

EXHIBIT B
Van Komen
Declaration

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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

THE CORPORATION OF THE
PRESIDENT OF THE CHURCH OF
JESUS CHRIST OF LATTER-DAY
SAINTS, a Utah corporation; LDS
FAMILY SERVICES

Plaintiffs

v.

RJ and MM, individuals

Defendants.

**DECLARATION OF ROGER VAN
KOMEN**

Civil No.

The Honorable

I, Roger Van Komen, declare and state as follows:

1. I am a manager at LDS Family Services, and have institutional and personal knowledge of the facts set forth below.

2. LDS Family Services, formerly known as LDS Social Services, is a corporation organized under Utah law and headquartered in Salt Lake City, Utah. LDS Social Services operated and administered a program called the Indian Student Placement Program (the "ISPP").

3. I am familiar with the ISPP and how that program was administered in the 1970s and 1980s.

4. Tribal members who wished to participate in the ISPP did so voluntarily with the agreement of their families. LDS Social Services maintained an office in Cedar City, Utah with regional responsibility for the ISPP, including working with members of the Navajo Nation. Decisions regarding the placement of Navajo tribal members from the part of the reservation where RJ and MM lived were made by LDS Social Services employees operating from their offices in Cedar City and Salt Lake City with input from the ecclesiastical leaders of the host families where the tribal members were placed.

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

DATED this 27TH day of May, 2016.

A handwritten signature in blue ink, appearing to read "Benjamin", written over a horizontal line.