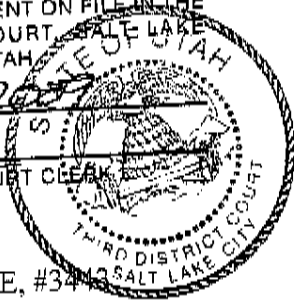


I CERTIFY THAT THIS IS A TRUE COPY OF AN ORIGINAL DOCUMENT ON FILE IN THE THIRD DISTRICT COURT, SALT LAKE COUNTY, STATE OF UTAH.

DATE: 06-04-2007

DEPUTY COURT CLERK



FILED  
DISTRICT COURT  
03 MAY -7 AM 8:59

COURT CLERK DEPARTMENT  
BY: *[Signature]*  
DEPUTY CLERK

DOUGLAS F. WHITE, #34143  
Attorney for Petitioner  
3282 So. Sunset Hollow Drive  
Bountiful, Utah 84010  
Telephone: (435) 843-9399  
FAX: (435) 843-9399

**IN THE THIRD JUDICIAL DISTRICT COURT  
SALT LAKE COUNTY, STATE OF UTAH**

CAROLYN JESSOP,  
Petitioner,

vs.

FREDRICK MERRIL JESSOP,  
Respondent.

**COMPLAINT TO ESTABLISH  
PATERNITY**

Civil No. 034902839 PA  
Judge: Iwasaki / Evans

COMES NOW, Carolyn Jessop, by and through her attorney, Douglas F. White, and alleges the following:

1. That the Petitioner is a resident of Salt Lake County, State of Utah.
2. That the Respondent is a resident of Colorado City, Mohave County, State of Arizona.
3. That the Petitioner, Carolyn Jessop, is the natural mother of the following minor children:
  - (a) Arthur Jessop, born December 20, 1987, age 15
  - (b) Betty Jessop, born July 24, 1989, age 13
  - (c) LuAnne Jessop, born July 24, 1991, age 11
  - (d) Patrick Jessop, born July 6, 1993, age 9

- (e) Andrew Jessop, born July 14, 1995, age 7
- (f) Merrilee Jessop, born June 17, 1997, age 5
- (g) Harrison Jessop, born May 17, 1999, age 3
- (h) Bryson Jessop, born September 18, 2001, age 1

4. That the Respondent, Fredrick Merrill Jessop, is the natural father of all of the minor children set forth above.

5. That the Petitioner and Respondent were not married to each other at the time of conception or birth of said minor children. Further, the parties have no intention of entering into marriage with one another at this time. Petitioner and Respondent were purportedly married to each other in an illegal polygamist relationship, beginning on May 17, 1986. They have had a total of eight (8) children together. Petitioner is the fourth purported wife of the Respondent's seven purported wives.

6. That there has been no order of the Court establishing the paternity of said minor children, although the Respondent, Fredrick Merrill Jessop, has publically acknowledged paternity of each of the children set forth herein.

7. That the Petitioner requests that there be a judicial determination of the relationship of the minor children to the Respondent; and as such, she is requesting the Court to establish paternity.

8. That once paternity is established, Petitioner, Carolyn Jessop, the natural mother, is to be awarded the sole custody, care and control of the minor children.

9. That once paternity is established, Respondent, Fredrick Merrill Jessop, should pay the monthly child support amounts, based upon the state guidelines, until the children reach the age teen (18) years or graduate from high school, whichever comes later, or are otherwise

emancipated and one-half (1/2) of any work related day care expenses. Said amounts to be determined by the Court. Further, should the Respondent become thirty (30) or more days delinquent in his child support payments, that the Court issue a withhold and deliver order pursuant to Section 62A-11-401, U.C.A..

10. That once paternity is established, Respondent, Fredrick Merrill Jessop, should be awarded visitation with the minor children as set forth in Section 30-3-35 et.al., U.C.A., and as modified according to the facts and circumstances of this particular case.

11. That both of the parties are responsible for providing health, accident, dental, orthodontic and ocular insurance for the benefit of the minor children, where available at their places of employment, if they are employed. Further, that both parties will pay one-half (1/2) of any medical, dental, orthodontic or ocular expenses, including deductibles, that are not covered by the insurance.

12. That the Respondent, Fredrick Merrill Jessop, is responsible for providing life insurance upon his person for at least \$20,000.00 for each of the minor children, and name the minor children as the beneficiary thereon.

13. That the Court order that the Petitioner is entitled to an equitable portion of all assets of real property and personal property acquired during their meretricious relationship.

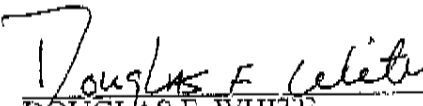
14. That the Respondent, Fredrick Merrill Jessop, be responsible for paying Petitioner's attorney's fees and costs of court incurred herein.

WHEREFORE, Petitioner prays for judgment against the Respondent as follows:

1. That the Court determine paternity so that a relationship between the Respondent and the children may be established pursuant to the allegations set forth herein.

2. That the Court grant whatever further relief deemed to be necessary under the premises.

DATED this 6 day of May, 2003.

  
\_\_\_\_\_  
DOUGLAS F. WHITE  
Attorney for Petitioner