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**IN THE FOURTH JUDICIAL DISTRICT COURT
UTAH COUNTY, STATE OF UTAH**

JANE DOE H.P.; JANE DOE P.H.; JANE DOE C.H.; JANE DOE B.K; JANE DOE B.B.; JANE DOE S.M.; JANE DOE R.U.; JANE DOE H.M.; JANE DOE K.H.; JANE DOE E.B.; JANE DOE A.S.; JANE DOE M.T.; JANE DOE A.G.; JANE DOE S.B.; JANE DOE K.S.; JANE DOE M.P.; JANE DOE S.P.; JANE DOE B.H.; JANE DOE A.W.; JANE DOE S.O.; JANE DOE M.Z.; JANE DOE M.R.; JANE DOE C.G.; JANE DOE T.M.; JANE DOE M.M.; JANE DOE K.W.; JANE DOE J.S.; JANE DOE C.S.; JANE DOE C.C.; JANE DOE M.C.; JANE DOE K.A.; JANE DOE S.A.; JANE DOE R.D.; JANE DOE D.B.; JANE DOE J.C.; JANE DOE L.W.; JANE DOE C.W.; JANE DOE S.L.; JANE DOE E.M.; JANE DOE A.F.; JANE DOE A.M.; JANE DOE A.A.; JANE DOE B.W.; JANE DOE W.D.; JANE DOE M.I.; JANE DOE L.B.; JANE DOE S.E.; JANE DOE D.M.; JANE DOE J.B.; JANE DOE K.C.; and JANE DOES 1–100,

Plaintiffs,

vs.

DAVID H. BROADBENT, M.D.;
INTERMOUNTAIN HEALTHCARE, INC.,

AMENDED COMPLAINT

Case No. 220400226
Judge Robert C. Lunnan

(Tier 3)

[JURY TRIAL REQUESTED]

dba UTAH VALLEY HOSPITAL; HCA
HEALTHCARE, INC. dba
MOUNTAINSTAR HEALTHCARE, a
Delaware corporation; and DOES 1–50,

Defendants.

The fifty (50) Plaintiffs named in the above caption and Jane Does 1–100 (“collectively “Plaintiffs”) hereby complain, allege, and aver against Defendants David H. Broadbent, M.D. (“Broadbent”); Intermountain Healthcare, Inc. dba Utah Valley Hospital (“IHC” or “Utah Valley Hospital”); HCA Healthcare, Inc. dba MountainStar Healthcare (“MountainStar”); and Does 1–50 (collectively “Defendants”) as follows:

Content Warning: the following complaint contains detailed accounts of sexual abuse.

INTRODUCTION

A woman is rarely more vulnerable than when she is laying on an exam table, unclothed, trusting a male gynecologist to provide her with the medical care she needs. **Dr. David H. Broadbent took advantage of his position, Plaintiffs’ vulnerability, and that relationship of trust as he sexually battered and abused Plaintiffs and numerous other women over the course of four decades.**

For the past forty years, Plaintiffs presented to Broadbent at his University Avenue clinic in Provo, or presented to IHC or MountainStar where Broadbent worked, and instead of receiving the medical care they sought, were sexually abused. In each instance, Plaintiffs felt horrible and violated, but Broadbent concealed his sexual misconduct under the guise of medically necessary care and hid behind the protected position of authority and trust inherently

given to physicians. In doing so, Broadbent created enough doubt and uncertainty in the minds of Plaintiffs and his other victims to prevent them from recognizing his sexual misconduct for what it was. For years, Broadbent conducted this scheme from his University Avenue office, feet from thousands of young women with little or no prior experience with OB/GYN appointments—who had no understanding of what was “normal” or medically necessary—and used his profession and their innocence to prey on them.

To make it worse, IHC and MountainStar held him out as one of their doctors, affiliated with him, and failed to stop him despite complaints against him. Multiple formal and informal complaints were made of Broadbent’s acts of sexual abuse, but neither IHC or MountainStar properly responded. In fact, formal complaints made it all the way to the Chief Administrator and Chief Medical Officer at Utah Valley Hospital, and yet, over a decade later, IHC was still referring women to go see Broadbent at his private clinic.

It was not until December 2021 when one of Broadbent’s victims related her experience on a podcast, causing numerous other accounts of women being sexually abused by Broadbent to surface, that Plaintiffs realized that they were not alone, and Broadbent’s actions were not medically necessary—they were unlawful. With this revelation and media on this issue, numerous other women came forward and started sharing their stories of being abused by Broadbent.

The traumatic abuses Plaintiffs experienced in a “safe space” with a person they were supposed to be able to trust shattered Plaintiffs’ sense of the world, their sense of safety, and their conception of trust in medical care providers everywhere. It caused Plaintiffs to question themselves, what they believe and know, and caused lasting harm which will not end with the resolution of a lawsuit—but from which other women, potential victims, may be protected.

THE PARTIES

1. Plaintiff Jane Doe H.P. resides in Utah County, Utah.
2. Plaintiff Jane Doe P.H. resides in Salt Lake County, Utah.
3. Plaintiff Jane Doe C.H. resides in Juab County, Utah.
4. Plaintiff Jane Doe B.K. resides in Utah County, Utah.
5. Plaintiff Jane Doe B.B. resides in Orange County, North Carolina.
6. Plaintiff Jane Doe R.U. resides in Utah County, Utah.
7. Plaintiff Jane Doe H.M. resides in Utah County, Utah.
8. Plaintiff Jane Doe K.H. resides in Utah County, Utah.
9. Plaintiff Jane Doe E.B. resides in Kane County, Utah.
10. Plaintiff Jane Doe A.S. resides in Utah County, Utah.
11. Plaintiff Jane Doe M.T. resides in Utah County, Utah.
12. Plaintiff Jane Doe A.G. resides in Utah County, Utah.
13. Plaintiff Jane Doe S.B. resides in Utah County, Utah.
14. Plaintiff Jane Doe K.S. resides in Scott County, Minnesota.
15. Plaintiff Jane Doe S.M. resides in Utah County, Utah.
16. Plaintiff Jane Doe S.P. resides in Salt Lake County, Utah.
17. Plaintiff Jane Doe B.H. resides in Iron County, Utah.
18. Plaintiff Jane Doe M.Z. resides in Kootenai County, Idaho.
19. Plaintiff Jane Doe M.P. resides in Utah County, Utah.
20. Plaintiff Jane Doe C.G. resides in Utah County, Utah.
21. Plaintiff Jane Doe T.M. resides in Utah County, Utah.
22. Plaintiff Jane Doe M.M. resides in Utah County, Utah.

23. Plaintiff Jane Doe A.W. resides in Moffat County, Colorado.
24. Plaintiff Jane Doe S.O. resides in Utah County, Utah.
25. Plaintiff Jane Doe K.A. resides in Salt Lake County, Utah.
26. Plaintiff Jane Doe S.A. resides in Washington County, Utah.
27. Plaintiff Jane Doe K.W. resides in Utah County, Utah.
28. Plaintiff Jane Doe M.C. resides in Utah County, Utah.
29. Plaintiff Jane Doe J.S. resides in Utah County, Utah.
30. Plaintiff Jane Doe C.S. resides in Utah County, Utah.
31. Plaintiff Jane Doe C.C. resides in Utah County, Utah.
32. Plaintiff Jane Doe M.R. resides in Utah County, Utah.
33. Plaintiff Jane Doe R.D. resides in Carroll County, Maryland.
34. Plaintiff Jane Doe D.B. resides in Lancaster County, Nebraska.
35. Plaintiff Jane Doe J.C. resides in Uintah County, Utah.
36. Plaintiff Jane Doe L.W. resides in Utah County, Utah.
37. Plaintiff Jane Doe C.W. resides in Utah County, Utah.
38. Plaintiff Jane Doe S.L. resides in Utah County, Utah.
39. Plaintiff Jane Doe E.M. resides in Bannock County, Idaho.
40. Plaintiff Jane Doe A.F. resides in Utah County, Utah.
41. Plaintiff Jane Doe A.M. resides in Utah County, Utah.
42. Plaintiff Jane Doe A.A. resides in Utah County, Utah.
43. Plaintiff Jane Doe B.W. resides in Utah County, Utah.
44. Plaintiff Jane Doe W.D. resides in Loudoun County, Virginia.
45. Plaintiff Jane Doe M.I. resides in Mercer County, Kentucky.

46. Plaintiff Jane Doe L.B. resides in Utah County, Utah.
47. Plaintiff Jane Doe S.E. resides in Utah County, Utah.
48. Plaintiff Jane Doe D.M. resides in Boulder County, Colorado.
49. Plaintiff Jane Doe J.B. resides in Gila County, Arizona.
50. Plaintiff Jane Doe K.C. resides in Utah County, Utah.
51. Plaintiff Jane Does 1–50 are individuals, yet unknown to Plaintiffs, who were sexually harassed, assaulted, and/or battered by Broadbent within the last four years.
52. Plaintiff Jane Does 51–100 are individuals, yet unknown to Plaintiffs, who were sexually harassed, assaulted, and/or battered by Broadbent more than four years ago.
53. Defendant David H. Broadbent, M.D. is an OB/GYN and is a resident of Utah County, Utah.
54. Defendant HCA Healthcare, Inc., is a Delaware corporation with its principal place of business in Davidson County, Tennessee. HCA is authorized to do business in the State of Utah as MountainStar Healthcare. MountainStar’s principal place of business is located in Salt Lake County, Utah.
55. Defendant Intermountain Healthcare Inc., dba Utah Valley Hospital is a Utah corporation doing business in Utah County, State of Utah.
56. Defendants Does 1–50 are persons or entities not presently known to Plaintiffs who aided and abetted in Broadbent’s schemes, are vicariously liable for Broadbent’s actions, concealed Broadbent’s tortious conduct, negligently or intentionally failed to act on complaints against Broadbent, or otherwise intentionally or negligently failed to take the steps necessary to protect Plaintiffs and other victims from Broadbent’s tortious conduct. When Plaintiffs learns the true identities of Does 1–50, they will amend the Complaint to allege their true identities.

JURISDICTION, VENUE AND TIER

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

58. This Court has jurisdiction over the claims asserted herein pursuant to Utah Code Section 78A-5-102(2).

59. Because the amount in controversy exceeds \$300,000, this case qualifies for Tier III discovery pursuant to Rule 26(c)(3), Utah Rules of Civil Procedure.

GENERAL ALLEGATIONS

60. Broadbent is an OB/GYN in Provo, Utah and, upon information and belief, has practiced there since the 1980s.

61. Broadbent sees many of his patients at his office, which is positioned one block from Brigham Young University freshman dorms and in the middle of numerous apartment complexes in which thousands of young female Brigham Young University and Utah Valley University students live.

62. During all relevant times, Broadbent was an employee, agent, permissive user, or other individual, acting under the direction and control of IHC and MountainStar, and acting within the course and scope of his employment, agency, and/or direction and control of IHC and MountainStar. Accordingly, IHC and MountainStar are liable for the conduct of Broadbent under the doctrine of vicarious liability and are, therefore, liable for the damages sustained by Plaintiffs as set forth below.

63. Each Plaintiff suffered trauma, pain, anxiety, distress, and other emotional and physical trauma as a result of Defendants' actions.

Jane Doe H.P.

64. Jane Doe H.P. presented to Broadbent several times between July 6, 2020 and May 11, 2021

65. At the July 6, 2020 appointment, Jane Doe H.P. was asked to change into a gown and lay on the table, at which time Broadbent began asking numerous questions. Suddenly, without explanation, Broadbent grabbed her and pulled her to the edge of the table in a sexual manner.

66. He then inserted a speculum, but Jane Doe H.P. soon realized that the speculum was gone and his fingers were inside her.

67. Jane Doe H.P. was shocked and left the appointment feeling uncomfortable and violated, but she questioned herself and reasoned that maybe she just misunderstood.

68. On October 7, 2020, Jane Doe H.P. asked to be checked for a std. Broadbent joked about how the swab would be painful and that he needed to swab her until he counted to 100.

69. Jane Doe H.P. thought he was joking, but he held the swab in her vagina and moved it around slowly as he counted to 100. He then refused to answer any questions and said, “we’ll find out in a few days.” As she walked out, the nurse handed her lubrication and Replens and said nothing.

70. At her May 11, 2021 appointment, Broadbent began doing a vaginal exam and started joking about not being able to find her cervix. Then, laughing, with his fingers still inside her, said, “there it is! You’re a girl!”

71. Jane Doe H.P. was later taken to the ultrasound room because there was concern that she had a miscarriage. Broadbent started using an external ultrasound and, as he searched for

a heartbeat to confirm that a miscarriage occurred, said he could not find a heartbeat, continued to look, and then excitedly exclaimed “Oh here’s a heartbeat!” As Jane Doe H.P.’s hope rose, he then laughed and said, “Just kidding, it is your bladder. There is no baby.”

72. Jane Doe H.P. was horrified, but Broadbent said he thought there was a fetal pole and Jane Doe H.P. asked for an internal ultrasound to make sure. Broadbent and the nurse then prepared a transvaginal pole and, as they placed a cover on it, joked about safe sex and how they needed to be safe before putting it inside her. Broadbent then placed it in her and left it in while he walked away and did something else.

73. Jane Doe left that appointment and cried in the car. She called a different OBGYN’s office and tried to make an appointment, but she was crying so hard that it took a while to explain everything.

74. In addition to these actions, at each of her appointments, Broadbent reached under her shirt without warning, slid his hands under her bra, and grabbed her breasts. The nurse who worked with him never stood behind him to oversee him. She stood by Jane Doe H.P.’s side or close to the door.

75. Jane Doe also remembers how, throughout her appointments, Broadbent rested a finger against her rectum while talking to her despite not performing an exam.

76. Jane Doe H.P. felt violated, distraught, and gross, but it was not until news of his abuse of other women came out in February and March 2022 that she realized that what she experienced in Broadbent’s office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

77. As she saw others' stories coming forward, she also realized he was not just a gross and insensitive OBGYN, and she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

78. Suddenly, the pain and trauma she felt from those appointments made sense as she realized the true nature of what Broadbent did.

Jane Doe P.H.

79. Jane Doe P.H., in preparation for her October 2020 wedding, decided she needed to get on birth control and looked at her insurance website for a provider. Broadbent was the first person on the list.

80. On July 29, 2020, she entered his office nervous and unsure what to expect. She was placed in an exam room, asked to take her pants off, and given a sheet.

81. Broadbent soon entered the room, and when Jane Doe P.H. said she wanted to get on birth control before her wedding, Broadbent asked about her fiancé. He then asked if her wedding night would be her first time having sex. She said yes, and Broadbent said, "your fiancé is pretty lucky to get to have sex with a girl like you."

82. Jane Doe P.H. did not know what to think or how to respond, so she sat there feeling uncomfortable.

83. But Broadbent did not stop there. He then told her that because she was not sexually active and only nineteen (19) she would not need a pap smear, but that he would like to do one just take a look and make sure everything was good before prescribing her birth control.

84. He then put his fingers inside her and asked if she used tampons. She said no, and when he asked why, she informed him she thought they were uncomfortable and only used them when she needed to.

85. Broadbent then proceeded to warn her about how sex hurts the first time and said “the size of a man’s penis was equivalent to 3 to 4 fingers in width,” and that because she did not use tampons, she was unprepared for what she was going to experience. Jane Doe P.H. looked over at the nurse and the nurse was holding up 3 fingers and nodding with what he was saying.

86. Then Broadbent said “watch this” and proceeded to stick 3 fingers up into her vagina without asking. Jane Doe P.H. tensed up and tried not to cry. She did not know what to do, and did not know what was “normal” for these exams.

87. Broadbent asked, “how’s that feel?” Jane Doe P.H. responded that it was uncomfortable. Broadbent took his fingers out of her and told her that she would need to work on stretching herself in a warm bath. He prescribed her birth control and went on his way. The nurse then gave her a bag of condoms and a lot of lubrication while saying, “you’re gonna need that.”

88. Jane Doe P.H. left the appointment feeling ashamed, confused, and violated.

89. Broadbent’s office called Jane Doe P.H. a year later and asked her to come in for another visit to re-prescribe her birth control. She asked if there was any way to prescribe without coming in. They said no, so she did not go in.

90. Jane Doe P.H. has not been to an OB/GYN since that appointment.

91. When the news about Broadbent’s history of abusing patients came out, the news brought up emotions she did not even realize she had. It was then that she realized that what she experienced in Broadbent’s office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

92. As she read stories from other victims, Jane Doe P.H. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe C.H.

93. In May of 2010, Jane Doe C.H. found out she was pregnant and scheduled an appointment with Broadbent. At the first appointment, Broadbent never put gloves on during his exams, including when he grabbed her breasts in a way unlike a usual breast exam performed to check for lumps.

94. While Jane Doe C.H. felt uncomfortable, she reasoned that Broadbent was a doctor. Nevertheless, she made sure to bring someone with her to the next appointment.

95. At the second appointment, Broadbent acted annoyed that she brought her husband, but proceeded to say, “Lets pop the hood and see how the pipes are looking.” He then began complimenting how “pretty pink” her vagina was. Jane Doe C.H. was more than uncomfortable with this comment but tried to play it off in her head as “doctor talk.”

96. While Broadbent moved a speculum around inside her, she felt one of his fingers moving back and forth on her crotch area. Her husband was in the room, but it was so subtle that he could not see what was happening. Jane Doe C.H. kept telling herself that maybe Broadbent was a little unorthodox and just tried to make it to the end of the appointment.

97. Broadbent then said he needed to feel her breasts again, without gloves. The way he felt her breasts seemed as though he was playing with them instead of inspecting them.

98. Jane Doe C.H. left that appointment and tried to bottle up the trauma and confusion that came from that appointment.

99. When the news about Broadbent’s history of abusing patients came out, all of that trauma came out as she realized that what she experienced in Broadbent’s office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

100. As she read stories from other victims, Jane Doe C.H. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator. She decided then that she needed to stand up and raise her voice against Broadbent.

Jane Doe B.K.

101. On Saturday, January 18th, 2020, Jane Doe B.K. presented at the Utah Valley Hospital Emergency Department, concerned that she had a miscarriage. The providers there confirmed the miscarriage and then referred Jane Doe B.K. to Broadbent, who was an on-call OBGYN for the hospital.

102. Based on that referral, Jane Doe B.K. set up and went to an appointment at Broadbent's office on January 21, 2020.

103. When Broadbent came in, he asked a few questions and then explained rather crudely the reasons miscarriages happen, made several offhand rude comments about children with down syndrome, why most people are not fit to be parents, and then said she did not know her body well enough.

104. Broadbent then asked if she ever had a pap smear before, to which Jane Doe B.K. responded "no, I haven't." Broadbent said, "We can do a pap smear today." But Jane Doe B.K. responded "no, I'd rather schedule another appointment for another day for a pap smear." Jane Doe felt uncomfortable, annoyed, and frustrated with Broadbent already.

105. Broadbent then said, "We're going to do one today, change, and I'll come back." He then gave her a sheet and told her to get undressed from the waist down. Jane Doe B.K. looked at her husband and asked if he heard her tell the doctor no. Her husband told her that he had, but after further discussion they decided just to have it done to make sure everything was fine. Jane Doe B.K. thought, "he is a doctor, someone who should be trusted and has the

expertise to recognize if there is something wrong.” So, she got undressed from the waist down and waited.

106. Broadbent eventually came back in with a nurse and proceeded to tell Jane Doe B.K. to place her feet in the stirrups. She stared at the ceiling because she did not want to be there and felt uncomfortable.

107. Broadbent started the pap smear and gave little warning when he stuck the speculum in. She was in pain, and she felt very anxious because it was jarring and uncomfortable. The nurse got upset at her for not paying attention and scolded her for it.

108. Then as the speculum was still inserted, Jane Doe B.K. felt Broadbent put his finger in her rectum. When he finished, she started to cry.

109. The nurse handed Jane Doe B.K. a tissue, and Broadbent asked if she had a breast exam before. She told him that since her mom was a nurse and her mom had breast cancer herself, her mom taught Jane Doe B.K. how to perform her own breast exams. She explained that she sometimes checked either in the shower or when lying down in bed.

110. Broadbent said, “Okay. Well let’s do one now just to make sure.” Without waiting for a response, and with Jane Doe B.K. still lying on the table, Broadbent stood up, put his hands under her sweatshirt, palmed both of her breasts, squeezed them once, and was done.

111. By that time, Jane Doe B.K. was frustrated, angry, upset, and overwhelmed and felt awful, gross, and violated. She wanted to get out of there as soon as possible and could feel a panic attack coming on.

112. Feeling violated and disgusted, and with her miscarriage having just occurred, Jane Doe B.K. went home to grieve. Everything was tangled in a messy ball of emotions, and she thought it was best to put it all out of her mind.

113. Then on Saturday, February 27th, 2022, when BYU's Daily Universe posted on Instagram a story about a Provo OBGYN who was accused of sexual assault, she read the article, and everything from that appointment in January 2020 came back. The stories from the other women were eerily the same as hers, and she then realized that what she experienced in Broadbent's office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

114. As she read stories from other victims, Jane Doe B.K. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe B.B.

115. On August 23, 2018, Jane Doe B.B. and her husband went to a 13-week prenatal appointment at Broadbent's office.

116. After they were seated in an exam room, Broadbent came in with an assistant and asked Jane Doe B.B. when she had her last pelvic exam and pap smear.

117. Jane Doe B.B. told him that she underwent an exam and pap smear just a few months prior.

118. Broadbent told her that, because she had an exam just a few months ago, she did not need another one that day, but he told her he could perform a pelvic exam if she wanted him to, "just to be safe."

119. Jane Doe B.B. told Broadbent that she did not want one and was in fact relieved that she did not need one.

120. Broadbent did not respond and unexplainedly handed Jane Doe B.B. a gown, told her to change, and left the room.

121. Jane Doe B.B. and her husband were confused about the need to undress since they just confirmed that she did not need, and did not want, a pelvic exam. Nevertheless, trusting Broadbent had a medical reason for asking her to change, Jane Doe B.B. undressed from the waist down and put on the gown.

122. When Broadbent came back in the room, he told Jane Doe B.B. to lie on the exam table and, without notice, warning, or explanation, and without the use of a speculum, he suddenly inserted his fingers into Jane Doe B.B.'s vagina and started moving them around. He then placed his hands on her abdomen.

123. In shock, Jane Doe B.B. tried to process what was happening when Broadbent suddenly slid both of his hands up under her shirt and then under her bra and began feeling her breasts with his palms on her nipples and one hand on each breast simultaneously.

124. When Broadbent finished, he gave no explanation for his actions, and Plaintiff left Broadbent's office feeling violated and thinking Broadbent's actions were unnecessary and inappropriate.

125. Immediately following the appointment, Jane Doe B.B. switched to a different OB/GYN for the remainder of her pregnancy.

126. For months after the appointment, Jane Doe B.B. had nightmares and questioned her own feelings and thoughts that what Broadbent did was wrong—telling herself that he was a doctor and maybe she was just being dumb. Since her last postpartum appointment (around six weeks after the birth of her kids), Jane Doe B.B. has been afraid to schedule an appointment with an OB/GYN.

127. It was not until Jane Doe B.B. listened to a podcast in December 2021—a podcast in which an interviewee related her own account of sexual abuse at the hands of Broadbent—that

she realized that what she experienced in Broadbent's office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

128. After hearing the account of another one of Broadbent's victims, Jane Doe B.B. reached out to the interviewee and learned that numerous other women heard the podcast and reached out with similar accounts of Broadbent sexually abusing them.

129. A look online at Broadbent's Google Reviews and other online reviews revealed additional personal accounts of sexual abuse.

130. That is when Jane Doe B.B. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

131. As she read the accounts and realized the true nature of what Broadbent did, the pain, suffering, anxiety, and distress she felt after her examination came flooding back.

Jane Doe S.M.

132. Jane Doe S.M. saw Broadbent from December 2014 to July 2015, and for a visit in January 2018.

133. At the time of her first appointment, Jane Doe S.M. was a first-time mom and had never been to an OBGYN other than once before to get birth control.

134. At her first visit, the nurse in the room told her to undress from the waist down, and Broadbent came in and proceeded to give her what he said was a vaginal exam. While doing this, he suddenly stuck one of his fingers in her rectum and then finished with the vaginal exam.

135. Broadbent then told her to lay back and, with no warning, lifted up her shirt, slid his hands up her, lifted her bra, and began to feel her breasts. He did not explain what he was doing, and did not explain things afterward.

136. Jane Doe S.M. felt uncomfortable and tried to rationalize that maybe this was just normal and she was just uncomfortable with the nature of the visit. Then the same thing happened at a subsequent visit, and she continued to try to rationalize it.

137. Beginning around 30 weeks-pregnant, Broadbent told Jane Doe S.M. he would do vaginal checks every time, but did not explain why, never said anything about dilation or effacement, and never asked if this was ok. He just brought her in, put his fingers inside her, and moved on.

138. For years, Jane Doe S.M. tried to push all of these memories and emotions back, tried to explain to herself that “it’s just his technique.” She did not know what was normal, and Broadbent took advantage of that.

139. When Jane Doe S.M. saw one of the articles detailing Broadbent’s history of abuse, her heart raced and she realized that what she experienced in Broadbent’s office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

140. As she read stories from other victims, Jane Doe S.M. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe R.U.

141. In 2018, Jane Doe R.U. became pregnant with her first child, and a family member recommended that she go see Broadbent for her prenatal care. She was nine weeks pregnant when she started going to his office.

142. During one of her first appointments, Jane Doe R.U. was told Broadbent would perform an exam & Pap smear, and the nurse handed her a hospital gown and told her to undress.

143. The nurse then left the room and Broadbent came in a few minutes later. Broadbent sat on his stool and instructed her to lay down and spread her legs open.

144. Jane Doe R.U. previously had a pap smear and knew that it caused pain and discomfort, so she quickly reached for the nurse's hand and immediately asked Broadbent to wait a minute so she could relax her body.

145. Broadbent chuckled and said "Oh you need a minute to get ready to get assaulted?"

146. Then, without waiting another second and with no consent, he proceeded to perform a vaginal exam. Jane Doe R.U. was in pure shock and disbelief and turned to her left to see if the nurse had just heard what was said. The nurse clearly had, but instead of saying anything, she stayed silent and acted like Broadbent had not said a word.

147. Jane Doe R.U. froze in fear realizing that her mom and boyfriend were sitting there and knew then that they too had witnessed what happened to her.

148. Jane Doe R.U. felt exposed and felt ashamed that she could not find the courage to speak up for herself and stop him. After what felt like hours, Broadbent finished, stood up, snapped his gloves off, threw them away, and exited the room.

149. Jane Doe R.U. lived with the trauma and shame, but it was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

150. As she read stories from other victims, Jane Doe R.U. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe H.M.

151. In 2017, Jane Doe H.M. was pregnant with her first child, and ended up scheduling her first appointment with Broadbent because her and her husband were students, he took their insurance, and his office was close.

152. At one appointment, Broadbent told Jane Doe H.M. to undress, put a gown on, and lay on the table. She did so and felt very vulnerable.

153. Then, without warning, Broadbent started feeling her breasts. He did not say anything before or during and gave no explanation after. She immediately felt incredibly uncomfortable and violated, but did not say anything.

154. Jane Doe H.M. continued to see him, and at a later checkup, Broadbent again asked her to undress and put on a gown, and came in with a nurse.

155. Then, without warning, Broadbent forcefully stuck his fingers in her vagina. She winced in pain, and Broadbent laughed and said to his assistant, “oh she didn’t like that.” Jane Doe H.M. felt horrible. Her pain was a joke to him.

156. She never forgot what Broadbent did to her, but it was not until the news about Broadbent’s history of abusing patients came out that she realized that what she experienced in Broadbent’s office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

157. As she read stories from other victims, Jane Doe H.M. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe K.H.

158. Jane Doe K.H. was pregnant with twins, was told that her pregnancy was more high risk, and needed a new OBGYN when she came across Broadbent on her insurance provider's covered provider page.

159. Her first appointment was on July 16, 2015, and her husband came with her.

160. Jane Doe K.H. sat on the table in an exam room and undressed from the waist down as requested. When Broadbent came in, he reached up under her shirt, slid his hands under her sports bra, then under her underwire bra (she wore one on top of the other at the time), and felt her breasts. In no way, however, did he feel with his fingers as though he was checking for lumps.

161. Broadbent said nothing and then, without warning, put his fingers in her vagina.

162. He then asked how she got pregnant with twins, and Jane Doe K.H. explained they used fertility treatments, to which Broadbent made a snarky comment about her husband's inability to conceive a child naturally.

163. At later appointments, Broadbent felt Jane Doe K.H.'s belly and made inappropriate comments about her weight.

164. She eventually switched to another OBGYN, feeling violated and uncomfortable about her appointments with Broadbent.

165. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

166. As she read stories from other victims, Jane Doe K.H. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe E.B.

167. In 2015, Jane Doe E.B. went to see Broadbent because she had a hard time finding another OBGYN in her area.

168. It was her first pregnancy and her first experience with an OBGYN. Jane Doe E.B.'s husband accompanied her to her appointments.

169. During each appointment, Broadbent made comments about Jane Doe E.B.'s body, such as how thin she was and how glad he was that she was not "another fat patient." During ultrasounds he said how happy he was that she was not fat because it made his job easier.

170. At one of Jane Doe E.B.'s appointments, Broadbent tried to convince her husband to leave the room (which he declined to do), and Jane Doe E.B. and her husband noticed the nurse get a very uncomfortable look on her face as she exited the room.

171. Broadbent then performed a needlessly painful pap smear. When he finished, he ran his hands down the length of Jane Doe E.B.'s legs, wiping surgical gel all over them.

172. Broadbent then quickly slid his hand up under her bra without warning. As he did so, he tried to block her husband's view of what he was doing.

173. Broadbent only grabbed one breast and then said "no lumps" as if he just performed a thorough mammogram.

174. At one point during Jane Doe E.B.'s pregnancy, she experienced abnormal bleeding and went to Broadbent for a checkup. After another painful pap smear, Jane Doe E.B. decided to switch providers.

175. She never went back to Broadbent, but she was afraid to file any complaints because she thought maybe it was all in her head.

176. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

177. As she read stories from other victims, Jane Doe E.B. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe A.S.

178. Jane Doe A.S. chose to go to Broadbent because she lived close by in Brigham Young University housing and, when she Googled "obgyn near me," Broadbent's information was the first to appear and closest office to her. He also seemed to be a reputable choice due to his health care and hospital affiliations.

179. On September 23, 2015, Jane Doe A.S. visited Broadbent's office for the first time with complaints of vaginal itching, and she was directed in to an exam room.

180. In the exam room, Broadbent handed her a robe and a sheet and told her to undress completely and put the robe on.

181. Broadbent returned after she changed and told her to lay back and put her feet in the stirrups on either side of the bed.

182. With no notice, warning, or explanation, Broadbent began touching Jane Doe A.S. around her thighs with both hands, then touching around her vagina, and lastly around her rectal area with multiple fingers.

183. Broadbent then proceeded, without warning, to place his pinky finger slightly inside her rectum and then began to place his fingers in Jane Doe A.S.'s vagina.

184. Broadbent did not explain what he was doing or why he was doing it, but when he finished, he started telling Jane Doe A.S. about the importance of performing breast exams on herself.

185. Then, again with no notice or warning, he placed the palm of his hands and tips of his fingers on her breasts and felt them simultaneously. Jane Doe A.S. was in shock and did not know how to respond or how to stop him.

186. Before Jane Doe A.S. could say anything, Broadbent started explaining in great detail how she could give herself breast exams at home. He took both of his hands and rubbed his own chest in circular motions saying, “It’s best to do this in the shower when you can get your boobs really soapy, I mean really lather them up, and rub in a circular motion to feel for lumps.”

187. Jane Doe A.S. felt extremely uncomfortable, but knew she was supposed to trust the doctor, and did not know what else she could do.

188. When Broadbent finished talking about performing breast exams, he prescribed her something for the itching and said she could leave.

189. For years, Jane Doe A.S. felt uncomfortable and “gross” about what happened in Broadbent’s office, but told herself that he was a doctor and he “knew what he was doing,” and she was just being dumb.

190. It was not until Jane Doe A.S. listened to a podcast in December 2021—a podcast in which an interviewee related her own account of sexual abuse at the hands of Broadbent—that she realized that what she experienced in Broadbent’s office was not was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

191. After listening to the podcast, Jane Doe A.S. reached out to the interviewee and learned that numerous other women heard the podcast and reached out with similar accounts of Broadbent sexually abusing them. She talked to the interviewee and the interviewee directed some of the victims to Jane Doe A.S. to talk with as additional support.

192. A look online at Broadbent's Google Reviews and other online reviews revealed numerous other similar accounts of sexual abuse.

193. That is when Jane Doe A.S. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

194. As she read the accounts and realized the true nature of what Broadbent did, the pain, suffering, anxiety, and distress she felt after her examination came flooding back.

Jane Doe M.T.

195. In 2009, Jane Doe M.T. was pregnant and needed a new OBGYN, so she googled OBGYNs close to her, Broadbent's information came up, and she booked an appointment.

196. At the first appointment, and subsequent appointments, Broadbent told her to change into a gown and, with no warning, began examining her vagina. Then, with no pause in the conversation, he penetrated her rectum with his index finger.

197. Jane Doe M.T. jumped when this happened and felt weird, but reasoned that he was an experienced doctor who must know what he was doing. She tried to shake off the uncomfortable feeling creeping over her as her husband looked at her wide-eyed.

198. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

199. As she read stories from other victims, Jane Doe M.T. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe A.G.

200. Jane Doe A.G. was 14 years old, in 2009, when she first went to Broadbent. She was already eight-months pregnant at her first appointment with him, so she only went to him a couple of times.

201. But at each appointment, Broadbent made a point of putting his hands on her breasts, massaging them, and explaining that was how she should massage them after she had her baby.

202. Each time he did this, she felt extremely uncomfortable, but thought that was what he was supposed to do and forced herself to think it was ok and she did not need to tell anyone.

203. In 2011, Jane Doe A.G. was pregnant again and went back to Broadbent since she did not know any other OBGYNs.

204. Her boyfriend came with her to her first appointment in 2011, and during what Broadbent claimed was a necessary pelvic exam, Broadbent said “I see what you like.” Jane Doe A.G. immediately felt uncomfortable, both with how Broadbent was touching her and with the comment he made.

205. Jane Doe A.G. felt dumb for going back to him, but again forced herself to trust him. She felt self-conscious about her body and what he did intensified those feelings.

206. Since those experiences as a young teenager, a minor, Jane Doe A.G. has felt uncomfortable being touched by any male, but for a long time, thought it was all in her head.

207. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

208. As she read stories from other victims, Jane Doe A.G. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe S.B.

209. Jane Doe S.B. first went to Broadbent in the spring of 2006 in preparation for getting married.

210. During a follow-up to her initial visit, Broadbent, after already performing what Jane Doe S.B. assumed was a vaginal exam, spontaneously inserted his finger into her rectum, causing a lot of pain.

211. Jane Doe S.B. asked what he was doing, and Broadbent said that it had to do with her fertility issues.

212. During the same visit, Broadbent roughly grabbed her breasts and lingered with his fingers on her nipples, explaining that it was harder to do a breast exam on her because she had breast implants.

213. That was the first of multiple instances very similar to this one that extended for the duration of her time going to his office. Each time Broadbent claimed that because of her fertility issues, she needed to be monitored more closely.

214. On March 14, 2007, Jane Doe S.B. delivered her son at Timpanogos Hospital. Immediately after the delivery, Broadbent placed his whole hand roughly into her vagina, claiming he needed to make sure all of the placenta came out.

215. When Jane Doe told him how much pain he was causing her, Broadbent chuckled.

216. In 2009, after continued worry about not being able to become pregnant again, Jane Doe S.B. became pregnant with twins. Unfortunately, she lost one of the twins a few short months into the pregnancy.

217. During an ultrasound with Broadbent, Broadbent took a long time looking around on the ultrasound, then checked the chart, started laughing, and said, “I forgot that other one was a goner, that’s why I couldn’t find it.”

218. Jane Doe S.B. and her husband were extremely upset by the comment and wanted to switch doctors, but by that time, Jane Doe S.B. was so afraid of not being able to have more kids because of her fertility issues, that she decided to continue seeing Broadbent.

219. After delivering her daughter on March 22, 2010, at Utah Valley Hospital, Broadbent again aggressively shoved his whole hand in Jane Doe S.B. to “make sure no placenta was left behind.” This time was so painful that Jane Doe S.B. screamed out, but Broadbent did nothing to alleviate the pain. Instead, he just looked at her and smiled while she cried, telling her to look as he moved her stomach from inside.

220. After a miscarriage scare with her next child, Jane Doe S.B. finally switched to another OBGYN.

221. Since her experiences with Broadbent, Jane Doe S.B. has lived with the embarrassment of what happened, the guilt of not having the courage to stop it, and the loneliness of thinking it was just her. The trauma she experienced at the hands of Broadbent affected her and her personal relationships.

222. It was not until the news about Broadbent’s history of abusing patients came out that she realized that what she experienced in Broadbent’s office was not part of a medically

necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

223. As she read stories from other victims, Jane Doe S.B. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe K.S.

224. In or around early 2010, Jane Doe K.S. went to Broadbent's clinic and was told to remove her clothes with little explanation. Jane Doe K.S. undressed, seated herself on the edge of the table, and waited for Broadbent.

225. When he came in, Broadbent positioned the stirrups and asked her to scoot to the edge of the table. Each time she stopped, he asked her to scoot closer, to the point that she felt like she was too far off the table.

226. Feeling uncomfortable, Jane Doe K.S. brought her knees slightly together and Broadbent put his hand on the inside of her thighs to widen her legs. Jane Doe K.S. already wanted all of it to pass, but figured this was a necessary part of getting married.

227. As she thought this, Broadbent leaned in with his face right next to her vagina, and said, "Everything smells okay." He then kept his face right by her vagina for a long time.

228. Broadbent finally leaned back, but then lubricated his fingers and, with little warning, began feeling Jane Doe K.S.' labia, clitoris, vulva, and then her perineum.

229. Broadbent then inserted a finger in her vagina and began massaging her clitoris with his thumb. He then inserted another finger, moving both fingers around, stroking the upper interior part of her vagina, and then used his other hand to press down on her lower pubic area.

230. Jane Doe K.S. was in shock and felt confused about what he was looking for and the length of time his fingers were inside of her.

231. Broadbent then went to his counter and began inserting different sized speculums into her vagina, deciding each one was not right, removing it, and retrieving a larger instrument.

232. Once he finished with this, he put his finger in her rectum causing her pain. Jane Doe K.S. remembers having a hard time controlling her breathing and doing her best to stay calm, hoping it would hurry the process.

233. Afterward, Broadbent reached up her gown, bringing her gown above her hips and fully exposing her naked waist, and felt her breasts.

234. Jane Doe K.S. did not understand why he was performing a “breast exam,” why his waist was close to hers, or why he was reaching up her body. She tried but could not bring her knees in because his body blocked them.

235. Broadbent then began to ask about Jane Doe K.S.’s sexual history. When she said she was not sexually active, he began asking how many men she was sexually active with, and asked again whether she was a virgin. Jane Doe K.S. said she was, and Broadbent said, “Really? It doesn’t seem like it.”

236. Broadbent then asked if she masturbated, and when she said no, told her that a lot of young mormon women came in lying to their husbands about their sexual activity but he could always tell who was lying.

237. Jane Doe K.S. froze, not knowing if he was accusing her or not, and not knowing how to respond, worrying that he may falsely accuse her and jeopardize her engagement.

238. After Jane Doe K.S. did not budge on her answers, Broadbent seemed resigned, but unbelieving that she was telling the truth. He went on to tell her that her soon-to-be husband was a very lucky man and that she would “be a *pleasure* to him.”

239. Broadbent then talked about the width and shape of her vagina, saying she “wouldn’t have any trouble with sex” and that her soon-to-be husband “wouldn’t have any trouble getting into” her and again emphasized how much she would “pleasure” her new husband.

240. When Broadbent finally left, Jane Doe K.S. sat there horrified. The assistant/nurse came in and could clearly see she was not okay. Jane Doe K.S. remembers the look on her face. She asked Jane Doe K.S. questions that seemed a little beyond the appointment, and more directed at what had just occurred, but Jane Doe K.S. could not seem to come up with any words and just wanted to leave.

241. Jane Doe K.S. will never forget her face. It was not kind. It was not compassionate, and Jane Doe K.S. was left feeling like she was made to feel like a fool.

242. For days following the appointment, Jane Doe K.S. felt pain, bruised, and sore and bled unusually for days despite not being on her menstrual cycle. She tried desperately to forget about it.

243. The only thing she said to her husband was that they would not have any trouble, and that she completed the exam.

244. That experience left Jane Doe K.S. emotionally and physically sick, feelings which came back when she saw the news about Broadbent’s history of abusing patients. That is when she realized that what she experienced in Broadbent’s office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

245. As she read stories from other victims, Jane Doe K.S. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

246. She now looks at her daughter and is committed to speaking up and helping her understand what is medical care and what is not.

247. Jane Doe K.S. is hurt, angry, sad, and bewildered that this happened to so many people.

Jane Doe M.P.

248. Around 2009, Jane Doe M.P. was a few months pregnant and went to see Broadbent for a checkup.

249. A nurse took her into the room and told her to undress from her waist down and to put on a robe and sheet below her waist.

250. A few minutes later, Broadbent came in the room, put on his gloves, and began to examine her. Jane Doe M.P. thought it awkward that the nurse was standing behind her above her shoulder, but did not think much of it in the moment.

251. Then, as Broadbent began to examine her, she realized that not only could she feel his fingers in her vagina, but at the same time, she could feel fingers in her rectum.

252. Jane Doe M.P. suddenly felt very uncomfortable, especially when Broadbent's fingers stayed there for a minute or so.

253. Broadbent then removed the gloves off his hands underneath the sheet where Jane Doe M.P. and the nurse could not see. He then instructed her to wipe herself and dress.

254. When Jane Doe M.P. did so, she confirmed that Broadbent put his finger(s) in her rectum because it was very slippery.

255. She stood there feeling humiliated and embarrassed.

256. It was not until she saw the news about Broadbent's history of abusing patients that she realized that what she experienced in Broadbent's office was not part of a medically

necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

257. As she read stories from other victims, Jane Doe M.P. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe S.P.

258. In 2008, Jane Doe S.P. was 19-years-old, about to get married, and heard she needed a “pre-marital exam,”¹ so she did an internet search for OB/GYNs in the area and saw that Broadbent’s office was right next to her apartment complex.

259. When Jane Doe S.P. went into Broadbent’s exam room, she was told undress, put on a gown, and lie on the table.

260. She was nervous and did not know what to expect when Broadbent walked in.

261. Without asking any questions, explaining what he was going to do, or giving any warning, Broadbent reached up Jane Doe S.P.’s gown and cupped both of her breasts at the same time.

262. Jane Doe S.P. was shocked, but he was a doctor and a man in authority and, her whole life, she was told to trust doctors and not question men in authority, so she told herself this must be normal.

263. As Jane Doe S.P. tried to convince herself this must be normal, Broadbent, again with no warning or explanation, stuck his fingers in her vagina.

264. As if that was not bad enough, Broadbent then caught her completely off guard when he suddenly shoved his fingers into her anus for a rectal exam, causing her extreme pain.

¹ A term commonly used in Utah to describe a first appointment with an OB/GYN prior to marriage. It is commonly used to establish a relationship with a doctor, discuss contraception options, and possibly have a pap smear performed. It is akin to a woman’s first annual exam.

Jane Doe S.P. remembers wincing in pain as she slid away on the table and suddenly felt extreme shame for her body.

265. Broadbent said nothing and explained nothing.

266. Jane Doe S.P. felt violated, but blamed herself, thinking, “I should have known the appointment included a rectal exam.” Jane Doe S.P. told herself she was stupid for not knowing that the exam included a breast exam and a rectal exam.

267. Jane Doe S.P. laid still, confused and shocked.

268. Then, as Broadbent finished and was removing his gloves he said, “Well, your husband is a lucky man.”

269. Jane Doe S.P. said she felt like she wanted to throw up.

270. Broadbent then proceeded to tell her she could use her fingers to stretch her vagina in preparation for her upcoming wedding and that if she experienced any bleeding during sex she should “just do what the Boy Scouts do and apply pressure.”

271. Jane Doe S.P. did not know what to do, so she deferred to his authority as her doctor and doubted her own feelings. As a result, she lost trust in herself and in authority figures.

272. For years, Jane Doe S.P. felt uncomfortable and violated, but she never told anyone—not even her husband. As she went to other OB/GYN’s, she felt some validation in her feelings and realized Broadbent’s actions were abnormal.

273. In 2018, she thought again about the experience and it occurred to her to check his reviews to see if anyone else experienced something similar. In reading other similar accounts, she realized his conduct was not part of a medically necessary exam, it was a series of unlawful actions Broadbent performed for no other reason than his own sexual gratification.

274. It was not until Jane Doe S.P. then spoke out about what happened to her that she realized Broadbent's actions were not just inappropriate or abnormal—they were unlawful actions Broadbent performed for no other reason than his own sexual gratification.

275. After speaking about her experience, other victims reached out to her and in subsequent conversations she realized that she had a legal claim.

276. As more and more victims reached out to her, and as she saw victims posting reviews online about being sexually abused by Broadbent, Jane Doe S.P. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

277. As she read the accounts and realized the true nature of what Broadbent did, the pain, suffering, anxiety, and distress she felt after her examination came flooding back.

Jane Doe B.H.

278. On December 22, 2008, Jane Doe B.H. was ambulated from Sanpete Valley Hospital to Utah Valley Hospital in preterm labor at 33 weeks gestation.

279. It was Jane Doe B.H.'s first pregnancy, and she arrived completely terrified of what would happen to her unborn baby. She was taken to the hospital's labor and delivery department where she was having contractions and worried that she would deliver before her husband could make it.

280. A nurse came in and started hooking her up to the fetal monitors when a doctor, who never bothered to introduce himself, came in. He took a seat in the guest chair of the room, reclined his feet, placed his hands behind his head like he was getting ready to watch his favorite show on TV, nodded toward the nurse and Jane Doe B.H., and simply said, "check her." The

nurse then proceeded to check her cervix for changes in dilation while the doctor watched on in a manner that made her feel extremely uncomfortable.

281. The nurse reported Jane Doe B.H.'s measurements to the doctor, he nodded and briefly said, "no food or drink until we can get her contractions under control," and left the room. It was then that Jane Doe B.H. asked the nurse if that was indeed her doctor and what his name was. The nurse her said his name was Broadbent.

282. An hour later, Jane Doe B.H.'s husband made it to her room. They had both been through so much that day that she did not want to tell him how creepy her OBGYN was, so she kept the "introduction" she had with him to herself.

283. Later that night, Jane Doe B.H.'s brother-in-law came to the hospital to visit and see if her and her husband needed anything.

284. He sat in one of the visitor's chairs, and her husband was on the couch, when Broadbent entered the room, barely gave a glance to the fact that she not only had her husband there, but that she had another visitor, and told Jane Doe B.H. that he needed to check her vitals.

285. Broadbent then walked over to her and, using his stethoscope, listened to her heartbeat.

286. Jane Doe B.H. thought he was done when, without any warning, Broadbent reached his hand completely down the front of her gown, popping open one of the clasps on her hospital gown, and, with his whole hand, groped Jane Doe B.H.'s breast.

287. With his hand still holding her breast, he asked, "is it tender?" Before Jane Doe B.H. could answer, Broadbent reached down and groped her other breast, exposing part of her body which her brother-in-law inadvertently saw. The way he groped her breast was nothing like breast exams Jane Doe B.H. subsequently experienced.

288. Broadbent continued to be her OBGYN provider for the next few days. Each time he would enter her room, she would cringe and hope that he would not touch her.

289. Jane Doe B.H. and her husband talked about asking for a new doctor to care for her, but were worried that there would be repercussions that may compromise her or her baby's care.

290. One day, while Jane Doe B.H.'s husband was grabbing lunch, Broadbent came in and her anxiety went through the roof. She just prayed that he would not try and touch while her husband was gone.

291. A nurse came in shortly after and she could not keep things quiet any longer. She told her the situation and asked her if any of it was normal. The nurse looked at her wide-eyed and asked Jane Doe B.H. if she could have her nurse manager come in; Jane Doe B.H. agreed.

292. After she retold her story to the nurse manager, the nurse manager told Jane Doe B.H. that she would escalate the situation, and that Jane Doe B.H. could request a new doctor.

293. Jane Doe B.H. was still terrified that this would cause issues with her care, but the nurse assured her that it would not. She then received a new OBGYN, was later discharged, and reached full term before delivering.

294. Unfortunately, despite being told that the situation would be "escalated," she never heard back from anyone at Utah Valley Hospital.

295. When she was called by the hospital about her bill, she was still very upset and told them that she was not going to pay it because Broadbent groped her breasts and would pay it once she heard that things had been taken care of.

296. Utah Valley Hospital told her that she would need to take it up with Broadbent's office because he was not the hospital's employee and they were not responsible for his behavior.

297. Not knowing what to do, Jane Doe B.H. felt angry, embarrassed, and defeated and worked to let go of what happened and just be happy that she had a healthy baby.

298. Six years later, in the fall of 2014, Jane Doe B.H. was employed by IHC and expecting her third child.

299. Through quarterly meetings, she started getting to know the Hospital Administrator over Utah Valley Hospital (the "Administrator"), and during one interaction with him and another hospital administrator, asked if Broadbent still worked at Utah Valley Hospital.

300. The Administrator told her that he did.

301. Jane Doe B.H. could not hide her distaste and replied, "he probably shouldn't be."

302. The Administrator kind of smiled and said something like, "yeah, some people don't like his personality."

303. Jane Doe B.H. replied that that was not the problem and told the Administrator all of the details from her experience with Broadbent. The Administrator seemed extremely uncomfortable and asked if Broadbent was touching her breasts to see if her milk had come in yet.

304. When she said no, the Administrator nodded and asked if she would be comfortable sending an email to him with an account of her experience so he could discuss it with the chief medical officer for the hospital. Jane Doe B.H. agreed and emailed him all the details she discussed with him earlier that day.

305. The next morning, Jane Doe B.H. received a call from the Chief Medical Officer for Utah Valley Hospital (the “CMO”) who told her that he reviewed the email she sent the Administrator and that he discussed the case with the medical leads over labor and delivery.

306. The CMO told Jane Doe B.H. that when he brought up her case to the doctors, they told him that they knew exactly which case he was referring to (even six years later), that they were both very familiar with her case.

307. The CMO then went on to tell Jane Doe B.H. that she should know that Broadbent was “disciplined” for what he did to her and that he had to undergo mandatory trainings which, to the best of her knowledge, were described as sensitivity and aggression trainings. The CMO explained that Broadbent had to complete those before he could go back to caring for patients.

308. While Jane Doe B.H. was somewhat happy to hear that at least something was done, she was still displeased to hear that Broadbent was still seeing patients. At that time, she was also too scared of losing her job to push the case any further.

309. When the news about Broadbent’s history of abusing his patients came out, Jane Doe B.H. realized the full extent of what happened to her, that it was unlawful, and that **years after her complaint to the Administrator and CMO of Utah Valley Hospital, IHC was still working with Broadbent and referring patients to him.**

310. After that many years, she still feels violated and angry that a person in a position of care saw a terrified woman who was worried about losing her baby and in an extremely vulnerable position as an opportunity to “push the envelope” and see what he could get away with—even being so brazen as to do it in front of two men in the name of “caring” for a patient.

Jane Doe A.W.

311. Jane Doe A.W. met Broadbent in 2004 when she started working at Utah Valley Regional Medical Center in the Operating Room. Broadbent came in now and then for surgical procedures and she saw him then.

312. Jane Doe A.W. and Broadbent did not talk much, but she knew who he was.

313. In 2006 Jane Doe A.W. got married and became pregnant soon after. A different OBGYN delivered her first daughter.

314. Unhappy with the care she received at the time of her first delivery, Jane Doe A.W. asked her colleagues at Utah Valley Hospital who they thought would be good to work with in light of some underlying medical issues, and they told her Broadbent handled infertility issues.

315. In 2008, Jane Doe A.W. made an appointment with Broadbent and met with him in his office.

316. The appointment began with questions about her medical history, and Broadbent said he wanted to do a pap smear and also perform an ultrasound to be thorough. He asked Jane Doe A.W. to lay back so he could do the exam.

317. That is when Jane Doe A.W. began feeling odd about the situation. There was no nurse in the room, nor did Broadbent step out to get one. She asked him, and he said that the nurse was short staffed and he would perform the exam without her.

318. Jane Doe A.W. thought to herself, “he’s the doctor and he knows what is best.” She was in her early twenties and was raised and taught not to question her elders or to question someone with more education than herself, so she said nothing.

319. Broadbent went to perform the exam, and Jane Doe A.W. explained she had a history of sexual trauma, explaining that it made her jumpy in these situations and she needed communication from him to help her stay calm while being touched in intimate areas.

320. Instead of listening to her or communicating, Broadbent, with no warning, roughly began touching her and inserting a speculum in her vagina. This caused her pain, and as Broadbent proceeded, the exam began to feel more and more wrong.

321. That is when Broadbent suddenly inserted two fingers in her rectum while placing his other fingers along her episiotomy scar and pushing his fingers together.

322. This caused more pain and Jane Doe A.W., with tears in her eyes, said “ouch!”

323. She left that day feeling uncomfortable about the entire experience and immediately switched to another provider.

324. Thinking back on the experience, Jane Doe A.W. felt like she was not in control of her own body—that she was just a piece of meat on the exam table.

325. When Jane Doe A.W. saw the news articles about Broadbent’s history of abusing patients, she instantly had those feelings return to her.

326. As she read stories from other victims, Jane Doe A.W. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe S.O.

327. Around December 24, 2008, Jane Doe S.O.’s water broke six weeks early while her regular OBGYN was unable to attend her delivery.

328. Jane Doe S.O. was transferred to Utah Valley Hospital, and the on-call doctor, who later performed a c-section, was Broadbent.

329. After the delivery, Broadbent went to Jane Doe S.O.'s recovery room. Her husband was not there, but Broadbent came in with a nurse who stood a couple of feet away from the foot of Jane Doe S.O.'s bed while he spoke by her side.

330. Toward the end of the visit, while talking about something related to the actual delivery, Broadbent slid his hand down Jane Doe S.O.'s hospital gown and pinched the nipple on her right breast.

331. His hand did not linger and he did not feel around—it was literally a hard, painful pinch, followed immediately by removing his hand.

332. During the entire incident, Broadbent continued speaking and did not break eye contact with Jane Doe S.O.; in fact, he continued discussing the delivery as though he had not done anything.

333. Jane Doe S.O. was shocked and embarrassed and was left feeling unsure and telling herself that she had to be misunderstanding the situation.

334. Jane Doe S.O. told her husband, but they were new parents and could not figure out why this would have happened.

335. For years after, she thought about the incident as bizarre and unexplained, and thought about her stupidity and cluelessness, not knowing whether she was stupid or clueless.

336. Then her husband sent her the article in KSL with the allegations against the Broadbent, and she felt her stomach drop. That is when she realized that what she experienced at the hands of Broadbent in IHC's facility was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

337. As she read stories from other victims, Jane Doe S.O. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe M.Z.

338. In the winter of 2008, Jane Doe M.Z. went to Broadbent's office because she was pregnant with her second child.

339. At the end of her initial vaginal exam, Broadbent said there was one last thing he had to do, but did not explain what it was or why he was doing it.

340. Then Broadbent shoved his finger quickly and forcefully up Jane Doe M.Z.'s rectum.

341. Jane Doe M.Z. was shocked and gasped. She looked at the nurse and Broadbent, thinking, "What just happened!?" Neither of them made eye contact with her and carried on like this was just part of the exam.

342. Jane Doe M.Z. had a few pelvic exams before this experience and could never remember this happening, but she just kind of assumed that maybe Broadbent did things a little different. She felt very uncomfortable, but thought she would feel more uncomfortable if she questioned his professional practices.

343. When she sat up with just the paper drape covering herself, the nurse left the room and Broadbent continued to stay in the room. He sat to the side of her and wanted to have a conversation, but he was not talking about anything medical.

344. Jane Doe M.Z. felt uncomfortable because she was not fully dressed, but Broadbent sat and talked to her for about 20 minutes. Jane Doe M.Z. thought to herself, "can I get dressed now? Are you expecting me to get dressed with you in here? I would feel much more comfortable having this conversation with my clothes on."

345. It was not until the news came out about Broadbent's history of sexually abusing patients that Jane Doe M.Z. realized that what she experienced in Broadbent's office was not part

of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

346. As she read stories from other victims, Jane Doe M.Z. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe M.R.

347. In 2004, Jane Doe M.R. became pregnant with her first child.

348. At her first appointment with Broadbent, her first time seeing an OBGYN, she was told to remove all of her clothes and put a paper gown on.

349. With a nurse and her husband in the room, Broadbent felt Jane Doe M.R.'s breast, examined her vagina, and then said he needed to do one more thing.

350. That is when he inserted his thumb into Jane Doe M.R.'s rectum. Jane Doe M.R. assumed it was normal.

351. She continued to see him in 2005 for her second pregnancy and in 2007 for her third pregnancy.

352. When Jane Doe M.R. was pregnant with her last child, she told her friend she had an appointment with Broadbent and said she was not looking forward to being "poked in the butt again." Her friend said that was not normal, and Jane Doe M.R. switched providers, but wondered if she just misunderstood what happened.

353. It was not until the news came out about Broadbent's history of sexually abusing patients that Jane Doe M.R. realized that what she experienced in Broadbent's office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

354. As she read stories from other victims, Jane Doe M.R. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe C.G.

355. In 2007, Jane Doe C.G. and her husband (fiancé at the time) went to see Broadbent.

356. She told Broadbent she was having horrible cramps during her periods and wanted to see if there was anything she could do to ease the pain.

357. Broadbent had her undress and put on a gown so he could conduct a physical exam.

358. He returned with no nurse to witness, which Jane Doe C.G. thought was strange.

359. Broadbent then grabbed Jane Doe C.G.'s breasts and started continually squeezing them.

360. Broadbent then said he had to make sure Jane Doe C.G.'s nipples could get hard. He rubbed, squeezed, and played with them until they got hard. This made her really uncomfortable, but she had never had a breast exam before, so she did not know what to expect or what was normal.

361. Broadbent then had her lay down and, as he asked about her cramps, put his ungloved middle finger in her vagina and pressed on her pelvis with his other hand.

362. He then pulled out his finger as she was still explaining her symptoms, then reinserted his middle and ring finger into her vagina, moving them in and out, quickly and repeatedly as he dug down into her pelvis again. He then reached up through the gown and fondled her right breast again. Jane Doe C.G. winced in pain, but as her husband started to stand up to say something, Broadbent stopped and pulled his fingers out.

363. Broadbent then put on gloves and said, “I’m going to stick a finger in your vagina and one in your rectum. If you enjoy this, I’m going to question you!” This made Jane Doe C.G. very uncomfortable, both what he said and what he was going to do, but she did not think she could say no.

364. Broadbent proceeded to insert his index finger into her vagina, his middle finger in her rectum, and pushed them deep enough to rest his thumb on her clitoris. Broadbent then began moving them in a circular motion which caused excruciating pain.

365. Broadbent then said he needed to feel the tissue between the rectum and vagina to make sure everything was normal. He started to pinch and rub the tissue that separated her vaginal and rectal areas really hard. It hurt so bad that Jane Doe C.G. closed her eyes and prayed for it to be over.

366. After he was done, Broadbent sat down and said, “if you want your cramps to go away, you can go on birth control, have a baby, or I can manually dilate your cervix.”

367. He asked if she wanted to be dilated right then, but she told him absolutely not.

368. After he left, Jane Doe C.G. got dressed and they left Broadbent’s office.

369. Looking back, there are things which Jane Doe C.G. mentally blocked out. She was extremely uncomfortable, and as she left, she told her husband she never wanted to go back.

370. With it being her first appointment outside of a pediatrician, she did not know what to expect or what was normal.

371. It was not until the news came out about Broadbent’s history of sexually abusing patients that Jane Doe C.G. realized that what she experienced in Broadbent’s office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

372. As she read stories from other victims, Jane Doe C.G. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe T.M.

373. Jane Doe T.M.'s first experience with Broadbent was in 1986. She was 18, newly married, and expecting a baby. During her first appointment with him, Jane Doe T.M. was told to undress, after which Broadbent said, "Your tan line is interesting," in a way that felt uncomfortable to Jane Doe T.M..

374. Thankfully, Jane Doe T.M. was hired for a full-time job soon after that appointment and, because of a change in insurance, switched to Certified Nurse-Midwives for the remainder of her pregnancy and delivery.

375. Then, in 2007, while pregnant with her sixth child, Jane Doe T.M. encountered Broadbent again.

376. For the first part of this pregnancy, Jane Doe T.M. continued to go to the Certified Nurse-Midwives. But, in her thirteenth week of pregnancy, Jane Doe T.M. developed a life-threatening blood clot that was treated at Utah Valley Hospital. The treatment needed to save her life was "incompatible" with pregnancy, and she fully expected to lose the baby. Miraculously, her baby survived. Unfortunately, she was then considered "high-risk," so she had to switch over to an OBGYN.

377. The OBGYN she chose delivered at Utah Valley Hospital, and when she went for her first appointment with her new doctor, Jane Doe T.M. noticed a schedule on the check-in desk that showed which doctor was on-call for the upcoming month.

378. She saw that Broadbent was listed as one of the on-call doctors, so she asked about it and learned that they rotated being on-call.

379. Jane Doe T.M. remembered Broadbent as being “creepy” with his comment about her tan line, but figured the odds were that he would not be on-call when she delivered, and just moved forward hoping that would be the case.

380. When Jane Doe T.M. was about thirty-two weeks pregnant, a non-stress test indicated her baby was in distress, and she was told that she would immediately be admitted to the hospital until the baby’s birth.

381. Jane Doe T.M.’s husband went home to get things they needed for an extended hospital stay, and she was temporarily placed in a hospital room while she began the admission process.

382. Jane Doe T.M. changed into a gown and was seated in a bed while a nurse gathered her information. When the nurse left the room, Broadbent came in.

383. Jane Doe T.M. figured he was on call for that day and was just there to help get everything set up.

384. Broadbent sat in a chair near her bed and asked some general questions about what was happening. Then Broadbent unexpectedly stuck his hand up the front of Jane Doe T.M.’s gown while saying, “Let’s do a breast exam.”

385. Jane Doe T.M. was sitting up in the bed, slightly reclined, and Broadbent began to run his hand across her breasts a few times, then removed his hand from inside her gown and said, “We probably don’t need to do a breast exam at this point.”

386. Jane Doe T.M. sat there in absolute stunned silence.

387. Broadbent left the room moments later, and the nurse who settled Jane Doe T.M. in came back in the room.

388. Jane Doe T.M. told the nurse that she did not want that man in her room again if she was alone. She told the nurse what happened, and the nurse began to type into the computer.

389. The nurse did not really ask anything afterward, and gave the impression that she was not surprised or shocked. After she finished typing, she told Jane Doe T.M. that if Broadbent came back into the room again while she was alone, she should push the nurse's call button and someone would come right in.

390. Within a day or two of being admitted to the hospital, the General Conference of the Church of Jesus Christ of Latter-Day Saints was being broadcast on television, so Jane Doe T.M. and her husband were watching it.

391. While they were watching, Broadbent came into the room, pulled up a chair, and started making small talk with them. They assumed he was LDS, so thought it was odd that he came into the room just to make small talk while Jane Doe T.M. and her husband watched the conference.

392. Jane Doe T.M. barely spoke to him and tried to keep her eyes on the television so he would leave. After a few minutes, he got up to leave, then put his hand on her lower leg and made a comment about her "nice legs."

393. At some point in the next couple days, Jane Doe T.M.'s maternal fetal medicine doctor approached her to ask about her complaint to the nurse regarding Broadbent's actions.

394. He listened and Jane Doe T.M. felt like he believed her, even though he mentioned that Broadbent was a good doctor—an interesting comment in light of what he did to Jane Doe T.M.

395. He then gave her a few options which included the option of a “Peer Reprimand” where he and Jane Doe T.M.’s regular OBGYN would confront Broadbent about what had happened and basically reprimand him as peers and colleagues.

396. Jane Doe T.M. also understood that a note would be placed in Broadbent’s records/file about the incident.

397. Jane Doe T.M. agreed to having Broadbent Peer Reprimanded, but feared taking the complaint any further, both because of concerns about the care she and her baby would receive if she pushed it, and because she was in a room in the hospital where she was essentially trapped if Broadbent should decide to come into her room and confront her about her complaint against him. Because of how he had already treated her before the complaint, the idea of that scared Jane Doe T.M..

398. Jane Doe T.M. also could not get a guarantee from her doctors that Broadbent would not deliver her baby. Both of her regular doctors were going out of town and it was possible Broadbent would be on call and there was no plan in place to keep him from delivering her baby.

399. If that happened, her care and her baby’s delivery would be in the hands of the person who groped her breasts and against whom she complained.

400. In the years since, Jane Doe T.M. tried not to think about what happened, and felt like there was nothing else she could do.

401. When Broadbent’s history of sexually abusing patients came out, Jane Doe T.M. realized the full extent of Broadbent’s actions.

402. She thought back on what happened to her and became angry and sad and cried remembering how it felt to have him do that to her. She was also angry that even after she took steps to complain, he was still hurting women in this way.

403. As she read stories from other victims, Jane Doe T.M. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe M.M.

404. Around 2007, Jane Doe M.M. was pregnant and went to her initial exam with Broadbent.

405. Once she was undressed, Broadbent came in and, without warning, inserted his fingers in her rectum and vagina at the same time.

406. When Jane Doe M.M.'s husband came home from work later that day, he found her in the house crying, feeling ashamed and afraid.

407. Jane Doe M.M. ended up delivering her baby at Timpanogos Hospital.

408. It was not until the news came out about Broadbent's history of sexually abusing patients that Jane Doe M.M. realized that what she experienced in Broadbent's office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

409. As she read stories from other victims, Jane Doe M.M. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe K.W.

410. In 2005, Jane Doe K.W. and her family moved from California to Springville Utah and needed a new OBGYN close to her home. That is when she and found out that Broadbent had an office in the same building as her daughter's pediatrician.

411. In January 2006, Jane Doe K.W. became pregnant and made an appointment to see Broadbent. She brought her one-year-old daughter with her in a stroller and her daughter sat there watching during the appointment.

412. A nurse stood in the corner of the room and Broadbent, with no warning and without the use of a speculum, suddenly stuck his fingers in her vagina and simultaneously inserted his pinky finger in her rectum.

413. She sat there in shock as the “exam” went on far longer than anything she previously experienced.

414. Jane Doe K.W. left the appointment feeling very confused about what happened, but thought she was reading into things or just being dramatic and that her experience could not possibly be what she felt it was because Broadbent was a doctor.

415. Jane Doe K.W. also thought that because Broadbent’s nurse was in the room and she did not say anything was wrong that Jane Doe K.W. must have been mistaken. She did not tell anyone for fear of seeming “silly.”

416. When Jane Doe K.W. read the article on KSL she panicked and ran to tell her husband about it. She had two thoughts when she read the other women’s experiences. Her first thought was she was not being dramatic or reading into things and her second thought was this was real; she really was victimized. She also thought about how she felt every time she walked by Broadbent’s office afterward on her way to her children’s pediatrician appointments.

417. It was then that Jane Doe K.W. realized that what she experienced in Broadbent’s office was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

418. As she read stories from other victims, Jane Doe K.W. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe J.S.

419. Jane Doe J.S. began seeing Broadbent in the Fall of 2005 while pregnant with her first child. Her husband came to a couple appointments with her, but usually she was alone.

420. At one appointment, Broadbent claimed he needed to perform a pelvic exam. No one else was in the room, and he did not explain why it was necessary.

421. Jane Doe J.S. suddenly realized that Broadbent inserted his fingers, rather than a speculum, in her vagina and simultaneously put another finger in her rectum. To make it worse, he let his fingers linger in her, then simply said he just needed to check some things.

422. Jane Doe J.S. was shocked, but she said nothing. She did not know anything about what to expect, and she defaulted to the idea that he was the doctor and chose to believe him.

423. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

424. As she read stories from other victims, Jane Doe J.S. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

425. Jane Doe J.S. carried the burden of being mistreated for so long, and even though it has been some time since it occurred, there has never been any resolution or restitution, leaving the incident feeling raw and unfair.

426. As she read the news, she knew she had to speak up and stop Broadbent from hurting more women. He built his career on abuse, and it must end.

Jane Doe C.S.

427. In the Fall of 2005, Jane Doe C.S. was referred to Broadbent for her very first Gynecological exam prior to getting married later that winter.

428. During the appointment, she was asked to undress and Broadbent proceeded to perform a digital exam of her vagina.

429. After the vaginal exam, without warning, explanation, or reason, Broadbent put his fingers in her rectum.

430. Jane Doe C.S. was startled by it and felt a lot of discomfort and pain.

431. After leaving his office, Jane Doe C.S. felt as though she had just been taken advantage of, but did not fully appreciate what just happened to her.

432. All she knew was that she would not go back to Broadbent's office ever again.

433. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

434. As she read stories from other victims, Jane Doe C.S. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe C.C.

435. In late summer 2005, Jane Doe C.C. found out she was pregnant. She was 19 years-old and had never been to an OBGYN, so she searched for the closest OBGYN.

436. Jane Doe C.C. set an appointment at Broadbent's office, not knowing beforehand what to expect.

437. When she arrived at the appointment with her fiancé and sister, the nurse took her vitals, told her to take her clothes off, and left the room. The nurse did not return the rest of the visit.

438. When Broadbent came in the room, he told her to lay down on the table and immediately grabbed her gown, opened it, and began feeling her breasts without any warning.

439. Jane Doe C.C. asked what he was doing and he said, “Just lay there and let me do my job.”

440. He then began asking Jane Doe C.C.’s fiancé questions about their relationship, such as how long they had been engaged.

441. Broadbent proceeded to sit down on a stool at her feet and, without warning or permission, grabbed her ankles and yanked her down to the edge of the table. Jane Doe C.C. felt like she was about to fall off, so she tried to move back, and Broadbent began yelling at her to stay and not to move.

442. Jane Doe C.C. began to shake in fear, too afraid to say anything else to him. She was already scared about pregnancy in general and scared to be in a new situation without knowing what was going on, and now she was completely frozen with fear.

443. Then, without warning, Broadbent began inserting his fingers into her vagina and began to ask questions about her fiancé and her sex life: how many times they had sex a week, what positions they used, if it hurt, did she enjoy it, if she could climax/orgasm, and so on.

444. Jane Doe C.C. was still frozen and could not answer, so her fiancé answered on her behalf, all while Broadbent had his hand inside of Jane Doe C.C.’s vagina.

445. Her fiancé also did not know what was normal, so he kept answering the questions that were being asked. Meanwhile, Jane Doe C.C. could feel Broadbent moving his

fingers around inside of her as she lay there terrified of what he was doing to her and not knowing if it was normal or not for an exam.

446. Broadbent then began asking questions about their religion, about their plans to get married, and if the baby was planned.

447. As they answered, Broadbent seemed to become angrier and began yelling at them about being bad examples, told them that they were going to hell for sinning, for being horrible parents for wanting to bring an unplanned child into this world without being good members of the church, and telling them they would be better off without the child—all while his hand was still in Jane Doe C.C.'s vagina.

448. After yelling and lecturing, Broadbent stood up, with one hand still inside Jane Doe C.C.'s vagina, and placed his other hand on her lower abdomen, just above her pelvic bone, feeling around before firmly planting his hand in one place.

449. Then, with a quick movement, Broadbent pushed both hands together, with the fingers in Jane Doe C.C.'s vagina pushing up towards her abdomen and the hand on her abdomen pushing in toward her body and down toward her vagina at the same time.

450. Jane Doe C.C. suddenly felt the most excruciating pain, unlike she ever felt before or sensed in her entire life. It immediately took her breath away and brought instant uncontrollable tears. She felt as though her body was being ripped in two.

451. All she could do was lay there and cry uncontrollably and whimper in excruciating pain. As soon as Broadbent finished, he said, "This should help you out," and told her to come back in a few weeks for medications and said she could expect bleeding. He then walked out of the room.

452. Jane Doe C.C.'s sister, who was sitting in the corner silent and horrified, had to help her sit up and clean up. She and Jane Doe C.C.'s fiancé helped her get dressed and essentially carried her out of the room and to the car as she cried in pain, saying "he did something to me, something is wrong."

453. For the next couple of days, Jane Doe C.C. could barely move because the pain was still severe. After that appointment, anytime she moved she bled slightly and experienced pain, but she was too afraid to call back to the office.

454. Within a few days, Jane Doe C.C. began to experience severe cramping and heavy bleeding, so her fiancé took her to the emergency room at Utah Valley Hospital.

455. A nurse in the emergency room told Jane Doe C.C. she needed to use an internal ultrasound to see if Jane Doe C.C. was losing the baby. As soon as she said Jane Doe C.C. needed to change and have something inserted into her vagina, she began shaking and crying.

456. Jane Doe C.C. told her about what happened at Broadbent's office and the nurse's eyes teared up as she began apologizing to her profusely and said she was most likely losing the baby, but she still had to verify.

457. The nurse helped Jane Doe C.C. calm down and was able to verify that she had indeed lost the baby. Before leaving the room, she stated it would be best not to go back to Broadbent because she had seen him do things like this before, then she left and allowed Jane Doe C.C. and her fiancé to grieve.

458. Before leaving, Jane Doe C.C. stepped to the bathroom, and as she sat there, it hit her that what Broadbent had done was equivalent to an abortion. Right there in that bathroom, all alone at the moment, all she could do was mourn and think about the rebuking Broadbent gave her and her fiancé in his office.

459. She left without ever saying another word because of the fear, the trauma, the grief, and the pain.

460. Shortly after getting married, Jane Doe C.C. found out she was pregnant again. She refused to go back to Broadbent.

461. Jane Doe C.C. was terrified of doctors from then on, and it almost cost her and her oldest daughter their lives as she waited to respond to a later medical issue out of fear of putting herself in the hands of another doctor. Even then, she shook out of fear that the same thing would happen with another doctor. It took almost an hour of the doctor going over step after step of what an exam would be and what it would feel like and that she could tell him to stop at any time before she would let him touch any part of her.

462. Today, Jane Doe C.C. cannot go to an OBGYN without her husband being in the room with her to help keep her calm.

463. Even with the trauma she felt, it was not until the news about Broadbent's history of abusing patients came out that she realized that much of what she experienced in Broadbent's office was not an overly aggressive doctor performing a medical exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

464. As she read stories from other victims, Jane Doe C.C. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

465. She now looks back, wishing she knew during that first appointment what she knows now. She sees her younger self as being young, dumb, inexperienced, and scared.

466. She never asked for that to happen. She never asked Broadbent to sexually abuse her and then to do what she believes took the life of her child. She never asked for the emotional and physical pain. She never asked to be sexually assaulted, to be victimized, and to be

traumatized for the past sixteen years, and she never asked for the pain, guilt, and grief that came after the appointment.

467. Jane Doe C.C. has since dedicated her life to those experiencing trauma and tries to help them find peace and comfort. No one should be victimized the way she was, and no one should have to carry that burden and pain alone.

Jane Doe M.C.

468. In September or October of 2005, Jane Doe M.C. was newly engaged and looking to find an OBGYN so that she could be prescribed birth control pills. It would be her first ever gynecological exam, and when she called Broadbent's office, they had the soonest available opening.

469. At the appointment, Jane Doe M.C. asked about birth control and Broadbent tried hard to talk her out of taking it, explaining that his wife and all but one of his daughters had never been on birth control and that his daughter who did take birth control gained lots of weight and became mean and irritable to the point that the family did not like being around her.

470. Broadbent then cautioned her that she was such a "pretty girl" that he would hate to see her in the same situation. He then brought up how her fiancé would not like that.

471. Eventually, he agreed to prescribe birth control, but told her she should plan when to start the medication so that she would not be on her period during her honeymoon, saying, "You're so attractive that your fiancé won't be able to help himself on your wedding night even if you're on your period."

472. By this point, Jane Doe M.C. felt frustrated and nervous, and the "exam" had not even begun.

473. During that portion, Broadbent started, without warning, with a breast exam. Jane Doe M.C. assumed it was standard procedure since she had nothing else to compare it to, but it was done without a nurse in the room. After touching her breasts, Broadbent called the nurse in.

474. During the pelvic exam, Broadbent never once explained what to expect or what he was doing. He knew Jane Doe M.C. was inexperienced and naïve when it came to gynecological visits and he took full advantage of that.

475. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

476. As she read stories from other victims, Jane Doe M.C. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe K.A.

477. In 2005, Jane Doe K.A. went to see Broadbent for a follow up appointment. When she arrived, Broadbent told her to take all of her clothes off, but she said she did not want to since he only needed to examine her cervix.

478. Broadbent told her to lay down, and as the exam began, Jane Doe K.A. thought it felt weird and then realized Broadbent did not have gloves on and there was no one else in the room.

479. At her next visit, Broadbent said a few words to her in Spanish (which she does not speak or understand) and again asked her to take all of her clothes off. She did not since she was only there for a cervix exam.

480. Broadbent was acting odd when he told her to lay down and immediately shoved his fingers in her vagina and kept moving them in and out.

481. Jane Doe K.A. asked him what he was doing and he said he was feeling to make sure her cervix was healed, but he was not feeling where her cervix was.

482. Broadbent then touched Jane Doe K.A.'s clitoris and the outside of her vagina. She can remember Broadbent's rough fingers and his fingernails inside her. Again, he was not wearing gloves and no one else was in the room.

483. Broadbent then told her stay away from "the boys" and then said the office would bill her.

484. As Jane Doe K.A. walked home from the appointment, she was completely in shock and felt dirty and disgusting. She never told anyone, sure that no one would believe her.

485. From then on, Jane Doe K.A. refused to undress completely for doctors, even in the emergency room. She has difficulty with examinations, and even struggled to spread her legs while giving birth. She constantly checks to make sure she is not alone with a doctor.

486. Broadbent's actions also affected Jane Doe K.A.'s intimate relationships. She is married to a loving and understanding husband who has been there for her any time anything triggers the trauma she feels. That trauma has also required years of therapy, and any time she thinks of what happened with Broadbent, she regresses.

487. When the news about Broadbent's history of abusing patients came out on Facebook, she was scrolling through, saw it, and immediately went into shock and had a severe panic attack which took hours to calm down from.

488. That is when she also realized that what she experienced in Broadbent's office was not a doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

489. As she read stories from other victims, Jane Doe K.A. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe S.A.

490. In 2004, when Jane Doe S.A. was 19, she went in to see Broadbent. She was a college student, it was her first time away from home, she was engaged, and she had not seen a gynecologist before and was told she needed a premarital exam.

491. When she got to the appointment, she undressed, and Broadbent began a physically and mentally uncomfortable rectal exam. With his fingers still in her rectum, Broadbent started reassuring her and said he needed to do it, so Jane Doe S.A. trusted him.

492. Broadbent then took her back to his office, asked if she was a virgin, and Jane Doe S.A. said yes.

493. Broadbent then proceeded to tell her she needed to use a dildo before her wedding night to help stretch herself out to make sex more pleasurable.

494. When Jane Doe S.A. left that day, she decided to never come back to Broadbent.

495. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

496. As she read stories from other victims, Jane Doe S.A. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe R.D.

497. In early 2004, Jane Doe R.D. went to Broadbent for an initial consult and physical.

498. At the end of her examination, Broadbent, without any explanation, inserted his finger in her rectum, and then put his hands on her breasts in a way which left her feeling uncomfortable.

499. At the next appointment, Jane Doe R.D. learned she had a miscarriage, and Broadbent turned to her and said, “your baby is dead.”

500. It was not until the news about Broadbent’s history of abusing patients came out that she realized that what she experienced in Broadbent’s office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

501. As she read stories from other victims, Jane Doe R.D. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe D.B.

502. In 2005, Jane Doe D.B. went to see Broadbent regarding menstrual problems.

503. Despite the appointment having to do only with menstrual problems, Broadbent asked her to fully undress and put on a gown. Jane Doe D.B. was seated on the exam table and placed her legs in the stirrups.

504. Broadbent then performed a vaginal exam without no attempt to communicate about what he was doing.

505. Jane Doe D.B.’s first language is Spanish, and English is her second language, so she already felt as though she was in an uncomfortable and compromising situation.

506. Broadbent then reached up and grabbed, fondled, and caressed her breasts in a way that she felt was for his own pleasure. She felt confused and scared because she could not see how this was connected to, or addressed, her medical concerns.

507. This experience was very traumatizing. It led Jane Doe D.B. to lose trust in medical doctors and the medical system. She left more confused about her medical problem than when she first presented to Broadbent.

508. Jane Doe D.B. never returned, Broadbent never solved her problem, and she was hesitant to seek additional medical care, so she continued to suffer.

509. Some time later she told her daughter about the terrible experience.

510. Then in December 2021, her daughter heard the podcast on which a story of abuse at the hands of Broadbent was shared. Jane Doe D.B.'s daughter recognized the similarities and told Jane Doe D.B. That is when Jane Doe D.B. realized the true nature of Broadbent's actions—his unlawful conduct.

511. After hearing this and reading Google and internet reviews about Broadbent, Jane Doe D.B. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe J.C.

512. In December 2001, at 24-weeks of gestation during her third pregnancy, Jane Doe J.C. was hospitalized for a short time at Utah Valley Hospital after her water broke.

513. Broadbent, the on-call doctor at the time, came in and looked at her chart.

514. Then, without introduction or warning, started touching Jane Doe J.C.'s breasts, starting over the hospital gown, then untying the gown and feeling underneath.

515. As he was touching her, Broadbent asked when she last had a breast exam and talked about the need for frequent exams.

516. As he left, Jane Doe J.C. sat there feeling flustered and confused because she came in because her water broke and yet Broadbent walked in and went straight for her breasts. Jane Doe J.C. was shocked and felt so helpless stuck in her hospital bed as he stood over her while she was tethered to IV's. She was already in a very scary situation, and he came in and made it so much worse.

517. Jane Doe J.C.'s husband and mother were furious when she told them. Her mother previously worked in Labor and Delivery at Utah Valley Hospital, so she went to the maternity clinical coordinator and complained on Jane Doe J.C.'s behalf about what happened and asked for him to be written up.

518. Looking back, Jane Doe J.C. wishes she had been in the right state of mind to realize what happened and follow up on her mother's complaint.

519. But it was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

520. As she read stories from other victims, Jane Doe J.C. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe L.W.

521. Around 2001, when Jane Doe L.W. was around twenty years old and unmarried, she went to see Broadbent for an annual exam.

522. During the exam, Broadbent reached up under her shirt and grabbed her breasts.

523. He then performed what he called a necessary vaginal and rectal exam.

524. Jane Doe L.W. was still on the table, unclothed, when Broadbent talked to her about losing weight and then “jiggled” her belly and said, “But I’d still whistle at you if you walked down the street.”

525. Later, when she was pregnant, she went to a different OBGYN.

526. Unfortunately, when Jane Doe L.W. went to Utah Valley Hospital to deliver her baby, Broadbent was the on-call doctor.

527. Upon delivery, Broadbent said, “it’s a boy but it’s missing some parts.”

528. He then told her he had to deliver the placenta and said “she would need an epidural for this” as he pushed his whole hand into her vagina up to what seemed like his elbow.

529. Jane Doe L.W. was horrified by what he said and did, but it was not until the news about Broadbent’s history of abusing patients came out that she realized that what she experienced in Broadbent’s office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

530. As she read stories from other victims, Jane Doe L.W. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe C.W.

531. In 1999, Jane Doe C.W. was only 14 years old, a minor, and found out she was pregnant.

532. During most of the appointments she went to in Broadbent’s office, Broadbent inserted two or three fingers in her vagina and took his time feeling around for what felt like a long time. Each time caused pain and left Jane Doe C.W. feeling uncomfortable.

533. At one exam in particular, Broadbent inserted his fingers into her vagina, and then simultaneously put a finger in her rectum and pinched between the two to “see the thickness of skin between them.” This by itself was incredibly painful.

534. Broadbent eventually delivered Jane Doe C.W.’s baby, and afterward put his whole hand in her vagina, claiming to be checking for pieces of the placenta.

535. He then made a comment to her boyfriend that he did the “husband stitch” for him while sewing her up.

536. During Jane Doe C.W.’s second pregnancy, she went to another OBGYN. At first, she had incredible anxiety about the appointments and the pain and discomfort she was going to experience. But the same things Broadbent did in his appointments were never done to her during her second pregnancy. Jane Doe C.W. just assumed medical practice changed and the way doctors performed exams were now different.

537. It was not until the news about Broadbent’s history of abusing patients came out that she realized that what she experienced in Broadbent’s office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

538. As she read stories from other victims, Jane Doe C.W. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe S.L.

539. In 1998, Jane Doe S.L. went to see Broadbent for her first prenatal exam.

540. Broadbent had her get undressed and told her she needed a pelvic exam, which she accepted since he was the doctor and she did not know whether it was necessary or not.

541. Toward the end of the exam, without warning or explanation, Broadbent inserted one of his fingers into Jane Doe S.L.'s rectum.

542. Jane Doe S.L.'s feeling of shock and discomfort continued as Broadbent began feeling her breasts.

543. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

544. As she read stories from other victims, Jane Doe S.L. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe E.M.

545. In 1997, at the age of seventeen, Jane Doe E.M. began seeing Broadbent as her regular OBGYN. Her appointments were never comfortable, but she was a new mom and was a teenager, and thought it was normal and reasoned it was time to grow up.

546. On September 9, 1997, Jane Doe E.M. was admitted to Utah Valley Hospital to be induced.

547. Once the birth started, there was some concern about the baby's heart rate and Jane Doe E.M.'s daughter was delivered rapidly with the use of forceps.

548. During the delivery of her afterbirth, Broadbent smiled at Jane Doe E.M., and said "Look!" That is when Jane Doe E.M. realized he was down between her legs with his whole hand and part of his arm inside her. He started to push up with his hand from inside her and told her that this is where her baby just was.

549. Jane Doe E.M. could see her stomach area going up and down. She was mortified and sick to her stomach. She did not understand why he was doing that, why his whole hand and arm were in her, whether it was normal, and why a doctor did something so gross and embarrassing.

550. Jane Doe E.M.'s embarrassment and shame was so much that she could not bring herself to ever really discuss what happened.

551. As a result of Broadbent's actions, Jane Doe E.M. experiences hyper vigilant behaviors at times, especially with doctors. It is also not uncommon to relive what he did as she lives with the scars of that trauma to this day. Jane Doe E.M. feels as though he treated her body like some sort of play thing and wishes so much that she could have asked a nurse or someone for help or told him to stop, but in that delivery room she felt like he was the king and she was just some ignorant teenager who had gotten pregnant.

552. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

553. As she read stories from other victims, Jane Doe E.M. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe A.F.

554. Around 1996 or early 1997, Jane Doe A.F., who was 14 years old at the time, was pregnant and began going to Broadbent's office.

555. At each visit, Broadbent had Jane Doe A.F. remove her clothes from the waist down, place her feet in stirrups for a vaginal exam, and while putting his fingers in her vagina, rammed his fingers into her rectum with no warning or lubrication.

556. After taking his fingers out of Jane Doe A.F.'s rectum, Broadbent then put his hands up her shirt.

557. Jane Doe A.F. could not change doctors, so she was trapped with Broadbent.

558. To this day, Jane Doe A.F. has trust issues, anxiety, and nightmarish memories of her appointments with Broadbent.

559. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

560. As she read stories from other victims, Jane Doe A.F. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe A.M.

561. In 1996, Jane Doe A.M. began seeing Broadbent for first pregnancy. She was 19 years old at the time.

562. At every exam, he insisted on performing a pelvic exam and a rectal exam.

563. When he performed pelvic exams, he forced his fingers too deep into her, leaving her feeling uncomfortable and disturbed.

564. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor

performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

565. As she read stories from other victims, Jane Doe A.M. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe A.A.

566. Jane Doe A.A. saw Broadbent from the fall of 1995 to March 1996. She went to him because he was listed as a high-risk pregnancy doctor near her.

567. From one of her first appointments on, Broadbent performed internal ultrasounds without anyone else present. Each time, he positioned Jane Doe A.A. so she was facing away from him. Jane Doe A.A. felt uncomfortable, but trusted this was normal since she had never seen a doctor for an ultrasound before.

568. At most appointments, Broadbent also performed what he claimed to be breast exams, but which were excessive and were unlike anything Jane Doe A.A. experienced with future doctors.

569. Because of the discomfort, Jane Doe A.A. started having her mother come to the visits. As soon as her mom joined, Broadbent switched to external ultrasounds, rushed through the appointments, and took no more interest in her. Jane Doe A.A. was a single mother, and it took her own mother joining her appointments before things changed.

570. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

571. As she read stories from other victims, Jane Doe A.A. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe B.W.

572. In 1996, Jane Doe B.W., a sixteen-year-old in State Custody, started going to Broadbent.

573. At her first visit, he had her take her clothes off from the waist down, put her feet in stirrups, and while performing a vaginal exam, put his middle finger in her rectum and turned it around several times.

574. Jane Doe B.W. immediately felt scared and uncomfortable. When the appointment ended, she asked to be assigned to a different doctor, but was not granted a new one.

575. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

576. As she read stories from other victims, Jane Doe B.W. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe W.D.

577. In or around 1996, Jane Doe W.D. went to Broadbent for a routine gynecological exam.

578. She was alone for the appointment, and Broadbent had her lie on a table as he performed a vaginal exam with his fingers.

579. Then, suddenly, without warning, notice, or explanation, Broadbent roughly penetrated her rectum with his finger to the point that his entire finger was inserted inside Jane Doe W.D.

580. This action caused Jane Doe W.D. physical pain, shock, and humiliation. Her entire body jerked upwards on the table in response to Broadbent roughly inserting his finger.

581. Broadbent then stood over her leering at her naked body and said, “I bet your boyfriend really likes those tan lines.”

582. Jane Doe W.D. was shocked, and could not respond or do anything. Immediately after the exam she felt angry, disgusted, and humiliated.

583. But Jane Doe W.D., thought to herself, “He is a doctor after all, and a man. Who am I to question or challenge him?” She was sure that no one would believe her or care anyway, so she did nothing, told no one, and buried it.

584. From that point on, her trust in, and respect for, men and doctors waivered and her own sense of safety was shattered. She felt ashamed, her self-worth was damaged, she became self-conscious about her body, and she lost her carefree way of being.

585. After Broadbent sexually abused Jane Doe W.D., she became hyper-vigilant in self-protection, and did not feel safe. It was not until years into her marriage the she told her husband about the experience and started asking herself, “why can I not relax into a hug at times? Why do I flinch at being touched without warning? Why do I feel uncomfortable at any mention of my beauty or my body? Why do I still hide my body from [my husband]? Why do I feel vulnerable even in my safest space?”

586. It was not until Jane Doe W.D. listened to a podcast in December 2021—a podcast in which an interviewee related her own account of sexual abuse at the hands of

Broadbent—that she realized that what she experienced in Broadbent’s office was not was not part of a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

587. After listening to the podcast, Jane Doe W.D. reached out to the interviewee and learned that numerous other women heard the podcast and reached out with similar accounts of Broadbent sexually abusing them.

588. A look online at Broadbent’s Google Reviews and other online reviews revealed numerous other similar accounts of sexual abuse.

589. That is when Jane Doe W.D. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

590. Since being sexually abused by Broadbent, Jane Doe W.D. has not seen a male gynecologist and will not see any male doctor for other medical reasons without her husband present.

591. Over time, Jane Doe W.D. mastered burying this memory, but as with any traumatic experience, there are triggers that cause flashbacks. When they occur, they affect her most precious relationships. A comment, a movie scene, a song, a dream, a client’s story, can bring it all back. When this happens, she becomes sad, angry, withdrawn, and irritable with her family. She cannot bear to be around anyone. She replays the abuse in her head, imagining that instead of doing nothing, she acted—imagining that if she did everything differently, had a voice, advocated for herself, sought help—things would be different.

592. Eventually, she buries it again and carries on.

593. In addition to the damage to her self-worth and difficulties in her relationships, Jane Doe W.D. has dealt with depression, social anxiety, denial, minimization (insisting to

herself that she was unaffected and that it was not that bad), suspicion of male intentions, and misplaced anger at an entire gender, anger at that man, and anger and shame at herself.

594. With time and perspective, and now knowing that the conduct was unlawful, Jane Doe W.D. can confidently say that the sexual battery Broadbent committed against her changed the trajectory of her life.

Jane Doe M.I.

595. Jane Doe M.I. went to Broadbent from 1995 to 1998.

596. As she went to him for prenatal care for her first child, he often performed rectal exams. When Jane Doe M.I. asked him why, he said he needed to in order to feel her uterus.

597. Then, on January 27, 1998, immediately after delivering her second child, Broadbent started pulling on the umbilical cord causing it to detach from the placenta, and then said he had to reach up inside her to get the placenta out.

598. While he had his hand/arm inside Jane Doe M.I., Broadbent started to raise and lower his hand so that her stomach started bouncing up and down as he said, "Haha, look at this!" Jane Doe M.I. was shocked, offended, and annoyed.

599. Later that year, in a post-partum exam, Broadbent again, while performing a vaginal exam, put his fingers in her rectum. She complained and Broadbent explained it away.

600. Then he did a long breast exam and, while he was feeling Jane Doe M.I.'s breasts, said, "You know, your husband is lucky to have such a beautiful wife."

601. Jane Doe M.I. was stunned and left that day swearing to never go back to him.

602. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor

performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

603. As she read stories from other victims, Jane Doe M.I. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe L.B.

604. Jane Doe L.B. visited Broadbent between 1993 and 1994. After calls to find a free or low-cost pregnancy test, she found Broadbent's office.

605. At her appointments, she was asked to strip down and wear a cloth, open robe and sit on the table with her back exposed.

606. At one appointment in particular, Broadbent came in to the room and, before examining her said, "no wonder you are pregnant, look at those tan lines."

607. Jane Doe L.B. was embarrassed, but did not reply.

608. Broadbent then had her lay back with her legs up and started a pelvic exam. Without any warning or explanation, Broadbent inserted a finger in her rectum. Jane Doe L.B.'s body went stiff and jerked. She was humiliated but did not dare say anything.

609. Broadbent then proceeded with a vaginal ultrasound. Unfortunately, a day or two later, Jane Doe L.B. miscarried.

610. The pain of losing a child was compounded by the pain and trauma of what Broadbent did to her.

611. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

612. As she read stories from other victims, Jane Doe L.B. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe S.E.

613. In 1991, at age 18, Jane Doe S.E. attended a new patient appointment with Broadbent in preparation for getting married and in order to discuss birth control. She had never been to a gynecologist before, and had never had a vaginal exam.

614. Without discussion or explanation, Broadbent put his fingers in her vagina and then in her rectum.

615. Jane Doe S.E. was healthy, and yet, during the exam, Broadbent unexpectedly inserted an object into her anus and felt the object move around. Broadbent did not ask if he could insert an object into her anus, he did not tell her he was going to do it, and he did not explain why he did it. It physically hurt, and it was emotionally upsetting.

616. Jane Doe S.E. felt like an object; like a faceless piece of meat.

617. Jane Doe S.E. turns fifty soon, and what happened to her in Broadbent's office has stayed with her ever since. She has found it hard to trust other men, and she cried as she recently shared what happened with her husband.

618. She feels ashamed that it happened to her; ashamed that she did not tell anyone. At the time she felt confused, felt stupid for allowing it to happen, and felt too embarrassed to tell anyone.

619. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

620. As she read stories from other victims, Jane Doe S.E. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe D.M.

621. Jane Doe D.M. first went to Broadbent in the fall of 1989. She was 19 years old and engaged to be married, so she went in for a premarital visit and to get birth control pills.

622. Her first appointment with Broadbent was the first OBGYN appointment she had ever been to.

623. Jane Doe D.M. was taken in the exam room, asked to take off all of her clothes besides a gown, and left alone with Broadbent.

624. With no warning, Broadbent began grabbing her breast with his bare hands under her gown and then started to massage them.

625. He did not say anything.

626. He then put his finger in her vagina and moved it around.

627. Suddenly, Jane Doe D.M. felt Broadbent put one of his fingers in her rectum. She could not figure out what he was doing or why he was doing it. Nothing was explained. He then put in a speculum and performed a pap smear.

628. The only thing Broadbent said to her at the end was that she was pretty and asked her to bring her fiancé to the next appointment to talk about sex since she was a virgin.

629. Jane Doe D.M. felt uncomfortable and dirty, but told herself that it was because she just was not used to this type of doctor or exam. He was a doctor, and she asked herself, “Isn’t he just doing his job?”

630. When Jane Doe D.M. came back to the next appointment with her fiancé, Broadbent spoke directly to him and told her fiancé that he (fiancé) could have sex with her any

time he wanted. Broadbent said, chuckling, that having sex during Jane Doe D.M.'s period would be particularly enjoyable for him even if it was a mess.

631. Broadbent then excused her fiancé from the room and said he needed another exam. He then proceeded to grab her breasts, put his fingers in her vagina, and put his finger in her rectum.

632. When Jane Doe D.M. got pregnant not long after, in 1990, Broadbent was the OBGYN the BYU insurance plan assigned her to. She came to him for her first appointment and he again grabbed her breast and then massaged them and put his finger in her vagina and rectum with no speculum and no explanation.

633. Jane Doe D.M. started dreading any appointments and tried to get a new doctor. She called BYU insurance, but they said the insurance had a policy that would not allow switching doctors, which meant she was stuck, trapped, with Broadbent.

634. As Jane Doe D.M.'s pregnancy progressed, Broadbent stopped examining her as he did before and, instead, began telling her she was getting fat, explaining if she was not careful, she would get fat hips that would spill over the chair and "no man wants to get with that."

635. Jane Doe D.M. was 88 pounds when she got pregnant, and Broadbent constantly reminded her at every appointment that she should not let herself go.

636. At one appointment, Jane Doe D.M. told Broadbent she wanted to breastfeed, and he responded by doing a breast exam.

637. While Broadbent felt Jane Doe D.M.'s breasts, he said "Your husband must like how big these are getting," and then laughed. She told herself Broadbent was just making a joke,

but it all felt off. She also told herself all women hate going to the OBGYN, and did not talk about it to her husband or anyone else. She felt stupid. She felt alone.

638. The last exam Jane Doe D.M. had with Broadbent was a postnatal visit at which he said he needed to check her episiotomy. As he did so, he talked about what a good job he did sewing her tight and winked at Jane Doe D.M.'s husband. That was the last time she saw him.

639. Broadbent was supposedly a respected doctor with advanced training, BYU insurance sent her there, he was a man, and she could not bring herself to question him out loud, even years later, asking, "Who would believe me?"

640. Since then, Jane Doe D.M. tried to push everything that happened down. She refused to see another OBGYN for years, but eventually went due to ongoing pain. Even though it has been over thirty years since her first experience in Broadbent's office, it has never left her. His face, his laugh, his exam, all left a scar deep in her soul. He hurt her physically and mentally.

641. When she read the recent news about the accusations against Broadbent, she was taken back to the exact moment it happened to her. Jane Doe D.M. started to cry and shake. She realized it was not just her. She realized it was abuse and not just a normal exam that she misread. She realized Broadbent is a predator who preyed on naïve women—preyed on her. She realized she was a victim—a victim of a doctor; someone she put her utmost trust in. She felt anger and sadness, but she no longer felt confused.

Jane Doe J.B.

642. Jane Doe J.B. was an unwed teenage soon-to-be mother in 1982 when an ecclesiastical leader referred her to Broadbent for her first pregnancy exam.

643. When she went to the appointment, he did a breast exam and started playing with and tweaking her nipples on both sides.

644. Broadbent then did a vaginal exam where he put in his fingers and moved them around her vagina and then used them to open her vagina.

645. She complained to her ecclesiastical leaders and to Broadbent's office, but nothing happened.

646. She was on Medicaid at the time and after the first visit she had her mother attend every visit.

647. It was not until the news about Broadbent's history of abusing patients came out that she realized that what she experienced in Broadbent's office was not an insensitive doctor performing a medically necessary exam, but unlawful actions Broadbent performed for no other reason than his own sexual gratification.

648. As she read stories from other victims, Jane Doe J.B. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

Jane Doe K.C.

649. In 1979, Jane Doe K.C. was 17 years old and six-weeks pregnant and started seeing Broadbent's father for prenatal visits.

650. After a couple visits, Broadbent took over, and Jane Doe K.C. had appointments with him at least once a month for the rest of her pregnancy.

651. At each appointment with Broadbent, a nurse took Jane Doe K.C. into a room to undress and put on a gown. The nurse then remained in the room until Broadbent came in and told her he needed something.

652. The nurse then left the room, and Broadbent continued with the “exam” despite the nurse being gone. Each time she left, Broadbent would do a vaginal exam and would then put his fingers in her rectum. Broadbent would then quickly put his hands up Jane Doe K.C.’s shirt to feel her breasts. Jane Doe K.C. thought she never had a breast exam like that, but then told herself she was pregnant and did not know better.

653. After the birth of her daughter, Jane Doe K.C. kept seeing Broadbent, not knowing where else she could go. That meant that every appointment proceeded as before with the nurse leaving the room, Broadbent examining her vagina, putting his fingers in her rectum, and then grabbing her breasts.

654. When Jane Doe K.C. was 19, she began to have problems with her estrogen levels, so Broadbent prescribed hormone replacement therapy and said she needed to come into his office every six months for a dilation and curettage (“D&C”)² procedure in order to keep her prescription, a procedure requiring her to be put under anesthesia.

655. Each time she went in for this procedure, Broadbent gave her a shot to put her under, and afterward someone would pick her up to help her get home. This went on for years.

656. In 1988, Jane Doe K.C. underwent a breast augmentation and noticed that Broadbent’s breast exams became more lingering.

657. In 1992, Jane Doe K.C. asked her boyfriend (now her husband) to come to a D&C appointment with her.

658. After an hour, Broadbent came out and as Jane Doe K.C.’s boyfriend went to take the still unconscious Jane Doe K.C. to the car, Broadbent reached under the sheet where she laid, patted Jane Doe K.C.’s inner thigh, and said to her boyfriend, “She sure is cute isn’t she?”

² A procedure to remove tissue from inside the uterus.

659. Jane Doe K.C.'s bi-yearly appointments continued until 1999 when she had a hysterectomy. After asking the provider who performed her hysterectomy about some of the things Broadbent did, including the D&C, the answers she received turned her stomach and made her start to question what Broadbent did. After that, Jane Doe K.C. never went back to Broadbent.

660. Jane Doe K.C.'s experiences with Broadbent, however, did not end there. Jane Doe K.C. and her husband owned a scuba store in Orem, Utah and, in the summer of 1999, Broadbent and his twelve-year-old son came to get scuba certified.

661. At the time, Jane Doe K.C. was the only instructor available. So, she proceeded to swallow her disgust and teach their open water class. All classes consist of classroom and pool sessions followed by an open water destination dive. After their open water certification, Broadbent and his son signed up for every class Jane Doe K.C. taught. They bought equipment and continued taking classes all the way up to rescue diver.

662. The rescue diver course is one that teaches underwater search and rescue. It turned out they would be the only two in the class. Jane Doe K.C. tried to get someone else to teach the class but was unable to. She was so done dealing with him, with the comments about how she looked in her wet suit, and with the looks he gave her when his son was not looking.

663. But, at that time, Jane Doe K.C. was dealing with the stresses of life, raising kids, finishing the construction of her new shop, and organizing trips. She did not want to teach this class, but with no other choice, did.

664. The classroom and pool sessions were without incident, other than those previously mentioned. The class went as follows: you are to find a victim on the bottom of a lake, you bring them to the surface remove their equipment and begin escorting them to shore

while performing artificial resuscitation. To simulate artificial resuscitation, the student simply blows on the victim's cheek, never actually performing mouth-to-mouth. As always, Jane Doe K.C. played the victim, a standard industry-wide practice which is well communicated before every dive.

665. The open-water scenario for Broadbent and his son took place at Bear Lake in late August of 1999. When Broadbent and his son located Jane Doe K.C., they brought her to the surface, with the son at her feet and Broadbent by her side.

666. As Broadbent removed her buoyancy compensating device, he fondled her breasts, in front of his son, grabbed her face, turned it towards him, and stuck his tongue so far down her throat that she choked.

667. Jane Doe K.C. immediately ended the dive. She was enraged and stormed out of the water, went straight to her tent, and cuddled up in the corner.

668. Jane Doe K.C.'s husband later confronted Broadbent, but for years after, Jane Doe K.C. experienced depression and emotional pain as she thought back on everything Broadbent did to her. She tried counseling, but it brought no relief. Broadbent's actions for the past two decades left her broken.

669. Despite Broadbent's abuse damaging and destroying relationships in her life, endangering her marriage, and causing a debilitating depression that led to bankruptcy, Jane Doe K.C. never filed a formal complaint with anyone. He was a man that seemed like a trusted member of the church and, in her mind, she was a naïve 17-year-old girl, pregnant and scared. She did not know how her appointments were supposed to go—she just did as she was told. Even when she began to realize something was wrong, Broadbent held her estrogen prescription hostage and she felt like she could not escape and still receive the care she needed. This was

before any “me too” movement, and she felt no one would believe her accusations even if she made them.

670. It was not until the news about Broadbent’s history of abusing patients came out that she realized that what she experienced in Broadbent’s office were in fact unlawful actions Broadbent performed for no other reason than his own sexual gratification.

671. As she read stories from other victims, Jane Doe K.C. realized that she was not the victim of an isolated event, but rather of a series of abuses at the hands of a sexual predator.

672. She realized she was not the only one, and thought for a long time about how many victims fell prey to Broadbent, a so-called “upstanding member of the community.”

673. She is now at a better place in her life, but as she recounted what Broadbent did to her, those scars, the pain, and horrible memories from her past resurfaced from the deep place she buried them.

FIRST CAUSE OF ACTION
(Sexual Battery against Broadbent)

674. Plaintiffs repeat and reallege each and every allegation above as if set forth in full herein.

675. In performing the acts described herein, Broadbent acted with the intent to cause a harmful and offensive contact with Plaintiffs’ persons.

676. On each occasion, Broadbent did, in fact, bring himself into offensive and unwelcome contact with Plaintiffs.

677. At all relevant times, Plaintiffs found the contacts by Broadbent to be offensive to their persons and dignity, and at no time did Plaintiffs knowingly consent to any of those offensive acts.

678. As a direct and proximate result of Broadbent's unlawful conduct, Plaintiffs suffered emotional distress, humiliation, embarrassment, mental distress, anxiety, and other damages in an amount to be proven at trial, but which are greater than \$300,000 each.

679. Broadbent's actions were not medically necessary—they were acts of sexual battery which he knowingly and intentionally performed for no other reason than his own sexual gratification. Broadbent concealed his actions under the guise of medically necessary care, shattered the trust these Plaintiffs and countless others placed in him, and committed these wrongful actions with no regard for the harm they caused to Plaintiffs and others. As a result of these willful and deplorable actions, Broadbent is liable for punitive damages and all attorney fees and costs expended in this action.

SECOND CAUSE OF ACTION
(Sexual Assault Against Broadbent)

680. Plaintiffs repeat and reallege each and every allegation above as if set forth in full herein.

681. When Broadbent approached Plaintiffs, he intended to cause them apprehension of an imminent harmful and offensive contact with their persons.

682. As a result of Broadbent's acts, Plaintiffs were in fact placed in apprehension of imminent harmful and offensive contact with their persons.

683. In performing the acts set forth above, Broadbent acted with the intent of making contact with Plaintiffs' persons.

684. At no time did Plaintiffs consent to any of Broadbent's acts as set forth above.

685. As a direct and proximate cause of Broadbent's unlawful conduct, Plaintiffs suffered emotional distress, humiliation, embarrassment, mental distress, anxiety, and other damages in an amount to be proven at trial, but which are greater than \$300,000 each.

686. Broadbent's actions were not medically necessary—they were acts of sexual assault which he knowingly and intentionally performed for no other reason than his own sexual gratification. Broadbent concealed his actions under the guise of medically necessary care, shattered the trust these Plaintiffs and countless others placed in him, and committed these wrongful actions with no regard for the harm they caused to Plaintiffs and others. As a result of these willful and deplorable actions, Broadbent is liable for punitive damages and all attorney fees and costs expended in this action.

THIRD CAUSE OF ACTION
(Negligent Supervision against MountainStar and IHC)

687. Plaintiffs repeat and reallege each and every allegation above as if set forth in full herein.

688. Upon information and belief, at all times relevant to the above allegations, MountainStar and IHC held out Broadbent to the public on their websites and in their marketing and advertising as one of their OBGYNs who had MountainStar's and IHC's trust and approval and who was MountainStar's and IHC's employee and/or agent. They also informed people of his services and referred women to him.

689. Broadbent practiced/practices at Timpanogos Regional Hospital (which is run by MountainStar) and Utah Valley Hospital (which is run by IHC).

690. MountainStar and IHC had a duty to supervise and direct Broadbent in a manner so as to protect Plaintiffs from acts of sexual harassment and battery.

691. MountainStar and IHC also had a duty to promote to the public a gynecologist who would not sexually harass, sexually assault, or sexually batter Plaintiffs and other women.

692. Upon information and belief, MountainStar, directly, through Timpanogos Regional Hospital, through the Utah Division of Occupational and Professional Licensing, and/or others, received complaints that Broadbent was sexually harassing and abusing women.

693. IHC, through the same mediums listed in the above paragraph, as well as through its staff at Utah Valley Hospital, received complaints that Broadbent was sexually harassing and abusing women. In fact, IHC received multiple formal complaints which were sent as high as the Chief Administrator and Chief Medical Officer at Utah Valley Hospital.

694. MountainStar and IHC were also aware of, or should have been aware of, the numerous online reviews recounting specific instances of sexual abuse at the hands of Broadbent.

695. Therefore, there was a foreseeable risk that Broadbent would engage in the same acts of sexual battery with Plaintiffs and other women.

696. MountainStar and IHC breached their duties and violated Plaintiffs' trust and the trust of countless unknown victims by failing to take action to protect Plaintiffs, inform them of the danger they were in, and otherwise prevent that harm from occurring. Such failures include:

- a. Failing to properly investigate or otherwise confirm or deny the allegations in the complaints, claims, and investigations relating to sexual abuse suffered at Broadbent's hands;
- b. Failing to implement reasonable safeguards to avoid acts of unlawful sexual conduct by Broadbent;
- c. Ratifying Broadbent's behavior;
- d. Failing to act reasonably and investigate alleged prior misconduct;

- e. Keeping Broadbent in their employ, allowing him continued affiliation with MountainStar and IHC and their facilities, and failing to properly discipline him; and
- f. Failing to implement systems or procedures to supervise or monitor doctors, chaperones, and other MountainStar and IHC agents to ensure that they did not molest or abuse patients in Defendants' care and, further, that they report all reasonable suspicions of sexual assault or battery to law enforcement.

697. As a direct and proximate result of MountainStar's and IHC's unlawful conduct, Plaintiffs suffered emotional distress, humiliation, embarrassment, mental distress, anxiety, and other damages in an amount to be proven at trial, but which are greater than \$300,000 each.

698. MountainStar's and IHC's actions and omissions manifest a knowing and reckless disregard toward the rights of Plaintiffs. As a result, MountainStar and IHC are liable for punitive damages and all attorney fees and costs expended in this action.

FOURTH CAUSE OF ACTION
(Fraudulent Misrepresentation against Defendants)

699. Plaintiffs repeat and reallege each and every allegation above as if set forth in full herein.

700. Defendants represented to Plaintiffs that Broadbent was a trustworthy gynecologist who would provide proper gynecological care to them.

701. When Broadbent made this material misrepresentation, he knew it was false and knew that the examinations were not proper, appropriate, medically necessary, or such that would constitute medical care under any definition.

702. Broadbent made material misrepresentations with the intent that they should be acted upon by Plaintiffs in that Plaintiffs should believe that his actions were proper, appropriate, and medically necessary and should not believe they had been sexually assaulted or that they should question his actions and should not be aware of a possible cause of action that they had against him and/or MountainStar or IHC.

703. MountainStar and IHC knew the above referenced representations were false, or made them recklessly, knowing they had insufficient knowledge upon which to base such representations.

704. IHC, in fact, had formal complaints evidencing these misrepresentations.

705. Similarly, upon information and belief, Plaintiffs and other victims of Broadbent filed complaints with MountainStar, IHC, and the Division of Occupational and Professional Licensing and posted numerous online reviews detailing sexual abuse at Broadbent's hands. MountainStar and IHC either investigated and failed to remove Broadbent, or never properly investigated those complaints.

706. MountainStar and IHC intended that Plaintiffs rely on the representation, and failed to take any appropriate action to protect Plaintiffs and others from Broadbent in an effort to protect the reputation and revenues of MountainStar and IHC and to avoid legal liability.

707. Plaintiffs relied on Defendants' representations and, for years, remained unaware that Broadbent's conduct was unlawful and that it was conducted for Broadbent's sexual gratification. Even when they questioned Broadbent's conduct, they did not believe or realize that what happened constituted sexual battery; did not realize that they were the victims of reportable offenses; and remained unaware that they had possible causes of action of any kind against Broadbent.

708. As a direct and proximate result of Defendants' unlawful conduct and fraudulent misrepresentations, Plaintiffs suffered severe emotional distress, fear, embarrassment, nervousness, anxiety, worry, shame, humiliation, distress, shock, other mental and emotional harm as detailed above, and other damages in an amount to be proven at trial, but which are greater than \$300,000 each.

709. Plaintiffs' reliance on Defendants' representation was a substantial factor in causing Plaintiffs' harm because, if they did not rely on those representations, they would not have met with Broadbent, and he could not have sexually abused them.

710. Defendants' actions and omissions manifest a knowing and reckless disregard toward the rights of Plaintiffs. As a result, Defendants are liable for punitive damages and all attorney fees and costs expended in this action.

FIFTH CAUSE OF ACTION
(Joint Venture against Defendants)

711. Plaintiffs repeat and reallege each and every allegation above as if set forth in full herein.

712. Defendants combined their property, money, effects, skill, labor, and knowledge as they worked together to bring in patients, whether through Broadbent's separate clinic, or through the hospitals they ran, and referred those patients back and forth to one another.

713. As Defendants associated in order to carry out a single business enterprise of treating and providing care to pregnant women and other women in need of gynecological care for the sake of profiting off of those women, they formed a community of interest.

714. Defendants also enjoyed a mutual right of control over the care being provided to the women as any of them could send the patients elsewhere, send patients between Broadbent's clinic and their facilities, and bill patients for whatever procedures they wished.

715. As IHC and MountainStar saw patients and referred them to Broadbent's clinic, they profited because they knew Broadbent would then bring that woman back to their facilities to deliver her child or receive other care which IHC and MountainStar could bill for and profit off of.

716. In so doing, Defendants also shared losses. For example, losing a mutual patient meant shared losses for both Broadbent and his clinic as well as MountainStar or IHC depending on which facility was involved.

717. For decades, Defendants continued in their agreement, explicit or implied, to refer women back and forth between one another, and profited extensively off of that relationship.

718. That meant that exposing Broadbent's history of sexual abuse would have caused financial and reputational losses for each of Defendants, losses which they did not want to incur.

719. For these reasons, each is liable for Broadbent's actions, and each is responsible for the harm caused to the Plaintiffs listed herein and what are likely hundreds, if not thousands, of other women who have not come forward.

SIXTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress Against Broadbent)

720. Plaintiffs repeat and reallege each and every allegation above as if set forth in full herein.

721. Broadbent intentionally engaged in acts of sexual battery against each of Plaintiffs, acts considered outrageous and intolerable as they offend generally accepted standards of decency and morality.

722. Broadbent intended to cause emotional distress as he sought his own sexual gratification, and any reasonable person would have known that sexually battering vulnerable

young women under the guise of gynecological care would result in the infliction of emotional distress.

723. Broadbent's conduct proximately caused Plaintiffs to suffer severe mental emotional distress which manifested as depression, anxiety, horror, grief, shame, embarrassment, humiliation, feelings of being violated, doubts regarding their own intelligence and self-worth, extreme self-consciousness, aversions to male physicians, distrust of male physicians, difficulty forming and maintaining personal relationships, and other harms as stated above.

724. Plaintiffs' damages are in an amount to be proven at trial, but are greater than \$300,000 each.

725. As a result of these willful and deplorable actions, Broadbent is liable for punitive damages and all attorney fees and costs expended in this action.

SEVENTH CAUSE OF ACTION
(Negligent Infliction of Emotional Distress against MountainStar and IHC)

726. Plaintiffs repeat and reallege each and every allegation above as if set forth in full herein.

727. MountainStar and IHC should have realized that their failure to properly investigate, respond to, and act on the complaints made against Broadbent involved an unreasonable risk of causing distress and subjecting Plaintiffs and other women to sexual abuse at Broadbent's hands.

728. MountainStar and IHC, from facts known to them, should have realized that the distress, if it were caused, might result in harm to Plaintiffs.

729. MountainStar's and IHC's actions and omissions proximately caused Plaintiffs to suffer emotional distress, humiliation, embarrassment, mental distress, anxiety, mental and

emotional distress which manifested physically, and other damages in an amount to be proven at trial, but which are greater than \$300,000 each.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs requests the following relief:

- A. On all claims for Relief, judgment in an amount to be proven at trial;
- B. For attorney fees and costs as provided by law;
- C. For punitive damages against Defendants; and
- D. For such other relief as the Court shall deem just and proper.

JURY DEMAND

Plaintiffs hereby demands a trial by jury on all claims so triable.

DATED this 14th day of March, 2022.

GROSS & ROONEY

/s/ J. Adam Sorenson
Attorneys for Plaintiffs