DECLARATION OF JOHN DEHLIN DATED APRIL 26, 2013

I, JOHN DEHLIN, hereby declare as follows:

1. I am over the age of 18 and am competent to make this declaration.

2. I make this declaration based on personal knowledge and, if called to testify, would testify as follows.

3. I have reviewed the Charge of Discrimination filed by Anne Peffer on February 26, 2013 (the "Complaint").

4. I am providing this declaration to lay foundation for the text messages attached to the Foundation's letter in response to the Complaint (the "Response").

5. I have reviewed all copies of text messages attached to the Foundations' Response and have confirmed that the text messages are accurate copies and were, in fact, received or sent by me.

6. The below copies of text messages, which may also be included as attachments to the Response elsewhere, were also received and/or sent by me on the dates and at the times indicated.

a. On July 24, 2012 Ms. Peffer and I exchanged the following texts:

- 10:14am Anne McMullin Peffer – "Would you make love to me? (long pause) At least that's proof to whomever reads this that we've never had sex."
- 10:15am John Dehlin "I don't think so. I think that would break us both. I really do."
- 10:16am Anne McMullin Peffer "I don't think I want to be with a man who toys with me and doesn't make love to me."
- 10:16am John Dehlin "I know! Thus the continual, "Run away!"
- 10:17am Anne McMullin Peffer "Make love to me."
- 10:18am John Dehlin "hahaha. Lol."

- 10:18am Anne McMullin Peffer "I'm not joking."
- 10:19am John Dehlin "I won't make love to you because I love you. It would hurt you. I swear it."
- 5:15pm John Dehlin "I'm 100% sure that the best thing for you to do in your life is to never have anything to do with me again. 100%. And yet you won't leave, and I can't go. So you're choosing this. And then resenting me for it. You're holding us in a double bind, by choice. And blaming me. When you are sad. OSF is nice. But nothing matters for you and your family if you're sad, broken and/or dead. You accused me earlier of being the martyr. You may want to look at yourself with those same lenses.
- 5:58p John Dehlin "P.S. I could accuse you of toying with me...for refusing to leave...but continually accusing me of harming you and your family. Or for telling me to not text or write you about non-work stuff, and the have you text me about work stuff, or to send me photos or messages of caring. I'm not complaining, because I love you, and I love hearing from you. And I don't blame you. But it hurts when you blame me for stuff."
- 6:11pm Anne McMullin Peffer "I wish that what I was saying made sense. It would have been better over the phone. I'm sorry that it feels like blaming. I'm sorry for the layer of blaming that is part of it. I'm sorry for toying with you.

b. On July 25, 2012, Ms. Peffer sent me the following text message.

- 10:34pm Anne McMullin Peffer "What's terrible is that I'm lonely and sad all the time and I don't want to be lonely and sad anymore. I want to be happy. I want all the things that everybody wants: a relationship and a little house and a love baby and a productive career. and what i have isn't that. it's a tense space to live in and three loving kids. but John.... you're not the right one to talk to. But who is? I reached out to [redacted] actually. Wanted to talk to him about divorce, etc..... but I'm worried that I'll just end up listening. anyway.... I know you need to go to bed. I'll scram, too."

c. On August 3rd, 2012, Ms. Peffer and I exchanged the following text messages.

- 7:56pm Anne McMullin Peffer "i guess there's not much to say. I can't seem to be okay having sex with anyone besides you, adn I can't have sex with you, so I figure the best route forward is to just let it go and focus on other things. pretty pathetic. but lots of people get by, right? All those gay Mormon believers? Lots of single mormon women?"
- 8:06pm Anne McMullin Peffer "I just wish I could have sex. Then i'd be okay. But I'm broken now. I just can't. It's been this way for over a year."
- 8:06pm John Dehlin "With [redacted] or anyone?"

- 8:06pm Anne McMullin Peffer "It's not going to change. well.... i haven't exactly tried with anyone else..... but i don't feel attraction in the same way I used to."

d. On August 5, 2012, Ms. Peffer and I exchanged the following text messages.

- Anne +1617[redacted] "I hate how happy you make me." 10:19 AM
- Me: "We need to have a talk. Let me know when you can. I want to explore something." 10:20 AM
- Me: And it has nothing to do with you being a mistress. I will never ask that of you. Ever." 10:21 AM
- +1617[redacted] Lol. Kk. I have 90 min until I have to pick up [redacted] from dance. 10:22 AM

e. On August 6, 2012, Ms. Peffer and I exchanged to following text messages.

- Me: I'm not coming to San Fran because I don't want to hurt you or others. Plain and simple. I hope you can see that. And that I'm not trying to take advantage. 12:52 PM
- +1617[redacted] Absolutely. Ur fine. It's for the best. 12:59 PM

f. On August 9, 2012, Ms. Peffer and I exchanged the following text messages.

- Anne +1617[redacted] Yeah.... we seem to need each other. Glad I've helped in some way. Am wondering where this crazy life will take us (or me at least). 1:09 PM
- Me: Day by day is all we have. :(1:11 PM
- Anne +1617[redacted] I'm just happy that someone I need needs me too. 1:12 PM
- Me: It's so crucial that we don't skype or be in the same city. I think we'd crack. 1:56 PM
- Anne +1617[redacted] I guess that means I shouldn't tell you what I'm wearing..... 1:58 PM
- Anne +1617[redacted] Just kidding. 1:58 PM
- Anne +1617[redacted] (mean joke) 1:58 PM
- Me: Yes. Terribly sad. Agreed. Walking. No skype. Never in the same city unless chaperoned. Agreed. Agreed. 2:04 PM
- Anne +1617[redacted] I just love you. 2:10 PM
- Anne +1617[redacted] I would make some very very nice love to you. 2:20 PM
- Anne +1617[redacted] It's hard to not seduce you. You should give me lots of credit here. 2:29 PM

- Anne +1617[redacted] Ooooo..... but what if I want you to seduce me? 2:31 PM
- Anne +1617[redacted] I think I know what you need right now. Yup. I could do that so enjoyably. 2:40 PM
- Anne +1617[redacted] We need each other. Plain and simple. 3:13 PM
- Me: I want to be clear about something. This isn't because you said something that hurt my feelings today. It is because I've believed for over a year that working together would hurt you, me, and our families. And it has. 8:31 PM
- Me: It's been beautiful, and harmful. And it's harming me now. And I believe it's harming you and our families now. And I really, sincerely want/need us to stop working together. 8:32 PM
- Me: I hope you can understand. It's not because I'm ungrateful for all you've done. 8:32 PM
- Me: It's because this is hurting me. And I believe it's hurting us. And definitely our families. Please, please go. Please don't make me keep asking. Please just go this time. For good. Please. 8:33 PM

g. On August 11, 2012, Ms. Peffer and I exchanged the following text messages.

- Anne +1617[redacted] Joanna will talk to you. 2 things: 1) you never contact me or me you, 2) I help with transition out and then go away. 10:39 PM
- Anne +1617[redacted] So maybe one last phone conversation if you want. Otherwise, that's it. 10:40 PM+1617[redacted] She will call to talk to you. 10:42 PM
- Me: Is that your decision or hers? 10:43 PM
- Anne +1617[redacted] Will explain everything. But only if I can talk. Don't want to text it. 10:44 PM

h. On August 26, 2012, Ms. Peffer sent me the following text messages.

- Anne +1617[redacted] Hi. Sorry about Joanna. Luckily, as we were equals (I'm on board, we're both on governance committee as per operational docs and the executive director 6:31 AM
- Anne +1617[redacted] position was not defined at last ratification), you are very free and clear. 6:31 AM
- Anne +1617[redacted] Her actions, according to [redacted] are outside the appropriate way to handle the situation. 6:31 AM
- Anne +1617[redacted] What she has given in writing demonstrates this. 6:32 AM
- Anne +1617[redacted] But please don't challenge her. 6:32 AM

- Anne +1617[redacted] If you can, please at least make me an author on Mormon Stories so I can help NYC so that the drama doesn't make it directly to Richard Bushman. 6:33 AM
- Anne +1617[redacted] As Joanna doesnt seem to understand smooth transition in this circumstance, I will transition than resign. 6:34 AM
- Anne +1617[redacted] She dies not have legal authority to stop us from working so I will start up business again and then taper off. 6:35 AM
- Anne +1617[redacted] According to her deceleration that she will fire us or resign, my guess is that she will resign. 6:35 AM
- Anne +1617[redacted] Does not have standing to fire us and that would look like huge power grab. 6:36 AM
- Anne +1617[redacted] *declaration. 6:36 AM
- Anne +1617[redacted]: My belief is that Joanna resigning from OSF would be positive. 6:37 AM
- Anne +1617[redacted] I will work to maintain positive relationship with her. 6:37 AM
- Anne +1617[redacted] So: please give me MS access to allow me to help NYC and other committees that have expectations. 6:38 AM
- Anne +1617[redacted] Also, I will make Facebook group requests late tonight. Please add me back and make me an admin in the main group. No need to make me an admin in all the 6:40 AM
- Anne +1617[redacted] regions. Doesn't matter. Would draw attention. 6:40 AM
- Anne +1617[redacted] I will remove my own admin after transition. 6:40 AM
- Anne +1617[redacted] Thanks. 6:40 AM
- Anne +1617[redacted] he actions. She quickly jumped to many conclusions. 6:59 AM
- Anne +1617[redacted] And FWIW, she didn't do a thorough investigation. The negative behaviors I texted her about were [redacted]s, not yours. There was not a name attached with t 6:59 AM
- Anne +1617[redacted] [redacted]did not have enough info to know better. He's cool. 6:59 AM
- Anne +1617[redacted] Actually, I'm just really messed up. I don't know up from down. Just Confused. Disregard everything I say. Ignore. Won't send anymore. Will step out of p 1:50 PM
- Anne +1617[redacted] roblem solving mode and let the chips fall. 1:50 PM

i. On October 9, 2012, Ms. Peffer sent me the following text messages.

- Anne +1617[redacted] I want you to know that nothing I have done has been in an effort to attack you. Nor have I participated in anything that may have hurt you beyond what I 6:07 AM
- Anne +1617[redacted] did to protect myself at home with an [redacted]husband and to protect the people who count on CTW. 6:07 AM
- Anne +1617[redacted] I don't know if you have enemies or not, but if you do, I am not one of them. 6:07 AM
- Anne +1617[redacted] Oh... and to be thorough. I've done what I could to protect myself from my fear of your attacks now and in the future. 6:11 AM
- Anne +1617[redacted] Be well John... and good luck with your life. 6:11 AM

j. On December 27, 2012, Ms. Peffer sent me the following text messages.

- Anne +1617[redacted] John, please send me my files. I need them right away. 7:18 PM
- Anne +1617[redacted] I have been patient out of respect for you and your family. 7:24 PM
- Anne +1617[redacted] I have waited long enough. 7:25 PM
- Anne +1617[redacted] Please have enough respect for me to send me my files and unban me from my community. 7:26 PM
- Anne +1617[redacted] It is December. It is time for this to end. 7:26 PM
- Anne +1617[redacted] Regardless of all the constraints you may or may not be facing, I deserve to be treated with respect. 7:27 PM
- Anne +1617[redacted] Stop this nonsense. It is not justified. Those who might say it is lack information. 7:29 PM
- Anne +1617[redacted] C'mon John. Just get this over with. 8:11 PM
- Anne +1617[redacted] What is it? It makes no sense to drag this out by holding things over my head. 9:12 PM
- Anne +1617[redacted] Did you make a plea bargain with your SP to be disfellowshipped? 9:13 PM
- Anne +1617[redacted] With Margi for your marriage? 9:13 PM
- Anne +1617[redacted] Do they know that I'm being punished for your benefit? 9:14 PM
- Anne +1617[redacted] Is that what they want? 9:14 PM
- Anne +1617[redacted] Is that what you want? 9:14 PM

- Anne +1617[redacted] Is this your way of winning? 9:15 PM
- Anne +1617[redacted] I just want my files and my community. 9:15 PM
- Anne +1617[redacted] There is no reason to act vindictively. 9:15 PM
- Anne +1617[redacted] Or is there? 9:15 PM
- Anne +1617[redacted] What would the reason be? 9:16 PM
- Anne +1617[redacted] Just give me my stuff and let this go. 9:16 PM
- Anne +1617[redacted] Put it behind you. 9:17 PM
- Anne +1617[redacted] What happens to you if you answer me? 9:17 PM
- Anne +1617[redacted] What do you lose? 9:17 PM
- Anne +1617[redacted] Is someone threatening you? 9:17 PM
- Anne +1617[redacted] Do you get excommunicated? 9:17 PM
- Anne +1617[redacted] Do you lose your kids? 9:18 PM
- Anne +1617[redacted] Do you ever question how reasonable this is? 9:18 PM
- Anne +1617[redacted] Do you turn green and purple striped? 9:18 PM
- Anne +1617[redacted] Sigh. This is so ridiculous. 9:21 PM
- Anne +1617[redacted] Adults figure out how to work within normal, healthy boundaries every day. 9:23 PM
- Anne +1617[redacted] They move on. 9:23 PM
- Anne +1617[redacted] This is only a big deal because someone is making it a big deal. 9:26 PM
- Anne +1617[redacted] It doesn't need to be. 9:26 PM
- Anne +1617[redacted] Put a few files in a Dropbox folder and share it with me. 9:27 PM
- Anne +1617[redacted] I'll be a hell of a lot more cool with this treatment of me if I find out it was Margi's idea. 9:30 PM
- Anne +1617[redacted] If it was your SP, I'm pissed. 9:31 PM
- Anne +1617[redacted] Straight white men in authority treat women like cattle. 9:31 PM
- Anne +1617[redacted] Something to be bought, sold and dispensed of. 9:31 PM
- Anne +1617[redacted] If this is you, you're sure making life miserable for yourself. 9:32 PM
- Anne +1617[redacted] Give me my stuff. 9:32 PM
- Anne +1617[redacted] I'm a person. 9:32 PM

- Anne +1617[redacted] Not a cow. 9:32 PM
- Anne +1617[redacted] Okay, since I'm enjoying my monologue..... I'd like to remind you of what I said in my email when I asked you never to speak to me again. 9:36 PM
- Anne +1617[redacted] First I said: 9:37 PM
- Anne +1617[redacted] "Make things right" 9:37 PM
- Anne +1617[redacted] Then: 9:37 PM
- Anne +1617[redacted] "Never speak to me again" 9:37 PM
- Anne +1617[redacted] You still haven't made things right. 9:38 PM
- Anne +1617[redacted] You're still holding things over my head. 9:38 PM
- Anne +1617[redacted] This has been a long, drawn out battle without a purpose. 9:39 PM
- Anne +1617[redacted] Who fights like this? 9:39 PM
- Anne +1617[redacted] It's bizarre: full of threats, ultimatums, options.... weird. 9:40 PM
- Anne +1617[redacted] I think that you'll grow antlers if you answer me. 9:40 PM
- Anne +1617[redacted] Or if you give me my files. 9:40 PM
- Anne +1617[redacted] That explains everything. 9:41 PM
- Anne +1617[redacted] You can't just get rid of me even though you don't want me texting you because if you just give me my files you'll grow antlers. 9:41 PM
- Anne +1617[redacted] I knew it!!! 9:42 PM
- Anne +1617[redacted] How could I be so dumb? 9:42 PM
- Anne +1617[redacted] Let's see..... who wins by holding things over my head? 9:50 PM
- Anne +1617[redacted] You? 9:50 PM
- Anne +1617[redacted] What do you gain? 9:50 PM
- Anne +1617[redacted] Control over me? 9:50 PM
- Anne +1617[redacted] A chance to hurt me? 9:50 PM
- Anne +1617[redacted] A chance to show me who the boss is? 9:51 PM
- Anne +1617[redacted] Margi? 9:51 PM
- Anne +1617[redacted] A chance to hurt the woman who hurt her? 9:51 PM
- Anne +1617[redacted] Revenge? 9:51 PM

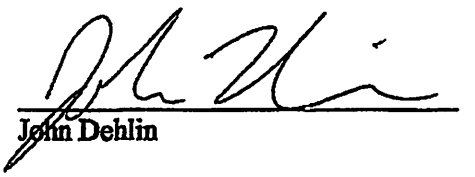
- Anne +1617[redacted] Your SP wouldn't gain much because he wouldn't give me a second Anne thought. 9:52 PM
- Anne +1617[redacted] I'd just be another thing to him. 9:52 PM
- Anne +1617[redacted] Until someone pointed out his mistake. 9:52 PM
- Anne +1617[redacted] Then he might remember to take notice. 9:53 PM
- Anne +1617[redacted] Just give me the damn files and unban me so that I can quit texting you. 9:54 PM
- Anne +1617[redacted] Yes, I'm swearing now. 9:54 PM
- Anne +1617[redacted] Shoot me. 9:54 PM
- Anne +1617[redacted] But you can't shoot me because that would be recognizing my existence and would change the color of your skin. 9:55 PM
- Anne +1617[redacted] Why put yourself in a pickle like this? 9:59 PM
- Anne +1617[redacted] Why not just be reasonable and fair? 9:59 PM
- Anne +1617[redacted] I think I've demonstrated that I'm capable of being easy to work with. 10:00 PM
- Anne +1617[redacted] Why make this so difficult? 10:00 PM
- Anne +1617[redacted] Antlers, marriage, kids, church membership? 10:01 PM
- Anne +1617[redacted] Life, liberty and the pursuit of happiness? 10:01 PM
- Anne +1617[redacted] Wellllll..... whatever this craziness is, it doesn't seem like those last few. 10:02 PM
- Anne +1617[redacted] Honestly..... I don't get it. 10:02 PM
- Anne +1617[redacted] You pretend you want a clean break while you simultaneously hold things over my head and feign innocence. 10:03 PM
- Anne +1617[redacted] Then you get people to discipline me for not maintaining the clean break while in reality you know I'd be more than happy to achieve a clean break. 10:04 PM
- Anne +1617[redacted] A break that isn't offensive and doesn't cross my boundaries. 10:05 PM
- Anne +1617[redacted] But that's not even on the table because my needs aren't part of the equation. 10:05 PM
- Anne +1617[redacted] Well..... I need my files and my community. 10:06 PM
- Anne +1617[redacted] Do whatever you'd like with your life, but don't mess with mine. 10:06 PM

- Anne +1617[redacted] Most people who know me well learn that I'm not someone to be afraid of..... I'm generally trustworthy, but I'm not someone to be messed with either. 10:07 PM
- Anne +1617[redacted] I can take care of myself. 10:08 PM
- Anne +1617[redacted] Now, I can see why Margi wouldn't trust me. 10:08 PM
- Anne +1617[redacted] She shouldn't. 10:08 PM
- Anne +1617[redacted] I've tried to show her as much respect as possible and give her space to not trust me. 10:09 PM
- Anne +1617[redacted] She deserves that. 10:09 PM
- Anne +1617[redacted] I hurt her horribly. 10:09 PM
- Anne +1617[redacted] And in very sorry. 10:09 PM
- Anne +1617[redacted] But it's time for me to move out of the mode of giving her space because I'm a person, too. 10:10 PM
- Anne +1617[redacted] I want my stuff. 10:10 PM
- Anne +1617[redacted] It's time for me to stand up for myself. 10:11 PM
- Anne +1617[redacted] I'm never coming after her husband. I'm done. I just want my stuff and I want to be left alone. 10:12 PM
- Anne +1617[redacted] But I can't do that because I'm dependent on you to allow it to happen. 10:12 PM
- Anne +1617[redacted] So here I am *enjoying* a monologue. 10:13 PM
- Anne +1617[redacted] Maybe tomorrow I'll talk about the weather. 10:14 PM
- Anne +1617[redacted] There's lots of snow here. 10:14 PM
- Anne +1617[redacted] Very heavy. 10:14 PM
- Anne +1617[redacted] But one can make heavy things light through forgiveness, setting things right and moving on. 10:15 PM
- Anne +1617[redacted] That's the beauty of life. 10:15 PM
- Anne +1617[redacted] G'night. 10:15 PM

7. While I have not copied all of the text messages between Ms. Peffer and myself (of which there are many), I believe the above text messages clearly reveal (i) that Ms. Peffer was not a victim of sexual harassment, (ii) that Ms. Peffer is only concerned with regaining access to Facebook groups, which groups I own and control—not the Foundation.

I declare state and certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 26th day of April 2013.



John Dehlin