the preceding paragraphs as though fully set forth herein.

1 150. Defendants ratified and endorsed Paul Adam's abusive conduct and sexual abuse of
2 Plaintiffs by their concealment, coverup, and failure to report the ongoing rapes and physical abuse
3 of the children, including Plaintiffs. Defendants concealed the abuse, failed to provide help to
4 Plaintiffs, and failed to treat any of the damages inflicted on the children for at least seven (7) years.

5 151. Defendants ratified and fully endorsed Adams behavior because they continued to
6 allow this abuse to occur unchecked and untreated for seven (7) years.

7 152. As a direct and proximate result of Defendants' conduct, Plaintiffs have suffered
8 significant damages in an amount to be proven at trial

9
10 **COUNT EIGHT: PUNITIVE DAMAGES**

11 **(Against All Defendants)**

12 153. Plaintiffs incorporate the preceding paragraphs as though fully set forth herein.

13 154. Defendants consciously pursued a course of conduct, and/or engaged in a coverup,
14 knowing that it created (and perpetuated) a substantial risk and/or significant harm to Plaintiffs,
15 and Defendants committed acts and omissions so egregious and reprehensible that it can only be
16 assumed that Defendants intended to injure Plaintiffs, or that they consciously disregarded the
17 substantial risk of harm created by their conduct, such that Defendants' conduct was the result of
18 an evil mind warranting the imposition of punitive or exemplary damages against them.

19 **CASE TIER**

20 155. Based on the characteristics set forth in Rule 26.2(b), Ariz. R. Civ. P., Plaintiffs
21 submit that this action should be assigned to Tier 3.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

- 24 (a) For compensatory and consequential damages in an amount to be determined at trial;
25 (b) For punitive or exemplary damages in an amount to be determined at trial;
26 (c) For Plaintiffs' costs, expenses, and attorney's fees incurred herein; and
27 (d) For such other and further relief as is this Court deems just and proper.
28

CADIGAN LAW FIRM
504 South Stone Avenue
Tucson, Arizona 85701

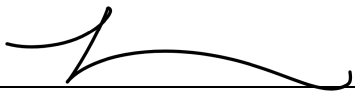
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RESPECTFULLY SUBMITTED this 29 day of November 2020.

CADIGAN LAW FIRM

-and-

MANLY, STEWART & FINALDI

By: 

Lynne M. Cadigan
John C. Manly
*Attorney for Plaintiffs JANE DOE I,
JANE DOE II, and JOHN DOE*

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EXHIBIT A



Protecting Members and Reporting Abuse

Abuse is the neglect or mistreatment of others (such as a child or spouse, the elderly, the disabled, or anyone else) in such a way that causes physical, emotional, or sexual harm. The first responsibility of the Church in abuse cases is to help those who have been abused and to protect those who may be vulnerable to future abuse. Church leaders and members should be caring, compassionate, and sensitive when working with victims and their families.

In a letter dated March 26, 2018, the First Presidency of the Church encouraged Church leaders to reach out in love to assist those suffering from abuse:

“This global issue continues to be of great concern to us today. Our hearts and prayers go out to all those who are affected by this serious problem.

“To help ensure the safety and protection of children, youth, and adults, we ask that all priesthood and auxiliary leaders become familiar with existing Church policies and guidelines on preventing and responding to abuse” ([First Presidency letter](#), Mar. 26, 2018).

Church leaders and members should fulfill all legal obligations to report abuse to civil authorities. No Church leader should ever dismiss a report of abuse or counsel a member not to report criminal activity. Bishops, branch presidents, and stake presidents should call the Church’s ecclesiastical **help line immediately each time they learn of abuse for assistance in helping victims and meeting reporting requirements.** Go to counselingresources.ChurchofJesusChrist.org for the help line number and more information.

Church leaders and members should also help victims, offenders, and their families connect with professional counseling or other community resources, where available. When working with offenders, priesthood leaders should help them repent, accept the full consequences of their actions, and cease their abusive behavior (see [Isaiah 1:18](#); [Mosiah 26:29–32](#); [Doctrine and Covenants 64:7](#)). This might also include connecting offenders with professional counselors or programs.

For Church leaders, please review the following video in a ward or stake council:

EXHIBIT B

The Purpose of Visiting Teaching

The Purpose of Visiting Teaching Is to Minister

How do we minister?

- Pray daily for [the sister you visit] and her family.
- Seek inspiration to know her and her family.
- Visit her regularly to learn how she is doing and to comfort and strengthen her.
- Stay in frequent contact through visits, phone calls, letters, e-mail, text messages, and simple acts of kindness.
- Greet her at Church meetings.
- Help her when she has an emergency, illness, or other urgent need.
- Teach her the gospel from the scriptures and the visiting teaching messages.
- Inspire her by setting a good example.
(See “How Visiting Teachers Love, Watch Over, and Strengthen a Sister,” in *Daughters in My Kingdom*, page 123.)



“The purpose of ministering is to help others become true followers of Jesus Christ. Ministering to others includes:

- Remembering their names and becoming acquainted with them (see Moroni 6:4).
- Loving them without judging them (see John 13:34–35).
- Watching over them and strengthening their faith 'one by one,' as the Savior did (3 Nephi 11:15; 17:21).
- Establishing sincere friendship with them and visiting them in their homes and elsewhere (see D&C 20:47)”
(*Handbook 2*, 3.2.3).

We will know we are successful in our ministry as visiting teachers when the sisters we visit can say:

My visiting teacher helps me grow spiritually.

I know that my visiting teacher cares deeply about me and my family.

If I have problems, I know my visiting teacher will take action without waiting to be invited.

As we do these things, we are accomplishing the purposes of Relief Society to:

- Increase faith and personal righteousness.

“Visiting teachers sincerely come to know and love each sister, help her strengthen her faith, and give service. They seek personal inspiration to know how to respond to the spiritual and temporal needs of each sister they

are assigned to visit. ...

“When appropriate, visiting teachers share a gospel message. These messages may be from the monthly visiting teaching message ... and the scriptures” (*Handbook 2*, 9.5.1).

"And their names were taken, that they might be remembered and nourished by the good word of God, to keep them in the right way, to keep them continually watchful unto prayer" (Moroni 6:4).

- Strengthen families and homes.

“Strengthening families is the focus of inspired Church programs such as home teaching (see D&C 20:47, 51), visiting teaching, and family home evening. As in all things, Jesus set the example of entering homes to minister, teach, and bless” (*Handbook 2*, 1.4.1).

“Many members do not have faithful Melchizedek Priesthood holders in their homes. Church leaders should give special attention to loving and supporting these members through inspired, watchful care, including home teaching and visiting teaching” (*Handbook 2*, 2.3).

- Help those in need.

“Assistance with spiritual and temporal welfare often begins with home teachers and visiting teachers. In a spirit of kindness and friendship that goes beyond monthly visits, home teachers and visiting teachers help individuals and families in need. They report the needs of those they serve to their priesthood leaders or Relief Society leaders” (*Handbook 2*, 6.2.4).

“[The Lord’s storehouse] includes Church members’ offerings of time, talents, compassion, materials, and financial means that are made available to the bishop to help care for the poor and needy. The Lord’s storehouse, then, exists in each ward” (*Handbook 2*, 6.1.3).

President Joseph F. Smith, the sixth President of the Church, said of an experience, “Never before had I seen so clearly exemplified the utility and beauty of this grand organization as in the example we here witnessed, and I thought what a gracious thing it was that the Lord inspired the Prophet Joseph Smith to establish such an organization in the Church.” Read more...

Organizing Visiting Teaching



The Relief Society presidency, in counsel with the bishop, prayerfully discusses how visiting teaching should be structured and organized in their ward or branch.

- Give special priority to sisters coming into Relief Society from Young Women, single sisters, new ward members, recent converts, newly married sisters, less-active members, and others with special needs.
- Discuss the needs of individuals and families and consider local needs and circumstances (distance, travel, and safety).
- Prayerfully seek revelation as you organize companionships and assign visiting teachers to each sister in the ward.
- Seek the bishop's approval for each assignment.
- Do not organize sisters into groups for the purpose of visiting teaching. (See *Handbook 2*, 9.5.2)

“As needed, the bishop may invite the Relief Society president to attend some ward PEC meetings to ... coordinate home teaching and visiting teaching assignments” (*Handbook 2*, 4.3).

Adapting Visiting teaching



“Leaders may adapt visiting teaching to ensure that sisters with the greatest needs always receive a monthly visit” (Handbook 2, 9.5.3).

“With approval from the bishop in exceptional cases, Melchizedek Priesthood leaders and Relief Society leaders may assign a husband and wife as a companionship where visits by a couple are needed” (Handbook 2, 9.5.2).

“Consider factors such as distance, travel, and safety” (Handbook 2, 9.5.2).

With approval from the bishop, Melchizedek Priesthood leaders and Relief Society leaders may temporarily assign:

- Only home teachers or only visiting teachers to certain families.
- Home teachers to visit a family one month and visiting teachers to visit Relief Society members in that family the next month.

With approval from the mission president, leaders may consider asking full-time sister missionaries to help with visiting teaching on a limited basis. ... When such approval is given, full time missionaries are assigned primarily to visit new members, part-member families, and less-active members. (See Handbook 2, 9.5.3.)

Refer to Handbook 2, 17.2.2, “Transportation and Communication.”

“The Relief Society president gave me a visiting teaching list of 12 sisters who lived in a barrio across town. ... I was busy with my other callings, and I was afraid that I wouldn’t know how to reach out...” Read more about this sister’s experience.

Assigning a Visiting Teacher



"Visiting teaching in the ward is determined by the bishop and Relief Society presidency after prayerful consideration" (Handbook 2, 9.5.2).

"Relief Society sisters accept their assignment to visit another as a call from the Lord" (Henry B. Eyring, "The Enduring Legacy of Relief Society," Liahona, Nov. 2009, 123; see also Daughters in My Kingdom, page 110).

"Members of the Relief Society presidency instruct visiting teachers on ways to care for, watch over, remember, and strengthen one another. ... They obtain the bishop's approval for each assignment" (Handbook 2, 9.5 and 9.5.2).

When you assign a sister, she should be able to say: "When my visiting teaching assignment was given, it was done in a way that helped me feel that I have an important spiritual mission to fulfill."

When making the assignment:

Explain the purposes of the assignment.

Help her understand why the Lord has called her to minister to a particular sister.

Suggest ways it could be done.

Provide contact information about those she is assigned to watch over.

Provide encouragement and instruction as needed.

Ask her to report back to the Relief Society presidency any special needs of the sisters and any service rendered. Leaders instruct visiting teachers to maintain confidentiality (see *Handbook 2*, 6.4).

Provide ongoing training and instruction:

- In Sunday lessons or Relief Society meetings (see *Handbook 2*, 9.5).
- Presidency members meet with visiting teachers regularly to discuss sisters' spiritual and temporal well-being (one on one) (see *Handbook 2*, 9.5.4).

*The Relief Society presidency and the young single adult leader meet regularly to ensure that visiting teaching assignments help address the needs of young single adults (see *Handbook 2*, 16.3.3).*



“By assigning our women to do visiting teaching, we give them the opportunity to develop the pure love of Christ, which can be the greatest blessing of their lives” (Barbara Winder, in Daughters in My Kingdom, page 120).

Reporting—Count the Caring



“The Relief Society presidency or those who are called to assist them receive monthly reports from visiting teachers. The visiting teachers report any special needs of the sisters they visit and any service rendered. In addition [to receiving monthly visiting teaching reports], presidency members meet with visiting teachers regularly to discuss sisters’ spiritual and temporal welfare and to make plans to help those in need” (Handbook 2, 9.5.4; emphasis added).

If a visiting teaching coordinator and supervisors are called to assist the Relief Society presidency, the presidency is to teach and train them on their roles and responsibilities with visiting teaching and on what questions they need to ask visiting teachers as they gather information:

Did you watch over and care for [Mary]? (*Daughters in My Kingdom*, page 123.)

Do [Mary] and/or her family have confidential or urgent needs that need to be reported to the Relief Society president?

Is there anything the Relief Society presidency can do to assist you with caring for the needs of your sisters and their family?

“Confidential information should be reported only to the Relief Society president, who reports it to the bishop.

“The Relief Society president gives the bishop a monthly visiting teaching report. Each report includes a list of those who were not contacted. If a sister and her family have urgent needs, the Relief Society president reports this information to the bishop immediately” (Handbook 2, 9.5.4).

“My desire is to plead with our sisters to stop worrying about a phone call or a quarterly or monthly visit, and whether that will do, and concentrate instead on nurturing tender souls” (Mary Ellen Smoot, in Daughters in My Kingdom, page 117).

“I knew that I was more than just a number on the record books for her to visit. I knew that she cared about me” (Daughters in My Kingdom, page 120).



The Work of Salvation



"This organization is divinely made, divinely authorized, divinely instituted, divinely ordained of God to minister for the salvation of the souls of women and of men" (Joseph F. Smith, in Daughters in My Kingdom, page 7).

"Let us have compassion upon each other, and let the strong tenderly nurse the weak into strength, and let those who can see guide the blind until they can see the way for themselves" (Brigham Young, in Daughters in My Kingdom, page 107).

Visiting Teaching Influences

Missionary Work

"In ward council meetings [ward council members] ... offer counsel about possible home teachers and visiting teachers for investigators who are preparing to be baptized and confirmed" (Handbook 2, 5.1.2).

"Much of the major growth that is coming to the Church in the last days will come because many of the good women of the world (in whom there is often such an inner sense of spirituality) will be drawn to the Church in large numbers. This will happen to the degree that the women of the Church reflect righteousness and articulateness in their lives and to the degree that the women of the Church are seen as distinct and different—in happy ways—from the women of the world" (Spencer W. Kimball, in Daughters in My Kingdom, page 95).

Convert Retention

"New Church members need the support and friendship of Church leaders, home teachers, visiting teachers, and other members. This support helps new members become firmly 'converted unto the Lord' (Alma 23:6)" (Handbook 2, 5.2).

"[Priesthood and auxiliary] leaders ensure that new members learn basic Church practices, such as how to ... serve as a home teacher or visiting teacher" (Handbook 2, 5.2.4).

"Home teachers and visiting teachers have important responsibilities to establish friendships with new members. In consultation with the bishop, Melchizedek Priesthood and Relief Society leaders give high priority to assigning dedicated home teachers and visiting teachers to new members" (Handbook 2, 5.2.5).

"You are going to save souls, and who can tell but that many of the fine active people in the Church today are active because you were in their homes. ... You are not only saving these sisters, but perhaps also their husbands and their homes" (Spencer W. Kimball, in Daughters in My Kingdom, page 117).

Activation

"In consultation with the bishop, Melchizedek Priesthood and Relief Society leaders assign dedicated home teachers and visiting teachers to less-active members. These leaders focus their efforts on the less-active members who are most likely to respond to invitations to return to activity" (Handbook 2, 5.3.3).

“President Joseph Smith said this society was organized to save souls. What have the sisters done to win back those who have gone astray?—to warm up the hearts of those who have grown cold in the gospel?—Another book is kept of your faith, your kindness, your good works, and words. Another record is kept. Nothing is lost” (Eliza R. Snow, in Daughters in My Kingdom, page 83).

“A heavenly record is kept of the work of Relief Society sisters as they reach out to those whose hearts have grown cold and who need faith, kindness, good works, and good words” (Daughters in My Kingdom, page 83).

Temple and Family History

Visiting teachers can encourage participating in family history.

“Sarah M. Kimball and Margaret Cook ... wanted to help prepare a temple for the people. Under the inspiration and guidance of a prophet and other priesthood leaders, they and their sisters ultimately helped prepare a people for the temple. This work continues today. Guided by the principles Joseph Smith taught, Relief Society sisters work together to prepare women and their families for God’s greatest blessings” (Daughters in My Kingdom, page 25).

Teaching the Gospel

“Visiting teaching gives women the opportunity to watch over, strengthen, and teach one another” (Handbook 2, 9.5).

“Sister Eliza R. Snow, the second Relief Society general president, taught: ‘I consider the office of a teacher a high and holy office’ ” (in Daughters in My Kingdom, page 108).

“Sister Snow hoped that sisters would ‘perceive a difference in their houses’ after a visit.” Read more... (See Daughters in My Kingdom, page 108.)

“And if any man among you be strong in the Spirit, let him take with him him that is weak, that he may be edified in all meekness, that he may become strong also” (D&C 84:106).



Return to the main page of Visiting Teaching Training.

EXHIBIT C

In The Matter Of:

United States vs.

Adams

Reporter's Transcript of Recorded Interview

February 9, 2017

Interview of Paul Douglas Adams

Griffin & Associates Court Reporters, LLC

2398 E. Camelback Road

Suite 260

Phoenix, AZ 85016

Original File PA020917.txt

Min-U-Script® with Word Index

In re:)
) Mag. No. 17-01439M
United States v. Paul Douglas Adams.)
)

REPORTER'S TRANSCRIPT OF RECORDED INTERVIEW

INTERVIEW OF: PAUL DOUGLAS ADAMS

INTERVIEW BY: S.A. BOB EDWARDS
S.A. TIFFANY MAYO

INTERVIEW DATE: 02/09/2017

PREPARED BY:
Debra Riggs Torres, RPR
Certified Reporter
Certificate No. 50647

PREPARED FOR:
Ms. Erica L. Seger

(Certified Copy)

1 PAUL ADAMS: Uh-huh.

2 S.A. EDWARDS: I showed up at the house
3 later, after everything was starting to wrap up, after we
4 departed. When I walked in, I noticed that there seemed
5 to be a lot of sex toys, a lot of like lube, kind of not
6 so much in a private area, more so in like common areas.

7 PAUL ADAMS: Uh-huh.

8 S.A. EDWARDS: The couch. I think in your
9 daughter's rooms. In fact, I think there were blowup
10 dolls that were found.

11 PAUL ADAMS: Oh, I -- I can explain that.

12 S.A. EDWARDS: No. And that's what I'm
13 looking for. I mean --

14 PAUL ADAMS: Sure.

15 S.A. EDWARDS: -- what's the deal with that
16 stuff?

17 PAUL ADAMS: Okay. The blowup doll, it's
18 never been out of that box, since I packed it up in
19 (indiscernible).

20 S.A. EDWARDS: Okay.

21 PAUL ADAMS: And that's all -- it's the only
22 reason I had that was, it was a -- it was just a big -- a
23 practical joke.

24 S.A. EDWARDS: Now --

25 PAUL ADAMS: I think it was April Fool's,

1 S.A. EDWARDS: Okay. Now -- now what about
2 all the lube? Now, the lube was everywhere.

3 PAUL ADAMS: Correct.

4 S.A. EDWARDS: That was on -- I saw it in
5 the kitchen. I saw it in -- next to the couch in the
6 living room. I saw it in the bedrooms. I saw it on the
7 beds.

8 PAUL ADAMS: Uh-huh. Um, that -- there's
9 basically two uses for that. Um, that was -- um, I did
10 use that with my wife, sexual relations with my wife.

11 S.A. EDWARDS: Okay.

12 PAUL ADAMS: Um, we would, you know, do
13 things in different rooms, depending on time of day. Like
14 if the kids -- the younger kids would be asleep in her --
15 her room, um, you know, we go to the unoccupied, you know,
16 family room.

17 S.A. EDWARDS: Okay.

18 PAUL ADAMS: So, I mean, it just depends.
19 Sometimes my office, when it wasn't occupied by my
20 daughter or anything like that. Um, you know, there's --
21 there's -- I would -- again, that wasn't completely given
22 up by me sometimes, if I needed to sleep when there was a
23 lot of activity in the house, and there'd always be a lot
24 of activity in -- you know, in and out of my wife's room
25 when the kids were home. If I needed to sleep or

1 entirely sure, but --

2 S.A. EDWARDS: Okay.

3 PAUL ADAMS: -- that's what comes to mind --

4 S.A. EDWARDS: Okay.

5 PAUL ADAMS: -- would be a halfway point, if
6 I were in Phoenix area.

7 S.A. EDWARDS: All right.

8 PAUL ADAMS: Um, let's see. One -- one
9 person I was chatting with, I think he said something
10 about Florida. Um, no specifics. I think just Florida.

11 S.A. EDWARDS: Okay.

12 PAUL ADAMS: Um, let's see. Um --

13 S.A. EDWARDS: Let's -- let's -- let's --

14 PAUL ADAMS: Yeah.

15 S.A. EDWARDS: -- change gears, man.

16 PAUL ADAMS: Okay.

17 S.A. EDWARDS: Um, so obviously there -- I
18 mean, we just discussed the lube, the pornography, all the
19 stuff that was kind of -- I mean, in my opinion, it was
20 kind of out in the open, as I would say.

21 PAUL ADAMS: Right. And -- yeah, I don't
22 deny that.

23 S.A. EDWARDS: Yeah. And, I mean, it's a
24 nice home you have.

25 PAUL ADAMS: Certainly.

1 S.A. EDWARDS: But, I mean, it's no mansion.
2 It's not like 4,000-square foot, you know what I mean?

3 PAUL ADAMS: Right.

4 S.A. EDWARDS: Um, I know we discussed it
5 yesterday, but does your wife have any knowledge of any of
6 this stuff?

7 PAUL ADAMS: No. She -- she did not know
8 this was going on.

9 S.A. EDWARDS: Okay.

10 PAUL ADAMS: And -- and she, um, would not,
11 you know -- um, she would protect the kids to the best of
12 her ability. She didn't -- she wasn't part of it. She
13 wasn't aware of it.

14 S.A. EDWARDS: Well, let me ask you this,
15 what -- how did she perceive having lube all over the
16 house and pornography in the drawers in your kid's bedroom
17 and, you know, a blowup doll in the closet that may not
18 have been blown up? I mean, how does she perceive that
19 as -- with the kids around?

20 PAUL ADAMS: I mean, she knew I had a
21 problem with pornography. Um, like I said, I -- I --

22 S.A. MAYO: Did she talk to you about the
23 type of pornography you were looking at?

24 PAUL ADAMS: No. No.

25 S.A. EDWARDS: Did you --

EXHIBIT D



COCHISE COUNTY SHERIFF'S OFFICE

205 N. JUDD DRIVE
BISBEE, ARIZONA 85603

1 **LEGEND: 17-03768(FreeTalk)**
2 **SR: Sara Ransom**
3 **RK: Richard Karwaczka**
4 **DB: Detective Borquez**
5 **SA: Special Agent Allen**
6 **ES: Erica Sager**
7 **RE: Robert Edwards (Agent Edwards)**
8 **LA: Leizza Adams**
9
10 SR: Ok. Is yours going, Rich?
11 RK: Mine's going.
12 SR: Today's date is August 31st, 2017. My name is Sara Ransom with the Cochise County
13 Attorney's Office. With me today is case officer Todd Borquez. And I'm gonna go, uh,
14 let everybody go around the room and introduce themselves so we know who's present.
15 SA: Special Agent Jay Allen, FBI.
16 ES: Erica Sager with the US Attorney's Office.
17 LA: Leizza Adams.
18 RK: Richard Karwaczka with the Public Defender's Office.
19 SR: 'Kay. And we are expecting Robert Edwards. He's not here yet. We'll just note when he
20 walks in. Um, Miss Adams, how do you prefer to be addressed
21 LA: Lei.
22 SR: today?
23 LA: Lei.
24 SR: Lei? Alright. Now we'll use, we'll use Lei. My name is Sara Ransom. I'm the prosecutor
25 in the case where um, pending in Cochise County, Arizona, against you and Paul Adams.
26 Um, is he still your husband?
27 LA: He's fighting it.
28 SR: Ok.
29 LA: He's fighting the divorce.
30 SR; Alright, so you filed for divorce. So soon to be ex-husband. Um, and today we're here to
31 do a free talk first with the State and then with federal agents who are here. You know that
32 this is being recorded, correct?
33 LA: Mm-hm.
34 (buzzing sounds)

COCHISE COUNTY
SHERIFF'S OFFICE
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1 LA: Tell lies.
2 ES: -- talk about lies. And then you start talking about a party that you went to
3 LA: Oh
4 ES: in Bisbee with your children and him, where you had chips and sodas. So why when I ask
5 about lies, why does this party come up?
6 LA: Mm 'cause he made it seem like it'd be okay. Um, but the other one that I was, the memo
7 thing.
8 RK: (inaudible)
9 LA: Uh, there's a specific lie in there that, apparently he was sentenced to, to be in prison for a
10 month. But because he used the family as an excuse, he was only there for 24 hours.
11 ES: What, what memo are you referring to?
12 LA: Oh, one of those hundreds of memos that I'd shredded when I was looking through his
13 stuff.
14 SA: Was it like a Border Patrol memo? Did it have the Border Patrol seal on it? Or
15 LA: Yeah. The stuff at the top says "memo" in huge, fat, bold letters.
16 ES: So like he was supposed to be suspended for 30 days?
17 LA: Nno. He, the time he was going to San Diego a lot. And apparently one of those times,
18 instead of being in San Diego, Sister Whor said that he was in prison.
19 SA: Do you know what he did to, resulted in him going to prison for a month?
20 LA: Nope.
21 SA; For 24 hours.
22 LA: I didn't read it. But some of the things that she read, like oh, he had a DUI. Did you know
23 he drank? I said no. It was another stupid thing he did. Mmm.
24 SA: So he got locked up for a DUI?
25 LA: I don't know. But there were a lot of memos. And I was just shredding and shredding.
26 And she was just trying to grab and look at it while I was shredding.
27 ES: And who, who is this that you're talking to?
28 LA: Chanice Whor. My visiting teacher. Um,
29 ES: What's it, the last name Ward, like W-a-r-d?
30 LA: W-a-r-r.
31 ES: W-a-r-r. Ok.
32 LA: She's an agent that did not know he was an agent. They never worked the same shift. And
33 when she was my kids' Sunday school teacher, she'd be part of the activities group.
34 RE: Too cold in here? ---
35 (inaudible)
36 LA: You know, hosting parties for kids at least.
37 ES: So she's a Border Patrol agent?
38 LA: Yes.
39 ES: Ok. And she's also a member of the LDS church?
40 LA: Yes.
41 ES: She lives in Bisbee?
42 LA: Yes.
43 ES: Ok. So she was there when you shredding all these documents after Paul was arrested?
44 LA: I just wanted to get rid of everything.
45 ES: Ok. She was there when you were doing that?
46 LA: Mm-hm.
47 ES: And she was looking through some of those documents?

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EXHIBIT E

THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS
OFFICE OF THE FIRST PRESIDENCY
47 EAST SOUTH TEMPLE STREET, SALT LAKE CITY, UTAH 84150-1200

August 4, 2020

To: General Authorities, General Officers, and the following leaders in the United States and Canada: Area Seventies; Stake, Mission, District, and Temple Presidents; Bishops and Branch Presidents; Members of Ward and Stake Councils

Dear Brothers and Sisters:

Involvement in Legal Proceedings

We remind leaders and members of a long-standing policy that Church leaders should not involve themselves in civil or criminal cases regarding members in their units, quorums, or organizations without first consulting with Church legal counsel (see *General Handbook: Serving in The Church of Jesus Christ of Latter-day Saints*, 38.8.26.1, ChurchofJesusChrist.org). This same policy applies to leaders corresponding with court personnel on behalf of criminal defendants or others, including through email.

However well intentioned, Church leaders sharing information in legal proceedings can sometimes be misinterpreted and even damaging. Such sharing can be especially harmful to victims and their families. Following the Church's policy also keeps the Church from being inappropriately implicated in legal matters.

If a leader believes he or she should testify or communicate in a legal matter or if a leader is being required to do so by legal process, that leader must contact the Office of General Counsel at Church headquarters at 1-801-240-6301 or 1-800-453-3860.

Sincerely yours,

Russell M. Nelson

Dallin H. Oaks

Henry B. Eyring
The First Presidency

EXHIBIT F

THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF COCHISE

STATE OF ARIZONA,)
 Plaintiff,)
 vs.)
 LEIZZA ALCANTARA ADAMS,)
 Defendant.)

No. CR-201700425

BEFORE: THE HONORABLE WALLACE R. HOGGATT
 Judge of the Superior Court
 Division 3

PRESENTENCE HEARING AND SENTENCING

13 AUGUST 2018
 BISBEE, ARIZONA

Reported By: SUSAN P. AULETTA, OFFICIAL REPORTER
 RMR, AZ CERTIFIED REPORTER NO. 50257

1 started approximately three to six weeks old.

2 Q. And did Paul Adams admit what he was doing to
3 M-2 specifically, or did the photographs make that
4 explicit?

5 A. A little bit of both.

6 Q. Okay.

7 A. So a lot of the videos and photographs that we
8 found of M-2, it was Paul Adams' penis, erect penis,
9 and then M-2's -- he was attempting to have oral sex
10 with M-2, he was also attempting to have vaginal sex
11 with M-2, and through Paul's own admissions during our
12 interview after his arrest he said that he found it
13 hard to have vaginal sex with M-2 because her body was
14 so small, and his penis would not fit into her vagina.

15 Q. Did Mr. Adams admit as to where this abuse
16 took place?

17 A. He did. He said it happened at the home in
18 Bisbee, Arizona.

19 Q. Were his statements consistent with the video
20 evidence you ultimately collected and viewed?

21 A. Yes.

22 Q. Did Paul Adams admit to any sexual misconduct
23 with any other children in the household?

24 A. No.

25 Q. Was he asked?

1 A. He was.

2 Q. Were all the other children male?

3 A. They were. Four males and two females.

4 Q. Was there any discussion as to whether or not
5 the children ever witnessed their siblings being
6 abused?

7 A. There was. To my knowledge, the children were
8 all forensically interviewed by child forensic
9 interviewers. And the children were not aware of each
10 other's abuses.

11 Q. Did Paul Adams say whether his wife knew what
12 he was doing?

13 A. He said that -- and this is to quote Paul
14 Adams during the interview -- he said that he has the
15 perfect lifestyle. He was boasting on a chat group
16 that he has the perfect lifestyle where he can have sex
17 with his two daughters and his wife doesn't care and
18 she knows.

19 Q. Was Paul Adams arrested at the conclusion of
20 his interview?

21 A. He was.

22 Q. Did you then proceed to the Adams residence?

23 A. I did.

24 Q. Do you know about what time you arrived?

25 A. I must have got there maybe 7 or 8:00 o'clock

1 something was off, as he described it.

2 Q. Did Bishop Herrod know of any actual
3 misconduct between Paul Adams and his children?

4 A. He did.

5 Q. Okay. Did he talk to you about it?

6 A. He did. He explained to me that Paul Adams
7 was taking a sort of counseling session, as Mr. Herrod
8 explained. The counseling session described by him
9 being that the bishop speaks with a member of the
10 church about topics to see if they need any help.
11 During one these sessions, Paul Adams admitted to
12 Mr. Herrod that he had been sexually assaulting his
13 oldest daughter M-1.

14 Once Mr. Herrod heard this, he had brought
15 Leizza Adams into the same counseling session, so there
16 were three of them in the counseling session at this
17 point, and then Mr. Herrod had Paul turn and explain to
18 Leizza exactly what he had just told him, to which Paul
19 did, he explained his sexual molestation of M-1 to
20 Leizza Adams in that counseling session.

21 Q. Did Bishop Herrod tell you approximately when
22 this took place?

23 A. He described it to me it was between 2011,
24 2012. It was on the tail end of his tenure in Bisbee
25 as a Bishop.

1 Q. Okay. Did the Bishop, aside from actual
2 sexual molestation or assaulting of M-1, did the Bishop
3 have any further detail about what Paul Adams was doing
4 with M-1?

5 A. He did. During the counseling session Paul
6 Adams explained to Bishop Herrod that Paul Adams was
7 visually -- he was taking video of M-1 orally
8 stimulating Paul Adams. He said that he had taken
9 video of this, and he's done it numerous times.

10 Q. And that information was conveyed to Leizza
11 Adams?

12 A. Yes, it was.

13 Q. Did Bishop Herrod recall Leizza Adams'
14 reaction to this news?

15 A. Again, Bishop Herrod had the same thought on
16 it as I did. He said that she appeared emotionless; in
17 fact, I believe he called her "emotionally dead" was
18 his term for it.

19 Q. Did she express surprise?

20 A. No.

21 Q. Did Bishop Herrod explain why he brought
22 Leizza Adams in the room?

23 A. He brought Leizza Adams into the room because
24 he wanted, you know, he wanted the children to be safe,
25 and he thought if he -- if Paul Adams told Leizza Adams

1 while Bishop Herrod was observing, that Leizza would
2 either remove the children from the situation or at
3 least, very least, keep the kids away from Paul.

4 Q. Did Bishop Herrod consider calling the police?

5 A. He did not. He did not.

6 Q. Did he give Leizza Adams the option of having
7 Paul Adams turn himself in?

8 A. Yes.

9 Q. Did Leizza Adams respond as to what she
10 planned to do?

11 A. Again, she responded that she will just do her
12 best to keep the children away from Paul.

13 Q. Did Bishop Herrod understand that Leizza Adams
14 was successful thereafter in keeping her kids away from
15 him?

16 A. He believes that he was not. The counseling
17 sessions continued with Paul Adams, to which Paul
18 continued to explain that he was sexually assaulting
19 his oldest daughter, M-1.

20 Q. And did Bishop Herrod bring Leizza Adams in
21 again?

22 A. Yes. He didn't have a count but he said there
23 were numerous times that he brought her in.

24 Q. So it wasn't just one time Leizza Adams heard
25 this?

1 A. No. And he couldn't tell me the count. He
2 said it was over numerous counseling sessions.

3 Q. Did Bishop Herrod say how long, the amount of
4 time these counseling sessions transpired with Paul
5 Adams where he would bring Leizza in?

6 A. As far as duration of the counseling session
7 of minutes or --

8 Q. No.

9 A. -- over years?

10 Q. Yes.

11 A. It was over years. He said that when he left
12 the Bisbee ward in 2012 he turned over the situation to
13 the next bishop coming in, who I believe is Kim Mauzy,
14 Bishop Kim Mauzy, who started in 2012 and was there
15 through 2017.

16 Q. Okay. Did Bishop Herrod do anything after he
17 was learning of all the these incidents with M-1 and
18 Paul Adams?

19 A. Bishop Herrod explained to me that he
20 consulted, as he referred to it -- and I mean no
21 disrespect -- he called Mormon headquarters in Salt
22 Lake City, Utah, and asked for legal advice as to what
23 to do. The church conveyed that he needs to continue
24 counseling sessions, and that there's no duty to report
25 to authorities due to the clergy-penitent privilege.

1 Q. So Bishop Herrod, in bringing Leizza Adams
2 back into the room each time, did he explain to you
3 what he was hoping to accomplish?

4 A. He was hoping that Leizza Adams would fix the
5 situation, that Leizza Adams would leave the house with
6 the children, thus not letting them being the victim of
7 sexual assault, continued sexual assault.

8 Q. Now, the information conveyed to you by Bishop
9 Herrod related to the Mormon church, is there an
10 ongoing criminal investigation related to that
11 information?

12 A. Yes, there is.

13 Q. And are you here under a Touhy letter?

14 A. Yes.

15 Q. Have you been instructed not to --

16 A. Yes.

17 Q. -- discuss beyond that?

18 A. Yes, ma'am.

19 Q. Do you know if, as far as the disclosures
20 between Paul Adams, Leizza Adams, and the Bishop, do
21 you know if he conveyed that information to anyone else
22 aside from who you've already identified, Bishop Mauzy
23 and Salt Lake City?

24 A. You're talking of Mr. Herrod, who else he
25 spoke to about it?

EXHIBIT G

THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS
OFFICE OF THE FIRST PRESIDENCY
47 EAST SOUTH TEMPLE STREET, SALT LAKE CITY, UTAH 84150-1200

March 26, 2018

To: General Authorities and the following leaders in the United States and Canada: Area Seventies; Stake, Mission, and District Presidents; Bishops and Branch Presidents

Dear Brethren:

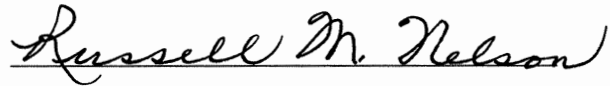
Preventing and Responding to Abuse

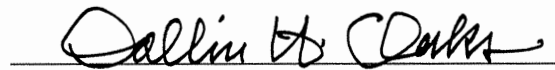
In 2008, the First Presidency issued a letter encouraging Church leaders to reach out in love to assist those who were suffering from abuse. This global issue continues to be of great concern to us today. Our hearts and prayers go out to all who are affected by this serious problem.

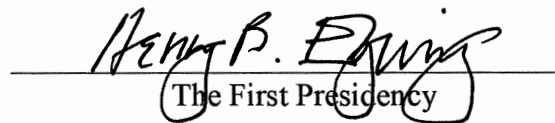
To help ensure the safety and protection of children, youth, and adults, we ask that all priesthood and auxiliary leaders become familiar with existing Church policies and guidelines on preventing and responding to abuse. A revised statement of these policies and guidelines is enclosed. We request that stake presidents and bishops once again review the attached with their stake and ward councils and teach this information as directed in the enclosure.

May the Lord bless you in your efforts to protect God's children from abuse.

Sincerely yours,







The First Presidency

This letter, with enclosure, is being distributed in English only. If it is needed in other languages, please contact the member of the Presidency of the Seventy who supervises the area. Area leaders can forward requests to the Priesthood and Family Department at ext. 2-2933.

15664

PREVENTING AND RESPONDING TO ABUSE

This document summarizes current Church policies and guidelines on abuse. All priesthood and auxiliary leaders should be familiar with and follow them to help protect God's children.

What Is Abuse?

Abuse is the mistreatment or neglect of others (such as a child or spouse, the elderly, or the disabled) in a way that causes physical, emotional, or sexual harm.

Abuse causes confusion, doubt, mistrust, and fear in the victims and sometimes inflicts physical injury. Most, but not all, allegations of abuse are true, and should be taken seriously and handled with great care. Abuse tends to become more severe over time.

The Lord condemns abusive behavior in any form—including neglect and physical, sexual, or verbal abuse. Most abuse violates the civil laws of society. (See First Presidency letter, “Responding to Abuse,” July 28, 2008.)

Teaching Doctrine

Stake presidencies and bishoprics should ensure that what they say about abuse is based on Church doctrine. In particular, they should teach the following:

- The doctrine of the Church commits all leaders and members to protect each individual (see Matthew 18:6; Ephesians 5:25, 28–29; “[The Family: A Proclamation to the World](#),” *Ensign* or *Liahona*, May 2017, 145).
- Abuse in any form is sinful, tragic, and in total opposition to the teachings of the Savior (see Doctrine and Covenants 121:37).
- The Savior extends succor, healing, and strength to victims of abuse because of His infinite and eternal Atonement (see Alma 7:11–12; 34:10).
- Those who commit abuse in any way are accountable to God (see Doctrine and Covenants 101:78). Heavenly Father and

The Abuse Help Line

For some years, the Church has operated a free and confidential abuse help line, 1-800-453-3860, ext. 2-1911, established for bishops and stake presidents in the United States and Canada. In other areas, bishops who learn of possible abuse should contact their stake presidents, who will seek guidance from the Area Presidency.

The following information will help bishops and stake presidents use this help line:

- This help line is available for bishops and stake presidents to call 24 hours a day, seven days a week, when addressing situations involving any type of abuse.
- The bishop or stake president should promptly call the help line about every situation in which he believes a person may have been abused or neglected or is at risk of being abused or neglected.
- When bishops or stake presidents call the help line, legal and clinical professionals will answer their questions and provide instructions about how to assist victims, comply with local laws and requirements for reporting abuse, and protect against further abuse.

For more information, see *Handbook 1*, 17.3.2.

His Son offer forgiveness to those who have committed abuse when they change their behavior and fully repent (see Mosiah 14:4–12; Doctrine and Covenants 58:42–43).

- The principles in “[The Family: A Proclamation to the World](#)” are vital for all members to understand and will help everyone avoid the evils of abuse (see Gordon B. Hinckley, “[Save the Children](#),” *Ensign*, Nov. 1994, 52–54).

Key Messages

How Can Abuse Be Prevented?

At Home

Church leaders should do the following to help prevent abuse in the home:

- Encourage couples and families to live the gospel in the home. They should establish patterns of kindness, respect, and open communication so that all family members are comfortable discussing sensitive matters (see “[The Family: A Proclamation to the World](#),” *Ensign* or *Liahona*, May 2017, 145).
- Encourage parents to teach children information and skills appropriate to their age and maturity so they will know what to do if faced with abuse.
- Make members aware of these publications: *Preventing and Responding to Spouse Abuse: Helps for Members* (1997) and *Preventing and Responding to Child Abuse: Helps for Members* (1997).

At Church

Church leaders should follow these guidelines to help prevent abuse at Church:

- A person *must not* be given a Church calling or assignment that involves working with children or youth if his or her membership record is not in the ward or if it has an annotation for abuse (see *Handbook 1: Stake Presidents and Bishops* [2010], 17.3.2).
- When adults are teaching children or youth in Church settings, at least two responsible adults should be present. The two adults could be two men, two women, or a married couple (see *Handbook 2: Administering the Church* [2010], 11.8.1). Where it may not be practical to have at least two adults in a classroom, leaders should consider combining classes.
- At least two adults must be present on all Church-sponsored activities attended by youth or children. All adult leaders participating in Scouting must be registered with the Boy Scouts of America (see First Presidency letter, May 12, 2017) and comply

with guidelines in the BSA publication *Guide to Safe Scouting*.

- When a brother participates in a ministering visit to an individual woman, he should go with his companion or with his wife.
- When a member of a stake presidency or bishopric or another assigned leader meets with a child, youth, or woman, he or she should ask a parent or another adult to be in an adjoining room, foyer, or hall. If the person being interviewed desires, another adult may be invited to participate in the interview. Leaders should avoid all circumstances that could be misunderstood (see *Handbook 1*, 7.4).
- On Church-sponsored overnight activities, a child or youth may not stay in the tent or room of an adult leader unless the adult is his or her parent or guardian or there are at least two adults in the tent or room who are the same gender as the child or youth (see *Handbook 2*, 13.6.12).
- If adult leaders and children or youth share other overnight facilities, such as a cabin, there must be at least two adults in the facility and they must be the same gender as the children or youth (see *Handbook 2*, 13.6.12).

Responding to Abuse

(See *Handbook 1*, 17.3.2)

Church leaders and members should follow these guidelines when responding to abuse:

- When abuse occurs, the first and immediate responsibility of Church leaders is to help those who have been abused and to protect vulnerable persons from future abuse. Members should never be encouraged to remain in a home or situation that is abusive or unsafe.
- Church leaders and members should be caring, compassionate, and sensitive when working with victims and perpetrators and their families.
- Church leaders should never disregard a report of abuse or counsel a member not to report criminal activity to law enforcement personnel.

- Church leaders and members should fulfill all legal obligations to report abuse to civil authorities.
- Priesthood leaders should help those who have committed abuse to repent and cease their abusive behavior (see Isaiah 1:18; Doctrine and Covenants 64:7).
- Professional counseling may be helpful for the victims and perpetrators and their families. It is almost always advised in cases of serious abuse.

Teaching Stake and Ward Councils

Stake presidencies and bishoprics should present this information in stake and ward council meetings. Members of stake and ward councils should then discuss this material in their respective presidency and leadership meetings and with others, as needed. They should:

- Teach the key messages in this outline and invite discussion from adult priesthood and auxiliary leaders. As part of the discussion, they might begin by watching the video *Protect the Child: Responding to Child Abuse*, found under “Abuse: Help for the Victim” (ministeringresources.lds.org). Because this information is sensitive, they should seek the guidance of the Spirit as they teach.
- Often a report of abuse will come to a trusted teacher or adviser. Members of stake and ward councils should help leaders, teachers, and members take proper steps in preventing and responding to abuse, including reporting the abuse to appropriate civil authorities.

Policy and Legal Issues Relating to Abuse

The following guidelines will help Church leaders handle policy and legal issues relating to abuse:

- Immediately call the help line at 1-800-453-3860, ext. 2-1911, when addressing situations involving any type of abuse.

- For guidelines on handling situations involving abuse, stake presidents and bishops should refer to *Handbook 1*, 17.3.2.
- For guidelines on handling confession, restitution, investigation, communication with aggrieved victims, and confidentiality in situations involving abuse, stake presidents and bishops should refer to *Handbook 1*, 6.4 and 6.5.
- For guidelines on handling Church discipline in situations involving abuse, stake presidents and bishops should refer to *Handbook 1*, chapter 6.
- Church leaders should not testify in civil or criminal cases involving abuse without first conferring with the Office of General Counsel at Church headquarters, 1-800-453-3860, ext. 2-6301. For specific guidelines, see *Handbook 1*, 17.1.26.

Other Resources

- “Abuse: Help for the Victim,” ministeringresources.lds.org
- “Abuse: Help for the Offender,” ministeringresources.lds.org
- Articles of Faith 1:12
- Doctrine and Covenants 121; 123
- Gordon B. Hinckley, “Personal Worthiness to Exercise the Priesthood,” *Ensign*, May 2002, 52–59
- Gordon B. Hinckley, “What Are People Asking about Us?” *Ensign*, Nov. 1998, 70–72
- Dallin H. Oaks, “Priesthood Authority in the Family and the Church,” *Ensign* or *Liahona*, Nov. 2005, 24–27
- Richard G. Scott, “To Heal the Shattering Consequences of Abuse,” *Ensign* or *Liahona*, May 2008, 40–43
- LDS Family Services courses [Strengthening Marriage and Strengthening the Family](#)

EXHIBIT H

The Mormon Church Has Been Accused of Using a Victims' Hotline to Hide Claims of Sexual Abuse

Families of survivors say the church funnels sexual abuse claims to church lawyers before police, a VICE News investigation reveals.

BM By [Barry Meier](#)

May 3, 2019, 7:46am



Helen W. wasn't born a Mormon, but she embraced the religion when she was 17 and it embraced her back.

When her son Alex was born with a heart defect and developmental disabilities, it was the Mormon Church that paid for his operations and treatments. When her second son, Zachary, was born eighteen months later, it was the members of her Martinsburg, West Virginia, congregation who helped find babysitters. And when Helen and her husband needed life guidance or wisdom, they turned to their bishop. Bishops of the Mormon Church — or the Church of Jesus Christ of Latter-day Saints, as it's formally called — are laymen, not professional clerics. Helen's bishop, Donald Fishel, had worked full-time as a utility company lineman before his retirement. But as a Mormon bishop, he played an all-encompassing role in his congregants' lives.

A bishop oversees the spiritual well-being of his followers, instructing them how to act in accordance with the teachings of Mormonism; and he oversees tithing, the practice of giving 10 percent of one's income to the church. He also tends to their everyday needs, providing marriage counseling, arranging for financial aid, finding jobs for the unemployed, mentoring teenagers, and filling other roles. A bishop is "your go-to for everything," says Helen. "You have a problem, you have a concern, financial concerns, anything. The bishop's door is always open. You go to your bishop and ask their advice."

Helen says she and her husband turned to bishop Fishel in 2008, when they were confronted with a parent's worst nightmare.

Helen was waiting with her kids for the school bus one winter morning when Zachary, who was then 4, started crying. He told her that he didn't want Michael Jensen — the 16-year-old son of a respected local Mormon family — to babysit him anymore. Jensen, Zachary said, was "mean." Helen liked the teenager and didn't understand why her son was acting so strangely. She pressed him to explain.

"Mom, he makes me suck his privates," Zachary said.

A decade later, Helen recalled that moment in a sexual abuse-related civil lawsuit she and five other families brought against local Mormon leaders, including Fishel, and the Mormon Church. (Because many of the children involved are still minors, VICE News is using the first initial of their families' last names.) Helen testified that she and her husband met with Bishop Fishel as soon as they could to tell him what Zachary had said.

"I told Bishop Fishel that Zachary told me that he was forced to put Michael's penis in his mouth," she explained. "He told us he was going to look into it, that he was going to talk to Michael."

In his testimony, Fishel insisted he was unaware that abuse had occurred and that Helen never spoke to him at all. Fishel also said that Helen's husband also did not tell him about sexual abuse but only said that his son was afraid of Michael Jensen and had described him as "the man who hurt me."

When Fishel went to see Michael Jensen to discuss it, he said that the 4-year-old had walked in on him while he was watching internet pornography and was upset by the graphic images he'd seen.

Mormons believe that bishops have a spiritual gift known as the power of discernment that allows them to divine if someone is telling the truth. Fishel told the court he prayed for guidance after meeting with Michael Jensen, and determined the teen was being truthful.

In many states, including West Virginia, clergy are required to notify public authorities when they learn about possible child abuse. Since Fishel said he was told there was no abuse, there was no reason for him to report it.

Helen and her husband accepted his decision. After all, the Mormon Church was their provider and protector.

Shielding the church

The Mormon Church calls the abuse reporting system it created two decades ago innovative and says it should serve as a model for other religions and groups.

“The Church has zero tolerance when it comes to abuse,” the Mormon Church states on its website. “We are unaware of any organization that does more than the Church to stop and prevent abuse.”

At the system’s heart is a 24-hour helpline that bishops and other leaders of the religion’s 14,000 congregations in the United States are urged to call when they hear about suspected abuse.

But testimony in Helen W.’s case revealed previously unknown details about how the Mormon Church’s reporting system operates — and who it really helps.

Mormon leaders have long insisted that the helpline’s sole purpose is to advise bishops about compliance with local abuse reporting laws. But court testimony, as well as other documents reviewed by VICE News, suggests that the system serves a very different purpose: to shield the Mormon Church from potential lawsuits that pose a financial threat to the Church.

The church also uses secrecy to mask the system's effectiveness. It has never disclosed the number of abuse-related calls made annually to its helpline or what percentage of those calls are referred to child protection authorities.

Asked by VICE News for that information, Eric Hawkins, a Mormon Church spokesman, said, "The Church does not share information about the helpline." He declined to say why.

The Mormon Church's lack of transparency contrasts starkly with actions taken by other religious groups and institutions. Since the early 2000s, when the Catholic Church became engulfed in the pedophile priest scandal, an affiliated group has annually published the number of abuse-related reports that Catholic bishops make to authorities.

But the Mormon Church's refusal to disclose help line data is only the most visible symptom of a system that appears to place church interests ahead of abuse victims'.

Helpline calls are not immediately transferred to authorities so they can take action. Instead, they are funneled into a law firm closely tied to the Mormon Church. As it turns out, the same firm that created the Mormon Church's abuse reporting system in 1995 now defends it in abuse-related lawsuits, including the one filed by Helen W.

Structurally, that law firm, Kirton McConkie, is independent of the Mormon Church. But for decades, the firm has served as its legal alter ego, its sword and shield in lawsuits, its policy adviser, and its legislative advocate.

The firm, which was founded by Church members, is located a few blocks away from the soaring Mormon Tabernacle in Salt Lake City. The Church is Kirton McConkie's largest client and, along with sex abuse cases, it represents the church in business and other kinds of disputes. Today, the Mormon Church still bars women from serving as bishops. A recent survey found only four women among the nearly 100 partners in its Salt Lake City office.

Kirton McConkie and the Church of Latter-day Saints declined interview requests for this story. Officials of Kirton McConkie did not respond to written questions about the firm's role in the helpline. In a written statement, an outside spokesman for the firm said it adheres "to standards that are consistent with the practices of law firms" and always advises "compliance with relevant laws."

But several experts said they could not see any benefit for abuse victims in having defense lawyers screen calls about such incidents before authorities are alerted.

Catholic bishops have been instructed since 2002 to alert the police about suspected abuse before contacting church lawyers. "If you are just looking at it from the outside, you might say to yourself, 'Are they trying to find a way not to report [incidents]?'" says Kathleen McChesney, a former top official at the Federal Bureau of Investigation, who consulted with the Catholic Church on its new reporting policies.

Details about the Mormon Church's abuse reporting system — and Kirton McConkie's role in it — emerged during Helen's lawsuit. And other revelations about the firm's role might have come to light, VICE News has learned, if the Mormon Church hadn't settled that lawsuit in March of 2018 while a trial was underway.

Timothy Kosnoff, a lawyer who represented Helen and other plaintiffs, says that a Kirton McConkie lawyer named Joseph Osmond acknowledged during a pretrial deposition that the firm uses information gleaned from helpline calls to identify cases that pose a high financial risk to the Mormon Church. Osmond also said during his deposition, which remains sealed, that he did not know why the church does not tell bishops to directly contact police — as the Catholic Church does — instead of calling the helpline, according to Kosnoff.

According to Kosnoff, another sealed deposition in the case shows helpline calls are first answered inside the Salt Lake City offices of a Mormon Church-sponsored agency known as LDS Family Services. Normally, staffers at the agency provide services to Mormons such as psychological counseling. But in the case of the helpline, they are under orders to transfer callers to Kirton McConkie, those disclosures indicate.

Officials for Kirton McConkie declined to comment on these allegations.

Directing abuse-related calls to church lawyers, legal experts said, lets the Mormon Church classify them as “attorney-client” communications and so protect them from disclosure in lawsuits and other forums. The Church’s maintenance of secrecy is so absolute that staffers at LDS Family Service who take notes during helpline calls are required to shred them at the end of every day, said Kosnoff, the plaintiffs’ lawyer.

“It’s a helpline for the lawyers, not for the children or anybody else”

“It’s a helpline for the lawyers, not for the children or anybody else,” said Kosnoff, who has gone up against Kirton McConkie in more than a hundred cases. “It gives

them an opportunity to get involved, to quickly send lawyers out there. Talk to victims. Silence them if they can.”

Separately, an internal Kirton McConkie document obtained by VICE News suggests that the firm also advises Mormon Church officials about whether they should notify public authorities about incidents of sexual abuse or misconduct.

The 2012 document, entitled “Special Investigations and Projects,” is a spreadsheet listing several sexual abuse cases involving church members at the time. Most of the cases cited in the document occurred outside the United States and involved Mormon men who were on religious missions, or so-called “elders.”

But one case concerned a Texas man who was at least 18, the youngest age at which a Mormon can be a missionary. In 2012, the man, while serving his mission in Arizona, confessed to church officials that before leaving his home in Texas, he had exchanged sexually explicit photographs with a 15-year-old girl. He also acknowledged that since arriving in Arizona he had kissed and touched a 15-year-old girl, the Kirton McConkie document states.

Church leaders had decided to end the man’s mission. But the Kirton McConkie document noted that while church officials in Texas would have “a duty” under state law to report his behavior to state officials if he returned home, doing so could result in felony charges against him. “His conduct is clearly unlawful in Texas, and his state President would have a duty to report,” the document states. “It is clear that the Elder needs to go home. Direction?”

Eric Hawkins, the Mormon Church spokesman, and Randy Austin, a lawyer with Kirton McConkie, were provided a copy of the document by VICE News. Neither responded to written questions about it, including whether the Church reported the man to authorities.

Teresa Huizar, the executive director of the National Children’s Alliance, a group that advocates for stronger abuse-reporting laws, said she found the document “disturbing” because organizations such as the Mormon Church have a legal and moral duty to report child abuse. “It is one of personal and institutional integrity,” Huizar said.

Duty to report

By coincidence, Michael Jensen was also working as a missionary in Arizona in 2012. The incident involving Helen W.’s son was then four years behind him.

But then more allegations of sex abuse involving Jensen surfaced in Martinsburg.

In late 2007, Spring T., who was a member of one Martinsburg’s two Mormon congregations, was unable to find a last-minute babysitter for her two sons, then aged 3 and 4. So she hired Jensen to take care of her children for a few hours. When she returned, her home was a mess and there were ketchup stains in the kitchen and bathroom.

That was the first and only time she used Jensen. But five years later, in 2012, her sons suddenly revealed that while Jensen was babysitting, he had smeared ketchup on his penis and forced them to perform oral sex on him.

“I broke down,” Spring says. “Nothing really prepares you for that.”



SPRING T. HIRED MICHAEL JENSEN TO CARE FOR HER TWO SONS, THEN AGED 3 AND 4. (PHOTO: ZACHARY CALDWELL/VICE NEWS)

Her initial reaction was the same as Helen W's. "I tried to get in touch with the bishop, I really did," Spring says. "But I thank God because he wasn't available."

Her next call was to the West Virginia State Police. "When you look at it from a different viewpoint of it not being a sin and it being a crime, then...I needed to put it in their hands," she says.

State troopers started an investigation, and at their request church officials agreed to bring Jensen, still on his mission in Arizona, back to West Virginia for questioning. But court testimony shows that church leaders in Martinsburg did not alert authorities when Jensen returned. A state trooper also testified that lawyers at Kirton McConkie did not notify him that Jensen was back.

As a result, several families, unaware of the abuse allegations, allowed Jensen to stay at their homes in the months prior to his arrest in mid-2013.

Jensen was convicted that year of sexually abusing Spring's children and is currently serving a prison sentence of 35 years to 75 years in a West Virginia state prison. At the time of his sentencing, a state judge classified him as a "violent sexual predator."

Spring joined the same lawsuit in which Helen was a plaintiff. Another family involved said they later learned that Jensen, while staying in their home after his return from Arizona, had sexually abused two of their sons, who were then 10 and 6. In settling the lawsuit in 2018 for an undisclosed sum, the Mormon Church denied any wrongdoing. Defense lawyers also said that the Church tried to aid the affected

families.

The Church of Latter-day Saints declined interview requests for this story, but sent an email saying it took appropriate action when it learned of the abuse by Michael Jensen. In regards to abuse cases, the church says it takes steps to encourage reporting and, where available, provides counselors to help victims.

Fishel and the Jensen family did not return our calls.

Helen and Spring say that instead of being embraced by fellow congregants for coming forward, they've been ostracized. Some of their former friends insist that Michael Jensen's parents were good Mormons who would never have raised a child molester. Others told Helen and Spring that as Mormons, it was their obligation to forgive him.

The women's faith and families are shattered. Helen and Spring are now separated from their husbands and their children are being treated for trauma.

"It was devastating," Spring says. "We were pushed aside and Michael received the protection of the church."

McChesney, the former FBI official, and Huizar, the child abuse expert, both said that the Mormon Church's lack of transparency and use of defense lawyers to screen abuse reports virtually guarantees that the type of tragedy that occurred in Martinsburg will happen again.

"You can pray for guidance about how to handle sexual abuse," said Huizar. "But you can pray and also report it to public authorities."

A version of this story appeared on VICE News Tonight on HBO on May 2, 2019.

EXHIBIT I

1 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
2 IN AND FOR THE COUNTY OF COCHISE

3 STATE OF ARIZONA,)

GRAND JURY NO. 17- 0132

4 Plaintiff,)

CASE NO. CR2017-)

5 vs.)

CASE NO. CR2017- 00426

6 LEIZZA ADAMS and)
7 PAUL DOUGLAS ADAMS,)

INDICTMENT

8 Defendant(s).)

9 The Grand Jurors of the County of Cochise, in the name of the State of Arizona,
10 and by its authority accuse:

11 LEIZZA ADAMS and
12 PAUL DOUGLAS ADAMS

13 and charge that in Cochise County:

14 Count 1

15 During June, 2015, PAUL DOUGLAS ADAMS lured a minor for sexual exploitation by
16 offering or soliciting sexual conduct with a person he knew was a minor under the age of 15
17 years, to wit: asked Mb.A. if she liked receiving oral sex from him, if she liked his penis or if she
18 liked sex with him, in violation of A.R.S. §§ 13-3554, 13-3551, 13-105, 13-701, 13-702, 13-703,
13-705, and 13-801, a class 3 felony punishable as a dangerous crime against children.

19 Count 2

20 During June, 2015, PAUL DOUGLAS ADAMS intentionally or knowingly engaged in
21 sexual intercourse with a person who was under 15 years of age, to wit: Mb.A. the first time, in
22 violation of A.R.S. §§ 13-1405(A)(B), 13-1401, 13-105, 13-701, 13-702, 13-703, 13-705, and
13-801, a class 2 felony punishable as a dangerous crime against children.

23 Count 3

24 During June, 2015, PAUL DOUGLAS ADAMS intentionally or knowingly engaged in
25 sexual intercourse with a person who was under 15 years of age, to wit: Mb.A. the second time,
in violation of A.R.S. §§ 13-1405(A)(B), 13-1401, 13-105, 13-701, 13-702, 13-703, 13-705, and
13-801, a class 2 felony punishable as a dangerous crime against children.

1 Count 4

2 During June, 2015, **PAUL DOUGLAS ADAMS** molested Mb.A. by intentionally or
3 knowingly engaging in sexual contact Mb.A., who was under fifteen years of age, to wit:
4 touched her vagina with his finger, in violation of A.R.S. §§ 13-1410, 13-1401, 13-105, 13-701,
13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable as a dangerous crime against
5 children.

6 Count 5

7 During June, 2015, **PAUL DOUGLAS ADAMS** molested Mb.A. by intentionally or
8 knowingly engaging in sexual contact Mb.A., who was under fifteen years of age, to wit:
9 touched her vagina with his penis, in violation of A.R.S. §§ 13-1410, 13-1401, 13-105, 13-701,
13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable as a dangerous crime against
10 children.

11 Count 6

12 During August 2016, **PAUL DOUGLAS ADAMS** sexually assaulted Mb.A. by
13 intentionally or knowingly engaging in oral sexual contact with Mb.A., who was under fifteen
14 years of age, when Mb.A was exclaiming “no” and “stop it,” in violation of A.R.S. §§ 13-1406,
13-1401, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable as a
15 dangerous crime against children.

16 Count 7

17 From between March 29, 2015 through February 8, 2017, **PAUL DOUGLAS ADAMS**
18 intentionally or knowingly engaged in oral sexual contact with a person who was under fifteen
19 years of age, to wit: with Ms.A. by placing his penis into Ms.A.’s mouth, in violation of A.R.S.
20 §§ 13-1405(A)(B), 13-1401, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2
21 felony punishable as a dangerous crime against children.

22 Count 8

23 From between March 29, 2015 through February 8, 2017, **PAUL DOUGLAS ADAMS**
24 molested Ms.A. by intentionally or knowingly engaging in sexual contact Ms.A., who was under
25 fifteen years of age, to wit: pressed his penis to Ms.A.s lips, in violation of A.R.S. §§ 13-1410,
13-1401, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable as a
dangerous crime against children.

Count 9

From between March 29, 2015 through February 8, 2017, **PAUL DOUGLAS ADAMS**
molested Ms.A. by intentionally or knowingly engaging in sexual contact Ms.A., who was under
fifteen years of age, to wit: pressed his penis to Ms.A.s lips, in violation of A.R.S. §§ 13-1410,

1 13-1401, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable as a
2 dangerous crime against children.

3 **Count 10**

4 From between March 29, 2015 through February 8, 2017, **PAUL DOUGLAS ADAMS**
5 molested Ms.A. by intentionally or knowingly engaging in sexual contact Ms.A., who was under
6 fifteen years of age, to wit: pressed his penis to Ms.A.'s vagina, in violation of A.R.S. §§ 13-
1410, 13-1401, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable
as a dangerous crime against children.

7 **Count 11**

8 From between March 29, 2015 through February 8, 2017, **PAUL DOUGLAS ADAMS**
9 molested Ms.A. by intentionally or knowingly engaging in sexual contact Ms.A., who was under
10 fifteen years of age, to wit: digitally manipulated Ms.A.'s vagina, in violation of A.R.S. §§ 13-
1410, 13-1401, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable
as a dangerous crime against children.

11 **Count 12**

12 From between March 29, 2015 through February 8, 2017, **PAUL DOUGLAS ADAMS**
13 sexually assaulted Ms.A. by intentionally or knowingly engaging in sexual contact with Ms.A.
14 without her consent, who was under fifteen years of age, in violation of A.R.S. §§ 13-1406, 13-
1401, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable as a
15 dangerous crime against children.

16 **Count 13**

17 On or between 2013 and 2017, **LEIZZA ADAMS**, having the care and custody of Mb.A.
18 and Ms.A, knowingly allowed the person or health of Mb.A. and Ms.A to be endangered, under
19 circumstances other than those likely to produce death or serious injury, in violation of A.R.S. §§
13-3623(B), 13-3601, 13-105, 13-701, 13-702, 13-703, and 13-801, a class 4 felony.

20 **Count 14**

21 From between March 2015 and February 2017, **PAUL DOUGLAS ADAMS** sexually
22 exploited a minor by recording, photographing, or possessing a visual depiction in which a minor
23 is engaged in exploitive exhibition or other sexual conduct, to wit: Mb.A., in violation of A.R.S.
§§ 13-3553, 13-3551, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony
punishable as a dangerous crime against children.

24 **Count 15**

25 During June, 2015, **LEIZZA ADAMS** conspired to lure a minor for sexual exploitation,
and in furtherance of the conspiracy **PAUL DOUGLAS ADAMS** asked Mb.A. if she liked

1 receiving oral sex from him, if she liked his penis or if she liked sex with him, in violation of
2 A.R.S. §§ 13-3554, 13-3551, 13-1003, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a
3 class 3 felony punishable as a dangerous crime against children.

4 **Count 16**

5 During June, 2015, LEIZZA ADAMS conspired with PAUL DOUGLAS ADAMS to
6 engage in sexual intercourse with a person who was under 15 years of age, to wit: Mb.A. the first
7 time, in violation of A.R.S. §§ 13-1405(A)(B), 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-
8 703, 13-705, and 13-801, a class 2 felony punishable as a dangerous crime against children.

9 **Count 17**

10 During June, 2015, LEIZZA ADAMS conspired with PAUL DOUGLAS ADAMS to
11 intentionally or knowingly engage in sexual intercourse with a person who was under 15 years of
12 age, to wit: Mb.A. the second time, in violation of A.R.S. §§ 13-1405(A)(B), 13-1401, 13-105,
13 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony punishable as a dangerous crime
14 against children.

15 **Count 18**

16 During June, 2015, LEIZZA ADAMS conspired with PAUL DOUGLAS ADAMS to
17 molest Mb.A. by intentionally or knowingly engaging in sexual contact Mb.A., who was under
18 fifteen years of age, to wit: touched her vagina with his finger, in violation of A.R.S. §§ 13-1410,
19 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony
20 punishable as a dangerous crime against children.

21 **Count 19**

22 During June, 2015, LEIZZA ADAMS conspired with PAUL DOUGLAS ADAMS to
23 molest Mb.A. by intentionally or knowingly engaging in sexual contact Mb.A., who was under
24 fifteen years of age, to wit: touched her vagina with his penis, in violation of A.R.S. §§ 13-1410,
25 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony
punishable as a dangerous crime against children.

Count 20

During August 2016, LEIZZA ADAMS conspired with PAUL DOUGLAS ADAMS to
sexually assault Mb.A. by intentionally or knowingly engaging in oral sexual contact with
Mb.A., who was under fifteen years of age, when Mb.A. was exclaiming “no” and “stop it,” in
violation of A.R.S. §§ 13-1406, 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-703, 13-705, and
13-801, a class 2 felony punishable as a dangerous crime against children.

1 **Count 21**

2 From between March 29, 2015 through February 8, 2017, LEIZZA ADAMS conspired
3 with PAUL DOUGLAS ADAMS to intentionally or knowingly engage in oral sexual contact
4 with a person who was under fifteen years of age, to wit: with Ms.A. by placing his penis into
5 Ms.A.'s mouth, in violation of A.R.S. §§ 13-1405(A)(B), 13-1401, 13-1003, 13-105, 13-701, 13-
702, 13-703, 13-705, and 13-801, a class 2 felony punishable as a dangerous crime against
6 children.

6 **Count 22**

7 From between March 29, 2015 through February 8, 2017, LEIZZA ADAMS conspired
8 with PAUL DOUGLAS ADAMS to molest Ms.A. by intentionally or knowingly engaging in
9 sexual contact Ms.A., who was under fifteen years of age, to wit: pressed his penis to Ms.A.s
10 lips, in violation of A.R.S. §§ 13-1410, 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-703, 13-
705, and 13-801, a class 2 felony punishable as a dangerous crime against children.

10 **Count 23**

11 From between March 29, 2015 through February 8, 2017, LEIZZA ADAMS conspired
12 with PAUL DOUGLAS ADAMS to molest Ms.A. by intentionally or knowingly engaging in
13 sexual contact Ms.A., who was under fifteen years of age, to wit: pressed his penis to Ms.A.s
14 lips, in violation of A.R.S. §§ 13-1410, 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-703, 13-
705, and 13-801, a class 2 felony punishable as a dangerous crime against children.

15 **Count 24**

16 From between March 29, 2015 through February 8, 2017, LEIZZA ADAMS conspired
17 with PAUL DOUGLAS ADAMS to molest Ms.A. by intentionally or knowingly engaging in
18 sexual contact Ms.A., who was under fifteen years of age, to wit: pressed his penis to Ms.A.'s
19 vagina, in violation of A.R.S. §§ 13-1410, 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-703,
13-705, and 13-801, a class 2 felony punishable as a dangerous crime against children.

19 **Count 25**

20 From between March 29, 2015 through February 8, 2017, LEIZZA ADAMS conspired
21 with PAUL DOUGLAS ADAMS to molest Ms.A. by intentionally or knowingly engaging in
22 sexual contact Ms.A., who was under fifteen years of age, to wit: digitally manipulated Ms.A.'s
23 vagina, in violation of A.R.S. §§ 13-1410, 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-703,
13-705, and 13-801, a class 2 felony punishable as a dangerous crime against children.

24 **Count 26**

25 From between March 29, 2015 through February 8, 2017, LEIZZA ADAMS conspired
with PAUL DOUGLAS ADAMS to sexually assault Ms.A. by intentionally or knowingly
engaging in sexual contact with Ms.A. without her consent, who was under fifteen years of age,

1 in violation of A.R.S. §§ 13-1406, 13-1401, 13-1003, 13-105, 13-701, 13-702, 13-703, 13-705,
2 and 13-801, a class 2 felony punishable as a dangerous crime against children.

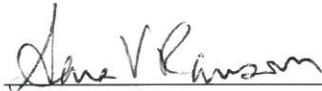
3 **Count 27**



4 From between March 2015 and February 2017, **PAUL DOUGLAS ADAMS** sexually
5 exploited a minor by recording, photographing, or possessing a visual depiction in which a minor
6 is engaged in exploitive exhibition or other sexual conduct, to wit: Ms.A., in violation of A.R.S.
§§ 13-3553, 13-3551, 13-105, 13-701, 13-702, 13-703, 13-705, and 13-801, a class 2 felony
punishable as a dangerous crime against children.

7 DATED this 25th day of May, 2017.

8 COCHISE COUNTY ATTORNEY

9
10 BY:


Sara V. Ransom
Deputy County Attorney



Foreperson of the Grand Jury

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