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Attorneys for Plaintiffs

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

OPEN STORIES FOUNDATION, an
Arizona liability company; and JOHN
DEHLIN, an individual;

Plaintiff,

v.

JENNIFER KAMP, an individual; and DOES
1-10;

Defendants.

COMPLAINT

Case No.: 230900882

Judge: Robert Faust

Tier 2

Plaintiffs Open Stories Foundation (“OSF”) and John Dehlin hereby complain against
Defendant Jennifer Kamp and DOES 1-10 as set forth below.

NATURE OF THE CASE

1. This case arises from OSF's disgruntled former employee, Defendant Jennifer Kamp, for knowingly and maliciously publishing verifiably false and defamatory statements about OSF and its Executive Director, John Dehlin, and making false claims against them.

2. Kamp made these false claims against OSF and Dehlin out of anger in response to being terminated with cause and in an effort to extort funds from OSF. When OSF refused to succumb to blackmail—because the claims were baseless—she lashed out and knowingly posted false and defamatory information about OSF and Dehlin on two YouTube Channels and, on information and belief, published false and defamatory information about OSF and Dehlin to third-parties.

3. OSF and Dehlin seek injunctive relief and damages for Kamp's defamation and tortious interference with its operations.

PARTIES, JURISDICTION, AND VENUE

4. Plaintiff OSF is an Arizona corporation with its principal place of business in Holladay, Utah.

5. Plaintiff John Dehlin is an individual who resides in Salt Lake County, Utah.

6. Defendant Jennifer Kamp is an individual who, upon information and belief, resides in Salt Lake County, Utah.

7. DOES 1-10 are individuals or entities whose identities are not yet known who acted in concert with or who otherwise assisted, abetted, or benefited from Kamp's wrongful conduct.

8. This Court has subject matter jurisdiction under Utah Code § 78A-5-102(1).

9. This Court has personal jurisdiction over the named defendant as Kamp resides in Utah, has engaged in business within the State of Utah, made misrepresentations in Utah, and/or caused harm to Plaintiffs located in Utah.

10. Venue is proper in this Court pursuant to Utah Code § 78B-3-307(1) and § 78B-3-307(3).

11. Because the alleged damages and amount in controversy is greater than \$50,000 but less than \$300,000, this is a Tier 2 action pursuant to Rule 26(c)(3) of the Utah Rules of Civil Procedure.

GENERAL ALLEGATIONS

A. Kamp Begins Working for OSF

12. In January 2022, OSF hired Kamp as Director of Operations.

13. In the Director of Operations position, Kamp's duties included: a) planning and managing events, b) basic office duties such as collecting mail from the post office, paying bills, depositing donation checks, and managing OSF payroll, along with c) various podcast production responsibilities including occasional audio engineering, helping with video lighting, managing OSF's content management process, and helping with research and writing related to upcoming guests and episodes.

14. Although Kamp lacked most of the skills she was hired to perform, she presented as a long-time listener and fan of Mormon Stories and expressed a willingness to learn. She was eager to assume additional responsibilities.

15. It was important to OSF that the person occupying the Director of Operations position be available to come into the office during work hours as needed by the Executive Director.

16. Kamp assured the OSF Board that she lived within twenty minutes of the OSF office and would be available as needed to come into the office during work hours.

17. In spite of her lack of skills or experience in a non-profit Director of Operations role, OSF hired Kamp at a higher hourly wage than she was making in her previous job. After two months in her position, Kamp was earning over \$60,000 annually with minimal prior experience relative to her position.

18. Shortly after hiring Kamp, Dehlin and the Board decided to no longer host events, relieving Kamp of one of her primary duties.

19. Dehlin and the Board also subsequently decided to develop additional podcast co-hosts in addition to Carah Burrell, Gerardo Sumano, John Larsen, and Margi Dehlin. Kamp expressed a very strong interest in becoming a co-host of Mormon Stories Podcast.

20. Even though Kamp lacked any podcasting experience, OSF was open to allowing her to co-host so long as it did not interfere with her other duties as Director of Operations.

21. Kamp eagerly agreed to co-host, and thereafter served as a semi-regular co-host of Mormon Stories Podcast.

B. Performance Issues

22. Almost immediately after starting with OSF, and especially after she began co-hosting, there were problems with Kamp's performance in the Director of Operations role. For example, Kamp struggled with payroll, overpaying herself and/or miscalculating hours; failed to

renew the OSF Directors and Officers insurance in a timely manner, causing the Board insurance to lapse; and continually failed to meet expectations pertaining to podcast production.

23. When Carah Burrell amicably departed OSF in April 2022, Kamp expressed a strong desire to assume all of Ms. Burrell's remaining responsibilities—which included oversight of OSF's video shorts program (e.g., TikTok and Instagram) and the management of OSF's social media assets—in addition to her existing duties.

24. Although OSF expressed concern that Kamp would not be able to complete all of her duties, Kamp insisted that she take over Ms. Burrell's responsibilities as well.

25. OSF eventually agreed upon the condition that Kamp never work more than 40 hours per week. If she could not complete her duties in 40 hours, OSF directed her on multiple occasions in writing to notify Dehlin and they would arrange for someone else to complete those tasks.

26. Kamp agreed.

27. But her job performance and work suffered, and she began acting increasingly entitled.

28. In a matter of a few months, she asked for three raises, inappropriately referencing the confidential payroll information entrusted to her as leverage.

29. OSF agreed to two of Kamp's requests, but declined a third request. By the end of Kamp's time with OSF she was earning around \$80,000/year in salary, with the potential for an annual performance bonus. In June 2022, because of the unceasing compensation-related drama Kamp caused OSF, the OSF Board decided to relieve Kamp of her payroll duties.

30. Kamp displayed excessive and unprofessional anger in response to this decision, yelling and crying at Dehlin. This inappropriate behavior was reported at the time to the Board by Dehlin.

31. Kamp also began to shirk off her primary work duties. For example, there were continual podcast production errors and Kamp significantly mismanaged the “shorts”/social media aspects of her position.

32. During this period Kamp also asked for permission to work from home two days a week so that she could attend a life coaching class. She apparently planned on launching an independent life coaching practice and multiple webinars in addition to her job at OSF even though she was struggling to adequately complete her responsibilities for OSF and complaining about over-work/exhaustion.

33. As Fridays were already designated as “work from home days,” Kamp’s request to work from home two additional days left her working away from the office more days than not, which increasingly impacted her job performance in a negative way.

34. OSF was flexible in response to each of Kamp’s requests to either take on more responsibility or to develop additional personal business pursuits outside of her OSF duties, but advised Kamp that it still expected her to be available to complete her job duties during work hours, and to meet in-person at the OSF office as needed.

35. Over time, Kamp was rarely in the office outside of her podcast co-hosting duties and had difficulty completing important assignments in the manner fitting of her position and compensation level.

36. And it became less and less clear how Kamp was occupying the 40 hours per week for which she was being paid. OSF expressed this concern to her.

37. When Kamp was asked about her work performance issues, she would become defensive or re-direct blame to someone else. She refused to accept even minor constructive criticism.

38. Kamp also had difficulty getting along with several staff members, showing a tendency to hold grudges at the slightest perceived offense, and refusing to work with certain strategic staff members.

39. Kamp became possessive of her role as Mormon Stories Podcast co-host. In one instance, when Dehlin chose another person to co-host a few episodes, Kamp yelled and cried at Dehlin, telling him that every time he used a different co-host than Kamp he was “taking money out of [her] pocket.” She also insisted that she was superior to other longstanding female co-hosts, in spite of listener feedback to the contrary.

40. Kamp even tried to impose upon Dehlin a quota for how many times per month she required him to allow her to co-host the podcast. This left Dehlin feeling like Kamp’s desire for additional compensation and her own personal ambitions too often came at the expense of the well-being of OSF.

41. Over time, it became apparent that Kamp had insufficient desire to perform the job for which she had been hired (Director of Operations), and instead wanted to host her own podcast (either with OSF or independently). Kamp seemed most interested in starting her own coaching business, using her position with OSF as a way to gain skills and contacts for her private business pursuits, as well as a way to market her private business interests, in a way that was often detrimental to OSF.

42. In late June 2022, Kamp became fixated on the idea of lead-hosting a panel about abortion, apparently secretly harboring the belief that this podcast episode would help launch her podcasting career.

43. As Kamp had no experience either lead-hosting podcasts or moderating podcast panels, Dehlin suggested a trusted colleague to co-host with Kamp. In response to Dehlin's suggestion, Kamp exploded, accusing Dehlin of trying to "steal her idea," and refusing to work with the other, experienced co-host.

44. OSF eventually allowed Kamp to record the podcast—the Women's Voices Panel—on July 22, 2022, at great expense to OSF.

45. Kamp decided to use this opportunity—what she thought would be her breakout podcast—to disclose specific personal details about abuse with an LDS/Mormon church context that she had mentioned during at least one earlier published podcast, and to announce that further details of her abuse would be disclosed on an upcoming podcast that she had already scheduled to air on the same day that she planned to launch her life coaching business.

46. After the July 22 podcast was recorded, however, there were multiple concerns about the quality of the podcast voiced by multiple OSF staff members, and it was not aired.

47. Kamp was undeterred by OSF's decision not to air the July 22 podcast and continued to suggest dates for it to be broadcast.

48. On July 27, 2022, Dehlin wrote to Kamp about her job performance, stating that she needed to be "coming to the office regularly" and that they needed to work on getting the publishing process running more smoothly.

49. Kamp initially deflected blame and criticized Dehlin for her failures, but eventually agreed that she would start coming into work Monday through Thursday.

C. August 25 Meeting

50. When her availability, performance, and attitude did not improve, on Thursday, August 25, 2022, Dehlin asked Kamp to meet him at the OSF office to, among other items, talk about an employee Kamp had expressed a desire to terminate, whom Kamp had been managing as Director of Operations.

51. When Kamp seemed reluctant to come into the office, Dehlin gave her the option of meeting remotely, but suggested that they could have a more productive conversation if it was in person.

52. He also indicated that he wanted to check in with her about her responsibilities as both Director of Operations and co-host, and about her availability to meet the requirements of these positions.

53. Kamp agreed to come in.

54. When she arrived, however, Kamp excoriated Dehlin, questioning his decision to ask her to come into the office, and demanding that he give her 24-hours notice before requesting that she come to the office (during work hours).

55. She cried, yelled, and acted in a wholly unprofessional manner that would have justified Dehlin terminating her on the spot for insubordination.

56. Dehlin tried, repeatedly, to de-escalate the conversation to no avail.

57. When it became apparent that nothing productive would come from this meeting, Dehlin ended it.

58. As Kamp left the OSF office, she informed Dehlin that she had secretly recorded the meeting. Dehlin viewed Kamp's actions as threatening, unprofessional, and a significant breach of trust.

59. Dehlin and Kamp each, independently, contacted the Board that evening to complain about the other's conduct during the August 25 Meeting.

D. The Board Meeting

60. In response, the Board convened a meeting on August 30, 2022, with both Dehlin and Kamp present.

61. Prior to that meeting, Dehlin indicated to members of the Board, as he had previously, that he thought they needed to restructure the Director of Operations position because of Kamp's ongoing performance concerns.

62. The Board gave Kamp the option of having the meeting without Dehlin, but suggested it would be more productive to have them both present so each of them could hear the other's perspective.

63. Kamp agreed to proceed with Dehlin on the Zoom call and each was given an opportunity to present their version of what occurred during the August 25 meeting.

64. Kamp spoke for more than two-thirds of the nearly 2-hour meeting.

65. Kamp falsely claimed to the Board that during the August 25 meeting Dehlin: a) threatened her job if she did not appear in person, b) yelled at her, and c) physically threatened her to the point that she felt unsafe.

66. Dehlin apologized for acting childish during the meeting, but was adamant that he had not threatened Kamp physically or otherwise.

67. Kamp acknowledged in the Board Meeting that much of her anger during the August 25 meeting had been misdirected at Dehlin and was actually a reaction to how she had been treated by a previous boss.

68. Kamp acknowledged that she had recorded the meeting, but when asked to replay the meeting for the Board so that it could test the veracity of their statements, Kamp claimed that she had deleted it.

69. When asked about her relationship with Dehlin generally, she responded that she “love[s]” working with him and that they make a “good team.” She acknowledged the August 25 meeting was the only time she had ever had a significant problem working with him.

70. Neither in the eight months prior to nor during the meeting, though given ample opportunity to do so, did Kamp report or suggest that she had ever felt sexually harassed by Dehlin in any way.

71. The Board and Dehlin both expressed concerns that Kamp had covertly taped the August 25 meeting with Dehlin, concluding that such conduct was not conducive to the relationship of trust they would need to work together.

72. During the meeting, the Board told Kamp that it would likely be restructuring her position, but was unsure how exactly that would impact Kamp’s job duties. Specifically, Dehlin said that her “role of director of operations and co-host . . . is not working.”

73. At the end of the meeting, Dehlin also related to Kamp his concerns with her ongoing unprofessional workplace behavior, specifically citing her misuse of private payroll information, her anger and jealousy towards other female co-hosts, her tendency to hold grudges with key staff members, her insubordination and demands, her mismanagement of the “shorts” business, and her breach of trust. When Kamp asked Dehlin directly if he wanted their working relationship to continue, Dehlin admitted that he was unsure if these issues were resolvable by that point.

74. After the meeting concluded, at Kamp's and the Board's request, Dehlin checked OSF's security footage to see if the August 25 Meeting had been captured.

75. It had.

76. Upon reviewing the footage and the communications between Kamp and Dehlin during the August 25 meeting, the Board reached the unanimous conclusion that Kamp had been dishonest with the Board and intentionally mischaracterized her interaction with Dehlin.

77. With this evidence of dishonesty, especially when paired with Kamp's history of non-performance, entitled behavior, insubordination, and poor workplace relations, the Board decided to restructure the Director of Operations position.

E. The Cryptic Text and Job Abandonment

78. Before the Board could discuss this with Kamp, however, Kamp made a last-ditch effort to save her job.

79. Shortly after the Board meeting, she sent a scanned copy of OSF's anti-harassment and anti-discrimination statement via text to Keri Witbeck and Clint Martin – two of OSF's three board members.

80. When Keri Witbeck asked why Kamp sent it and said she "wasn't aware" what the statement had to do with the Board's decision, Kamp responded in text with a vague claim that Dehlin and his prior co-host had exchanged sexual jokes and innuendo with each other when they worked together (at least five months earlier). She acknowledged that this conduct had stopped.

81. She then referenced a single instance in early August with Dehlin, using the verbiage "thinking about it now it doesn't feel right" – wherein *she* made a sexual joke to Dehlin after watching a video that contained in her words "oral sex language".

82. Nowhere in the text (or elsewhere) does she say that Dehlin asked her to watch the video or specifically claim that she was sexually harassed by Dehlin.

83. But the Board was concerned about Kamp's characterization of the video and decided to investigate.

84. Upon further investigation, the Board was presented with evidence to show that this claim had also been a fabrication or at least grossly mischaracterized by Kamp.

85. The video Kamp was actually shown was a work-related music video by a post-Mormon recording artist who Mormon Stories was considering for an interview. Kamp and Dehlin both watched the video as part of their due diligence to determine whether the artist would be an appropriate fit for the Mormon Stories audience, wherein they both agreed she was, and the artist's managers were immediately notified to arrange an appearance on the podcast.

86. When the Board tried to reach Kamp to ask additional questions about her cryptic text messages, she refused to respond to them.

87. Kamp also stopped performing the majority of her job duties and refused to perform several tasks asked of her while the Board was deliberating – demonstrating further unprofessional behavior.

88. At that point, the Board had no choice but to confirm its earlier decision and to terminate Kamp.

89. The Board did offer Kamp a severance, which is its standard practice when an employee is terminated.

E. The Smear Campaign

90. Instead of accepting the severance or any accountability for her dishonesty and unprofessional behavior, Kamp decided to further her agenda of launching her own podcast and

to exact revenge on OSF by spreading information she knew to be untrue about her interactions with Dehlin.

91. She began contacting OSF's listeners, donors, and former interviewees, upon information and belief, to make increasingly exaggerated and untrue claims about how she had been treated by Dehlin and OSF.

92. Suddenly, a number of OSF donors cancelled their monthly contributions to the show, and at least one scheduled interviewee cancelled her appearance on the podcast.

93. At that point, OSF and Dehlin reached out to some of the donors about the reason for their cancellations and were informed that Kamp had been telling a number of people at a public event, and in other private settings, that she left OSF because she had been horribly mistreated and sexually harassed by Dehlin.

94. Upon information and belief, she made other defamatory statements similar to the ones set forth below.

F. First Defamatory Video

95. On or around October 23, 2022, Kamp then proceeded to publish these statements to the world at large on one of her YouTube channels.

96. While plugging her new podcast, Kamp falsely claimed that Dehlin physically threatened and intimidated her and sexually harassed her and other past OSF employees.

97. She also falsely claimed that OSF has been trying to silence her and ostracize anyone who supports her.

98. This video was also shared on TikTok.

99. She made these statements knowing they were untrue and even after being informed that there was evidence to demonstrate their falsity.

G. Second Defamatory Video

100. When OSF refused to cave to her attempts at blackmail, Kamp released a second defamatory video on YouTube on January 29, 2023, making wildly fabricated statements in an effort to harm OSF and Dehlin and to ultimately drive traffic to her podcast and life coaching businesses.

101. She did this using a YouTube handle—@mormstories—that was virtually identical to the Mormon Stories YouTube Channel handle in order to publish her false statements more widely to Mormon Stories’ listeners.

102. Kamp begins the podcast by virtue flagging and promising to tell the truth, but then proceeds to tell countless, verifiably false, and intentionally harmful statements about OSF and Dehlin.

103. It is impossible to address all of her untruthful statements within these pleadings, but, by way of representation, Kamp made the following knowingly or recklessly false statements.

104. Kamp asserts that OSF and Dehlin acted illegally by fostering an environment of sexual harassment and covering up sexual harassment allegations against Dehlin, when she states, among other false statements, that: (a) she made an “official claim” of sexual harassment against Dehlin prior to a Board meeting and that OSF invited Dehlin to attend a board meeting to discuss that claim in violation of its sexual harassment policy; (b) she was not given adequate time to discuss her concerns at the Board Meeting; and (c) the OSF board did not investigate or respond to her “concerns about the multiple claims” against Dehlin.

105. Each of these statements was knowingly false. Kamp indisputably never made a claim of sexual harassment to the Board. Prior to the Board Meeting, the only complaint she

made to the Board was that she was upset that she had been required to come into the office on what she considered to be a work-from-home day.

106. This is consistent with her statements at the Board Meeting, which was recorded. *See Exhibit A.* At no time during the Board Meeting did Kamp say anything about harassment. Kamp never made a claim, official or otherwise, of sexual harassment, until after the Board Meeting when OSF notified her that her current position was not working and it was likely to re-structure her position. Even then she made no official claim. Instead, she sent the cryptic texts described in paragraphs 79-82, in which she attached copies of OSF's anti-harassment and anti-discrimination statement and, in response to a question by the OSF board member, said that Kamp had made an inappropriate joke to Dehlin that "thinking about it now, it doesn't feel right."

107. The Board, nevertheless, did follow up on the texts. It spoke to Dehlin and attempted to speak with Kamp about the texts and what they were referencing.

108. In response to the questions posed by the Board, Dehlin promptly provided evidence to show that: (a) the video Kamp was referencing was not an explicit or objectively offensive video; (b) it was part of Dehlin and Kamp's duties to watch the video to determine whether the singer was a good fit to be a Mormon Stories Podcast guest; (c) after viewing the video on Dehlin's desktop computer, Kamp and Dehlin both agreed that the singer should be interviewed, and the singer's agents were immediately contacted, with Kamp copied on the email; and (d) Kamp made no objection and raised no concern about the nature of the video or her interactions with Dehlin to anyone at OSF, including Dehlin or the OSF Board.

109. Kamp knew her statements about the Board not investigating her claims or following up with her are false because she failed to answer multiple calls from the Board Member, Clint Martin, between the Board Meeting and when she was eventually terminated.

110. These statements were also made with reckless disregard for their veracity because Kamp did not know what investigations the Board engaged in. As described above, the Board had asked Dehlin to explain his understanding of what was referenced in the cryptic text message and he provided them with the information set forth in paragraph 108. He also provided them with a copy of the video Kamp referenced.

111. Kamp, however, refused to respond to the OSF Board's efforts to contact her for more information and to explain what she meant by her texts. Upon viewing the video and evidence provided by Dehlin, it was clear to the Board that Kamp's insinuations were false. The video was not inappropriate, was work-related, and was viewed by both as a normal part of the podcast candidate vetting process.

112. Furthermore, at no point prior to her termination had Kamp ever stated that Dehlin had made an inappropriate joke related to the video or used the words "oral sex" with her in any way. Instead, her post-Board Meeting texts directly contradict the assertion made in her video, stating that she—not Dehlin—made the inappropriate joke.

113. Kamp's claims that she was surprised to have Dehlin attend, uncomfortable having Dehlin attend, and under a time constraint that did not allow her to tell her story during the Board Meeting are directly contradicted by both the text exchanges leading up to, and the actual footage of the Board Meeting (which was recorded with her knowledge and consent). Both show that her statements in this regard were also knowingly false.

114. Kamp was told prior to the meeting that Dehlin would be in attendance; she was told during the meeting that Dehlin could be excused if she wanted to discuss anything without him present; and she monopolized the nearly 2-hour meeting, talking for two thirds of the total meeting time.

115. Never, at any time, did she insinuate that Dehlin had made sexual advances to her or other OSF employees (because he had not). Instead, she said that she and John “work really well together,” “are a really good team,” and that she “loves [her] job.”

116. Kamp’s claim that OSF blocked her from using any of her OSF accounts prior to the Board Meeting is also demonstrably false.

117. Kamp similarly knowingly or recklessly makes false claims that Dehlin sexually harassed 19 women at OSF by, among other false statements, stating (a) that OSF adopted its anti-retaliation and harassment policy in response to claims made against Dehlin by multiple former employees; (b) repeatedly referring to legal claims made or otherwise had by multiple employees; (c) claiming that Dehlin had engaged in the same “harmful pattern” with “at least 19 other women over the last 12 years”—two or more women per year.

118. These claims were knowingly false or made with a reckless disregard for their veracity.

119. The OSF anti-harassment and anti-retaliation statements were adopted in response to the MeToo movement and as a genuine reflection of OSF’s values.

120. There have never been any credible claims of sexual harassment made against Dehlin. The only (false) claim made against him was made years ago, was investigated by two separate OSF Boards and the New Hampshire Commission on Human Rights, and was voluntarily withdrawn on two occasions after evidence was provided to show that the person

making the claim had made an unwanted sexual advance towards Dehlin and threatened to make false claims against him.

121. Kamp knew or had reason to know that her statements that she went to the Board “to stop a harmful pattern that at least 19 other women in the past 12 years have experienced while working with John Dehlin” and that 19 women or two women per year for the last 12 years had been harassed by Dehlin were false. Most of the women Kamp claims were harassed are completely unknown to Dehlin. Only four of the women ever worked for OSF and two of those never worked directly with Dehlin. The document Kamp says shows that Dehlin harassed 19 women says nothing about harassment.

122. In her video, Kamp describes the conduct she claimed to have complained about to OSF. To be clear, the first time OSF heard of Kamp’s current version of what she claims happened as it relates to the video was after Kamp was terminated and was only made by her attorney as part of a settlement demand. That version is directly contradicted by Kamp’s own text messages following the Board Meeting, in which she admits that *she* made a sexual joke to Dehlin and admits that the video did not make her feel uncomfortable.

123. Kamp’s accounts of what happened to her have continued to evolve significantly since her termination. The version Kamp relates in her second podcast has never been shared with anyone at OSF prior to her podcast and is adamantly denied by the people she claims to have witnessed it. It is also dramatically different than the version she sent to OSF in previous correspondence.

124. Among other things, Kamp claims that Dehlin and Carah Burrell engaged in sexual banter in front of Kamp while at work and that she formally complained to Dehlin about it on at least four occasions.

125. These statements are knowingly false. Kamp did not formally complain to Dehlin about his interactions with Burrell because there was nothing to complain about. Both Burrell and Dehlin flatly deny Kamp raised any concerns about sexual banter during Kamp's OSF employment.

126. Although OSF prioritized upholding its sexual harassment policy, Kamp was never assigned with the primary task of enforcing it as she claims. Instead, OSF encouraged all of its employees to report promptly any violations to the Board.

127. Both in her podcast and, upon information and belief, in public settings that included OSF viewers, donors, and interviewees, Kamp has claimed that the video she was asked to watch was sexually explicit and "pornographic," or words to that effect and she has specifically claimed that it was the video "Juicy" by Jo Sarah, in which a scantily clad woman talks explicitly about sex.

128. This video was absolutely not the video shown to Kamp, and Kamp knows it. Forensic evidence establishes that the first time the Jo Sarah video was played on any device belonging to OSF or Dehlin was on the date Kamp first made this false allegation against Dehlin.

129. Forensic evidence establishes that the video played at OSF on or near the dates Kamp claims was "Juicy" by Abby Anderson, a post-Mormon singer. The pop-country video is, objectively, safe-for-work. Ms. Anderson is fully dressed throughout the video and uses playful and catchy lyrics that, although containing some innuendo, are not explicit, graphic, or otherwise offensive.

130. Moreover, viewing this video was part of OSF's process, and Kamp's job duties, to vet people OSF plans to interview.

131. Furthermore, Dehlin never made an inappropriate joke about the video. Kamp's own text, in which she claims to have made a sexual joke, contradicts her current version of this encounter.

132. Her text also contradicts her statements that she immediately felt uncomfortable and indicated such discomfort to Dehlin by freezing and/or walking away as she claims.

133. Finally, in the video, Kamp claims that on a different date, Dehlin was kissing his wife (Margi) in front of Kamp and suggested that he was sorry he could not do the same to Kamp.

134. Put simply, this never happened. Both John and Margi Dehlin flatly deny this ever occurred.

135. Moreover, the fact that this is a complete fabrication by Kamp is supported by the fact that she never made such an outrageous claim prior to her 2nd video release. She never raised that incident or anything like it to OSF's Board, even in the text she sent to OSF after the Board Meeting. Nor was such an incident ever raised in any of the correspondence from Kamp's attorney when he was outlining what Kamp thought to be her strongest examples of harassment.

136. Kamp also falsely states that OSF has tried to hide evidence, insinuating it had acted illegally, by, among other false statements, (a) stating that OSF's counsel had threatened her not to speak about her experience at OSF and (b) claiming that OSF deleted its transparency podcasts.

137. These statements are knowingly false. None of OSF's transparency podcasts have been deleted.

138. Additionally, OSF's counsel has never been in direct contact with Kamp. To the extent any discussion has occurred between OSF and Kamp's counsel, OSF's counsel was

adamant that any potential settlement agreement not include a confidentiality or non-disparagement provision so that OSF, Dehlin, and Kamp could each talk freely about their experiences with each other. OSF's counsel did ask Kamp's counsel to advise Kamp to cease and desist from making knowingly—and verifiably—false statements about OSF and Dehlin.

139. Kamp also falsely claims that Dehlin has stolen from her and misused OSF funds, with fabricated statements that (a) OSF has refused to pay for unpaid overtime; (b) Dehlin tried to hide Margi's salary from Kamp; and (c) Dehlin canceled events, but kept money from them.

140. Kamp's statement that she is owed overtime lacks credibility because Kamp was in charge of reporting her own payroll hours, was paid for every hour submitted, and, for the vast majority of the time that she worked at OSF, was responsible for issuing her own paycheck. She also was repeatedly told by Dehlin and agreed never to work more than 40 hours per week. Furthermore, as discussed above, she was taking classes up to three days a week during the workweek and, towards the end of her employment, was not completing even basic duties of her primary position at OSF.



141. Despite the likelihood that Kamp's claims for overtime are fabricated, OSF has not withheld any payment from her. OSF offered to pay the claimed amounts to Kamp, stating, through counsel,

I do want to remind you, though, of our earlier agreement to pay the unpaid overtime Ms. Kamp is claiming. As you know, Ms. Kamp was in charge of tracking her own hours and authorizing the amount for her own payroll checks. Due to that and the fact that she was instructed (and agreed) not to work more than 40 hours per week, OSF was quite surprised by this claim from Ms. Kamp. That said, OSF is dedicated to paying its employees fairly and if Ms. Kamp legitimately worked hours she was not paid for, it wants to pay her for those.

142. OSF requested confirmation from her counsel about amount and payment method.

Kamp did not respond.

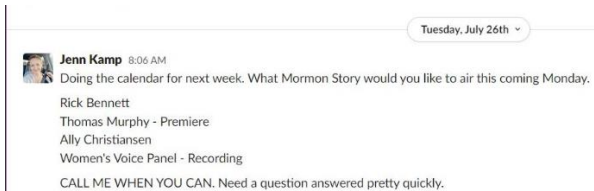
143. Similarly, there was nothing untoward or secret about Margi's pay. OSF pays several of its established podcast co-hosts \$1,000 per episode and it is a matter of public record.

144. Kamp knew this statement in her podcast was false. In the conversation where Kamp claims that Dehlin "slipped" and told her Margi's rate, he actually stated, in writing, "You already know what Margi gets paid per episode," "that's what the board approved," "just like [other established podcasters]."

145. Dehlin certainly never took any money from Kamp or anyone for events that were cancelled. Financial records establish that no money was collected for those cancelled events. Kamp's statements to the contrary show a reckless disregard for their veracity and the undisguised intent to interfere with OSF's relationship to its listeners and donors.

146. Kamp also claims that Dehlin and OSF treated her improperly and acted unlawfully when Dehlin watched the Women's Voice podcast she had hosted and purportedly used that information to publicly reveal that she had been abused without her consent.

147. These statements are knowingly false. Among other things, Kamp specifically asked Dehlin to review the podcast—she now claims that he watched over her objections—and made it clear to him that she wanted it to be promptly released.



148. Kamp’s claim that Dehlin intentionally told “everyone at the beginning of the [August 10] podcast that [she] was sexually abused as a child” without her permission and with an intention to retaliate against her is objectively false.

149. Kamp had publicly disclosed that she was abused in an earlier episode of the podcast aired on July 5, 2022, saying that she had “personal experiences” with abuse. That same week, she told Dehlin she wanted to tell her full abuse story in her own Mormon Stories Podcast episode and scheduled her interview.

150. Kamp also disclosed her abuse on the July 22 podcast, which she believed would be soon aired, and used it as a teaser for her own Mormon story. In that podcast, she stated “I am going to tell my story in August, so I won’t go into all the details now. When I was young . . . between the ages of 6 and 9 . . . I was sexually abused.”

151. Dehlin’s only statement on the August 10 podcast was that Kamp was going to at some future point discuss her own “personal experiences of abuse within a Mormon context.” This general statement did not say anything about the nature of the abuse or whether it happened to her directly. It certainly did not state that she had been sexually abused, as she asserts in her video.

152. Finally, in her podcast, Kamp admits that she was advised by her counsel that she lacks a legal basis for her claims, but that she nevertheless decided to file a claim against Dehlin and members of the OSF Board.

153. She further admits that she did not file the lawsuit to resolve any dispute, but rather to make a public record of her (false) allegations to embarrass Dehlin and harm OSF.

FIRST CAUSE OF ACTION
(Tortious interference with economic relationships)

154. Kamp intentionally interfered with OSF's business relationships by among other things engaging in the following conduct:

- a. Making false statements to OSF's contributors, supporters, audience, and donors about OSF and Dehlin.
- b. Intentionally interfering in the operations of OSF.
- c. Intentionally making false allegations against OSF and Dehlin for the purpose of disrupting OSF's business and in knowing or reckless disregard that such conduct would harm OSF's relationship with its audience, contributors, supporters, and donors.
- d. Destroying information and/or evidence of Dehlin's innocence and of her misconduct.

155. Kamp used improper means to interfere with the relationship between OSF and Dehlin and OSF's contributors, supporters, audience, and donors, including via defamation and disseminating intentionally false claims.

156. As a result of Kamp's actions, OSF and Dehlin have been damaged in an amount to be proved at trial.

157. Because Kamp's conduct was intentional, OSF and Dehlin are also entitled to punitive damages.

SECOND CAUSE OF ACTION
(Defamation Per Se)

156. Plaintiffs incorporate by reference the foregoing paragraphs as if fully set forth herein.

157. Kamp has intentionally made false and misleading statements to others about OSF and Dehlin, asserting or implying that they had violated the law, physically threatened, and sexually harassed Kamp.

158. When those statements were made, Kamp knew they were false and/or she made them with reckless disregard for their veracity and with the intent to purposefully injure Dehlin and OSF.

159. Kamp's statements were not privileged.

160. The defamatory statements made against Dehlin and OSF constitute defamation per se and entitle it to damages as a result of the harm to OSF's business and OSF and Dehlin's reputation.

161. Additionally, Dehlin and OSF have suffered special and actual damages as result of the defamatory statements in an amount to be determined at trial.

162. Kamp's conduct was in bad faith, with malice, and with reckless indifference to Dehlin and OSF's rights. Dehlin and OSF are thereby entitled to punitive damages in an amount to be determined at trial.

THIRD CAUSE OF ACTION
(Breach of Trademark)

163. Plaintiffs incorporate by reference the foregoing paragraphs as if fully set forth herein.

164. Plaintiffs have a protectable interest in their common law trademark Mormon Stories. They have used that name for decades and built-up significant goodwill for that business name, which is well recognized in the community.

165. Kamp intentionally used a substantially similar mark, the YouTube Handle @MormStories in an effort to drive business to her podcasts and away from the actual Mormon Stories YouTube Channel.

166. There is a substantial likelihood of confusion because the names for each are virtually identical and the services each provides are very similar; they are both podcasts about the stories of post-Mormons.

167. Kamp intentionally used a similar mark in an effort to draw business away from Plaintiffs and to confuse listeners looking for Mormon Stories.

168. OSF is entitled to injunctive relief, immediately prohibiting Kamp from using the handle @MormStories, and to damages in the amount of any business, including advertising funds or donations, that was diverted from Mormon Stories or received by Kamp on that YouTube channel.

FOURTH CAUSE OF ACTION
(Injunctive Relief)

169. Plaintiffs incorporate by reference the foregoing paragraphs as if fully set forth herein.

170. Plaintiffs are entitled to immediate injunctive relief ordering Kamp to immediately remove all YouTube and Instagram videos making any defamatory statements.

171. Plaintiffs have and will continue to suffer irreparable harm if an injunction does not issue in the form of their destroyed reputation, goodwill, and business.

172. There is a substantial likelihood Plaintiffs will prevail on the merits because there

is significant evidence that Kamp's statements are fabricated, knowingly false, and/or made with a reckless indifference for their veracity.

173. The balance of harms weighs in favor of Plaintiffs.

174. Public policy favors Plaintiffs.

175. The injunction should issue immediately to require the removal of Kamp's video and use of the YouTube channel affiliated with her @MormStories handle.

TIER DESIGNATION

Pursuant to 8(a) and 26(C)(3) this matter falls under Tier 2 and should be permitted discovery pursuant to Tier 2.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully requests the following relief:

- A. An award of damages against Defendant in an amount to be proven at trial, but not less than \$50,000;
- B. An award of pre- and post-judgment interest to the maximum extent allowed by law;
- C. An award of punitive and exemplary damages as allowed for by law;
- D. An award of attorneys' fees and costs of collection as allowed for by law;
- E. Any other relief to which Plaintiff is entitled as allowed by law;
- F. Injunctive relief; and
- G. For any other relief necessary and just under the circumstances.

DATED this 7th day of February, 2023.

TOMCHAK SKOLOUT LAW PC

/s/ Jenifer L. Tomchak

Jenifer L. Tomchak
Nicole A. Skolout
Attorneys for Plaintiffs

GOSDIS LAW FIRM, PLC

/s/ Shane D. Gosdis

Shane D. Gosdis
Attorney for Plaintiffs

EXHIBIT A

<https://www.youtube.com/watch?v=ytwml0y8KY0>