

CLERGY CASES 1
Fr. Berard Connolly
Franciscan Friar (OFM)
Confidential File

Bates Number 392 was removed by the Plaintiffs at the request of the Franciscans.

Accused cleric in treatment center

A Franciscan brother being sued by a Spokane woman who claims he sexually abused her is on administrative leave and in a psychiatric treatment center, said a top official of the order.

Berard Connelly was placed on leave in September after the Franciscan order learned the details of allegations by a former student at a Spokane all-girls high school where Connelly taught more than 20 years ago, said the Very [REDACTED] head of the Franciscan friars in the Western United States.

"He's in a psychiatric treatment center that specializes in issues of abuse," [REDACTED] said Thursday night.

"He'll be on administrative leave until an accurate determination can be made of his ability to work with people and his fitness to be in the ministry," [REDACTED] said.

The Franciscans are also offering to pay for counseling for [REDACTED] the complainant in the suit filed earlier this week in Spokane County Superior Court.

The order will probably decide within a month whether Connelly should be returned to the ministry.

He refused to comment on whether Connelly abused the woman or anyone else claims they were victimized by the cleric.

The lawsuit states Connelly "continuously sexually abused, harassed and intimidated plaintiff and other students" at the now-defunct Marycliff High School.

The abuse took place when [REDACTED] attended the school and St. Ann's parish from 1968 to 1973, the lawsuit says. Connelly taught there and was in charge of student affairs, according to the complaint.

Attempts to reach Connelly and [REDACTED] have been unsuccessful.

Although the alleged incidents happened as many as 24 years ago, [REDACTED] state law extends the statute of limitations for child sex abuse claims.

Bates Numbers 394-397 were removed by the Plaintiffs at the request of the Franciscans.

St. Francis Retreat
P O 1070
San Juan Bautista, CA 95045

5/11/93

Brothers in Apache and O'odham Lands,

This morning I reached the bottom of my clean T-shirt drawer and found a shirt marked "Blessed Kateri Tekakwitha, San Carlos Apache." (Yes, Walt, I paid for it --last summer!) The shirt reminded me I wanted to write you.

I've been wanting to do this for quite awhile. Since last September 17, to be exact. I wanted to apologize for embarrassment or hurt, I wanted to explain. I wanted to be angry. I wanted to say I'm sorry. But, now I just want to tell you I miss "the Globe Friars" very much and I miss The People you serve.

I guess since even before I entered the friars I wanted to be a missionary. Probably not a few of you have heard my story of telling Gus Hobrecht I felt called to the missions and he quickly assured me God wanted me to continue cooking at Serra Retreat!

When finally, after 40 years, I finally did go to the desert -- and counted pennies, pesos and drachmas with Mike at San Xavier, my past soon caught up with me and blew it for me. At least I spent awhile with the greatest friars in the Province and began to love The People you love. I fell in love with San Xavier del Ba:c. I wanted to live and finish out my life among The People. That's not to be.

I daily pray for the Missions in Arizona and New Mexico. Maybe I'll join the FMU. This September I want to visit the San Xavier District and hopefully see you.

I'm feeling fairly good. Time back east helped me out of serious depression. The past years are taking their toll on my body by diabetes and my knee is worse. However, my mind is alert! Seriously, my soul and my heart are at peace. I do not know what is ahead; I am happy I am with friends. -- And, I miss the desert!

I was reading about "dream catchers" woven by the Plains Indians. Good dreams pass through the hole in the center while bad dreams are trapped in the web, where they perish in the light of dawn. I hope you and I, and The People you serve, have mostly good dreams with the bad ones perishing in the dawn.

Peace!

OEM CONN 1
0398



Saint Mary's Basilica

231 North Third Street
Phoenix, Arizona 85004-2265

FRANCISCAN FRIARS

November 24, 1991

Br. Berard Connolly, O.F.M.
St. Francis Retreat Center
PO Box 1070
San Juan Bautista, CA 95045

Dear Berard:

This is meant to be a personal letter. And personal letters should (at least in the old-fashioned way) be handwritten, not typed. However, my handwriting is so wretched that I chose the better part!

Yesterday I was talking with Mel Jurisich and he mentioned that you are at SJB. It is, of course, no surprise that the definitorium knows in general the difficulties that are preying upon you at the present time.

I want you to know that my heart goes out to you, and my prayers and thoughts are with you.

It's truly said that we all have different feelings but the same emotions. In the depths of my own addictive experience I know the heartbreaking sense of shame and fear and guilt. Spiritual writers call it the dark night of the soul. I have been there. So in that sense I can truly say that I am with you during this time in your life.

Don't pack it in, don't hang it up! I am often strengthened by the motto once given to me: This, too, like gas shall pass. It sounds flippant, but there is much truth in it.

As there is great truth in the 1st Step: "We admitted we were powerless...that our lives had become unmanageable." I think of this on the feast of Christ the King. To me the main message on this day is that the Lord came as one who was powerless on earth. But He found meaning for His life and enables us to understand that life is not out of control; that there is a purpose to what happens even though we cannot find a purpose at the time. And that scares us. With God's grace we live through the darkness into the light. The light will come.

*Your friend,
Warren*

OFM CONN 1

0399

(602) 252-7651



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

February 10, 1993

Dear Berard

Peace and good. Enclosed please find the official letter which details what we talked about in Hartford and what I have received from the Institute. Let me add a more personal note.

First, I want to welcome you back heartily to the province. These have been difficult days for the past three years, but I for one am happy you have stuck it out and persevered. It is not only an example to me but a real gift--you see, where would I be without faithful friends, ones who accept my own limitations and are willing even to be hurt by me at times but to still accept me. I thank you for that. And I want to say very clearly, that trying to address your situation has not been burdensome for me--you are not a burden, nor a mistake. You are a wonderful friar, one who contributes immensely to the province and the friars. This is how I feel--and I say this both as friend and as provincial.

I received your sample letter for Westfriars. As far as I am concerned, you may print what you like--it is your letter. If I may offer some personal counsel, I would think it better to talk it over with your therapist and also with Richard. They might have some good advice as to how to approach it and what exactly is best to say. From my perspective, I think you should emphasize that although difficult at first, you found the program beneficial, that you are happy to be back here (which I think you are), that you offer to help anyone who would like to speak with you about the experience, that you hope we can all face ourselves honestly--that is, turn it outward. The "stigma" is not a disease, but a gift to the community, and God has made this now part of yourself precisely for others. I think you should be proud of what you have done to handle all of this. I am.

Thanks for the invite to write on Clare. I think I will take you up on this--I will be giving a retreat to the Clare in June in SB, and plan to write up some of the conferences. Also, may I suggest that we try to dig up several conferences by David Temple and in honor of the centenary publish one with each edition of Westfriars. Dave left over fifteen feet of talks, many of them on Clare. Some are notes, but they are quite full. I can try to locate some when I am in SB; or perhaps you can go down there and look with Tim's help. It is just an idea.

God bless you, Berry. I love you.

OFM CONN 1

0400



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

Brother Berard Connolly, OFM
St. Francis Retreat
549 Mission Vineyard Rd
Box 1070
San Juan Bautista, Ca. 95045

February 10, 1993

Dear Berard

Peace. I hope you are doing well; I'm glad to hear that you are enjoying the retreats. You're good at it, and that makes a lot of sense. I am really glad you can help at San Juan and continue to do Westfriars.

I have heard from the Institute of Living and would ask you to abide by the following regulations while living and working at San Juan Bautista:

- (1) You are to continue weekly outpatient therapy with a therapist recommended and contacted by Dr. Les Lothstein. You should make arrangements for this as soon as possible by contacting Dr. Lothstein if he has not already contacted you.
- (2) A support group is also necessary: this should be worked out between yourself and your therapist. I think this needs to be as supportive and professional as possible, at times confrontive. The members of the support group should be ones dealing with their own sexual history and in recovery from it. I think it would be best to consult with Tom West as to which type of group would be most appropriate, and I presume we will be talking about this in the future to see that we take the best possible steps now.
- (3) You must have a regular spiritual director; I would suggest meetings initially twice monthly, and then possibly monthly.
- (4) Your monitor will be Fr. Richard McManus, with whom you should meet in an official capacity at least twice monthly to discuss your progress and continued addressing of the issues.
- (5) You may have no contact with minors, either in a pastoral or personal capacity. Any departure from this should be discussed immediately with your therapist and Fr. Richard.

I would appreciate the details of your response to these requirements (numbers 1, 2, 3) as soon as possible.

OFM CONN 1

0401

Connolly, 2

Thanks for your cooperation, Berard. These restrictions are quite standard, and I know from our talks that you see them as important also. What I am happy about is your return to the province and the great contribution you have made and will continue to make.

God bless you. Please be assured of my continued support and prayers.

Fraternally

cc. Fr. Richard McManus, OFM



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

December 8, 1992

My dear friars

May the Lord give you peace. During this Advent season and on the occasion of this great feast of our Lady, I pray that the Holy Spirit will fill your hearts with hope and courage.

With this mailing you will find enclosed the minutes of the last definitorium meeting and an additional document which is very important in the life of our fraternity.

As many of you know, over the past several months the definitorium has been grappling with allegations of the sexual abuse of minors which had occurred at our minor seminary during the post-conciliar years. I met initially with a group of about seventy concerned lay people in Santa Barbara on October 28th; since that time a smaller group of laity have been meeting to suggest approaches to the problem, and I presented to them our administrative response to the whole situation this past December 4th. It is vitally important that we respond in a clear and forthright manner to these allegations. The enclosed document outlines our response to the situation at St. Anthony's within the context of a larger plan for the whole province. It is the unanimous opinion of the definitorium that we move in this direction. In doing so, I feel that we are trying to give a good example of our own commitment to Gospel integrity.

Of course there are so many questions and sub-questions attached to this situation that it is difficult to discover how to move.

My heart goes out to all of you, and I very much appreciate the support which you have given to myself and the definitors and staff of the administration. For myself, let me mention four issues that are so clear to me.

First, I ask you please to remember with great kindness and compassion the families and victims who have been offended. These are good, Christian people; and they sincerely wish to have the Gospel proclaimed in all its fullness. We are blessed by their fidelity.

Also, I want to thank you so much for the great expressions of concern and compassion which so many of you show to our friars against whom these allegations have been made. They are our brothers and we love them. We are blessed by their presence.

OFM CONN 1

0403


St. Anthony's, 2

I am very proud of the excellent work which has been done by St. Anthony's Seminary throughout the years. Many of our finest friars have served there with distinction; they have poured their life blood into the education of young men; they have desired to create stronger members of society, better Christians, fine Catholics, and even better Franciscans. In this they have succeeded, and we friars have all basked in the glory of their work and dedication. Let us continue to affirm each other and hold fast to that which is good.

Lastly, this feast of the Immaculate Conception is so precious to ourselves as friars minor; its chief proponent was our own John Duns Scotus. Why? Well, I think in his own small way Francis viewed the world from the perspective of Love, passionate love able to create, to build, to multiply, to guide, to encompass all things; love able to take the highs and lows of existence and weave a pattern of tremendous beauty. This feast simply celebrates Yahweh's love in the Son for the servant and handmaid of us all. It is wonderful that neither the wanderings of the people nor their sins, neither any power nor force in all of existence, neither the might of the state nor the darkness of inner experience--nothing at all--was able to change this love of God for the chosen one.

My brothers, you are God's chosen ones. Let us together continue to imitate our Father Francis. Grasped by Love, we find, I think, that it overcomes all things.

Fraternally



Third party privacy

A COMPREHENSIVE APPROACH TO PROVINCIAL POLICY AND A PASTORAL RESPONSE TO INSTANCES OF SEXUAL ABUSE OF MINORS AT ST. ANTHONY'S SEMINARY

THE RELIGIOUS FRATERNITY

The sexual abuse of minors is an egregious violation of personal integrity which results in the breaking of society's most basic bonds of human loyalty and trust. It is an invasion of both the personal and familial life of the victim. I cannot express in words the sorrow that all of us feel for the victims and families. We are deeply compassionate.

When this abuse is perpetrated by a priest or religious, the offensiveness is compounded by the high regard, faith and power given to those in positions of pastoral example and leadership in the Catholic Christian community.

Knowledge of the action provokes confusion about faith, anger at the personal violation, and sows distrust in all directions. In many instances it creates a "solidarity in victimhood" between the minor, his family, and the community to which they belong. Often the violation is so fundamental that it is met with denial and incomprehension. Because defensiveness is frequently a factor, those once victimized can become twice victimized--and the cycle of violence continues. I am truly sorry if, in some ways, we have contributed to this cycle.

Vowed to the Gospel life, we friars unreservedly believe that sexual abuse cannot be tolerated in any form. Above all, we abhor the sexual abuse of children who are essentially powerless and voiceless. As a religious fraternity we must take decisive, unequivocal, effective measures to speak for those who have no voice, to tend the wounds of those in the Body of Christ who have been violated, and to begin to restore the basic trust and fidelity which have marked the close relationship between the friars and the community which received them in the bonds of friendship.

We friars must also share the pain of facing the truth about ourselves and our brothers. We publicly and firmly want to take personal and corporate responsibility for systemic changes to heal the past, address the present and plan the future. As "penitents from Assisi" and vowed peacemakers within the Church and society, we will, with your help, "turn our face like flint" to the urgent task at hand. Within our Gospel way of life we believe that our pastoral response should be dictated by the integrity of the Gospel and our covenant with you, the People of God. With your help and partnership, we seek "truth with a pastoral face."

THE PRESENTING ISSUES

In March of 1989 [REDACTED] filed charges of sexual abuse against Philip Mark Wolfe, a Franciscan priest and teacher at St. Anthony's Seminary from September 1981 to June 1984. The molestations occurred between 1983 and 1987 but, because of the statute of limitations, only the charges of Bernard Smith were dealt with.

In September of 1989 Philip Wolfe pleaded "no contest" to one count of oral copulation with a person under eighteen and was given a six month's jail sentence followed by six months in a treatment center.

Recently, in May of this year, the [REDACTED] informed the Provincial Minister that [REDACTED] a member of the Santa Barbara Boys' Choir, had been inappropriately, sexually touched by Fr. Robert Van Handel, founder of the choir and teacher at St. Anthony's Seminary from May 1975 to its closure in June 1987.

In October of this year a public letter was sent to all participants in the Boys' Choir. On October 28, during a meeting at St. Anthony's Seminary, new information surfaced, indicating that Fr. Robert's sexual abuse of minors extended into the seminary itself. Since that time, several other victims--some both members of the Boys' Choir and seminarians--

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PROVINCIAL POLICY AND PASTORAL RESPONSE

have come forward. In addition, past allegations, dating back many years, have come to light, along with rumors.

THE EVOLUTION OF PROVINCE POLICIES

The first Province policy concerning issues of sexual misconduct was developed by the Franciscans in 1988. Subsequent revisions in this policy have been prompted by the persistence and honest challenging by the [REDACTED] and we are indebted to them.

After meeting with the [REDACTED] in January 1990, in the wake of the dreadful first victimization, the definitorium worked on achievable goals actively and with the strongest pastoral responsibility. Many of these goals have been presented by the [REDACTED] themselves. Let me give a few examples:

For myself, I have shared the fruit of my own experience the past two years with Region VI of the Conference of Major Superiors of Men, insisted on the importance of major policy statements and reviews at that level, and spoken on the importance of correct action and attention to victims with the Committee on Priestly Life and Ministry of the National Conference of Bishops, of which I was a member for three years. Our experience has had a major effect on the English Speaking Conference of the Order of Friars Minor covering Malta, England, Canada and the United States. Our own experience in Santa Barbara, then, has had a ripple effect for the good far beyond the boundaries of the friars and Santa Barbara. The response on all of these levels has been tremendous.

Locally, this process of growth these past two years involved the entire Franciscan fraternity. Admissions' procedures were scrutinized and modified; professionals in the fields of psycho-sexual development and sexual deviancy conducted sessions for both those in formation and for the fraternity at large. After an interim policy, a clear and precise statement on sexual misconduct was adopted by the Province in January 1992. Our policy has been composed with the best psychiatric, pastoral and legal advice possible.

We see our policy and programs as developmental because, for example, the policy now in place was designed to deal with current rather than historical issues of misconduct. The most recent knowledge of past instances of abuse opens up a new chapter in our own painful growth. In all of this, we have committed ourselves to working in a comprehensive way.

COMPREHENSIVE PROVINCE POLICIES

1. Formation Programs

Aspirants to our way of life come to us by way of our Vocations' Directors. After thorough initial interviews and tentative approval, the candidates then undergo a lengthy process of discernment which includes independent and objective professional evaluation, using such instruments as the Object Relations Test, the Rocharch, hostility quotients and word association testing as well as extensive interviews covering family history, work experience, socialization patterns, psycho-sexual development and so on.

The application process is concluded with a final interview with the candidate and the independent Admissions to Formation Committee consisting of five friars. Having reviewed all the testing and other documents and consulting with the vocation directors, the Admissions Committee deliberates privately and prepares its own recommendation for each applicant. This is presented to the Provincial for final approval or rejection.

Although this is a thorough process, in the light of recent events the entire structure will be reevaluated and, if necessary, augmented through the recommendations of an independent review board.

2. Ongoing Education

In our formation program which lasts from six to nine years, we have in place extensive programs of continuing education in the areas of sexual maturation, pastoral responsibility and sexual deviancy. After final vows and admission to pastoral responsibilities as a priest or laic friar, the programs of education continue, sometimes through the local diocese and more often through the Province itself. All of these programs will likewise be reviewed by an independent board. If necessary, these also will be augmented.

3. Personnel Review

As a corporate entity the Province does not operate any educational establishments involving minors. Parish programs are regulated by the policies of each diocese in which we work. It is, however, incumbent upon us to institute an independent review of all friars involved in ministry to minors. Likewise we will review all past personnel decisions and request recommendations from the independent board so that any current policies may be corrected where they are found to be inadequate. We will insist on total cooperation and compliance with local diocesan programs and requirements in the area of youth ministry.

4. Review of Current Policies

Our current, public policies governing the sexual abuse with minors will be stringently upheld, especially those regulating the placement and ministry of offenders. Article 9 of our policies states in part:

Where appropriate, the accused will be required to undergo a psychiatric evaluation by a mental health facility specializing in sexual disorders and approved by the Provincial.

When the psychiatric evaluation has been completed, the Provincial, in consultation with the Provincial Team and, where appropriate, with legal counsel and mental health professionals, will determine whether the friar should be permitted to minister and, if so, under what circumstances...

Ordinarily, no religious against whom a serious accusation has been substantiated will be permitted to return to public ministry unless: (a) he has undergone long-term psychotherapy (including prescribed medication) and the psychotherapist has advised that he is not a threat to the public; (b) he participates in a therapy group or life management support group; (c) it is possible to adequately supervise and monitor his contacts with the public; (d) he is subject to special placement and supervision by an on-site supervisor and the Provincial or his delegate.

5. Review Board

By August 1993 the Province will establish a separate review board designed to address the above areas of concern; it will make further recommendations to the provincial administration to insure the integrity of the friars' lives and ministries as these relate to minors. This board will also deal in a continuing manner with cases of sexual misconduct with minors which may arise.

This ongoing review board will be directly under the Provincial. It will be composed of five persons: two friars and three lay specialists. Articles of procedure will be drawn up and based on the best models currently available. These articles will be reviewed by the board itself and then approved by the provincial definitorium. The definitorium explicitly commits itself to the establishment of this permanent project.

A PASTORAL PLAN FOR ST. ANTHONY'S SEMINARY

With respect to the allegations involving the conduct of certain friars at St. Anthony's Seminary, the following steps will be taken:

PROVINCIAL POLICY AND PASTORAL RESPONSE

The friars will continue to be proactive in responding to known victims and their families through the offering of counseling, the identification of local resources, personal visits and remuneration for therapy.

Because there may be victims unnamed and undiscovered as yet, a Board of Inquiry (see below) will send a letter to all known students from the school year 1964-1965 to the time of the seminary's closure. While maintaining appropriate confidentiality and sensitivity, the Board will thus be able to identify the victims of sexual abuse, the perpetrators of the abuse and the credibility of the allegations. Established procedures will be followed to determine the truth as best as possible (outside of a court of law).

A formal Board of Inquiry will be established by the Province of St. Barbara (January 1993). The board will function independently of the Provincial administration and will report directly to the Provincial Minister. The board has an essentially pastoral purpose, acting for the good of the victims, the well being of the community and the friars, and the integrity of the Church. It is fact-finding, consultative and advisory, not adversarial or adjudicative. This board will process the results of past pupil contacts and investigate the allegations of sexual misconduct with minors and related issues at the seminary. It will follow Province policies on active care for victims.

This Board of Inquiry will have five members: an outside friar skilled in counseling and issues of sexual abuse (Fr. Dismas Bonner, O.F.M.); a professional layman (Dr. Eugene Merlin) with the same qualifications; three other members, one of whom will be a recovering victim and/or parent of a victim.

A draft of procedures will be drawn up under the authority of the Provincial Minister and the Board of Inquiry before final adoption in consultation with the Provincial Minister.

With respect to confidentiality, the "Chicago Policy Regarding Clerical Misconduct with Minors" principles will be invoked. Final recommendations and observations to the Provincial Minister will, respecting confidentiality, be made public jointly by the Board of Inquiry and the Provincial Minister.

After sufficient review, a friar established to have been an offender against minors will not return to active public ministry without thorough and enforceable guidelines as recommended by the Board of Inquiry.

In the course of the next five months, the friars will sponsor a series of fora to educate both the Franciscans and the local faith community on issues of child abuse and its implications; the spiritual dimensions and meaning for the church; and the identification of local resources in the area. These goals may be accomplished by a day of recollection or weekend retreat, workshops and study groups.

The Province will work with the archdiocese in sponsoring a workshop for the broader Catholic community in Santa Barbara for the purposes of education and community information.

December 4, 1992

SAINT FRANCIS



RETREAT CENTER

February 11, 1994

Dear [REDACTED]

This is sort of a formal thank you note.

You know my appreciation for all you have gone through in my behalf. I guess I was especially touched when I saw it first hand in Spokane. All I can say is Thanks! Also, it was good that you "encouraged" me to visit the Poor Ladies with you.

My feelings still have not caught up with me. There is no winner in this thing and maybe I have to stop looking for one. I still have deep feelings from the undeserved goodness of the friars in my behalf. They are such good men. I have the fear of someone else's memory being enhanced with the publicity of these cases. I am tormented by fears in my own life. I know this "minimum security prison" is not of San Juan but within my own mind.

Third party privacy

I wish [REDACTED] would have consented to see me.apist/Patie

Psychotherapist/Patient Privilege

Still, [REDACTED], a weight has been lifted and I even found myself singing the other morning.

Regarding my health, which I believe is tied up with the rest of my life. The hip bone and the thigh bone.....!

Yesterday I had a good talk with Dr. Yanagihara, the oncologist. (No, [REDACTED] I didn't pick him out!). He is well respected in the cancer field in this area. I asked him what my five-year prospects are, being a diabetic and all.

It seems I have a 60/70% chance of survival, which I believe is the same as crossing the street - in Mexico. There is a 40% chance the sarcoma may return and a 20% chance it may come to my chest. Percentages are what they are and I can live with them. Besides in five years I'll be 71 and we'll be one year from the millennium.

My right leg, my "bad one," isn't any better. It's a deteriorating kneecap. Was going to get it fixed this year but I - and I'm sure the insurance company - will wait for

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0409

SAINT FRANCIS



RETREAT CENTER

February 11, 1994

Dear

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My feelings still have not caught up with me. There is no winner in this thing and maybe I have to stop looking for one. I still have deep feelings from the undeserved goodness of the friars in my behalf. They are such good men. I have the fear of someone else's memory being enhanced with the publicity of these cases. I am tormented by fears in my own life. I know this "minimum security prison" is not of San Juan but within my own mind.

I wish , would have consented to see me. Wendy, my psychologist, said her refusal could stem from the fact she may have painted a devil face on me and would rather keep this image rather than the person I really am.

Still, Joe, a weight has been lifted and I even found myself singing the other morning.

Regarding my health, which I believe is tied up with the rest of my life. The hip bone and the thigh bone....!

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0409

SAINT FRANCIS



RETREAT CENTER

another year.

I know I have a way to go in life's journey. I admit a lot of disquietude at Lester's coming, the "magister laicorum" and those ghosts. However, I know the facts of life and the burden of the definitorium. I'll live through it and I believe I am becoming a better friar for it. Without reminders, difficult as they are, would I have even thought of the contemplative dimension of our life. I have so far to go.

My mind, with the exception of a misfiring synapse or two, is doing fairly well. I can find the airport!

Thanks again, [REDACTED]

Peace!

Berry

OFM CONN 1

0410



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

Berard Connolly, OFM
St. Francis Retreat
Box 1070
San Juan Bautista
95045

April 12, 1993

Dear Berard

Peace and good. Happy Easter. It was good to see you for the couple of days during Holy Week; I appreciate very much your solicitude forme. Please be assured of my prayers and support. These are difficult times, but I will do my best to be with you. If there is anything I can do, don't hesitate to ask.

Enclosed please find a release form which is self-explanatory. I am passing this to you because the Board of Inquiry has asked me to do so. I want to make it clear that you are not obliged to sign this. The Code of Canon Law is very explicit on this point: 630.5: "Members are to approach superiors with trust, to whom they can express their minds freely and willingly. However, superiors are forbidden to induce their subjects in any way whatever to make a manifestation of conscience to them."

As far as I know, the Board of Inquiry has not received any information regarding SAS students and yourself, beyond the back rubbing which you had mentioned to me. Signing the release has advantages and disadvantages, which I am sure you can realize. I think the Board simply wants to communicate what information they do have, and then receive some indication of the course of your treatment.

Please let me know what you decide. I would suggest you talk it over with Wendy or Lothstein. I will support you in whatever decision you make.

Faternally



OFM CONN 1

0411

Third party privacy

MONDAY MEN'S STAG

4-6-93

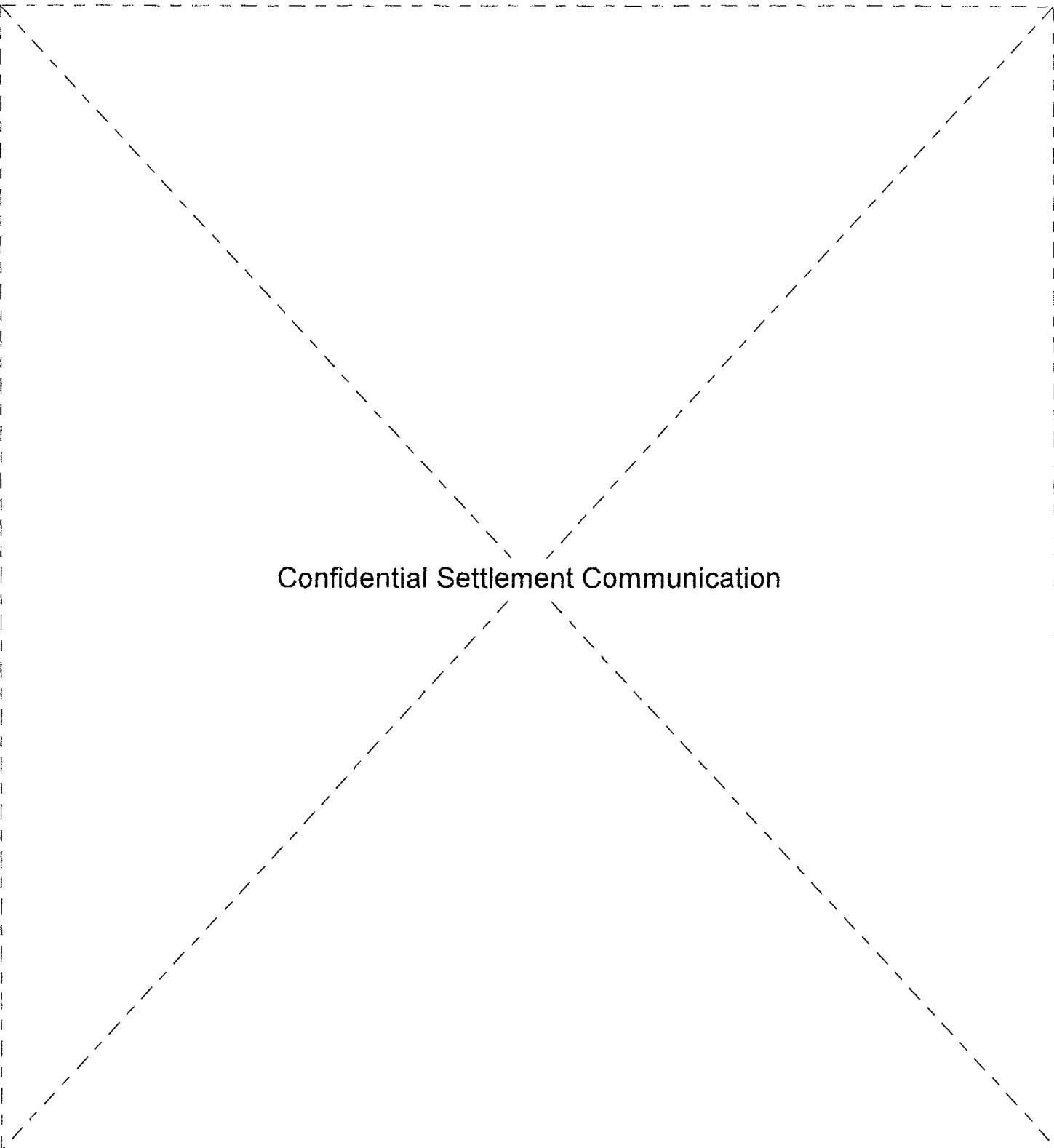
ABE P. 646-8183
ALAN C. 422-4649 H 899-7576 W
ANDREW 899-0150
BEN P. 899-7567 H 649-3277 W
BILL C. 373-1063
BILL S. 625-0776 H 649-8006 W
BILL V. 422-1631
BOB 624-6241
BOB M. 372-8813
BRODUS 663-5005 H 671-0604 W
BRUCE 637-9691
DAN W. 373-1910
DAVID T. 899-1703
DAVID W. 372-0356 H 655-8114 W
DON 625-5997
DOUG S. 373-0637 H 372-6792 W
DOUG W. 655-9642
ED B. 443-0743
ELIOT 373-0808
GENE I. 646-1220
GEORGE B. 1-595-0515
GEORGE Y. 758-8377 H 422-8825 W
GLENN 372-3092 H 624-2299 W
GREG G. 422-0423
HAROLD 375-8675
IRA F. 375-2076 H 625-5840 W
JACK 753-2500 H 728-6187 W
JIM E. 422-7024
JIM F. 375-1803 H 375-3577 W
JOSH J. 375-4494 H 394-8550 W
KIRK 394-1715 H 373-2991 O
LARRY M. 883-1430

LOU H. 484-9814 H 675-2745 W
MARK 671-2774
MICHAEL M. 649-5350 H 372-8292 W
MICHAEL N. 624-2209 H 649-0957 W
MIKE M. 394-0129 H 449-8471 W
MIKE S. 649-6835 H 375-3577 W
PETE 646-2661
PHIL M. 375-7780
RALPH 758-3061 H 422-9021 W
RAMIRO 422-8527
RANDY B. 625-6395 H 375-6410 W
ROB 624-0244
ROBERT 484-5079
ROGER B. 443-4671
SCOTT 625-3546
SCOTT S. 655-3166 H 649-1808 W
SEAN 649-8045
STEVE A. 655-8560
TIM D. 625-9971
WALT S. 375-0240 H 384-3550 W
WILL R. 899-5455 H 647-4339
YUTAKA K. 484-1491 H 646-2095 W

OFM CONN 1

0412

Bates Number 413 was removed by the Plaintiffs at the request of the Franciscans.



Confidential Settlement Communication

**OFM CONN 1
0414**

Bates Numbers 415-420 were removed by the Plaintiffs at the request of the Franciscans.

WENDY SINCLAIR-BROWN, Ph.D.

PERMISSION TO RELEASE INFORMATION

I hereby authorize and request [REDACTED] to release confidential professional information, including personal, psychological, psychiatric, and medical records and opinions, resulting from my contacts with them, to Wendy Sinclair-Brown, LMFT, Ph.D. The specific information is as follows:

1. any and all documents pertaining to my hospitalization at the Institute for Living.
2. other information pertinent to my case in my file.

I understand that I have no obligation whatsoever to disclose the requested information and that I may revoke this consent at any time by informing any of the above noted individuals. Further, the above consent shall expire after a period of 90 days from the date of my signature below.

In consideration of this consent, I hereby release the above parties from any and all liability arising therefrom.

Signature: Grace J. Connolly Date: 1/24/94

Bates Number 422 was removed by the Plaintiffs at the request of the Franciscans.

Third party pri.

COPY RECEIVED THIS

DAY OF

12 19 94

By: T. D. Proaty

ATTORNEY FOR

J. A.

RECEIVED

DEC 13 1993

ETTER & McMAHON, P.S.

ANTONIETTI

RECEIVED

JAN 13 1994

FOR YOUR INFORMATION
ETTER & McMAHON, P.S.

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

a single woman,

Plaintiff,

vs.

BROTHER BERARD CONNELLY, a
Franciscan Brother; THE CATHOLIC
DIOCESE OF SPOKANE; THE CATHOLIC
BISHOP OF SPOKANE; THE FRANCISCAN
FRIARS, PROVINCE OF SAINT BARBARA;
AND THE ROMAN CATHOLIC CHURCH OF
THE PAPACY,

Defendants.

NO. 92-205445-5

PLAINTIFF'S REQUESTS
FOR ADMISSION
PROPOUNDED TO
DEFENDANT BROTHER
BERARD CONNELLY

TO: BROTHER BERARD CONNELLY, defendant
AND TO: WILLIAM F. ETTER, your attorney

Plaintiff herewith submits the following Requests for
Admission to be answered separately and fully under oath
within thirty (30) days from the date of service of said
Requests upon you.

IN ACCORDANCE WITH CIVIL RULE 36(a), EACH REQUEST FOR
ADMISSION IS CONSIDERED ADMITTED UNLESS, WITHIN THIRTY (30)
DAYS AFTER SERVICE OF THE REQUEST FOR ADMISSION, OR WITHIN
SUCH SHORTER OR LONGER TIME AS THE COURT MAY ALLOW, THE PARTY
TO WHOM THE REQUEST IS DIRECTED SERVES UPON THE PARTY
REQUESTING THE ADMISSION A WRITTEN ANSWER OR OBJECTION
ADDRESSED TO THE MATTER, SIGNED BY THE PARTY OR BY HIS
ATTORNEY. IF OBJECTION IS MADE, THE REASONS THEREFOR SHALL BE
STATED. THE ANSWER SHALL SPECIFICALLY DENY THE MATTER OR SET
FORTH IN DETAIL THE REASONS WHY THE ANSWERING PARTY CANNOT
TRUTHFULLY ADMIT OR DENY THE MATTER.

DEFINITIONS

In this First Set of Requests for Admission, the
definitions of certain words and phrases are set forth below.
When used in this First Set of Requests for Admission, these
words and phrases are to have the meanings set forth below,
unless otherwise specified in the individual Requests.

A. "Person": "person" means any natural person, firm,

REQUESTS FOR ADMISSION - 1

OEM CONN 1

0423

Antonietti P.S.
ATTORNEY AT LAW

111 West Cataldo, Suite 210
Spokane, WA 99201

partnership, association, joint venture, corporation, trust,
estate or any form of legal entity.

B. "You" and "Your": "You" and "Your" refer to
defendant Brother Berard Connolly.

DATED this 10 day of December, 1993.

JOAN L. ANTONIETTI, P.S.

Joan L. Antonietti
Joan L. Antonietti
WSBA #13795
Attorney for Plaintiff

REQUEST FOR ADMISSION NO. 1: Admit that you sexually abused,
plaintiff on parish premises.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 2: Admit that you sexually abused
Plaintiff during parish related activities.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 3: Admit that you sexually abused
Plaintiff.

RESPONSE: Admit.

REQUESTS FOR ADMISSION - 2

OFM CONN 1
0424

Joan L. Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

1 REQUEST FOR ADMISSION NO. 4: Admit that you sexually abused
2 parishioners other than Plaintiff on parish premises.

3 RESPONSE: Deny.

4
5 REQUEST FOR ADMISSION NO. 5: Admit that you sexually abused
6 parishioners other than Plaintiff during parish related
7 activities.

8 RESPONSE: Deny.

9
10
11 REQUEST FOR ADMISSION NO. 6: Admit that you have sexually
12 abused parishioners other than Plaintiff.

13 RESPONSE: Deny.

14
15
16 REQUEST FOR ADMISSION NO. 7: Admit that you sexually abused
17 students other than Plaintiff.

18 RESPONSE: Deny.

19
20
21 REQUEST FOR ADMISSION NO. 8: Admit that you sexually abused
22 students other than Plaintiff on parish premises.

23 RESPONSE: Deny.

24
25
REQUESTS FOR ADMISSION - 3

OFM CONN 1
0425

JOANNE **Antonietti P.S.**
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509.325.7777

1 REQUEST OF ADMISSION NO. 9: Admit that you sexually abused
2 students other than Plaintiff during parish related
3 activities.

4 RESPONSE: Deny.

5
6 REQUEST FOR ADMISSION NO. 10: Admit that other brothers and/or
7 priests were aware of certain inappropriate activities and
8 conduct on the part of yourself directed toward your students
9 and/or parishioners.

10 RESPONSE: Deny.

11
12
13 REQUEST FOR ADMISSION NO. 11: Admit that other brothers
14 and/or priests should have been aware of certain inappropriate
15 activities and conduct on the part of yourself directed toward
16 your students and/or parishioners.

17 RESPONSE: Deny.

18
19
20 REQUEST FOR ADMISSION NO. 12: Admit that other brothers
21 and/or priests were aware of certain inappropriate activities
22 and conduct on the part of yourself directed toward Plaintiff.

23 RESPONSE: Deny.
24
25

REQUESTS FOR ADMISSION - 4

OFM CONN 1
0426

JOAN L. Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 REQUEST FOR ADMISSION NO. 13: Admit that other brothers
2 and/or priests should have been aware of certain inappropriate
3 activities and conduct on the part of yourself directed toward
4 Plaintiff.

5 RESPONSE: Deny.

6
7 REQUEST FOR ADMISSION NO. 14: Admit that you assaulted and
8 battered plaintiff?

9 RESPONSE: Deny.

10
11
12 REQUEST FOR ADMISSION NO. 15: Admit that your acts directed
13 towards Plaintiff constituted extreme and outrageous conduct?

14 RESPONSE: Deny.

15
16
17 REQUEST FOR ADMISSION NO. 16: Admit that your outrageous
18 conduct intentionally, recklessly and/or negligently caused
19 plaintiff to suffer severe emotional and mental distress?

20 RESPONSE: Deny.

21
22
23 REQUEST FOR ADMISSION NO. 17: Admit that you violated
24 plaintiff's right to enjoy her relationship with her family?

25 RESPONSE: Deny.

REQUESTS FOR ADMISSION - 5

OFM CONN 1
0427

JOAN L. Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

Third party privacy

1 REQUEST FOR ADMISSION NO. 18: Admit that due to your
2 outrageous behavior, that plaintiff has suffered the loss of
3 her marriage to [REDACTED]

4 RESPONSE: Deny.
5
6

7 REQUEST FOR ADMISSION NO. 19: Admit that due to your
8 outrageous behavior, that plaintiff has suffered the loss of
9 her religious faith.

10 RESPONSE: Deny.
11
12

13 REQUEST FOR ADMISSION NO. 20: Admit that as a result of your
14 sexual abuse, plaintiff has suffered physical pain and
15 suffering and distress.

16 RESPONSE: Deny.
17
18
19

20 REQUEST FOR ADMISSION NO. 21: Admit that as a result of your
21 sexual abuse, plaintiff has suffered psychological pain and
22 suffering and distress.

23 RESPONSE: Deny.
24
25

REQUESTS FOR ADMISSION - 6

OFM CONN 1
0428

Joanne **Antonietti P.S.**
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

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REQUEST FOR ADMISSION NO. 22: Admit that as a result of your sexual abuse, plaintiff has suffered emotional pain and suffering and distress.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 23: Admit that as a result of your sexual abuse, plaintiff has suffered humiliation.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 24: Admit that as a result of your sexual abuse, plaintiff has suffered anxiety.

RESPONSE: Deny.

REQUEST FOR ADMISSION NO. 25: Admit that as a result of your sexual abuse that plaintiff has had to seek out psychological treatment and therapy?

RESPONSE: Deny.

1 REQUEST FOR ADMISSION NO. 26: Admit that you touched
2 plaintiff inappropriately without her consent.

3 RESPONSE: Deny.

4
5 REQUEST FOR ADMISSION NO. 27: Admit that the Franciscan Friars
6 Province of St. Barbara had notice of your propensity to
7 behave inappropriately, sexually either prior to or during
8 your sexual abuse of plaintiff.

9 RESPONSE: Deny.

10
11
12 REQUEST FOR ADMISSION NO. 28: Admit that the Catholic Diocese
13 of Spokane had notice of your propensity to behave
14 inappropriately, sexually, either prior to or during your
15 sexual abuse of plaintiff.

16 RESPONSE: Deny.

17
18
19
20 REQUEST FOR ADMISSION NO. 29: Admit that the Catholic Bishop
21 of Spokane had notice of your propensity to behave
22 inappropriately, sexually, either prior to or during you
23 sexual abuse of plaintiff.

24 RESPONSE: Deny.

25
REQUESTS FOR ADMISSION - 8

OFM CONN 1
0430

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/325-7333 FAX 509/325-7334

1
2 REQUEST FOR ADMISSION NO. 30: Admit that the Franciscan Friars
3 Province of St. Barbara had received complaints regarding your
4 inappropriate conduct either prior to or during your sexual
5 abuse of plaintiff.

6 RESPONSE: Deny.

7
8
9 REQUEST FOR ADMISSION NO. 31: Admit that Catholic Diocese of
10 Spokane had received complaints regarding your inappropriate
11 conduct either prior to or during your sexual abuse of
12 plaintiff.

13 RESPONSE: Deny.

14
15
16 REQUEST FOR ADMISSION NO. 32: Admit that the Catholic Bishop
17 of Spokane had received complaints regarding your
18 inappropriate conduct either prior to or during your sexual
19 abuse of plaintiff.

20 RESPONSE: Deny.

JAN 12 1994

ETTER & MANNION, P.S.
1017

947

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FAX

} SS.

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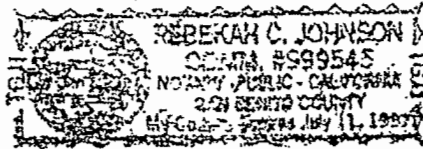
BROTHER PAUL CONNELLY, being first duly sworn upon oath, deposes and says:

Answers to the foregoing Requests for
 Answers thereto, and state that they are
 true to the best of my knowledge.

my knowledge.

Brother Bernard Connolly

SUBSCRIBED AND SWORN TO before me this 12th day of January, 1994.



Rebekah Johnson
NOTARY PUBLIC in and for
the State of California
residing at Hollister.
My commission expires:
July 11, 1997

The undersigned attorney for the party responding to the above described matters signs this response in compliance with Rule 26(g) of the Superior Court Civil Rules.

DATED this 12th day of Jan, 1994.

William F. Etter
William F. Etter WSBA # 091582

REQUESTS FOR ADMISSION - 10

OFM CONN 1
0432

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Tulsa, OK 74104

Third party privacy

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DEC 13 1993

MORRISON & LEVEQUE, P.S.

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

[REDACTED] a single woman,

Plaintiff,

NO. 92-205445-5

vs.

BROTHER BERARD CONNELLY, a
 Franciscan Brother; THE CATHOLIC
 DIOCESE OF SPOKANE; THE CATHOLIC
 BISHOP OF SPOKANE; THE FRANCISCAN
 PRIARS PROVINCE OF SAINT BARBARA;
 AND THE ROMAN CATHOLIC CHURCH OF
 THE PAPACY,

PLAINTIFF'S FIRST SET OF
 INTERROGATORIES AND
 REQUESTS FOR PRODUCTION
 OF DOCUMENTS PROPOUNDED
 TO DEFENDANT THE
 CATHOLIC BISHOP OF
 SPOKANE

AND RESPONSES THERETO

Defendants.

TO: DEFENDANT THE CATHOLIC BISHOP OF SPOKANE and your attorney,
 Ronald G. Morrison

Pursuant to Rules 26, 33 and 34 of the Civil Rules for Superior Court of the State of Washington, the Plaintiff submits the following Interrogatories and Requests for Production of Documents to be answered separately and completely under oath within thirty (30) days of the service thereof upon you. In answering, you are required to furnish such information as is available to you, not merely the information you know of your personal knowledge. This is intended to include any information in the possession of your agents, attorneys, or any investigators for you.

COURT RULES REQUIRE THAT THE ANSWERS BE PRECEDED BY THE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND THUS EXTRA COPIES OF THESE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS ARE BEING SERVED UPON YOU IN ORDER TO EXPEDITE THE ANSWERING THEREOF. YOU MAY TYPE YOUR ANSWERS IMMEDIATELY AFTER THE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND THUS AVOID RETYPING THE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS.

THESE INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS ARE CONTINUING IN NATURE, AND THE PLAINTIFF HEREBY DEMANDS THAT ANY ADDITIONAL INFORMATION COMING INTO YOUR POSSESSION OR YOUR COUNSEL'S OR AGENTS POSSESSION THAT WOULD CHANGE OR ADD TO YOUR ANSWERS IN ANY WAY BE PROMPTLY FURNISHED TO THE UNDERSIGNED, IN ANY EVENT, NO LATER THAN THIRTY (30) DAYS AFTER RECEIPT OF SUCH INFORMATION.

INTERROGATORIES AND REQUESTS - 1

OFM CONN 1

0433

Antonietti P.S.
 ATTORNEY AT LAW
 111 West Cataldo, Suite 210
 Spokane, WA 99201
 509-325-7333 FAX 509-325-7334

Moreover, pursuant to Rules 26 and 34 of the Civil Rules for Superior Court of the State of Washington, the Plaintiff herein requests that you produce and permit Plaintiff to copy documents described below which are now in your or your attorneys or agents possession, custody and/or control.

Unless otherwise mutually agreed to, inspection and/or copying shall take place at the offices of the Plaintiff's attorney, Joan L. Antonietti, P.S., W. 111 Cataldo, Suite 210, Spokane, WA 99201, during regular business hours until completed, not later than thirty (30) days from the date of service of these Requests. Visual inspection shall be made by the Plaintiff's attorneys, and copying shall be done by photocopying or other appropriate means.

DEFINITIONS

As used in these interrogatories, the following terms shall have the following meanings:

1. The term "you" means yourself and any of your agents, employees, representatives, predecessors and successors in interest, any and all other persons or entities acting on your behalf.

2. The term "and" and "or" shall, unless the context clearly indicates otherwise, embrace both the conjunctive and disjunctive.

3. In construing these interrogatories, the singular of each term shall include the plural, and the plural shall include the singular, and a masculine, feminine or neuter pronoun shall not exclude the other genders.

4. The term "document" means all written, graphic, or printed matter of any kind, however produced or reproduced, including all originals, drafts, working papers, and non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, and electronic, mechanical or electrical records or representations of any kind, transacted through detection devices into reasonably useable form. The term "document" includes, but is not limited to, papers, books, patents, book entries, accounts, letters, photographs, objects, tangible things, correspondence, telegrams, cables, telexes or telefax messages, memoranda, notes, data, notation, work papers, inter-office communications, inter-departmental communications, minutes, reports and records of any communications (including telephone or other conversations, interviews, conferences, or committee or other meetings),

INTERROGATORIES AND REQUESTS - 2

OEM CONN 1
0434

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 affidavits, statements, summaries, opinions, reports, studies,
2 analyses, formulas, plans, specifications, contracts,
3 licenses, agreements, offers, acceptances, journals, books or
4 other records of accounts, summaries of accounts, bills,
5 receipts, balance sheets, income statements, advertisements,
6 desk calendars, appointment books, diaries, lists,
7 tabulations, charts, graphs, maps, surveys, sound recordings,
8 computer records or impressions, microfilm, and all other
9 records kept by electronic, photographic, or mechanical means,
10 and things similar to any of the foregoing, however
11 denominated.

12 5. The term "all documents" shall mean every document,
13 as defined above, whether an original or a copy, which is or
14 has been in your possession, custody, or control.

15 6. The term "person" includes any natural person, firm,
16 association, partnership and joint venture corporation, and
17 any other form of legal entity, and any city, state or federal
18 governmental entity or any agency, board, or court thereof.

19 7. The term "identify" means, with respect to a
20 document, to state its title, identifying number, type (e.g.,
21 letter, inter-office memorandum, etc.), date, author,
22 addressee, signatories, recipients, present location,
23 custodian, subject matter, and any other identifying
24 characteristics.

25 8. The term "identify" means, with respect to a person,
to state his or her full name, present or last known residence
address and phone number; present or last known business
address and phone number; present employer, job title,
responsibilities and duties; prior experiences and background,
including tenure in each title or position held to date; and
previous job title, responsibilities, and duties; and employer
and business address at the date of the event or transaction
referred to.

9. The term "identify" means, with respect to an oral
communication, to state the date of oral communication and the
place where it occurred, the persons present during such
communication, the person to whom such oral communication was
directed, the person who made such communication, and the
means by which such communication was transmitted (i.e., in
person, by recorded message, or by telephone).

10. The term "relate," "relating to," or "related to"
means directly or indirectly referring to, pertaining to,
discussing, describing, commenting on, constituting,
evidencing, referencing, comprising, or reflecting upon the
stated subject, in whole or in part.

INTERROGATORIES AND REQUESTS - 3

OFM CONN 1

0435

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

INSTRUCTIONS

1. These interrogatories and requests are intended to be continuing in nature, and any information which may be discovered by you subsequent to the service and filing of your answers and responses should be brought to the attention of the inquiring party, through supplemental answers and responses, within a reasonable time following discovery (30 days). If such responses are not furnished, this party will move at the time of trial to exclude from evidence any requested information not so furnished.

2. Each interrogatory and each subparagraph of each interrogatory is to be fully and separately answered, in writing, and under oath. Before each response is given, the paragraph and subparagraph number of the interrogatory to which the answer or response relates is to be set forth.

3. The answer to each interrogatory and response to each request for production of documents shall include such knowledge as is within your custody, possession or control or readily obtained by you including knowledge within the custody, possession or control of your attorneys, agents, and other representatives.

4. If you refuse to answer any interrogatory or request for production of documents, in whole or in part, identify the basis of your refusal to answer, including any claim of privilege, in sufficient detail so as to permit the Court to adjudicate the validity of your refusal to answer.

5. With respect to any interrogatory or request for production of documents contained herein, if you are able to provide some, but not all, of the information requested, provide such information as you can and specifically identify each item as to which you do not have the sufficient information to fully respond.

6. We have attempted to provide you with sufficient space under each interrogatory and request for production to state your answer or response. If the space provided is insufficient, please continue your answer or response on a separate sheet, and attach that sheet to the copies of this pleading which you return to us.

INTERROGATORIES AND REQUESTS - 4

OFM CONN 1

0436

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111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7331

the Catholic Bishop of Spokane, by stating as follows:

- (a) Their name and title;
- (b) Business address; and
- (c) Business and home telephone number.

ANSWER:

Father John Steiner is the present Vicar General and the custodian of all diocesan records. The Diocese, however, has no "personnel records" for Brother Berard Connelly. All diocesan records are kept at the Chancery which is located at W. 1023 Riverside, Spokane, WA. Father Steiner's office is in the Chancery, and his phone number is 456-7100.

REQUEST FOR PRODUCTION NO. 1: Please produce all personnel records, other documents and/or files regarding or which in any manner relate to Brother Berard Connelly.

RESPONSE:

There are no personnel records or specific files regarding Brother Berard Connelly, but records in which he is mentioned are available for inspection at the law office of Ronald G. Morrison at any mutually convenient time.

INTERROGATORY NO. 3: Please identify any persons who acted in a supervisory capacity over Brother Berard Connelly for the Catholic Bishop of Spokane by stating their:

- (a) Name, address and telephone number;
- (b) Title at present and while they supervised Brother

INTERROGATORIES AND REQUESTS - 6

OFM CONN 1
0437

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509.325.7320 FAX 509.325.7324

Connelly; and

(c) Dates during which they supervised Brother Berard Connelly.

ANSWER:

No individual on behalf of the Diocese acted in any supervisory capacity over Brother Berard Connelly. He was presumably subject to the supervision and direction of his superiors within the Franciscan Friars, Province of Saint Barbara.

INTERROGATORY NO. 4: Please provide a brief description of Brother Berard Connelly's duties and responsibilities while he was working in Spokane, Washington and set forth relevant dates, if his duties changed during that period of time.

ANSWER:

Brother Berard Connelly's duties while he was in Spokane were dictated solely by the needs of the Franciscan Friars here in Spokane and Brother Berard's superiors within the Province of Saint Barbara. I am uncertain what those duties may have been or whether they changed at all during his stay in Spokane.

INTERROGATORIES AND REQUESTS - 7

OFM CONN 1
0438

Antoniotti P.S.
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509/ 325-7330 • FAX 325-7334

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6 INTERROGATORY NO. 5 : Has Brother Berard Connelly ever
7 been requested, by the Catholic Bishop of Spokane, to undergo
8 counseling, evaluation or treatment? If your answer is in the
9 affirmative, please state:

10 (a) The name, address and phone number of each
11 counselor, evaluator, psychologist, or psychiatrist who
12 has seen Brother Berard Connelly pursuant to your
13 request;

14 (b) The reasons why you requested Brother Berard
15 Connelly to undergo counseling, evaluation or treatment;
16 and

17 (c) The dates upon which you requested Brother Berard
18 Connelly to undergo counseling, evaluation or treatment.

19 ANSWER:

20 No.
21
22
23
24
25

INTERROGATORIES AND REQUESTS - 8

OFM CONN 1
0439

Antoniotti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509.325.7330 • FAX 509.325.7334

1 INTERROGATORY NO. 6: Have there been any complaints,
2 whether formal or informal, in any format including, but not
3 limited to letter, memo, verbal complaint or legal documents,
4 lodged or filed against Brother Berard Connolly for any reason
5 whatsoever?

6 ANSWER:

7 Not to my knowledge.
8
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17

18 INTERROGATORY NO. 7: If your answer to the immediately
19 preceding interrogatory is in the affirmative, please state:

- 20 (a) The nature of the complaint(s);
21 (b) The date on which the complaint was made or filed;
22 (c) Identify all persons who have knowledge of the
23 complaint by stating their name, address and phone
24 number; and
25 (d) How the complaint was resolved if at all.

INTERROGATORIES AND REQUESTS - 9

OFM CONN 1
0440

Antoniotti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

ANSWER:

N/A.

REQUEST FOR PRODUCTION NO. 2: Please provide copies of all documents which in any manner relate to any complaint identified in response to the preceding interrogatory.

RESPONSE:

N/A.

INTERROGATORY NO. 8: Have there been any complaints, whether formal or informal, in any format including but not limited to letter, memo, verbal complaint or legal documents, lodged or filed against any Catholic priest or brother who resided or worked in Spokane, Washington either prior to or during the time Brother Berard Connelly worked in Spokane,

INTERROGATORIES AND REQUESTS - 10

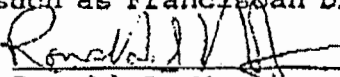
OFM CONN 1
0441

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

Washington which were based on inappropriate conduct.

ANSWER:

Objection. This Interrogatory is overly broad and beyond the scope of permissible discovery. It is also unduly burdensome because it would require a search of all diocesan records from the time the first Bishop of Spokane was installed. In addition, the Bishop's response to complaints regarding a diocesan priest granted faculties in this Diocese would not be relevant to the Bishop's response to complaints regarding other religious ministering within the geographical boundaries of the Spokane Diocese, such as Franciscan brothers like Brother Berard Connelly.


Ronald G. Morrison

INTERROGATORY NO. 9: If your answer to the immediately preceding interrogatory is in the affirmative, please state:

- (a) The nature of the complaint(s);
- (b) The date on which the complaint was made or filed;
- (c) Identify all persons who have knowledge of the complaint by stating their name, address and phone number; and
- (d) How the complaint was resolved, if at all.

ANSWER:

See objection to Interrogatory No. 8.

INTERROGATORIES AND REQUESTS - 11

OFM CONN 1
0442


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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane WA 99201

1 REQUEST FOR PRODUCTION NO. 3: Please provide copies of
2 all documents which in any manner relate to any complaint
3 identified in response to the preceding interrogatory.

4 RESPONSE:

5 See objection to Interrogatory No. 8.
6
7
8

9 INTERROGATORY NO. 10: If you currently are or have been
10 a party to any litigation other than this lawsuit arising out
11 of the sexual abuse of the complaining party; state for each:

- 12 (a) The nature of the suit;
13 (b) The date, court, place and cause number for each
14 prior action;
15 (c) The full names and last known addresses of all
16 parties of each prior suit and their attorneys;
17 (d) The present status of each suit; and
18 (e) If concluded, the result or disposition of each
19 suit.

20 ANSWER:

- 21 1. [REDACTED] v. Bishop of Spokane:
22 a.-c. See attached;
23 d.-e. [REDACTED] claim settled - [REDACTED] claim pending.
24 2. [REDACTED] v. Fontenot:
25 a.-c. See attached;
d.-e. Dismissed by summary judgment as to Bishop of
Spokane.
3. [REDACTED] v. Beaver;
a.-c. See attached;
d.-e. Settled.

INTERROGATORIES AND REQUESTS - 12

OFM CONN 1

0443

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111 West Cataldo, Suite 210
Spokane, WA 99201
509.325.7330 FAX 509.325.7334

1
2
3 INTERROGATORY NO. 11: Please state whether or not the
4 Catholic Bishop of Spokane maintained any procedures or
5 policies regarding supervision of parish students and/or
6 children while on or at parish grounds, schools, functions
7 and/or activities during the period of time that Brother
8 Berard Connolly was working in Spokane County, Washington.

9
10 ANSWER:

11 Not for non-certified personnel.
12
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20 INTERROGATORY NO. 12: If your answer to the immediately
21 preceding interrogatory is in the affirmative, please state:

- 22 (a) The date the policy was implemented;
23 (b) Whether or not any training was provided regarding
24 said policy;
25 (c) Whether or not the policy or procedure provides any

INTERROGATORIES AND REQUESTS - 13

OFM CONN 1
0444

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direction to persons who witness inappropriate conduct
directed toward parish students and/or children; and
(d) To whom the policy was disseminated.

ANSWER:

N/A.

REQUEST FOR PRODUCTION NO. 4: Please produce copies of
any policy identified in response to the immediately preceding
interrogatory.

RESPONSE:

N/A.

INTERROGATORY NO. 13: Please state whether or not the
Catholic Bishop of Spokane maintained any policies or
procedures regarding inappropriate sexual conduct on the part
of priests or brothers while Brother Berard Connelly was
working in Spokane, Washington.

INTERROGATORIES AND REQUESTS - 14

OEM CONN 1
0445

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

ANSWER:

At the time in question, the only policies or procedures regarding inappropriate conduct by priests would have been set forth in Canon law.

INTERROGATORY NO. 14: If your answer to the immediately preceding interrogatory is in the affirmative, please state:

- (a) The date the policy was implemented;
- (b) Whether or not any training was provided regarding said policy;
- (c) Whether or not the policy or procedure provides any direction to persons who witness inappropriate conduct; and
- (d) To whom the policy was disseminated.

ANSWER:

Objection. This information is equally available to the plaintiff. See the Code of Canon Law.


Ronald G. Morrison

INTERROGATORIES AND REQUESTS - 15

OFM CONN 1

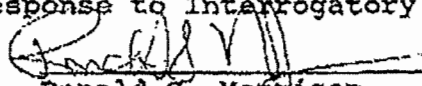
0446


ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1
2 REQUEST FOR PRODUCTION NO. 5: Please produce copies of
3 any policy identified in response to the immediately preceding
4 interrogatory.

5 RESPONSE:

6 Objection. See response to Interrogatory No. 14.

7 
8 Ronald G. Morrison
9
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11

12 INTERROGATORY NO. 15: Identify all persons who are
13 witnesses to any of the incidents complained of by Plaintiff
14 by setting forth their:

- 15 (a) Name, address, and telephone number; and
16 (b) The substance of what they witnessed.

17 ANSWER:

18 This defendant is aware of no witnesses to the
19 alleged abuse other than those previously disclosed by the
20 plaintiff.
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25 INTERROGATORY NO. 16: Identify all witnesses you intend

INTERROGATORIES AND REQUESTS - 16

OFM CONN 1
0447

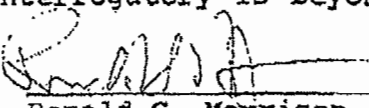
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ATTORNEY AT LAW
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Spokane, WA 99201
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to call at trial by setting forth their:

- (a) Name, address, and telephone number; and
- (b) A summary of their expected testimony.

ANSWER:

Objection. This Interrogatory is beyond the scope of permissible discovery.


Ronald G. Morrison

INTERROGATORY NO. 17: Identify all expert witnesses you intend to call at trial by setting forth their:

- (a) Name, address, and telephone number and their title;
- (b) The subject matter on which the expert is expected to testify;
- (c) A summary of their expected testimony; and
- (d) The basis for their expected testimony.

ANSWER:

A determination regarding expert witnesses who will be testifying at trial has not yet been made, but this response will be supplemented as soon as this determination has been made.

INTERROGATORIES AND REQUESTS - 17

OEM CONN 1
0448

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 INTERROGATORY NO. 18: Please state the reasons why
2 Brother Berard Connelly ceased working in Spokane, Washington.

3 ANSWER:

4 This is unknown, but presumably his superiors
5 in the Franciscan community felt his services could be better
6 utilized elsewhere.
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INTERROGATORIES AND REQUESTS - 18

OFM CONN 1

0449

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 STATE OF WASHINGTON)
2) ss.
3 County of Spokane)

4 _____, being first duly sworn on oath,
5 deposes and states:

6 I am the _____ of The Catholic Bishop of
7 Spokane, and I am authorized to execute these Interrogatories
8 and Requests for Production of Documents on behalf of The
9 Catholic Diocese of Spokane.

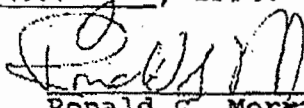
10 I have read the answers to the foregoing Interrogatories
11 and Requests for Production of Documents, know the contents
12 thereof, and state that they are true and correct to the best
13 of my knowledge.

14 _____
15 SUBSCRIBED AND SWORN TO before me this _____ day of
16 _____, 1994.

17 NOTARY PUBLIC in and for
18 the State of _____,
19 residing at _____.
20 My commission expires:
21 _____

22 The undersigned attorney for the party responding to the
23 above discovery matters signs this response in compliance
24 with Rule 26(g) of the Superior Court Civil Rules.

25 DATED this 10th day of January, 1994.


Ronald G. Morrison
WSBA # _____

INTERROGATORIES AND REQUESTS - 18

OEM CONN 1
0450

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

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DEC 16 1993

Huppin Ewing
Anderson, & Paul

December 14, 1993

William F. Etter
Etter & McMahon
Suite 450 Fernwell Bldg.
West 505 Riverside
Spokane, WA 99201

Ronald G. Morrison
Morrison & Leveque
South 1717 Rustle
Spokane, WA 99204

C. Eugene Huppin
Huppin, Ewing & Anderson
221 North Wall St., Suite 500
Spokane, WA 99201

RE: [REDACTED] v. Connelly, et al.

Dear Counsel:

I am writing to obtain dates from you upon which you are available for Plaintiff's deposition of the following individuals:

- a) Father [REDACTED]
- b) Father [REDACTED]
- c) The Superior(s) of the Franciscan Friars of St. Barbara from 1968 to 1973
- d) Bishop Skylstad
- e) Brother Berard Connelly

Could you please provide me with the name of Father [REDACTED] predecessor(s) from 1968 to 1973, in order that I can properly note their deposition.

In addition I would also like to depose your experts, if any. Accordingly I would request that you get their names to me as soon as possible. I may also need to depose some of your lay witnesses. Could you please provide me with their names at your earliest convenience.

I would like to receive your discovery responses prior to deposing Father [REDACTED] his predecessor(s) from 1968 to 1973, Father Blessing, Brother Connelly and Bishop Skylstad. Accordingly

OFM CONN 1

0451

[REDACTED]
December 14, 1993
Page - 2

your responses.

I would like to depose the above named individuals during the last two weeks of January. Please provide me with available dates and your thoughts on appropriate locations and I will schedule the depositions.

I anticipate deposing any lay or expert witnesses you intend to call during the first two weeks of January, 1994. Please provide me with available dates in that regard.

Pursuant to my discussion with Mr. Huppin, I am also writing to inform you that [REDACTED] declines your settlement offer of \$25,000.

I look forward to your early response in these matters.

Very truly yours,

Joan L. Antonietti

JOAN L. ANTONIETTI

ls

cc: C. Eugene Huppin
William Etter
Ronald Morrison

OEM CONN 1
0452

Bates Number 453 was removed by the Plaintiffs at the request of the Franciscans.

RECEIVED

DEC 13 1993

Third party privacy

ETTER & McMAHON, P.S.

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

[REDACTED] a single woman,

Plaintiff,

NO. 92-205445-5

vs.

PLAINTIFF'S REQUESTS
FOR ADMISSION
PROPOUNDED TO
DEFENDANT BROTHER
BERARD CONNELLY

BROTHER BERARD CONNELLY, a
Franciscan Brother; THE CATHOLIC
DIOCESE OF SPOKANE; THE CATHOLIC
BISHOP OF SPOKANE; THE FRANCISCAN
FRIARS, PROVINCE OF SAINT BARBARA;
AND THE ROMAN CATHOLIC CHURCH OF
THE PAPACY,

Defendants.

TO: BROTHER BERARD CONNELLY, defendant
AND TO: WILLIAM F. ETTER, your attorney

Plaintiff herewith submits the following Requests for Admission to be answered separately and fully under oath within thirty (30) days from the date of service of said Requests upon you.

IN ACCORDANCE WITH CIVIL RULE 36(a), EACH REQUEST FOR ADMISSION IS CONSIDERED ADMITTED UNLESS, WITHIN THIRTY (30) DAYS AFTER SERVICE OF THE REQUEST FOR ADMISSION, OR WITHIN SUCH SHORTER OR LONGER TIME AS THE COURT MAY ALLOW, THE PARTY TO WHOM THE REQUEST IS DIRECTED SERVES UPON THE PARTY REQUESTING THE ADMISSION A WRITTEN ANSWER OR OBJECTION ADDRESSED TO THE MATTER, SIGNED BY THE PARTY OR BY HIS ATTORNEY. IF OBJECTION IS MADE, THE REASONS THEREFOR SHALL BE STATED. THE ANSWER SHALL SPECIFICALLY DENY THE MATTER OR SET FORTH IN DETAIL THE REASONS WHY THE ANSWERING PARTY CANNOT TRUTHFULLY ADMIT OR DENY THE MATTER.

DEFINITIONS

In this First Set of Requests for Admission, the definitions of certain words and phrases are set forth below. When used in this First Set of Requests for Admission, these words and phrases are to have the meanings set forth below, unless otherwise specified in the individual Requests.

A. "Person": "Person" means any natural person, firm,

REQUESTS FOR ADMISSION - 1.

OFM CONN 1
0454

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partnership, association, joint venture, corporation, trust,
estate or any form of legal entity.

B. "You" and "Your": "You" and "Your" refer to
defendant Brother Berard Connelly.

DATED this 10 day of December, 1993.

JOAN L. ANTONIETTI, P.S.

Joan L. Antonietti
Joan L. Antonietti
WSBA #13795
Attorney for Plaintiff

REQUEST FOR ADMISSION NO. 1: Admit that you sexually abused,
plaintiff on parish premises.

RESPONSE:

REQUEST FOR ADMISSION NO. 2: Admit that you sexually abused
Plaintiff during parish related activities.

RESPONSE:

REQUEST FOR ADMISSION NO. 3: Admit that you sexually abused
Plaintiff.

RESPONSE:

REQUESTS FOR ADMISSION - 2

OFM CONN 1
0455

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ATTORNEY AT LAW
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1 REQUEST FOR ADMISSION NO. 4: Admit that you sexually abused
2 parishioners other than Plaintiff on parish premises.

3 RESPONSE:
4

5 REQUEST FOR ADMISSION NO. 5: Admit that you sexually abused
6 parishioners other than Plaintiff during parish related
7 activities.

8 RESPONSE:
9

10 REQUEST FOR ADMISSION NO. 6: Admit that you have sexually
11 abused parishioners other than Plaintiff.
12

13 RESPONSE:
14

15 REQUEST FOR ADMISSION NO. 7: Admit that you sexually abused
16 students other than Plaintiff.
17

18 RESPONSE:
19

20 REQUEST FOR ADMISSION NO. 8: Admit that you sexually abused
21 students other than Plaintiff on parish premises.
22

23 RESPONSE:
24
25

REQUESTS FOR ADMISSION - 3

OEM CONN 1
0456

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
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509/ 325-7330 • FAX 325-7334

1 REQUEST OF ADMISSION NO. 9: Admit that you sexually abused
2 students other than Plaintiff during parish related
3 activities.

4 RESPONSE:

5
6 REQUEST FOR ADMISSION NO. 10: Admit that other brothers and/or
7 priests were aware of certain inappropriate activities and
8 conduct on the part of yourself directed toward your students
9 and/or parishioners.

10 RESPONSE:

11
12
13 REQUEST FOR ADMISSION NO. 11: Admit that other brothers
14 and/or priests should have been aware of certain inappropriate
15 activities and conduct on the part of yourself directed toward
16 your students and/or parishioners.

17 RESPONSE:

18
19
20 REQUEST FOR ADMISSION NO. 12: Admit that other brothers
21 and/or priests were aware of certain inappropriate activities
22 and conduct on the part of yourself directed toward Plaintiff.

23 RESPONSE:

24
25
REQUESTS FOR ADMISSION - 4

OFM CONN 1
0457

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

1 REQUEST FOR ADMISSION NO. 13: Admit that other brothers
2 and/or priests should have been aware of certain inappropriate
3 activities and conduct on the part of yourself directed toward
4 Plaintiff.

5 RESPONSE:

6
7 REQUEST FOR ADMISSION NO. 14: Admit that you assaulted and
8 battered plaintiff?

9 RESPONSE:

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12 REQUEST FOR ADMISSION NO. 15: Admit that your acts directed
13 towards Plaintiff constituted extreme and outrageous conduct?

14 RESPONSE:

15
16
17 REQUEST FOR ADMISSION NO. 16: Admit that your outrageous
18 conduct intentionally, recklessly and/or negligently caused
19 plaintiff to suffer severe emotional and mental distress?

20 RESPONSE:

21
22
23 REQUEST FOR ADMISSION NO. 17: Admit that you violated
24 plaintiff's right to enjoy her relationship with her family?

25 RESPONSE:

REQUESTS FOR ADMISSION - 5

OFM CONN 1
0458

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

Third party privacy

1 REQUEST FOR ADMISSION NO. 18: Admit that due to your
2 outrageous behavior, that plaintiff has suffered the loss of
3 her marriage to [REDACTED]

4 RESPONSE:
5

6
7 REQUEST FOR ADMISSION NO. 19: Admit that due to your
8 outrageous behavior, that plaintiff has suffered the loss of
9 her religious faith.

10 RESPONSE:
11

12
13 REQUEST FOR ADMISSION NO. 20: Admit that as a result of your
14 sexual abuse, plaintiff has suffered physical pain and
15 suffering and distress.
16

17 RESPONSE:
18

19
20 REQUEST FOR ADMISSION NO. 21: Admit that as a result of your
21 sexual abuse, plaintiff has suffered psychological pain and
22 suffering and distress.
23

24 RESPONSE:
25

REQUESTS FOR ADMISSION - 6

OFM CONN 1
0459

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ATTORNEY AT LAW
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Spokane, WA 99201
509/ 325-7330 - FAX 325-7334

1
2 REQUEST FOR ADMISSION NO. 22: Admit that as a result of your
3 sexual abuse, plaintiff has suffered emotional pain and
4 suffering and distress.

5 RESPONSE:
6
7

8 REQUEST FOR ADMISSION NO. 23: Admit that as a result of your
9 sexual abuse, plaintiff has suffered humiliation.

10 RESPONSE:
11
12

13 REQUEST FOR ADMISSION NO. 24: Admit that as a result of your
14 sexual abuse, plaintiff has suffered anxiety.

15 RESPONSE:
16
17

18 REQUEST FOR ADMISSION NO. 25: Admit that as a result of your
19 sexual abuse that plaintiff has had to seek out psychological
20 treatment and therapy?

21 RESPONSE:
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REQUESTS FOR ADMISSION ~ 7

OFM CONN 1
0460

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111 West Cataldo, Suite 210
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REQUEST FOR ADMISSION NO. 26: Admit that you touched plaintiff inappropriately without her consent.

RESPONSE:

REQUEST FOR ADMISSION NO. 27: Admit that the Franciscan Friars Province of St. Barbara had notice of your propensity to behave inappropriately, sexually either prior to or during your sexual abuse of plaintiff.

RESPONSE:

REQUEST FOR ADMISSION NO. 28: Admit that the Catholic Diocese of Spokane had notice of your propensity to behave inappropriately, sexually, either prior to or during your sexual abuse of plaintiff.

RESPONSE:

REQUEST FOR ADMISSION NO. 29: Admit that the Catholic Bishop of Spokane had notice of your propensity to behave inappropriately, sexually, either prior to or during you sexual abuse of plaintiff.

RESPONSE:

REQUESTS FOR ADMISSION - 8

OFM CONN 1
0461

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 - FAX 325-7334

1
2 REQUEST FOR ADMISSION NO. 30: Admit that the Franciscan Friars
3 Province of St. Barbara had received complaints regarding your
4 inappropriate conduct either prior to or during your sexual
5 abuse of plaintiff.

6 RESPONSE:
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8

9 REQUEST FOR ADMISSION NO. 31: Admit that Catholic Diocese of
10 Spokane had received complaints regarding your inappropriate
11 conduct either prior to or during your sexual abuse of
12 plaintiff.

13 RESPONSE:
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16 REQUEST FOR ADMISSION NO. 32: Admit that the Catholic Bishop
17 of Spokane had received complaints regarding your
18 inappropriate conduct either prior to or during your sexual
19 abuse of plaintiff.

20 RESPONSE:
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REQUESTS FOR ADMISSION - 9

OFM CONN 1
0462

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/375-7330 - FAX 509/375-7334

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STATE OF WASHINGTON)
) ss.
County of Spokane)

BROTHER BERARD CONNELLY, being first duly sworn upon
oath, deposes and says:

I have read the answers to the foregoing Requests for
Admission, know the contents thereof, and state that they are
true and correct to the best of my knowledge.

Brother Berard Connelly

SUBSCRIBED AND SWORN TO before me this _____ day of
_____, 1994.

NOTARY PUBLIC in and for
the State of _____,
residing at _____.
My commission expires:

The undersigned attorney for the party responding to the
above discovery matters signs this response in compliance with
Rule 26(g) of the Superior Court Civil Rules.

DATED this _____ day of _____, 1994.

William F. Etter WSBA # _____

REQUESTS FOR ADMISSION - 10

OFM CONN 1
0463

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ATTORNEY AT LAW
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Spokane, WA 99201
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Third party privacy

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DEC 13 1993

ETTER & McMAHON, P.S.

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

[REDACTED] a single woman,

Plaintiff,

NO. 92-205445-5

vs.

BROTHER BERARD CONNELLY, a
Franciscan Brother; THE CATHOLIC
DIOCESE OF SPOKANE; THE CATHOLIC
BISHOP OF SPOKANE; THE FRANCISCAN
FRIARS, PROVINCE OF SAINT BARBARA;
AND THE ROMAN CATHOLIC CHURCH OF
THE PAPACY,

PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND
REQUESTS FOR PRODUCTION
OF DOCUMENTS PROPOUNDED
TO DEFENDANT BROTHER
BERARD CONNELLY

Defendants.

TO: DEFENDANT BROTHER BERARD CONNELLY and to your attorney,
William F. Etter

Pursuant to Rules 26, 33 and 34 of the Civil Rules for
Superior Court of the State of Washington, the Plaintiff
submits the following Interrogatories and Requests for
Production of Documents to be answered separately and
completely under oath within thirty (30) days of the service
thereof upon you. In answering, you are required to furnish
such information as is available to you, not merely the
information you know of your personal knowledge. This is
intended to include any information in the possession of your
agents, attorneys, or any investigators for you.

COURT RULES REQUIRE THAT THE ANSWERS BE PRECEDED BY THE
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND
THUS EXTRA COPIES OF THESE INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS ARE BEING SERVED UPON YOU IN ORDER TO
EXPEDITE THE ANSWERING THEREOF. YOU MAY TYPE YOUR ANSWERS
IMMEDIATELY AFTER THE INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS AND THUS AVOID RETYPING THE
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS.

THESE INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS ARE CONTINUING IN NATURE, AND THE PLAINTIFF HEREBY
DEMANDS THAT ANY ADDITIONAL INFORMATION COMING INTO YOUR
POSSESSION OR YOUR COUNSEL'S OR AGENTS POSSESSION THAT WOULD
CHANGE OR ADD TO YOUR ANSWERS IN ANY WAY BE PROMPTLY FURNISHED
TO THE UNDERSIGNED, IN ANY EVENT, NO LATER THAN THIRTY (30)
DAYS AFTER RECEIPT OF SUCH INFORMATION.

INTERROGATORIES AND REQUESTS - 1

OFM CONN 1
0464

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ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 - FAX 325-7334

Moreover, pursuant to Rules 26 and 34 of the Civil Rules for Superior Court of the State of Washington, the Plaintiff, herein requests that you produce and permit Plaintiff to copy documents described below which are now in your or your attorneys or agents possession, custody and/or control.

Unless otherwise mutually agreed to, inspection and/or copying shall take place at the offices of the Plaintiff's attorney, Joan L. Antonietti, P.S., W. 111 Cataldo, Suite 210, Spokane, WA 99201, during regular business hours until completed, not later than thirty (30) days from the date of service of these Requests. Visual inspection shall be made by the Plaintiff's attorneys, and copying shall be done by photocopying or other appropriate means.

DEFINITIONS

As used in these interrogatories, the following terms shall have the following meanings:

1. The term "you" means yourself and any of your agents, employees, representatives, predecessors and successors in interest, any and all other persons or entities acting on your behalf.

2. The term "and" and "or" shall, unless the context clearly indicates otherwise, embrace both the conjunctive and disjunctive.

3. In construing these interrogatories, the singular of each term shall include the plural, and the plural shall include the singular, and a masculine, feminine or neuter pronoun shall not exclude the other genders.

4. The term "document" means all written, graphic, or printed matter of any kind, however produced or reproduced, including all originals, drafts, working papers, and non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, and electronic, mechanical or electrical records or representations of any kind, transacted through detection devices into reasonably useable form. The term "document" includes, but is not limited to, papers, books, patents, book entries, accounts, letters, photographs, objects, tangible things, correspondence, telegrams, cables, telexes or telefax messages, memoranda, notes, data, notation, work papers, inter-office communications, inter-departmental communications, minutes, reports and records of any communications (including telephone or other conversations,

INTERROGATORIES AND REQUESTS - 2

OFM CONN 1
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interviews, conferences, or committee or other meetings), affidavits, statements, summaries, opinions, reports, studies, analyses, formulas, plans, specifications, contracts, licenses, agreements, offers, acceptances, journals, books or other records of accounts, summaries of accounts, bills, receipts, balance sheets, income statements, advertisements, desk calendars, appointment books, diaries, lists, tabulations, charts, graphs, maps, surveys, sound recordings, computer records or impressions, microfilm, and all other records kept by electronic, photographic, or mechanical means, and things similar to any of the foregoing, however denominated.

5. The term "all documents" shall mean every document, as defined above, whether an original or a copy, which is or has been in your possession, custody, or control.

6. The term "person" includes any natural person, firm, association, partnership and joint venture corporation, and any other form of legal entity, and any city, state or federal governmental entity or any agency, board, or court thereof.

7. The term "identify" means, with respect to a document, to state its title, identifying number, type (e.g., letter, inter-office memorandum, etc.), date, author, addressee, signatories, recipients, present location, custodian, subject matter, and any other identifying characteristics.

8. The term "identify" means, with respect to a person, to state his or her full name, present or last known residence address and phone number; present or last known business address and phone number; present employer, job title, responsibilities and duties; prior experiences and background, including tenure in each title or position held to date; and previous job title, responsibilities, and duties; and employer and business address at the date of the event or transaction referred to.

9. The term "identify" means, with respect to an oral communication, to state the date of oral communication and the place where it occurred, the persons present during such communication, the person to whom such oral communication was directed, the person who made such communication, and the means by which such communication was transmitted (i.e., in person, by recorded message, or by telephone).

10. The term "relate," "relating to," or "related to" means directly or indirectly referring to, pertaining to, discussing, describing, commenting on, constituting, evidencing, referencing, comprising, or reflecting upon the

INTERROGATORIES AND REQUESTS - 3

OFM CONN 1

0466

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509/ 325-7330 - FAX 325-7334

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stated subject, in whole or in part.

INSTRUCTIONS

1. These interrogatories and requests are intended to be continuing in nature, and any information which may be discovered by you subsequent to the service and filing of your answers and responses should be brought to the attention of the inquiring party, through supplemental answers and responses, within a reasonable time following discovery (30 days). If such responses are not furnished, this party will move at the time of trial to exclude from evidence any requested information not so furnished.

2. Each interrogatory and each subparagraph of each interrogatory is to be fully and separately answered, in writing, and under oath. Before each response is given, the paragraph and subparagraph number of the interrogatory to which the answer or response relates is to be set forth.

3. The answer to each Interrogatory and response to each Request for Production of Documents shall include such knowledge as is within your custody, possession or control or readily obtained by you including knowledge within the custody, possession or control of your attorneys, agents, and other representatives.

4. If you refuse to answer any Interrogatory or Request for Production of Documents, in whole or in part, identify the basis of your refusal to answer, including any claim of privilege, in sufficient detail so as to permit the Court to adjudicate the validity of your refusal to answer.

5. With respect to any Interrogatory or Request for Production of Documents contained herein, if you are able to provide some, but not all, of the information requested, provide such information as you can and specifically identify each item as to which you do not have the sufficient information to fully respond.

INTERROGATORIES AND REQUESTS - 4

OFM CONN 1
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6. We have attempted to provide you with sufficient space under each interrogatory and request for production to state your answer or response. If the space provided is insufficient, please continue your answer or response on a separate sheet, and attach that sheet to the copies of this pleading which you return to us.

DATED this _____ day of December, 1993.

JOAN L. ANTONIETTI, P.S.

Joan L. Antonietti
Joan L. Antonietti
WSBA NO. 13795
Attorney for Plaintiff

INTERROGATORY NO. 1: Please state:

- (a) Your full name;
- (b) Home address;
- (c) Date of birth; and
- (d) Place of birth.

ANSWER:

INTERROGATORIES AND REQUESTS - 5

OFM CONN 1
0468

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1 INTERROGATORY NO. 2: Identify each and every person who
2 provided any information used in responding to these
3 Interrogatories and Request for Production of Documents,
4 listing with respect to each the Interrogatory or Request for
5 Production for which the information was provided.

6 ANSWER:
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15 INTERROGATORY NO. 3: State each residence address you
16 have occupied at any time since you became a Franciscan
17 Brother, and the dates of each such occupation.

18 ANSWER:
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INTERROGATORIES AND REQUESTS - 6

OEM CONN 1
0469

JOAN E. Antoniotti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201
509/ 325-7330 • FAX 325-7334

1 INTERROGATORY NO. 4: Identify all of your
2 jobs/occupations that you have engaged in since completing
3 high school and set forth in each instance:

4 (a) The period of time spent in each such
5 job/occupation;

6 (b) Name and address of each employer/supervisor;

7 (c) Description of the type of work performed;

8 (d) The compensation received per month;

9 (e) Reasons for leaving.

10 ANSWER:

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16 INTERROGATORY NO. 5: Please state whether or not you
17 have ever been arrested or charged with a crime. If your
18 answer is in the affirmative, please also state:

19 (a) When the arrest or charging took place;

20 (b) Where you were arrested or charged;

21 (c) Describe the exact details and basis of each such
22 arrest or charge; and

23 (d) Describe the final disposition of each arrest or
24 charge.
25

INTERROGATORIES AND REQUESTS - 7

OFM CONN 1
0470

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509/325-7333 FAX 509/325-7334

ANSWER:

INTERROGATORY NO. 6: Have you ever voluntarily entered or been committed to any hospital, clinic or institution, either public or private, for the treatment or observation of any psychological or psychiatric condition(s), alcoholism, drug addiction, or any psychological or psychiatric problems of any kind including but not limited to inappropriate sexual conduct? If your answer is in the affirmative, please state:

(a) The name and address, and telephone number of each such hospital, clinic or institution;

(b) The dates of your stay;

(c) The purpose or reason for your entry or being committed into such hospital, clinic or institution; and

(d) The name, address and phone number of any health care providers who cared for you at the hospital, clinic, or institution.

INTERROGATORIES AND REQUESTS - 8

OFM CONN 1

0471

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Spokane, WA 99201
CNR 775-7730 • FAX 775-7734

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2 ANSWER:
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12 REQUEST OF PRODUCTION NO. 1: Please provide copies of
13 all records maintained by any hospital, clinic or
14 institution(s) identified in the immediately preceding
15 interrogatory pertaining to yourself.
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17 RESPONSE:
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INTERROGATORIES AND REQUESTS - 9

OEM CONN 1
0472

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509/ 325-7330 • FAX 325-7334

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4 INTERROGATORY NO. 7: Please identify all physicians,
5 psychologists, psychiatrists and counselors whom you have
6 seen, consulted with and/or been treated by and state with
7 respect to each:

8 (a) Dates upon which you were seen by each health care
9 professional;

10 (b) Names, addresses and phone numbers of each health
11 care professional; and

12 (c) Reasons for contacting each health care
13 professional.

14 ANSWER:
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22 REQUEST FOR PRODUCTION NO. 2: Please produce copies of
23 all records pertaining to you kept by each of the health care
24 provider(s) listed in the immediately preceding interrogatory.

25 RESPONSE:

INTERROGATORIES AND REQUESTS - 10

OFM CONN 1
0473

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509/ 325-7330 • FAX 325-7334

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5 INTERROGATORY NO. 8: Please state whether or not there
6 is any history of sexual abuse in your family. If your answer
7 is in the affirmative, please identify each affected family
8 member and their relation to you and describe the abuse which
9 occurred.

10 ANSWER:
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18 INTERROGATORY NO. 9: Please state whether or not there
19 is any history of alcohol and/or drug abuse in your family.
20 If your answer is in the affirmative, please identify each
21 affected family member and their relation to you and describe
22 the abuse which occurred.

23 ANSWER:
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INTERROGATORIES AND REQUESTS - 11

OFM CONN 1
0474

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509/ 325-7330 • FAX 325-7334

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4 INTERROGATORY NO. 10: Have you ever been asked to
5 undergo any type of counseling or psychological evaluation by
6 any of your employers and/or by the Franciscan Friars,
7 Catholic Diocese of Spokane, or The Catholic Bishop of
8 Spokane? If your answer is in the affirmative, please state:

9 (a) The name and address of each such employers or co-
10 defendant who made the request;

11 (b) The name, address and phone number of the
12 counselor(s)/evaluator(s);

13 (c) Indicate the dates of counseling/evaluation; and

14 (d) Describe the reasons you were asked to undergo
15 counseling/evaluation.

16 ANSWER:
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INTERROGATORIES AND REQUESTS - 12

OFM CONN 1
0475

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1 REQUEST FOR PRODUCTION NO. 3: Please provide copies of
2 all counseling/evaluation records for each counselor/evaluator
3 identified in response to the preceding interrogatory.

4 RESPONSE:

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8 INTERROGATORY NO. 11: If you currently are or have ever
9 been a party to any litigation other than this lawsuit; please
10 state for each:

- 11 (a) The nature of the suit;
12 (b) The date, court, place and cause number for each
13 prior action;
14 (c) The full names and last known addresses of all
15 parties of each prior suit and their respective
16 attorneys;
17 (d) The present status of each suit; and
18 (e) If concluded, the result or disposition of each
19 suit.

20 ANSWER:
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INTERROGATORIES AND REQUESTS - 13

OFM CONN 1
0476

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1 INTERROGATORY NO. 12: Please state whether anyone
2 excepting Plaintiff has ever complained about you with regard
3 to any of the following:

- 4 (a) Inappropriate sexual conduct;
5 (b) Inappropriate conduct directed toward parishioners;
6 (c) Inappropriate conduct directed toward students;
7 (d) Inappropriate conduct at parish dances; or
8 (e) Inappropriate conduct directed towards other
9 brothers, priests, nuns or sisters.

10 ANSWER:
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INTERROGATORIES AND REQUESTS - 14

OEM CONN 1
0477

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INTERROGATORY NO. 13: If your answer to the immediately preceding interrogatory is in the affirmative:

(a) Identify the complaining party by name, address, and phone number;

(b) Identify the person(s) to whom the complaining party complained, by name, address and phone number;

(c) Summarize the complaint;

(d) Describe the disposition, if any, of the complaint;

(e) Identify all persons who have any knowledge of the complaint, whether actual knowledge of the substance of the complaint or that the complaint had been made;

(f) Set forth the respective dates upon which each complaint was made; and

(g) Please state whether or not any of the aforescribed complaints were set forth in writing.

ANSWER:

INTERROGATORIES AND REQUESTS - 15

OEM CONN 1
0478

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1 REQUEST FOR PRODUCTION NO. 4: Please produce any
2 documents regarding or in any manner relating to any of the
3 complaints identified in response to the immediately preceding
4 interrogatory including but not limited to any written
5 complaint itself.

6 RESPONSE:

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14 INTERROGATORY NO. 14: Please describe your educational
15 background by stating as follows:

16 (a) Names and address of all grade schools, high
17 schools, colleges or universities attended;

18 (b) Dates of attendance;

19 (c) Describe any degrees obtained, and set forth the
20 dates upon which any degree was obtained; and

21 (d) Describe any education and/or special training
22 required of you by the Franciscan Friars, and/or Catholic
23 Bishop of Spokane, or the Catholic Diocese of Spokane.
24

25 INTERROGATORIES AND REQUESTS - 16

OFM CONN 1
0479

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ANSWER:

REQUEST FOR PRODUCTION NO. 5: Please produce any records or documents pertaining to yourself maintained by the Franciscan Friars, Catholic Diocese of Spokane, or Catholic Bishop of Spokane, including but not limited to:

- (a) Personnel records or documents;
- (b) Medical records or documents; and
- (c) Disciplinary records or documents.

RESPONSE:

INTERROGATORIES AND REQUESTS - 17

OFM CONN 1
0480

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1
2 INTERROGATORY NO. 15: Please identify any persons
(excepting Plaintiff) with whom you have been sexually
inappropriate by stating:

3 (a) Their name, address and phone number;

4 (b) Describe the inappropriate sexual activity engaged
in;

5 (c) Set forth the dates upon which the inappropriate
6 sexual activity occurred; and

7 (d) State whether any person complained about the
8 inappropriate sexual activity and if your answer is in
9 the affirmative, identity said persons by name, address
10 and phone number.

11 ANSWER:
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20 INTERROGATORY NO. 16: Please identify all persons whom
you intend to call as witnesses at trial by stating:

21 (a) Name, address and phone number of each witness; and

22 (b) The substance of each witness' expected testimony.
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INTERROGATORIES AND REQUESTS - 18

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0481

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ANSWER:

INTERROGATORY NO. 17: Please identify all persons who witnessed any of the incidents complained about by the Plaintiff by stating:

- (a) Name; Address; and phone number of each witness; and
- (b) The substance of each witness' knowledge with regard to Plaintiff's allegations.

ANSWER:

INTERROGATORIES AND REQUESTS - 19

OFM CONN 1
0482

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1 INTERROGATORY NO. 18: Please identify any and all
2 persons whom you intend to call as an expert witness in this
3 matter by stating:

- 4 (a) The name, address and phone number of each expert;
5 (b) The substance of their expected testimony; and
6 (c) The basis for their expected testimony.

7 ANSWER:
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13 INTERROGATORY NO. 19: Please state the reasons why you
14 ceased working in Spokane, Washington.

15 ANSWER:
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INTERROGATORIES AND REQUESTS - 20

OEM CONN 1
0483

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1 STATE OF WASHINGTON)
2) ss.
3 County of Spokane)

4 BROTHER BERARD CONNELLY, being first duly sworn on oath,
5 deposes and states:

6 I have read the answers to the foregoing Interrogatories
7 and Requests for Production of Documents, know the contents
8 thereof, and state that they are true and correct to the best
9 of my knowledge.

10 BROTHER BERARD CONNELLY

11 SUBSCRIBED AND SWORN to before me this ____ day of
12 _____, 1994.

13 NOTARY PUBLIC in and for
14 the State of _____,
15 residing at _____,
16 My commission expires:
17 _____

18 The undersigned attorney for the party responding to the
19 above discovery matters signs this response in compliance with
20 Rule 26(g) of the Superior Court Civil Rules.

21 DATED this ____ day of _____, 1994.

22 William F. Etter
23 WSBA # _____

24 INTERROGATORIES AND REQUESTS - 21

25 OFM CONN 1
0484

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Bates Numbers 485-491 were removed by the Plaintiffs at the request of the Franciscans.

Bates Numbers 492-495 were removed by the Plaintiffs at the request of the Franciscans.

SAINT FRANCIS



RETREAT CENTER

file

October 18, 1993

Dear [REDACTED] --

Welcome home from Malta!

I found the enclosed little prayerbook and wondered if you might like to add it to your pious-book collection.

Regarding the Provincial Definitorium notes:

1) I have memories of helping Hugh Noonan mailing those giant recordings of the "Hour of St. Francis" and like most friars was very proud and fond of "The Hour."

Over the years I felt The Hour lost its mission and became discontent with preaching to aunts and mothers-in-law, little people. It lost its touch and became self-grandizing, artsy.

I have no regrets with its closing.

2) I repeat my sorrow at the amount of time you have had to spend in sex cases. 75% taken from Province leadership and inspiration is a terrible loss.

3) And I thought "MC" meant "multi-cultural." The 11% is a shocker when seen in print. I'm just as glad you noted it in the budget so we all see misconduct is costly. In money. Some of us know the cost in spirit.

If I were less mentally healthy I would fear that while friars may forgive and accept the sinner they might not be as generous when it comes to 11% of their often hard earned money.

[REDACTED] you've said the friars never surprise you. They do surprise me with their kindness -- at least, many of them.

Peace!

Benny

OFM CONN 1

0496

Bates Numbers 497-500 were removed by the Plaintiffs at the request of the Franciscans.

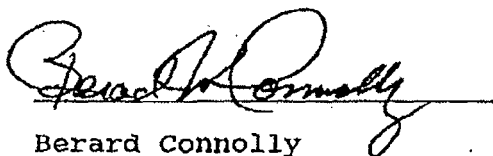
Bates Numbers 501-502 were removed by the Plaintiffs at the request of the Franciscans.

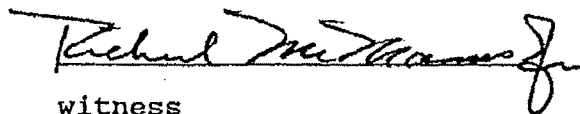
Bates Numbers 503-508 were removed by the Plaintiffs at the request of the Franciscans.

Bates Numbers 509-510 were removed by the Plaintiffs at the request of the Franciscans.

Very [REDACTED]
[REDACTED]

I, Berard William Connolly, a Professed Franciscan of the Saint Barbara Province, do hereby give my consent to the release of my personal files as maintained at the Provincial Office, to [REDACTED] with the understanding that he will use whatever information contained therein in a prudent and lawful manner.


Berard Connolly


witness

4-12-93
date

Bates Number 512 was removed by the Plaintiffs at the request of the Franciscans.

January 3, 1990

[REDACTED]

Dear [REDACTED]

I am writing you this confidential letter to bring a case of sexual abuse by a member of your order, Br. Berard Connolly, to your attention. The motivation for writing this letter is to help bring about my own personal healing and closure to this issue of sexual abuse. I also want to protect others from the pain of betrayal, shame, and violation that results from sexual abuse. In light of statements he had made, and my own experience, his being around children concerns me greatly. It has been my experience coming from a dysfunctional family situation involving alcoholism and sexual abuse, that any pedophile must receive ongoing counseling and monitoring. Therefore, I would like a written reply confirming that Br. Berard will receive therapy as well as current monitoring of his activities or behaviors in dealing with children.

The abuse by Br. Berard has effected every aspect of my life and continues to play a role in my present views of God, the Church, love, trust, and this list is innumerable. When I was a young adolescent and all was chaotic in my family, I turned towards what appeared to be a safe and spiritual direction for protection from the sexual abuse and alcoholism at home, only to be guided step by step into further abuse. I only became more confused in my teen years by the mixed message of having Br. Berard not only as a friend, but also as a representation of the Church, providing instruction in religion courses in high school. Because of the role that he held in my life and the Church, coupled with the abuse, I felt that I had seduced God, when in reality it was Br. Berard who had neatly groomed me. The injustice of the matter was that he was the adult in the situation and exploited his position and the knowledge of my family situation to cross boundaries repetitively that should never be crossed.

I am requesting reimbursement for the counseling I have received over the last year, as well as any further counseling, with Sr. Cathy Beckley at St. Joseph Family Center in Spokane, WA.

Sincerely,

[REDACTED]

Third party privacy

FRANCISCAN FRIARS PROVINCE OF SAINT BARBARA

[REDACTED]

January 17, 1990

Dear [REDACTED]

Peace and all good. It was with great concern that I read your letter to me of January 3, which arrived here just a few days ago.

The matters which you raise are of the utmost importance. I want to express to you my deepest concern, for yourself and for the suffering that has happened. I have dealt with some of these questions of abuse before, and I know that the agony the victim goes through can hardly be described. I am grateful that you have addressed these issues in such an honest and concerned manner in your letter.

In order that your own needs might be well met and your concerns for Brother Berard be more adequately addressed, I would appreciate some more information. I know that the matters you have touched on are of a very sensitive and personal nature, and I can assure you they will be treated with the utmost confidentiality. I have asked the chairman of our health and wellness committee, [REDACTED], to contact you either directly or through St. Cathy Beckley at the Family Center in Spokane. [REDACTED] is trained in psychology and has a good deal of experience. I hope that you will be able to talk with him as openly as you have written to me. Because this matter is of such concern (and it is important that it be addressed in an on-going way for all involved), it is vital that we proceed together to heal terrible hurts and make certain that such a thing does not happen again.

I hope that this suggestion is acceptable to you. Please be assured of my continued prayers and concern.

Sincerely

[REDACTED]

OEM CONN 1
0514

1500 Cherry - fourth Avenue
Oakland, CA 94612

Fr. James Blessing, O.F.M.

Provincial Minister (415) 536-3722

Third Party Privacy Rights

February 19, 1990

Confidential

[REDACTED]
C-- Sister Cathy
[REDACTED]

[REDACTED] Could I just share the questions I had in mind and you could see if those would be appropriate, and give us an organized way of approaching it

1. What is it that happened? What did Brother Berard do? Where did it occur and when did it occur? How old were you and how often did it occur? What period of time and what capacity. And what capacity were you relating to him and he relating to you. Teacher, student, whatever, basically those would be the first questions. Would that sound alright to ask?

[REDACTED] What is it that Berard did? What actually happened?

[REDACTED] In light of the sexual abuse?

[REDACTED] Yes.

[REDACTED] Ok, it initially started out at the rectory at St. Ann's and it began with I feel an inappropriate touch and taking pictures of what was seemingly physical abuse that had gone on in the family.

[REDACTED] What do you mean by an inappropriate touch?

[REDACTED] Being told to lift up my shirt, take my pants down and after doing that and having the pictures taken and then seemingly caressing me to support me in the fact that I was physically abused in my family, that was the first incident.

[REDACTED] What does caressing mean?

[REDACTED] Holding

[REDACTED] And how would he hold you?

Tightly

Like a hug, embrace

Embrace, ya ya

And besides that, how long would that embrace last approximately?

About three minutes, to start out with.

And did he touch you in any other way?

Not at that particular time.

You mentioned he asked you to

To take my shirt off and take my pants down, and he would touch my arm, oh he would say is that really a bruise or welt.

Were there other undergarments that you were wearing at that time.

Yes

Did he ask you to do more than that?

Not at that time.

Ok, thank you. And if you'll just continue as best you can there.

Is it easier for you to just tell rather than just be asked?

Yes it is

I'm wondering about that, I think it might

We can do that at the end some place along the line If you can be specific about the details like I would be asking you.

Ok

Getting the kind of question kind of like right now this is what you need, have you had that in mind maybe just stop after you tell a little bit and then just see if there is more specifics. I think what we are getting into is real specifics

What I feel right now is it's like a challenge like I am having to prove myself.

I suppose ya

I going to follow; but would you keep in mind that The real specifics

Yes ok, ok, I'll give you real specifics. I feel that from that point

Excuse me, I'm going to do the same thing [REDACTED] How old are you?

I am in the 7th grade, ok so I would have been 13 13, 14

Yes 13 or 12 and a half and from that point then Brother Berard played a real significant role in the fact, that when ever there were family fights in our immediate family, he always seemed to have a sense of what was going on, and intervened and always came and picked us up. And at different points he would drop my brother off with the intention of wanting to talk to me as to what was really going on, and I feel that as I started to mature, especially like 8th grade going into the 9th grade that he completely took on a different role rather than just being a family friend or a mentor, he started acting more like a boyfriend and he would just drive around and park and act once again he was he was going to be consoling in the fact that what was going on at home and then offer hugs and caresses, and then it got into more of a fondling type of situation and what would happen as far as the overall touching it would happen like maybe once a week, twice a week, and then he would cool off and maybe things would lay low for like maybe three or four weeks maybe five weeks, it would be almost like rungs of a ladder, he'd start one thing, stop it and there would be a cool off period and then depending on the intensity of what was going on at home and how vulnerable we were in our sharing to him as to the physical abuse or the sexual abuse at home, it was almost I feel like that it was part of the grooming that he gained that trust as an avenue to sweep in and use his own form of sexual abuse, as a consoling means. If that makes sense. And so by this time now, probably the summer

of 8th grade and once again it was it's anywhere from one week, to three weeks, to six weeks, it just, I never did understand the reasoning of this patterning as to why he would seemingly be over and covert in his touches and it got to the point of masturbation and then he would back off, and I think given the opportunity it would have been full intercourse. It never was.

like masturbation, he fondled you?

He would fondle me and manually place my hands on him

On his penis

yes

ok

And generally speaking this would be in a parking situation, I can remember being at the rectory a couple times not, that wasn't a real profound thing there the most significant thing I do remember was in the seventh grade and that was with the pictures and I always thought that was kind of strange because this is in the rectory and so I see some of the effects of that in my own life now as to my views of clergy, my views of religion, my views of God, my views of trust, my views of intimacy, I mean it's really innumerable and at different points and time Brother Berard never really taught in grade school, he was just kind of, I don't know how to describe his role other than that he was like a grounds keeper and he did a lot of parish work but as far as a teaching role he wasn't a teacher, and after situations had occurred in my life, and I felt really out of control I just every time I knew my brother wasn't going to be in the situation I pretty much knew what was going to take place as to him moving in sexually.

Even as a child

Even as a child, ya it was real frightening to me it was, it was real paralyzing, and I thought what am I doing that causes this because this person is a representative of the church and certainly this person can't be bad, it's got to be me because of everything else that was going on with my family and, so all along I was intruding the guilt and

the shame, and blaming myself for it and in that not being able to set limits in boundaries of saying no, because I didn't think I had the right to say no, because here on one hand he was acting like a father in a sense, in a weird kind of sense of consoling and yet knowing both my brother and I were really vulnerable to being in a spot of needing to be loved and needing, just we were in a needy spot, and him recognizing that and I guess that's why I don't really think that I could, really had a good sense of why I couldn't say no, and that's been a hard one to deal with. Its been real painful to deal with, but yet on the same degree I feel that in that he is totally wrong, he over stepped boundaries that he never should have over stepped and it didn't always necessarily have to be physically abusive, you know even verbally I remember instances of basketball practice because up until the time that Brother Berard came to St. Ann's, they didn't have a real sports program and he was real enthusiastic about getting kids involved with out side activities and I remember at one point, and I'm kind of back tracking right now, I remember one of the first basketball practices that we had and he had made a comment about a young girl at that time who was embarking upon puberty and she was a little obese, but she wasn't wearing a bra and probably needed to wear a bra, but in light of that the comments he that he even drew attention to that, and I thought that this was really obscure that here this person is a religious, especially as a male, why is he drawing attention to this, you know as a kid I didn't think I had a right to challenge that, I just thought this is bizarre, And I that's been pretty recent that I even dealt with that issue, but it stands out in my mind that you him noticing, that, if anyone was to notice it I would have thought at that point would have been the two girl couches, they could have appropriately addressed it, and said something but it just seemed real out of line, and even just to me that's verbal abuse, in the sense of what was going on, and I remember him questioning me as to my own dating patterns, throughout this period, especially as I got into high school he introduced me to a family in St. Francis of the Cee Cee parish at that time and wanted me to go out with the son, and over the course of time he took us water skiing and I know the two daughters and the son of this family and Brother Berard was rather intent as to what my dating patterns were with this young man and just exactly how far and what limits I had with this

guy, and I thought that's really inappropriate, it's non of your business and so not only tying it with the actual inappropriate touch that he was exhibiting towards me, I feel that there was verbal abuse and to me that's a form of mental abuse too. And then there was a slacking off period, there was probably a good six months that there wasn't real close contact in our family, and then just out of the blue he ended up at Marycliff, which was really odd because the priest we had at the time was a diocesan priest and we never had fill in priest or brothers to teach our religion classes and I don't know whether, at that point and time, this is when I was a junior now, whether or not it was because he was aware that we had career path counseling going on at that time and we have some involvement with the school counselor and that because of the chaotic family situation that I was in that maybe I'd blow the whistle as to a lot of other issues in my life that were trouble making and real crazy making for me but just out of the blue this one week, it was one day in particular that he was teaching my religion class, and I thought this is really a paradox, and at that time I was really rebellious and I in class was verbally acting out in class and he didn't do anything to curtail my acting out in class, and I always thought that was really strange that he wouldn't, I mean there are ways of dealing with classroom situations classroom management but I always now look at that and say was he afraid I was going to blow him out of the water and say well, what right do you have to address me when in fact you have been doing you know the ummm.. inappropriate fondling, masturbation ummmm just a lot of inappropriate actions, and now you are standing up here teaching religion class. In with a classroom of girls. So time went on and situations in my family got a little bit more intense, at this time I am probably a senior in high school, this is a year later, and as I say the contact with him slowly was weaning out, there were two friends of mine at that time that were teachers at St. Anns that were in the judgment volunteer program that I spent alot of time with and Sally and Darlene knew Brother Berard and they had pretty much become like a sanctuary for me to go and stay when my family was really chaotic and I don't know if Brother Berard felt threatened by that I never did say anything to them in light of what had happened and I don't know if they even had a sense of what was going on, but it was like contact with my brother and I was slowly diminishing, and every once

in a while he'd pop into the picture and sing by our house, or he'd call and say do you want to go out and have a Coke, and then it came time for his Golden Jubilee and my mom at that time, this is when I started getting into drugs then and my mom said you have this invitation to go to his Golden Jubilee, and I said why would I want to do that and she just kind of looked at me, and said well he's been a really good person to you all this time, and I go let's get real and up until this time I had told my mom about some sexual abuse issues with step-dads that has been in our family and I was disbelieved and I said why should I spill my guts on this one and not be believed again, because I thought I am really going to be labeled this crazy for this, and I just left it and she say's, and then she addressed me and was saying, you're really an ungrateful person for not going and participating in this, and I said "I'm not going, and then after that I was pretty heavily into drugs, and he swung by my grandma's, I was at my grandma's at the time and he looked at me, and at that time I was down to about 95 pounds, and he says "Deb, you're really screwing up" he says "why are you messing up with drugs and stuff " and this was verbatim, these were his words, and I said I don't know why don't you tell me, you seem to have all the answers, and he said lets go for a ride, and I thought oh wonderful, let's go for a ride, and he said I have to do something, and I don't know what he did, but in that point and time took me to two guy's houses, they were also brothers from St. Frances of the Cee Cee and he said I am going to drop you off here and I don't know what his intentions was in that, both of these guys were on drugs, and I was just supposed to make conversation with two guys that I didn't know.

These were Franciscans.

No no these were two kids from St. Francis of the Cee Cee parish, and they to were from a disfunctional family situation and umm excuse me, and he left me there, and he came back, I don't know what his expectation was in that, if he thought that I was going to be really promiscuous with these guys, I had a real ill feeling that, here this person just kind of comes picks me up runs and does an errun, then is going to come back and pick me up again and I you know, I still don't have any continuity to that but then shortly thereafter he was transferred out of Spokane again but on and off

he would send birthday cards on and off he would drop a letter and then it was about, when he was in Provo, Utah and he was working in a mental hospital with kids that he came back to Spokane, and that was about in '79 again and I had told him that I was getting married, and he came up and I had point blank addressed the issue with him and I said Berard have you ever thought that the things that occurred in my childhood involving you were wrong, and he danced around it he didn't want to address the issue of sexual abuse, he didn't want to address anything, it was just like nothing happened, and that always left me with this crazy making in my head, like did this happened didn't this happen, why do I have these internal feelings, you know not being able to focus on what went on, and I really feel that in that crazy making, that my drug use prior to that time really escalated and my own drinking habits escalated, and some real fears, of men and fears of being intimate of being able to trust, really started to surface, and I couldn't put a label on these things as to why, being internal stuff, at that point I had left the catholic church, and had gotten involved with the fundamental church, which was a charismatic kind of church, and I remember him, says well, [REDACTED] some day you will come back around to the fact that the catholic church, is right, and I said why would I want to do that, after all of this and I was just kind of putting things out, feelers out to see what are you going to do with this stuff that I have laid out on the table, and it's just like total denial, with the fact that he did anything that was wrong, and so then after that point and time things continued, on and it wasn't until this last year again that I had any real contact with him, so that brings it to current day so, and going back to the motive for writing the letter I would think that not only would I feel it would be a real injustice, and a real torture for any other child to have to go through this again, and that's the motive for even addressing this.

Break in tape.

[REDACTED] That physically, mentally, spiritually, that he literally rape my spirit and that really bothers me and to me he's very spiritually sick, and in that sickness because of that insensual relationship caused a spiritual sickness in me and I feel comfortable enough now and I feel encouraged and I have hope that I am healing and I know that going

back to the motive for writing the letter, I don't want this to happen to anyone else.

when you talked to Brother Berard last May and confronted the sexual abuse issue by saying, I am being _____ because of sexual abuse, when he talked about having some therapy, that was

He said he had therapy in Oakland California or not Oakland but Berkeley California, when he was down there, and he also mentioned, this is what it was almost like a double on condra to me because immediately after he had ended the fact that he had received therapy he jumped two sentences later by saying, tying in his drinking habits, and I wasn't aware that he had a drinking problem whatsoever and he brought up the friend of his that he visited on the East Coast the several times, and he said you know _____ if you are drunk enough you could lay anything with four legs, and I thought that for somebody that's suppose to be remorseful in something that was just addressed and have tears in their eyes, are the tears so much for the fact that you have been caught and are going to be exposed or are the tears really tears of remorse and repentance, and that really bother me and just to make light of it,

Somehow he brought up his own drinking as if it might be an excuse to be promiscuous

Yes, yes

So, but, your concern is that , one of your concerns is that there some kind of sense that he has some treatment

Yes, because like I said, I don't know what has occurred, with my brother, I don't anything

Have you talked to your brother about this?

My brother is very close now, but Brother Berard had close relations with him, and took him under wing alot, and then there was a real cutting off point, and that startles me because my brother is right now very toxic as far as his drug use, his drinking, he is in jail right now, for a pharmacy robbery, and I can't help but think that there, not only with the family situation but I think there are other things that appear to me to be symptomatic as to the whys and why not to things, and but my

brother is very close now, I did talk to my mom a little bit and she had to conveyed to my brother about Brother Berard being transferred, and my brother just of the cuff goes, well, why are you talking to me about this and my mom never even brought up anything with sexual abuse, and he says, Did he rape [REDACTED] and he dropped it at that. That's really an obscure statement to make you now with just laying out on the table that he's being transferred and what did he think about it and I don't know the essences of the conversation other than that, and but as far as my brother disclosing it seemed to me he hasn't. But in the sense, even with the photography, what I remember of Brother Berard's office he had a collage of kid's school pictures and different other pictures and I kind of, I walked in on that with the memory that I had and I thought, you know different families that he would keep tabs on in his journeys, when we would go see people he would introduce us to people and I thought is was real interesting that with the families that I do know of that there are some blatant incidents where some kids have really spun out on drugs, and I you know this is my only speculation but it almost makes me wonder if they haven't been affected in some way shape or form by either being approached or physically, verbally, in some inappropriate way.

[REDACTED] Loren do you need, listening do you need some more specifics?

[REDACTED] Yes, if you're up to it

[REDACTED] Let's go back to that

[REDACTED] thank you again for offering all of this, at this time I would like to ask you what, could you be specific again, in what specifically did Brother Berard do?

[REDACTED] OK, starting with from the year 1968 to 1973 this is the period of the grooming and it started out with first the photo's, being asked if I had any physical abuse, and from that point he

[REDACTED] Debbi, could you talk about how many times he did photograph you, was it over a period, was it more than once?

[REDACTED] It was just the one time, but the thing that I do remember, that was his hobby, was photography and

remember other instances of him taken pictures but I remember being clothed, and

But in this situation were you clothed?

But in this, no I wasn't.

Ok, would you just be specific. What did he ask you to do?

He asked me to take off my shirt, lift up my shirt first and then to take off my pants and then to take my pants off, he wanted to examine whether or not I had any bruises or welts, and from that I got dressed after that

Were you wearing anything else besides?

My underpants, yes

A top of some sort.

I had on like a T-shirt and slacks, jeans and he asked me to take those off, and he wanted to see if I had bruises on my arms, bruises on my back, bruises on my legs, and as he was asking if I had these he was touching to see if I did, it was a fondling type of touch and it felt inappropriate I don't have any other word, then that it just was I knew it was wrong, I felt it was wrong

A touch on you

A touch on my arm, a touch on my back, touch on my side, a touch on my leg, and then after, he says well I think we should take some pictures of this in case anything ever comes of it, as, I, what I was 12 and half years old, and it really didn't click as to what was going on, I didn't think he was going to do anything, I really didn't think he was doing anything really bad, it just didn't feel right, that was the sense about it, as a child, it just didn't feel right, and so then I got my clothes back on and I remember as I got dressed and he kind of gave me this little dialogue, On this is too bad that this is going on in your home and then pulled me into himself and the odd thing about it was as he pulled me into himself I could hear his heart just pounding, to me it seemed he was aroused at the situation, because his breathing was a lot heavier than what it should be, and I thought that was really strange

Even as child?

Even as a kid, I though, this is not safe, I mean I had been around other situations and I thought this is not safe, but I thought this guy is suppose to be safe, this is a sanctuary that I've turned to, that I can trust, and so then from that point I was 12 and a half.

Did this happen in his bedroom?

In the rectory, from his office, into his bedroom, it first started out in his office and he started talking about the physical abuse that was going on in the family, and how much drinking that was going on and then he said well why don't you step in here, and he said why don't you take your top off, why don't you take your pants off and we can check to see if there is any physical evidence of what's going on

Do you still have underwear on the top and bottom

I had underpants on, at that time I was not wearing a bra, and I just thought, there was something inside of me that just didn't feel right, I thought he's not suppose to be doing this, and

You had no clothing on from the top up.

Right,

And it wasn't OK

No it wasn't, It wasn't OK I just felt really bad, I guess it's the feeling like when my ears start to get red, if you get embarrassed and your ears and your neck ya know, and that's what I'm feeling right now, It's just kind like this wasn't right

We want you to know this wasn't right, it shouldn't have happened to you

Ya ya and I think that is something that I really want to address is that what ever the intent was in how it started out, and this where I intend to get lost in my own identity was I remember statements along the line like even in his questioning of my dating practices what I did with the guys that I went out with ya know I don't think it was so much as concern as to whether I was this wholesome

catholic girl as to how far have you really advanced in your sexual techniques to this point in life and ya know that really bothered me because to me that another form of abuse and like with the situation with our step dads they would always say there were two step dads in particular that we had had and this was the same time frame and they said this Brother Berard guy is kind of a flaky kind of guy ya know he must be screwing around with you and your brother, and so then there was this cover up to protect him in a sense like "well no he's not" he wouldn't do anything like that, so you know it's like perpetuating another lie

You would _____

Yes, yes yet this one step dad in particular who was very physically abusive to my mom as well as to my brother and I, I mean he hit it right on the head, he knew exactly what was going on because this guy was a sexual abuser as well, and you know that the irony of it to me, and so at 12 1/2 it progresses, and Brother Berard started taking more liberty in a sense that he would take both my brother and I together to like basketball games, baseballs games, take me to my baseball practices, and this is the odd thing that I just can't get the puzzle part to as to how he had so much liberty to do this, how he won you know fast recognition to be able to just to cart us all around all the time you know this, I am settling a question that I have and it wasn't

Why your mother would let him take you

Yes and the same thing was real evident because there were other kids in the parish that he pretty much had full rein with, and I just thought this is real bizarre, this is, I mean as an adult now I can say this is really bizarre that this man can just walk in and say I am going to take your kids and do such in such and take them such in such and really have no restraints no boundaries and so moving from 12 and 1/2 and going back to the basketball games and baseball games and meeting other catholic families whether they being from within St. Anns parish or whether they would be in from St. Francis of the CeeCee parish or just outlining parishes that he had some contact with other kids, he would take liberty to take us to Taco Time and then find out you know kind of pump us as to what was going on

He would take you and your brother

Yes, he would take my brother and I and kind of get a feel as to what was going on and feed into the family well what happens when there is drinking, what happens ya know is there sexual abuse is your mom abusive is your step dad abusive and just kind of like it seemed the more information that he could acquire it was like he would take those very things and use them as a spring board as a means to touch on our vulnerability,

And is that what you mean by grooming

Yes, and in that and once he developed the trust because it took alot to disclose to somebody and I say that whole heartily especially the adults that were in our life to disclose the reality of what was going on at home and not be shamed in that and then he knowing that situation, betrayed that trust by starting by the inappropriate touch, I can remember standing in the school yard this was right around the picture time, which I would have been 12 years old and it's kind of a picture you would see of a Franciscan monk I mean I am stereotyping now of course but it would be like you had all these kids around but and he was real tangible and pulling kids into himself and at times it just didn't feel right and

How did it not feel right

In a sense of how his closeness in his hugging in his it just didn't feel safe it was like this guy is getting off on this

are you saying as a child looking over with Brother Berard that the kids around him that you could stand over here

Yes. Even being one of those kids and just how he would take kids in and there is a safe space and I could hug either one of you and know that there is a safe space in that, but it would be more than, it would be kind of like there was no breathing space, in between there you know and didn't even have to be a forward type hug, but it could be a just backward pulling into that person and you know I can't really articulate other than the feeling wasn't right, and so moving from that in already after having said the fact of having gone to the basketball games, and the baseball games and this

and that, then he got on this kick to where he would take us around and show us the sights of the city.

■ You and your brother?

■ Yes, my brother and I and then he would make up some lame excuse as to why he would have to talk to me and drop my brother off at home and my brother would go and say ■ is going to talk to Brother Berard, in which seems really obscure to me here I am 13 year old and any right minded parent would have challenged that, I mean I would challenge that, well I would, and well he would continue and; well ■ I would really like to talk to you more about the family situation as to what's going on and so he would drive to some ummm I remember is there a Rimrock up here somewhere

■ Yes

■ And he would say oh lets drive and I'll just keep talking, well inevitably he would get to Rimrock and I don't know the name of it, it's up above the five mile, and he would always find these convenient parking spots, and he would start out his little dialogue by saying it's so bad what's going on in your family and you know this must be really painful and give specifics of things we had told him as to what was going on with the step dad's, are mom's drinking was escalating at the point and where was it going to go, and you can always trust me, and then saying some what of a dialogue then physically moving into give a hug and then a begin to a real tight hug and then either begin fondling or caressing and kissing

■ Under your clothes?

■ Under my clothes, Initially it would start off on top of my clothes then under my clothes you see it would be a progressive type of thing like I said before like rungs up a ladder it would start up like one rung you know to see how far we get with this, if there is going to be any resistance to it and litterly, physically I would just numb out and I wouldn't know what to do, and in all honesty like I said before I didn't have any boundaries to really know that it was ok to say no to this person

■ this difficult, if you can even be more specific than that, it will be helpful.

ok

Where ever he was touching

Right. hugging how long caressing, what does that mean

Ok, In parking he would usually stop and as I already stated with the dialogue he would begin to caress and hug and the hugs would probably last anywhere from three minutes to five minutes, it would just be a holding and it would like this is to be some show of affection, that this ok that I am consoling you in the fact that things aren't ok then from that he would either begin to fondle me with my clothes on, on top of my clothes, and that would be like by breast or just caressing all over and then sometimes tried to kiss me sometimes trying to french kiss me, and then backing off, and that would be one parking scene, then maybe given a week or two weeks there wasn't a real pattern as to the consistency of when the predictability of when he was going to do this or when he wasn't going to do this so then another two, three weeks would go by and or whether it would be from a basketball practice or some outing that we'd been on, then it would be a new spot in town, well let me show you this other part of the city and once again the parking situation would occur, he would advance from his general procedure starting to hug, then his caressing, which would be anywhere from three to five minutes just

Caressing again

Caressing and in the sense of over my clothes an then it would move to over my clothes to under my clothes to

Where under you clothes

Unsnapping my bra and fondling my breast and then that would be the length of that setting, and then given another two or three weeks, another spot in town, you know as far as seeing the light of the city, he had this thing for lights, and obviously the lights went out,

What kind of lights, city lights?

The city lights, yes parking

██████ To fondle you?

██████ Yes, and so what I see is that, it is a real progressive type of thing, first it would start with over the clothes, under the clothes, then loosening my bra, then it would move from the upper portion of my body to the lower part of my body,

██████ With all your clothes on?

██████ With all my clothes on, all my clothes were always in the car

██████ But he would put his hand under all of your clothes?

██████ Yes,

██████ And touch your breast?

██████ Yes, and then it got into, moving to another parking situation, and this could be it just depended on his own cooling off period to whether or not anything was going to be said, that was the determining factor, was to whether or not I was going to expose this, and I mean I couldn't even address it then, and I would just think who would I expose it to, and he believed

██████ And you were how old at this time?

██████ At this time I was 13 and a half and going into high school, and then I remember being a freshman in high school and this was like in the summer of like going into my freshman year, and once again being in one the parking spots, whether on the south hill or being on the north side, and there were a variety of places, and that, I guess that was the intriguing part about him, was that he knew all these forlorn places, and all these just kind of places, that he knew about, I mean he really knew his way around town like nobody I that I have ever known

██████ Which makes you wonder, how often he'd been there, but anyway...Trying to get the specifics for you but it's questionable

██████ Yes, and so, another incident had occurred, and so rather staying with the upper portion of my body, I guess he felt it was safe to take another rung on the ladder, so he just began to fondle me with my

clothes on, on the lower, my legs, and then tried --
masturbation on the outside of my clothes

██████ Masturbating you?

██████ Yes, and then continued and went in my clothes and
did masturbation, and that was pretty much the
essence of that instance, and then continuing

██████ Was that a one time incident?

██████ No, and then continuing on situation in parking
was, he manually took my hand and wanted me to
masturbate him

██████ Under his clothes?

██████ Yes, under his clothes, and then once again I am
about in the middle of my freshman year, 14, 14 1/2,
and basically from that point on it was on again,
off again when ever he felt it was convenient to
step in and out of the family at this point he did
and like I said previous to this, the regularity of
seeing us at that point, I don't know if he thought
it was to critical or not because of being caught,
because of my association with other people that I
had at that time, different teachers, family
dynamics were so out of control, I can not

██████ He backed off again?

██████ Yes, but its not saying that he completely stopped,
because he didn't, and this went up through the time
when I was a senior in high school, which at the
time I would have been 16 1/2 , 17

██████ Mostly in the car ██████

██████: Yes,

██████ In the car, you would kind of know, it was that
kind of sense that this is going to happened

██████ Yes if my brother wasn't there, I knew this was
going to happen, I would just kind freeze, I can
remember bodily putting myself against the right
side of the car, yes I can remember one time as a
freshman, there were two other people involved in
this but he got this wild idea that he wanted to
take us three down to Oregon, and I remember staying
in a

Threes?

There was another girl and a guy, and myself

Your brother?

No, not my brother, and we ended up staying in a clouster nunnery down there, convent, and if I remember right it was _____ (name of nunnery), I don't remember anything sexually happening, I just thought it was odd that he had the liberty to take all three of us on this road trip

That the parents would let you?

Yes, and now that astonishes me, and nothing in that sense occurred, I guess the fears that I had that it was going to , because of everything that had happened at this point, and at that time it was real scary, and I remember him taking us around and showing us, there was a seminary down there that had clothes, and we met people, but there were other contacts that he had, there were other kids, that he was kind of keeping tabs on, I remember going to a couples house, they weren't married, but they were into drugs, and remember being in their house and I thought this is obscure to see this aspect and to see somewhat of a condoning of a specific lifestyle, and not real blament, but the under tones of acceptance, that was my observation at the time, and I remember being really terrified, and I am away from home now and anything can happen, but nothing happened, but I still to this day think it is really strange that he had too much liberty.

You're talking of a time period of time between 12 1/2 and yes,

Between 1968 and 1973

Ok and you were 12 1/2 to

12 1/2 to 16 1/2 , 17 years old

Do you have any sense of the numbers of times that he may have masturbated you?

I don't, I know it was alot

Like five, what your sense, what's your guess even if (tape out)

[REDACTED] We were just asking you if you had any sense what the number of times that Berard masturbated you?

[REDACTED] I would say it's not less than 10 times, and the sense that I have about it to, as I matured and became more of an adult, that there was more of a risk for him to become physically involved with me, and he's very tangible and even to this day, he's more than willing to give a hug, what is suppose to be a regular hug, but I don't even feel safe in that he's not

[REDACTED] He's not safe

[REDACTED] Ya

[REDACTED] I just wanted to say that, he is not safe, and he's not just not safe for you [REDACTED] I just don't want this to be all about you, it is about you, what happened to you but I think it is important to know that just because something that happened to you, this is about him

[REDACTED] Yes,

[REDACTED] How are you doing?

[REDACTED] I'm fine.

[REDACTED] I think one of the concerns I have is in kind of the details of the questions is, I don't want you to walk out of here thinking it was no big deal

[REDACTED] It is a big deal. It's a real big deal

[REDACTED] Ok

[REDACTED] And you know , I know that from an adult perspective, and knowing that as well, and like I said over and over again I don't want to hear or see the effects of what he has done to me on someone else again

[REDACTED] You might

[REDACTED] Yes, yes, to me it's just a real violent, robbing of someone's identity

[REDACTED] Well Loren do you still have some need for some specifics, or do you feel you have a sense of what went on

██████████ Pretty much complete, just two thoughts are in my mind, and could you just briefly say the role that Berard had in relation to you other than what you have already described. Did you say he was a teacher at times or mostly just a friend?

██████████ Generally speaking at St. Anns he was like a parish caretaker in a sense that he took care of the church, visited people in the parish, in grade school per say, I don't remember him teaching at all

██████████ And in relation to you, particularly is what I am saying.

██████████ In relationship to me, he was a family friend, he also was a religion teacher at one point which was really unique in high school, because I never had him in that capacity as a religion teacher

██████████ And how long

██████████ And that was a one time shot

██████████ One day, you mean, one class

██████████ One class, yes, and to me that was just obscure, other than that basically, family friend, and parish caretaker, groundskeeper

██████████ Would you consider him a confidant at that time, as a kid, could you trust him?

██████████ Ya, well I trusted him as friend you know in the sense of a role model, would be a better way to say it, he was a role model in the sense of what I thought a constructive male figure was when in light of all the step-dads that we had had at that point, I mean there wasn't anything constructive about them, and I thought that he was a good role model in the sense of a religious figure, and going back to thing about being a confidant, ya I felt safe enough to be able to disclose and I know my brother as well felt safe enough to disclose family situations and that's basically what it was

██████████ So the betrayal came, let me see if I can, the betrayal came in using your confidence and your trust using that as a way to begin to abuse you, as a way in

██████████ Yes,

It was like somehow having that trust and talking about what happened in the family as a way to come in and get closer to me.

That is where you used the word grooming, is that right

Yes,

I think that is important, that, betrayal quality, safe and then not safe

Yes, because it was a real mixed message at times, you how much can I really be safe with saying and you know and disclosing of myself and what's going on in the family because I, at different points I have to honestly say there was a concern

His concern, was genuine

Yes, and that's where the twistedness of the situation comes in for me, I can say yes by all appearances this seemed genuine, as a child it seemed genuine and safe, his concern for us, but was that what appeared to be to genuine and safe, was that really just a means of his own self gratification in light of the sexual abuse, and you know that's something I can't answer now, you know because he is not a safe person to me now, he is a scary person, real scary

You might as well go for this you have to walk out of here in about twenty minutes

Ok, you mentioned that Berard put your hand, manually took your hand and put it on his penis, was that a one time incident, or did that happen more than one time

It happened more than one time.

Do you have any idea about

I'd say that would be like under five times

Were there any other incidents of sexual interaction that you can think of that you haven't mentioned?

Not that I can remember at this point. No

That was plenty.

[REDACTED] I have bits and pieces of things but you know a, I can't really say

[REDACTED] do you a sense that you've pretty much, that this is probably the extent of it, that there isn't something that you are going to remember, Because sometimes,

[REDACTED] Yes, yes

[REDACTED] Did you have a sense that you pretty well, that you have some real graphic memrances, and this is not dream state or

[REDACTED] No it's not, it's not my imagination

[REDACTED] And you don't have a sense that you are going to wake up with some new revelation, ya, it's pretty concrete

[REDACTED] Ya, it's pretty concrete, I guess sense of feeling, if I had to describe the feeling, it's like being a piece of glass that was taken in someone's hands you know I equate this with stain glass work, to take a very expensive piece of glass you know of worth and to have someone take that and handle it and say this has potential for something and then to take that piece of glass and smash it on the cement, and that's my gut level feeling of to what has happened, and I guess to tie in with the feelings especially from a spiritual aspect, that really bothers me, it really bothers me,

[REDACTED] Can you think of any other questions, that are important?

[REDACTED] No, I think get ahead of myself of thinking what's next in terms of just our own healing process, what's next in terms of responsiveness, from you community, I guess I was wondering what you are hoping for [REDACTED] in terms of meeting Father Loren, are there anymore steps that you need from the Franciscan community.

[REDACTED] I would just like to have those questions answered that I addressed in the beginning as to whether or not, he has received therapy, if there's going to be an ongoing therapy, if there is any kind of monitoring going on with his being around children, and a sense of what kind of retribution for his counseling

[REDACTED] You mean financial

Yes,

Restitution

Yes,

Is that a distinction, what we're

Restitution, I think was the word you were searching for

Yes, yes

Are you asking [REDACTED] Is it, a is the Franciscan community willing to pay for counseling, your healing process]

Yes,

That's is what your asking about

Yes,

Ok, I wanted to make sure that I wasn't speaking for you in regard

And I guess you know, the big thing is, has this issue ever been addressed before about him

Ya, I think that's a kind of wondering you've had is, has he been accused, has anyone else come forward

Has he been called on the carpet?

Would you like to know that if they have

Yes, and why has he been allowed to function in the same capacity, if that be the case then, why hasn't there been some legal action.

I was wondering, the three of us have been talking and all of a sudden I tried to image Brother Berard sitting here and I guess, and I don't think you need to go through this, that isn't it, do you have a sense that you could maintain your own clarity in his presence]

[REDACTED] Yes, I could

Could I go back to the counseling. What have you already done as far a counseling, what might be, just some general parameters, what is still necessary, I know you can't pin point that

You were in group for how long about a year
A year

That's where this kind of started. When came to me to get into this ACOA group I had to interview, and in the interview, I started asking as I do with everybody abuse, sexual abuse, and at that point you were able to talk some about step-dads, and I think Brother Berard, I am not sure in came out in the first interview, but so it's been about a year of therapy

With you

With me, group and then what in the last couple three months you begin to have some, stopped group, about three or four months ago, longer

Yes

And then we have done some individual counseling to begin to really address some of the issues especially about Brother Berard and the sexual abuse, that has kind of been a real key, and your pondering doing a sexual abuse group here at the center starting next month, and again in terms of longevity I'd say I'd like to somewhat conservative about a year or so but I think it's probably going to take a year or two, because my sense is here that you are at the beginning of this, I would like to be able to tell you you're not, but I sense you're at the beginning, of beginning to get the impact of this, even to get this really happened, the significance, so my sense is if you can continue addressing the specifics of the sexual abuse, kind of head on for a year or so, I think there is a real potential to get beyond that, My sense it's pretty early, early phase of this

Yes, I feel like a little baby, you know learning how to walk

Were you trying to get into this in terms of counseling, are you trying to get a sense of a monetary figure too

Yes, sure,

Ok, I know you want specifics, what's your sense of what you paid out in counseling in the last year I could look at my reports to but do you have a sense of what, weekly for about a year at \$25.00 what about \$2,000.00 for group and then

And then individual

Individual, what another \$400.00, ya has been put out, She has put out about \$2,500.00, is that about right?

Yes,

And if we are looking into the next year it would be another \$2,000.00 for group, And my sense is that it would probably be important to do some individual, so we're kind of up there in that price range

Yes, it's alot

It is alot

See again we can talk finances and cost but it's just such but it isn't the cost, that's not even close to saying what the cost is, but it's important to get some specifics. I don't want to minimize what the other costs have been

I really think you know, the big costs is, given certain situations not have to have happening

Say that again

I really feel that if certain situations hadn't occurred with Brother Berard especially from a religious stand point, because that really took on a lot of bearing, that like say situations with drug abuse and alcohol abuse and just I look at my own tendencies today, how hard driven I can be like with trying to jam so many things into a days time I guess you could say it was like a workaholic at different times, not really have established set boundaries and the effects on different areas, it can be real crazy making, and being able to express with clarity what my feelings really are rather than locking up, and I can't help but think that, going back to what I originally said that things may have

been different, and this is where I am at now and to keep walking.

Sure

That was one of the things when sitting down trying to put some of this stuff into some kind of form as to as to what really happened. It's just like I could hear the little kid in me, at 12 1/2 just scream and I thought this is scary stuff, this is real scary stuff

one of the things, that again, down the road is the potential to be able to confront Brother Berard now again, and have him and part of that being in a safe enough manner, what he, and I don't even know if this would even happen, but whether if he can apologize, and take full responsibility to what happened, in a real safe-kind of setting, obviously he has to be willing to do that, but I think that might be real important, to your healing process for him to claim responsibility,

Yes,

That's generally

Yes, whether it be verbally, written or what ever, or in person,

Again, I think we are down the road, I think it might be real important whether you can get it or not, to get him to assume responsibility. For him to say, this was my fault not your fault, it's real important for people who have been abused as children to have a perpetrator claim responsibility. Sometimes that's not even safe doing face to face, it would depend, but I think that is one of my hopes, that at some point, depending on what happened to Brother Berard, whether his capacity to be able to make, to be able to take responsibility for this, to own it, for your sake, it also makes it on a whole level

Yes

So I guess what I am thinking, again I am thinking ahead, but it might not be a bad idea for me at some point to be in contact with his therapist, even he is ever in therapy, to see his potential

He would be

[REDACTED] Yes, that I would be in contact with, his you know, again I am out there in the future, but that might be real helpful to maybe arrange something that would be helpful to [REDACTED]

Because I think that's one of the things that has been set up in the past with him is that, How could you expose me, type of thing, that attitude, whether it be spoken or unspoken always to check you out

You can't expose me [REDACTED] well you have. How much do you want him to know about this interaction, Is that up to the community?

Well,

Ya, well I think that might be up to you [REDACTED] how much?

What is going to be the process from this point

Well, from this point, I would like to get this typed up or at least allow the [REDACTED] to hear it and those who are an authority to be working, then we will address the situation, probably by, bring Berard into a therapy situation, but first of all we have to find out what has already taken place. Now that we have the specifics here, now we'll find out what therapy has already taken place and then appropriate therapy from this point on, perhaps a therapy program, that would be several months

Ok, I really feel that in light of this, that he should be made accountable, and made responsible, and yes, I think he should be fully aware of this stuff that has gone on.

Could he read this manuscript?

That's fine.

I think it might be important to have a copy sent to [REDACTED] first, if you have and comments or anything made before it's giving to , especially Brother Berard, I think that's real important.

Yes, very

At this point, another thing that might be addressed just briefly, is at this point [REDACTED] are you looking at any kind of litigation.

[REDACTED]
[REDACTED]
I guess that's dependant upon the fact of whether or not the issue has been addressed before, and if he has been allowed to function in the same capacity, that has been addressed.

[REDACTED]
If somebody else has already come forward in the community and said, Hey this guy's unsafe, he's molested my children, he's molested me, and that, somebody else stepped forward and nothing happened, is that what you're saying, so that litigation would come as a result some kind of leverage, to have something really happen. That is your intent right now,

[REDACTED]
Yes

[REDACTED]
I did want to make that clear

[REDACTED]
Yes

[REDACTED]
But sometimes people don't get counseling until they're forced

[REDACTED]
But that's pretty much my determining factor

[REDACTED]
Like what happens from here is what. Father [REDACTED] you don't know at this point what had been the history with him, you're really just coming in pretty fresh,

[REDACTED]
Right, exactly, It just has to look into

[REDACTED]
Ok, ok

[REDACTED]
But it will be

[REDACTED]
And as it is will [REDACTED] be apprized as to what, I suppose that will be up to your judgment to but, say there has been some other allegations, you know that there have been other people that have said that he had abused me or my children, would [REDACTED] be priviledged to that information, I guess I don't know

[REDACTED]
Or is that like confidential stuff

[REDACTED]
You probably don't know but it's an important question

[REDACTED]
It is an important question

[REDACTED] Because you know, what's to say that he's not protected in this

[REDACTED] Are the Franciscans protecting him? Well if they have been and they might have been I can't speak for whether they have or haven't, I don't think anybody can anymore, it's just there's too much

[REDACTED] Absolutey not, from this point on

[REDACTED] This right now, but also in history, there is just too much with priest and brothers, it's just with any man, who have abused women, children, just can't be covered up

[REDACTED] You are specifically asking to know, that something will be done, and you would like to know what that is

[REDACTED] Yes, and I would also like to know, if, have there been previous accounts brought to the attention of, and I guess that would be the spring board, if there has been, then I would persue litigation against him.

[REDACTED] You're saying if at all, or if this isn't taken serious, or not in a treatment program, ok

[REDACTED] Yes, then I would pursue litigation

[REDACTED] You mean if he had not

[REDACTED] If the issue of sexual abuse had been addressed prior to this, that there were other families or other children involved, and he has not completed therapy or it was just kind of swept under the carpet per say that I will pursue litigation

[REDACTED] The likelihood of him abusing other children is very very high,

[REDACTED] Ya ya

[REDACTED] I say that because I don't think you're unique

[REDACTED] That's my sense about it, you know the fact that about has it ever been addressed and if that be the case if it was addressed then whay has he been allowed to function in the same capacity, without any kind of monitoring.

[REDACTED] And it might be that no one has come forward [REDACTED]

[REDACTED]
Yes

It can be that people just abuse one child, and that's more a rarity, but at least my understanding of people who abuse children, that generally there is a pattern to, usually high frequency, it's pretty amazing, that one man can keep a number of children in that process at the same time. I hope that's not the case here but

[REDACTED]
I don't have any other questions

I am just assuming that you will send us a copy, transcript of this transcript, and then I would imagine that you would be the next person to pursue any litigation. I have your phone number, Do you have [REDACTED] phone number too

[REDACTED]
You can have it

[REDACTED]
Ok

EOT

[REDACTED] [REDACTED]

May 16, 1992

The following is a summary of my interaction with [REDACTED] regarding Berard Connolly.

I received a copy of Fr. [REDACTED] letter (dated January 17, 1990) to [REDACTED] and was asked to meet with her regarding her concerns.

On February 1, 1990, at 1:00pm, I met with [REDACTED] and [REDACTED]

With [REDACTED] permission, [REDACTED] audiotaped the session; and with [REDACTED] permission, I later had the audiotape transcribed. Later I mailed [REDACTED] a copy of the transcript. I also mailed her the original audiotape.

The transcript indicates the content of the session. (A copy of the transcript was sent to the Provincial Office) Some of the concerns that [REDACTED] and [REDACTED] who facilitated the meeting, brought up are the following (these are not quotations but the tenor of basic concerns):

1) Are the Franciscans willing to pay for [REDACTED] counseling?

2) Has Berard Connolly, received therapy? Is there ongoing monitoring going on. What kind of monitoring? Has anyone else ever come forward to accuse him? If so why hasn't there been some legal action? Has this issue of sexual abuse regarding Berard Connolly ever been addressed, and if it has, then why has he been allowed to just go on? Have the Franciscans simply protected him?

3) Down the road, Berard should claim responsibility as the perpetrator, to take responsibility for this situation for [REDACTED] sake. That is, [REDACTED] and her therapist would like to know that Berard can own the abuse to [REDACTED]. They would like to meet with Berard. In the future, then, (after Berard has had some counseling) a meeting could be held in Spokane with [REDACTED] Berard Connolly, ofm and [REDACTED]

5) In the future, [REDACTED] would like to be in contact with Berard's therapist, [REDACTED]

OFM CONN 1

0546

██████████ the Provincial Minister, met with Berard Connolly at the Franciscan Renewal Center in Arizona and addressed the situation with Berard. ██████████ was later brought into the meeting. ██████████ proceeded with the plan to bring Berard to an appropriate psychotherapist for diagnostic testing and assessment. A report with recommendations was to be sent directly from the therapist to ██████████

██████████ sought a reputable therapist in Arizona with expertise in counseling in the area of child sexual abuse. Dr. Gary Decker, a psychologist and a psychotherapy specialist in the area of child abuse was chosen (initially recommended, I believe, by the Diocese of Phoenix). Dr. Gary Decker, Ph.D., 10640 N 28th Drive, Suite C205, Phoenix Arizona 85029. Phone: (602) 375-9367.

██████████ accompanied Berard to the first session with Dr. Decker (March 19th, 1990). ██████████ presented the basic complaints made by ██████████ and requested diagnostic testing and assessment for Berard and a report with recommendations to be sent to ██████████. Berard began counseling with Dr. Decker and continues to be in counseling with him to this time (May 14, 1992).

██████████ continued correspondence with ██████████. The following are some examples of follow-up correspondence:

On March 5, 1992, I mailed the transcript of the audiotape to ██████████ along with a letter. In the letter A) I indicated that I hoped to reach her by phone before she received the transcript to share with her the current process (how we were proceeding with Berard Connolly); B) I encouraged her to read the transcript when she could have support from ██████████ (I was concerned that if she read the transcript by herself she might experience disturbing feelings with no one to be supportive to her.); C) I invited her to call me collect anytime or to send me a phone bill. I gave her my itinerary and phone numbers.

On March 15, 1992, I phoned ██████████. In this call she clarified that the incidents that she was concerned about with Berard took place between 1968 and 1973.

In other phone correspondence with [REDACTED], Berard, and attorney Richard Roberts, in my best memory, the following information was conveyed (I am not sure how many calls this entailed or the exact order or dates in which the matters were conveyed):

1) I asked [REDACTED] if she would be willing to give me the cost of her counseling. This would include what she had spent and what she felt she would still need to spend in the future. Would she accept a discerned amount from the Franciscans in one payment? I did not expect an answer at that moment.

2) I asked [REDACTED] about setting a date for the requested meeting with herself, [REDACTED], Berard Connolly and me. [REDACTED] indicated that [REDACTED] was leaving Spokane soon. [REDACTED] also suggested that a letter from Berard would be sufficient, that it would also save the expense of travel. This letter should include his admission that this was a wrongful act and that it will not occur again (with other children), that he accept responsibility for his actions; that he state the fact that the role that he played with her life was morally wrong; that he holds some responsibility in the problems and issues that she is facing in life.

[REDACTED] phoned Berard. He indicated that he was quite willing to come to Spokane for the meeting unless [REDACTED] had a clear preference not to have the meeting or if it would be harmful to her. He indicated that he really did not want to hurt [REDACTED] any more than she had been hurt. Berard admitted his wrongness.

[REDACTED] called [REDACTED] to say that Berard was willing to come to Spokane to meet with her. Would it be possible to have the meeting before [REDACTED] left Spokane. Loren suggested June 29, 1990 as a possible date if [REDACTED] could arrange it with [REDACTED]

On June 14th or 15th, 1990, Richard Roberts, an attorney in Spokane, phoned me [REDACTED] to let me know that he was helping [REDACTED] understand her rights regarding her concerns with Berard. He told me that he had told [REDACTED] not to communicate further with me. He mentioned that [REDACTED] felt bad about not answering my messages left on her phone recorder, so he was calling me so that I would understand why she would not be communicating with me. He was very courteous.

I asked Richard Roberts if he could be clearer as to what his procedure would be. He informed me that he would contact me through the mail so that there would be a record of his transaction. I indicated that he could also communicate with [REDACTED] Richard Roberts has never communicated with me in writing or by phone since that time. His phone number is (509) 838-0125).

[REDACTED] and I have not communicated since that time. No meeting with [REDACTED] Berard and myself took place. [REDACTED] did not suggest a total amount for her counseling. To my knowledge, no money from the Province has been sent to [REDACTED] for counseling.

[REDACTED]

[REDACTED]

June 28, 1990.

Dear [REDACTED]

On June 14th or 15th, 1990, Richard Roberts, an attorney in Spokane, phoned me to let me know that he was helping [REDACTED] understand her rights concerning her complaint about one of our friars. I asked if he could be clearer as to what his procedure would be. He informed me that he would contact me through the mail so that there would be a record of his transaction. Richard Roberts has not yet contacted me. For information, his phone number is (509) 838-0125. I do not have his address at this time.

For added information, it may be helpful to note that on march 15th, 1990 I phoned [REDACTED] in order to clarify the time period of the past incidents related to her complaint. She informed me that these incidents took place between 1968 and 1973.

I will keep you promptly informed about any further development.

Sincerely,

[REDACTED]

OEM CONN 1

0550



Third party privacy

FILE COPY

Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (415)536-3722 Fax (415)536-3970

Sr. Catherine Beckley, MSW
St. Joseph Family Center
1016 N. Superior
Spokane, WA 99202

February 20, 1990

Dear Sr. Catherine:

Peace and all good!

Thank you very much for sending me notice of the meeting which you had with [REDACTED] of Feb. 1, 1990. I would be glad to reimburse you for the cost of it except there was no bill enclosed. If you could inform me as to the cost, I would be more than willing to send you a check.

I would ask you, when you do send the bill to me, to mark the outside of the envelope "personal and confidential." This type of information comes only to myself. Thanks very much for your attention to this. I'm glad the meeting with [REDACTED] went well. I appreciate all the effort that you're putting into this.

Sincerely,

[REDACTED]

[REDACTED]

OEM CONN 1

0551



February 6, 1990

Dear [REDACTED]

This is a bill for the two hour session that I had with [REDACTED] on February 1, 1990. [REDACTED] indicated that I send the bill to you. We had a very fine session. Thank you for asking him to talk with us.

Sincerely,

Sr. Catherine Beckley, M.S.W.
Sr. Catherine Beckley, M.S.W.
Therapist

OEM CONN 1
0552



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

To: [REDACTED]
From: [REDACTED]
Re: Brother Berard Connolly

September 15, 1992

Basically, Brother Berard is accused of sexual molestation of one [REDACTED] from 1968 to 1973. The letter from Joan Antonietti, her attorney, to me reads: "In fact, he commenced his sexual relationship with [REDACTED] with limited touching, touching that confused her since it was not at that point clearly molestation. Brother Berard increased the invasiveness and frequency of the touching and ultimately engaged in masturbation with [REDACTED]"

In the interviews conducted by a private investigator other alleged incidents were indicated. [REDACTED] indicates inappropriate behavior occurred between Brother Berard and herself when she was a minor; she refers mostly to touching and kissing. Several boys indicated that he took them to a hotel to go swimming, while he remained in the room looking out the window watching them.

One individual indicates that Brother Berard took him to a hotel ([REDACTED] was about 27 at the time), gave him a drink, and then may have sodomized him and performed oral sex with him and masturbated him when he was waking up.

It appears that this activity took place over a long period of time. Berard has not yet been confronted with the information, and it is felt this can best be done in a therapeutic setting. Certainly, I have great concern for his health and well being.

OFM CONN 1

0553



RICHTER-WIMBERLEY, P.S.

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PAUL H. RICHTER
WILLIAM P. WIMBERLEY (Ret.)
LESLIE L. WOODS (1986)

*ADMITTED IN IDAHO AND WASHINGTON

August 13, 1992

Fr. [REDACTED]
Franciscan Friars
Province of Santa Barbara
1500 - 34th Avenue
Oakland, CA 94601

Re: [REDACTED]

Dear [REDACTED]

I have been retained to represent [REDACTED] As you are aware, [REDACTED] was repeatedly sexually molested from 1968 to 1973 by Brother Berard. This molestation took place while Brother Berard was carrying out his official functions and duties as a Franciscan brother assigned by his province to St. Ann's Parish. Brother Berard has admitted to this molestation to our investigator.

[REDACTED] has suffered greatly because of this molestation. As a result, she has sought out and been involved in intensive counseling and therapy, both with [REDACTED] and a private counselor, and continues in counseling today. Perhaps the saddest result of Brother Berard's breach of [REDACTED] trust and belief in him and his misuse for personal gratification of his position of authority is [REDACTED] loss of faith in the Catholic church, clergy, religion and God.

[REDACTED] grew up in a troubled home environment which involved alcohol abuse, molestation and neglect. Brother Berard stepped forward to meet some of [REDACTED] unfulfilled needs by counseling with her, involving her in normal childhood activities, taking her on outings such as to get a Coke or to dinner and to athletic events. During these activities he would question her about problems at home and get her to confide in him. [REDACTED] began to trust and look up to Brother Berard.

In reality, Brother Berard was grooming [REDACTED] and preparing her for the sexual molestation which was to come. In fact, he commenced his sexual relationship with [REDACTED] with limited touching, touching that confused her since it was not at that point clearly molestation. Brother Berard increased the invasiveness and frequency of the touching and ultimately engaged in masturbation with [REDACTED]

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(208) 667-6065



RICHTER-WIMBERLEY, P.S.

Attorneys at Law

August 13, 1992

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These incidents of sexual molestation took place while Brother Berard was acting in his official capacity and function as a Franciscan brother. Certain of these incidents occurred on church grounds. On one occasion Brother Berard had [REDACTED] undress in his bedroom and took her picture.

During the investigation of my client's claims, I discovered other molestation victims of Brother Berard, [REDACTED] and [REDACTED]. I have enclosed copies of their taped statements for your review.

I have also discovered that other brothers, priests and parishioners had knowledge of certain improprieties engaged in by Brother Berard. I have enclosed copies of relevant taped statements in that regard.

During my investigation I spoke with Sister Kathy Beckley, who initially counseled [REDACTED] and to whom [REDACTED] first disclosed the incidents of molestation. When I requested copies of her treatment records for [REDACTED], she informed me that when she quit counseling she left all of those records with the St. Joseph Family Center. I have since requested and been sent all records possessed by the center. They are totally devoid of any treatment notes or records and contain nothing but billing records. I have since recontacted Sister Kathy Beckley in this regard and she now tells us that she burned all of [REDACTED] counseling notes. The impropriety of this action is obvious and flagrant.

Based on the foregoing, I believe [REDACTED] has a valid legal claim against Brother Berard based on theories of assault, battery and intentional and/or negligent infliction of emotional distress. I also believe based on recent rulings in several recent Washington State cases that the province and St. Ann's Parish would be liable for Brother Berard's acts under the theories of respondeat superior.

In addition, [REDACTED] has direct claims against the province and St. Ann's Parish based on theories of negligent supervision and retention.

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RICHTER-WIMBERLEY, P.S.

Attorneys at Law

[REDACTED]
August 13, 1992
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In order to resolve my client's claims without the necessity of litigation, my client is demanding \$350,000. This amount will increase if litigation becomes a necessity.

Please provide me with a response to this demand at your earliest convenience but in any event not later than 30 days, at which time it will become necessary for me to formalize this matter.

Very truly yours,

RICHTER-WIMBERLEY, P.S.

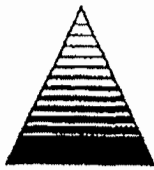
Joan L. Antonietti
By: JOAN L. ANTONIETTI
Attorney for [REDACTED]

JLA/C

cc: [REDACTED]

Enclosures

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Pinnacle
Investigations, Inc.

RECEIVED

APR 30 1992

[REDACTED] CASE
FATHER TOM FROST INTERVIEW SUMMARY

RICHTER-WIMBERLEY, P.S.

BY: Sandra Brewer, Pinnacle Investigations, Inc.

Father Tom Frost
Box 796
Covered Wells
Papago Indian Reservation
Sells, AR 85634
(602) 383-2482

I spoke to Father Tom on 04/23/92 at Covered Wells on the Papago Indian Reservation. This is the second interview of Father Tom. He was the priest at St. Anne's in Spokane when Brother Berard was assigned at St. Anne's.

Father Tom stated that he did not particularly notice Brother Berard bringing into his room a lot, although he did notice that it did happen some. He did notice that Berard spent a lot of time with children who came from dysfunctional homes. He stated that Berard would take them to individual places. Father Tom felt that he was doing this trying to counsel these kids.

I asked Father Tom what Berard's assignment was as a brother. Father Tom stated that a brother usually has some sort of trade, whether it be mechanical or teaching, and that the brother would help out in his area of expertise or whatever the priest would ask of him. That is why he had Brother Berard working with the youth.

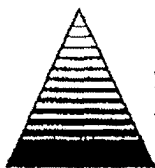
I asked Father Tom why he requested that Brother Berard leave Spokane. Father Tom stated that he asked Berard to leave because of "community-type" problems. He stated the problems also involved some conflict with Father Jay Ilch concerning the differences these two had. Father Tom would not elaborate on this.

Father Tom suggested that I speak to Berard so while at his residence he gave me Brother Berard's phone number and had me call Berard from his residence with him present. Father Tom left after the conversation started.

After speaking to Brother Berard I spoke to Father Tom again and he shared with me how devastated and suicidal Berard has been since this situation has surfaced. Father Tom did say that Berard had told him that he had his sexual development later in life, which lead to these problems in Spokane. Father Tom also did state that he is aware that Brother Berard is seeing a counselor regularly.

END OF INTERVIEW SUMMARY ([REDACTED] /Frost) jlm

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Pinnacle
Investigations, Inc.

[REDACTED] CASE

Interview Summary with Jay Ilch

By: Sandra Brewer, Pinnacle Investigations, Inc.

Jay Ilch
Regency Care
E 44 Cozza Street
Spokane, Washington
489-4466

I spoke to Jay Ilch over the telephone on March 23, 1992. This is my second interview with Jay Ilch. I spoke to him several months ago. Jay Ilch is an ex-priest who was in Spokane at Saint Annes at approximately the same time that (inaudible) Connelly was. Ilch stated that he was extremely uncomfortable around Berard. He stated it was almost like, "Inviting a convicted felon to your house." Ilch also stated that he remembered children that were in Berard's bedroom, next to the parlor, where the priest would have social visits. When he was in the parlor he could hear children's voices in Berard's bedroom. His room was just off the Parlor. Ilch does remember that he had a particular relationship with the [REDACTED], but does not remember any other children besides [REDACTED]. Jay Ilch was in Spokane approximately two years serving as a priest and he suffered, "burnout" and was put on medications. He stated that the Franciscan order then shipped him off to California. He stated that he had at his disposal a psychiatrist and medications. I asked him if psychiatrists were available for any of the priests or brothers that needed them and stated, "Oh, yes." Ilch also stated that it was very much unusual that Berard had children in his bedroom. This was not a usual behavior for priests. He stated year after year the awareness seemed to grow, but nobody had really said anything about it.

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Pinnacle
Investigations, Inc.

Case

Dottie O'Reilly Interview
By Sandra Brewer, Pinnacle Investigations, Inc.

Dottie O'Reilly
N.8400 Wall
Spokane, Wa.
509-466-7400

I spoke to O'Reilly on 01-31-92. O'Reilly's family and children attended St. Francis of Assisi while Brother Berard was assigned there.

O'Reilly stated that she was involved in programs at the church, including chaperoning dances. She stated, "I really didn't like social injustices, so it upset me when Berard showed favoritism when he picked the altar boys and when he took teenagers to the dances, the father-daughter dances."

O'Reilly stated, "Berard showed favoritism to a young man who's parents were getting a divorce. He made him an altar boy ahead of my children. He was always showing favoritism to children from divorced families, including girls."

O'Reilly also stated that she and her husband were chaperoning the dances, and the priests and Berard would dance with the girls. She stated that she got into arguments with Berard over these things.

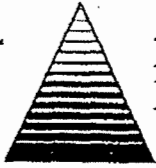
O'Reilly stated, "Someone wrote a letter to Bishop Toppel over Berard and the dances, and I got blamed for it. People were always accusing me of doing it. I did not write the letter and I don't know who did."

I asked O'Reilly if she had a daughter who attended the school, and she stated that she would not tell me her daughter's name because they were having problems presently. She did state that Berard would give certain favorite girls, gifts, including her daughter, which she did not approve of.

O'Reilly did say that she had a lot of arguments with Berard and felt that she was looked down upon for doing this.

End of Interview.

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**Pinnacle
Investigations, Inc.**

Case

Anne Moulton Cunningham Interview

By Sandra Brewer, Pinnacle Investigations, Inc.

I interviewed [REDACTED] on 05-03-91 at her residence.
[REDACTED] was acquainted with Berrard Connelly and attended
St. Anne's parish where he was assigned.

The following interview was taped with [REDACTED]
permission.

Q: "[REDACTED] can you tell me when you first met Brother
Berard?"

A: "I'm not sure what the year was. I might have been in
eighth or ninth grade."

Q: "Do you remember what year you graduated so we can
calculate that?"

A: "1970."

Q: "Would you say you met him in 1966 or 1967?"

A: "I think so."

Q: "You were a freshman?"

A: "Um, yes."

Q: "Where were you going to school at?"

A: "Marycliffe."

Q: "So you met him while you were at Marycliffe?"

A: "Right."

Q: "Were you involved in going to a catholic church at
that time?"

A: "Yeah, St. Annes. I might even, no I think I was going
to school at Marycliffe. I was going to St. Anne's
parish at the time in the youth group."

Q: "You met Brother Berard through the youth group?"

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A: " I'm not sure exactly how I met him, well through the church, somehow I met him through somebody in the church; and he was in the youth group also. He helped with the youth group."

Q: " I'm showing [REDACTED] a picture she had of Brother Berard. Is that a picture of him?"

A: " That's him."

Q: " Who is that with him?"

A: " Those are my sisters."

Q: " Your sisters. Which sisters are these?"

A: " [REDACTED]"

Q: " How old are they there?"

A: " [REDACTED] I don't know. She might have been about eight or nine, and [REDACTED] was only about five."

Q: " How close was Brother Berard to your family?"

A: " He was very close. He was there quite a bit."

Q: " When you say "quite a bit", can you elaborate on why he was there and how often he was there?"

A: " He became a good friend of my family's and he was there often to; my mom would fix him dinner or we'd have, you know, treats, He come and pick us up a lot and take us to different functions. I don't know, we'd go to church functions or things like that."

Q: " Was there a male or a husband in your home; or a father in your-home most of the time?"

A: " There was a father, but he was never around, so Berard kind of took that role on I guess."

Q: " When you say he was never around, were they divorced?"

A: " They weren't divorced. He lived, my grandmother had a farm and he basically was out there, 99% of the time. He'd just come home now and then."

Q: " Would you say Brother Berard became a father figure in your family?"

A: " To my sister and I, yes; to [REDACTED] and I."

Q: " To [REDACTED] and you?"

A: " [REDACTED] personally did not like him at all."

Q: " How old was [REDACTED] at that time?"

A: " She was probably seventh grade, sixth or seventh grade."

Q: " She was three years younger than you?"

A: " No, she's younger than that. She's five years younger. I think she was about four years behind me so, I'm not sure."

Q: " Okay."

A: " I knew him for three years, I think when he was at St. Anne's. He was at St. Anne's for quite a while."

Q: " Did he go somewhere else while you knew him."

A: " He's kept in contact with me all these years. I just saw him a couple of years ago. He sent me a Christmas card this year."

Q: " Can you tell me of other people or other girls that Brother Berard had contact with ?"

A: " [REDACTED] was probably the one he had the most contact with. He was always with her. [REDACTED] was another one. He was with my little sister [REDACTED] on and off. Those are probably the main people when he was at St. Anne's that I remember; oh he was with the [REDACTED] quite a bit. Those are probably the main people that I can remember he was with."

Q: " Did Brother Berard ever do anything that made you feel uncomfortable?"

A: " He, yes."

Q: " When did that start?"

A: " After I'd known him for awhile, he use to be, he use to when there were no adults around he use to make comments that were really uncomfortable, sexual comments. He could be real "handsy", and I remember my little sister [REDACTED] really disliked him, a lot because she thought he was a dirty old man. She couldn't

understand why he always had his hands on all of us and the comments that he made, made her sick at the time."

Q: " When you talk about hands on, what are you talking about?"

A: " Hugs. Just touching."

Q: " What type of hugs? Just arm around the shoulder, body hugs?"

A: " All of them. It just depended where you were and who you were with."

Q: " Do you remember him touching you?"

A: " Yes, I do. He use to take me out for counseling sessions and uh, when I had problems with family, not really friends; he basically hit on my family. He use to get me to where I was crying over something that might have happened with my mom or my dad, the absence of my dad; and then the next thing I knew, he'd be trying to kiss me. Usually I'd jump out of the car before he could do much more. One time he tried and started getting real "handsy", I got out of the car and walked home and he followed me and that kind of became the standing joke about me walking home."

Q: " Where did this occur at?"

A: " Um, this occurred at, well when I walked home; we parked in parking places where kids came to make out and the last time it happened when I walked home we were parked up on Carnahan hill somewhere, and I didn't live that far away so I walked home and he followed me there."

Q: " Can you tell me specifically what happened that time as well as you can remember?"

A: " Well, I remember crying and lying over by the door, kind of leaning against the door. The next thing I knew he had his arms on me and french kissed me. His hands were, they were going for my shirt or something and I just opened the door and jumped out and just took off. I was so mad I couldn't believe it."

Q: " Did he touch your breasts?"

A: " I don't remember. I remember he tried. I just

remember struggling and getting out of the car."

Q: " So you fought him off, then is what you are saying?"

A: " Right."

Q: " Was he on top of you at that time?"

A: " Trying, yes he was."

Q: " Was he grabbing at your clothes?"

A: " He was trying, yeah."

Q: " You left the car?"

A: " Yes."

Q: " What did he say to you?"

A: " He kept trying to get me back in the car, said, "Come on". He followed me and kept trying to talk me into getting back into the car and I wouldn't get back in the car. I said I was walking home and he followed me all the way home."

Q: " How often did this sort of thing happen?"

A: " It happened three times that I can remember, and I remember after it happened the first time I would tell him that didn't want to stop the car and he'd say, "We're just going to talk." Then usually he'd try something and then I'd get mad and then he'd back off."

Q: " Can you explain, "try something?"

A: " Kissing, basically and "handsy".

Q: " When you say getting handsy, are you talking about touching you in sexual places?"

A: " He'd try."

Q: " Can you remember any other specific time that he sexually touched you or attempted to?"

A: " Somehow, and this is real hazy, but I remember falling asleep and driving home from somewhere and I remember he tried to get his hands down my pants, and I woke up and

he didn't do it."

Q: " Do you remember what point he was at when you woke up?"

A: " He didn't have any, he was trying to unsnap my pants."

Q: " Okay, so his hands were trying to unsnap your pants and it woke you up."

A: " Right."

Q: " How often would you say touching or kissing occurred with him, or attempts by him to touch or kiss you?"

A: " I would say, oh touching, lots. The actual kissing, this is, I know three times for sure but I honestly don't remember how many times. I remember three times being in the car alone with him when he really tried."

Q: " Can you tell me other places where he would try to touch you and kiss you besides the car. Was there other places?"

A: " I don't remember any other places."

Q: " Do you remember?"

A: " He would have us over at the rectory a lot. He would be real huggy doing things like that at the rectory. He wouldn't actually be, I don't remember him actually trying anything in the rectory, but there were also three or four other people living there. I mean, he'd have to be real careful about what he did."

Q: " Did he ever take you on any trips?"

A: " We went to Osoyoos Lake."

Q: " And that's in Canada?"

A: " Yes."

Q: " What was the understanding when you went with him?"

A: " From what I remember it was suppose to be a youth group trip, but he ended up only taking [REDACTED] and me, and we went up to Canada for the weekend."

Q: " Where did you stay?"

A: " In a hotel room. All of us were in one room. "

Q: " How many beds were in the room?"

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A: " It was one double bed and a single bed."

Q: " What was the sleeping arrangements?"

A: " Him and [REDACTED] slept in the double bed and I slept in the single bed."

Q: " What was his position in the double bed in relation to your position in the single bed?"

A: " He was adamant about the fact that he was going to sleep next to me in the double bed, but he wanted [REDACTED] on the outside. He wanted to be closer to me, and at night all I remember him is touching my arm, but I don't remember anything else about that night."

Q: " Do you remember what the arrangements were for changing into night clothes, or did any of you do that?"

A: " There was a bathroom in there."

Q: " Did you change in there?"

A: " Yes we did. I had a nightgown on."

Q: " What did he have on?"

A: " I don't remember. I think I don't remember what they even slept in."

Q: " After that night what happened on the trip?"

A: " We stayed there a couple of days and when we came back we didn't want, I don't remember how, somehow we ended up at a drive-in movie. I don't remember exactly how we got there, but instead of going straight home we went to the drive-in. I just remember falling asleep at the drive-in, I was exhausted. [REDACTED] was on one side of me and I think he was on the other side of me at the drive-in."

Q: " Did he take any other trips with you that you remember?"

A: " I don't remember."

Q: " After the high school years, did he ever contact you?"

A: " He contacted me quite often. From different parts of the country. I know that I asked him, I wanted him to be in my wedding. I wanted him to be one of the, I don't know, the priests that give something. He didn't come and I remember him making some comment about he might be too jealous to be there at my wedding. I

I thought that was kind of funny that he would say that. He also made comments about other boyfriends that I had, and he always seemed kind of jealous. [REDACTED] and I went out for quite a while and he was jealous. He made a comment to me about being jealous about [REDACTED] "

Q: " Did you get the idea that he was trying to be a boyfriend of yours?"

A: " He partially thought he was. I'm sure he must have. He just would make comments about different boyfriends that I had. I thought that was kind of strange."

Q: " When was your last contact with him?"

A: " About three years ago when he came back to town. He had dinner at our house."

Q: " You have gotten written cards from him?"

A: " He sends me Christmas cards every year."

End of Interview.



Pinnacle
Investigations, Inc.

CASE

BY: Sandra Brewer, Pinnacle Investigations, Inc.

SB [REDACTED] I understand that you went to St. Francis of Assisi School and Parish in your youth back in the '60's. I do want to talk to you about a brother that was there at the time by the name of Berard Connolly and what you knew of him, his involvement that you observed and in your family - any involvement he had. Am I taping this with your consent?

[REDACTED] Yes, I know the tape recorder's on.

SB Okay. Why don't we start with when you went to school at St. Francis. What year did you graduate?

[REDACTED] 1967.

SB And you have several brothers and sisters, is that correct?

[REDACTED] There is a total of [REDACTED]

SB Could you name them for me?

[REDACTED] Yeah. Starting with the oldest, [REDACTED]

SB And their ages if you can remember.

[REDACTED] [REDACTED] will be [REDACTED] [REDACTED] will be [REDACTED] I myself will be [REDACTED] [REDACTED] will probably be [REDACTED] I would guess is probably getting like [REDACTED] around [REDACTED] - he's the youngest.

SB Can you tell me when you first met Berard Connolly?

[REDACTED] I was at St. Francis, I'm just trying to think when he came to the parish. Because I was an altar boy under his domain, so to speak, and I would say probably when I was a 5th grader. I would imagine. Because I was an altar boy for quite a while.

SB At any time that you were around Brother Berard, did he make any sexual approaches toward you?

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Not in public at any time. He was always kinda being friendly to us and treating us, you know, a little extra special, so to speak.

SB Can you explain that?

He would take us out for an ice cream cone, buy us a little plaque with St. Francis of Assisi on it with his prayer, and give us some special - it was kind of an honor as an altar boy to get to serve mass at a funeral, at weddings, those type of situations because it was kind of a higher up position, so to speak. And so he kind of favored [redacted] and I for that and he always gave us awards for being outstanding altar boys.

SB Can you name anybody else that was an altar boy at the same time you were?

Just about everybody. There's probably [redacted] I don't think, well [redacted] maybe wasn't. There was a [redacted] that hung around [redacted] but I don't think he was an altar boy. [redacted] was my age, [redacted] was [redacted] age, [redacted] was my age. I think [redacted] was my age. [redacted] - he became a preist, he was my age.

SB Okay, I think that's enough on that. When you said that Berard didn't do anything in public, did he do anything in private?

Yes.

SB Can you explain to me what he did in private?

TO The only incident that I ever remember, it was in the summertime and I would probably have to say I was going into the 7th and [redacted] was - see [redacted] was set back a year - so we were both probably going into the 7th grade at that time. And Berard stopped by and asked if we wanted to go swimming, and [redacted] and I said "Sure". So he said "Well, I don't like going to public pools because they're overcrowded". So he said "Why don't we just go to this motel downtown". And I was trying to think of the name of the motel.....

SB Can you tell me where it might be?

Yeah, it was on - where the one way goes north - so it would be Maple - and the one way going....

SB 2nd?

Yeah, 2nd and Maple.

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SB Was it behind the Denny's restaurant?

No. No, there's a building there and I'm just trying to place it. But it was kinda in the back, there was a building out front on the corner but it's not a Denny's.

SB Is it behind - it isn't behind the Denny's like the Travelodge or a....

It seems - Travelodge sticks in my mind, but I don't think it was the Travelodge.

SB Was it right close to the corner of 2nd and Maple?

Um-hum. (Affirmative) If you're coming Maple, just before you go underneath that bridge to get onto Maple Street Bridge it's the motel to the east.

SB Okay. That is a Nindel's Hotel.

So he took us there and...

SB Did he register at the hotel?

Yep, he said "Let me go check in" and he checked in and registered for a room. And it was down on the ground floor about right in front of the pool. And so we go into the room and he said "Well, let's go in here and get our swimming suits on" and that type of stuff. Well, he didn't even have a swimming suit, which kind of suprised me, but I didn't think anything about it. And we kind of just sat around and talked a little bit in the room. I don't remember a whole lot what went on in the room.

SB Who was with you?

My brother

SB That's it.

Yeah, there was just the two of us. And of course all we had on our mind was to go swimming. We didn't get too many opportunities to do that other than going to the public pool. So when somebody was taking us it was kind of a treat, especially when it was with Berard because he was always, you know, a little extra special for us. But anyway, we were sitting around in the room and he started asking questions that were pertaining to life saving, you know, as far as CPR, mouth-to-mouth resuscitation and that type of stuff. And he asked us if we knew how to do it, and and I kinda looked at

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each other and I said "Well, I think that I do. I've never done it before". And he said "Can you show me? I've never had mouth-to mouth resuscitation or never had to do it". And then he said "I might want to know how if the need ever arises". And so I said, "Okay. You just clip the person's nose" and then I put my mouth over his and just showed him how, and just right then I felt strange, but I didn't understand any of the feelings because I was pretty young at the time. And I wasn't sexually developed or anything at that age. And so I said "Well, that's all I know how to do" and he goes "Oh, okay". And he didn't push it any further. [REDACTED] remembers being pantsed. I vaguely remember that, Berard mentioning "Well, let's pants [REDACTED] And me being a boy, a young boy I said "Yeah, that sounds like fun", and so we pantsed [REDACTED] but that's...

SB Was he naked once he was pantsed?

[REDACTED] Um-hum. (Affirmative)

SB Did [REDACTED] show him how to do CPR too?

[REDACTED] I don't remember that. No, that was - I only remember me, and Berard was laying down on the bed, and he had...

SB He was laying on the bed?

[REDACTED] Yeah, and he had me get on top of him and just kinda lay over him, on top like that and...

SB Did he have you straddle him?

[REDACTED] No. No, I just layed across his chest. And I put my arms over his chest and then my mouth over his.

SB Okay. Did he do anything with his hands?

[REDACTED] Not that I remember.

SB Okay. Any other incidents that happened to you personally, or that you observed?

[REDACTED] Well, after that, after we showed him how to do the mouth-to-mouth and stuff, we - [REDACTED] and I still had swimming on our minds so we just said "Let's go swimming". And the only thing I thought was kind of strange, he never joined us in the pool. And [REDACTED] and I tried to get him to come out and join us because that was the whole idea of going down there. But I do remember very well, of him being in the room, looking out the window watching us. And it didn't click with

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me what he was doing, but I don't know what he was doing by himself in there but I know he was watching real close and it was just [REDACTED] and I in the pool so it's hard to say what he - was going on in there. So.... After that there was only one other incident that kind of clicked just recently. Nothing happened or anything but I remember one time he asked me to stay after. As an altar boy you had so many hours a week you'd have to practice and get ready for that following Sunday or whatever. And he asked me to stay after and I said "Okay", it was no big deal because we lived fairly close to the church at that time. So I would have to have been in the 8th grade and [REDACTED] was already in high school then. And he sat me up on a counter in the back of the church, where we put on our altar boy coats and stuff, and he got real close to me and just talked to me eye-to-eye. He was also a counselor for the boys. And he made a comment to me that I never quite understood what he was talking about. But he made the comment like "You can't quite ever unlock my mind or what is going on inside my head". But he was real close to me and his eyes were set right on my eyes like he was in a trance or something. And that was the only other time that he ever made any abusive - or any actions with me.

SB Did you observe him around young females at all?

[REDACTED] No. I never saw him around girls.

SB Okay. And do you know of anybody else that he sexually molested?

[REDACTED] Nope. The only thing I do remember, when my brother and I were living together on [REDACTED] he came by, I was out dating - which is my wife now. And he stopped by to say "Hi" and had a few drinks with [REDACTED] and then he left and came back with a girl - and [REDACTED] knows more of that story because [REDACTED] was there. And [REDACTED] I think, finally threw him out of the house because he was kissing her and that kind of stuff.

SB You don't know who the girl is?

[REDACTED] No, and I don't think [REDACTED] does either.

SB Where was it at?

[REDACTED] We were living on [REDACTED] I don't remember the address but about the [REDACTED] It's right over here.

SB And you saw him kissing her?

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■ I didn't, but ■ did.

SB ■ did see him kissing her?

■ ■ told me about that the next morning. I said, "Well, how long did Berard hang around." And he goes "Ah, God" and then he starts telling me this story, so ■ probably best...

SB What did he tell you?

■ ■ just told me that Berard left and brought this girl back and they sat down on our couch and ■ said it was like he wanted to use our house as a place to have sex with the girl. And ■ said "It just made me sick" because, you know, we were brought up in the Catholic faith that the priest and the brothers were celibate and ■ said he was French kissing her. So he had the tongue down her throat and all that stuff. ■ said he just got nauseated and I think ■ ended up making them leave the house.

SB This was - how old were you, do you think.

■ ■, we were moved away so it was probably 1972 - maybe '73.

SB Okay. Tape's off for a minute.

(Tape Off)

(Tape On)

SB We have the tape back on. Has any of your brothers came to you recently since I've contacted them, mentioning being molested at all by Brother Berard Connolly?

■ ■ is the only one.

SB Okay. What did ■ tell you?

■ Okay, well ■ told me that incident when he was living on Nebraska and I was already moved out and married with my wife. And when he called me that next day and said "Well Berard was in town and stopped by" and that kind of stuff. And that was all that was told to me then. I think Friday night this past week he called me up and told me he was molested by Berard and he was - Berard wanted to go out and have a few drinks with ■, so ■ said "Okay". So they went out for a drink, but on the way ■ said that they stopped at a motel. Berard said he's got some special alcohol or something he wants to have ■ try. / And ■ didn't think anything of it, and I probably wouldn't have

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either, you know, "we're going to go over to your motel for a minute". And [REDACTED] says he went into another room and mixed him a drink and so he couldn't see what was going on or what he was mixing. Then he came out and [REDACTED] said all he remembers is having three drinks and he was out, and the next thing he knows was the next morning, [REDACTED] was laying on the bed and Brother Berard was sucking on his penis and masturbating him at the same time. And [REDACTED] said he just couldn't believe what was happening, jumped up and asked him what was going on. And then that's as far as that conversation went. But it really surprised me that [REDACTED] did that. And then [REDACTED] also added to that that his rectum hurt for two weeks after that, so I'm sure he got anus....

SB How long ago did that happen?

[REDACTED] Um, let's see. I moved out, away from him in '77 when I got married. I would have to say - [REDACTED] thinks he was about 27. Well, I got married when I was 24 so [REDACTED] was 25 in '77. And so two years after that, so it would probably be about 1979.

SB Okay. Do you know if any of your other brother or sisters were molested by Brother Berard?

[REDACTED] Not to my knowledge.

SB Okay.

[REDACTED] And I - he didn't really seem to show any interest in anybody else in our family but [REDACTED] and me. And I was kinda surprised when you mentioned my older sister getting a gift from him. I don't remember that. But I do remember - in fact I think Mom's got some of the gifts that I got from him, still in her house.

SB Okay. I'm going to turn the tape off again.

(Tape Off)

(Tape On)

SB Is there anything else that you remember about Berard Connolly that strikes you, or did strike you a little differently back then?

[REDACTED] Well, when we were altar boys I noticed - he had control probably of at least thirty boys ranging from 5th grade up through the 8th. And I noticed he had a very short fuse and I had respect for him in that way because I was afraid of him of physically grabbing me and throwing me out. And I've seen him do that to a couple of the altar boys which the only one that I can remember is [REDACTED] And he graduated with me.

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He physically took [REDACTED] - 'cause [REDACTED] was kinda goofing off in school, you know, or during the session that we were going through at that time, and grabbed him and ran him out of the church and just threw him out the door. And then came back and he was all red-faced and, you know, he did have a short temper.

SB Was there anybody else that he had a close relationship with that he might have taken out for ice cream or taken, you know, somewhere special?

[REDACTED] The only one that I ever remember is [REDACTED] but I bet he would deny it and think that Berard was the greatest. I really do, I think...

SB Any females that he would have even had a chance to be around?

[REDACTED] Not that I can remember.

SB Okay. Okay, I think that's it.

END OF INTERVIEW



Pinnacle
Investigations, Inc.

CASE

INTERVIEW

BY: Sandra Brewer, Pinnacle Investigations, Inc.



SB [REDACTED] ...could you spell the road please?

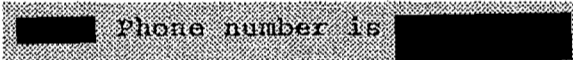


SB Okay. Spokane, Washington. And your phone number?



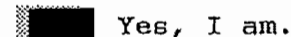
Veredale, Washington.

SB [REDACTED] Okay.



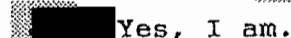
Phone number is [REDACTED]

SB And are you employed?



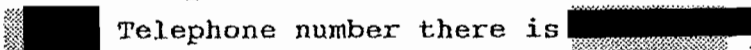
Yes, I am.

SB Is that [REDACTED]



Yes, I am.

SB And their number - do you have the number for them?



Telephone number there is [REDACTED]

SB Okay. [REDACTED] I'm here to talk to you about Berard Connolly. He was a brother back at St. Francis of Assisi when you were going to school there with your family. And I'd like to ask you a few questions about him and your knowledge of him. Present here today while we talk is myself and [REDACTED] what is his name?



SB And how do you spell [REDACTED] last name?



SB Okay. [REDACTED] Am I taping this with your consent?

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[REDACTED] Yes, you are.

SB Okay. [REDACTED] how did you first meet Berard Connolly?

[REDACTED] Through St. Francis - an altar boy.

SB How old were you?

[REDACTED] Boy, that's the only - about 7th grade maybe.

SB Okay, and you are how old now?

[REDACTED] I'll be forty next month, in [REDACTED]

SB And am I correct when I say that you're from a family of several brothers and sisters.

[REDACTED] Yeah, six brother - six of us - six boys and two girls.

SB Okay, is [REDACTED] one of your brothers?

[REDACTED] Yes, he's one year younger than I am.

SB Okay, so one of your brothers is [REDACTED]

[REDACTED] Yes.

SB And is your parents [REDACTED]

[REDACTED] That's correct.

SB Okay. You said you met Brother Berard when you were about in 7th grade at St. Francis of Assisi?

[REDACTED] As far as I can recall, yes.

SB Okay. How did you know him - how did you get acquainted with him? Were you involved in some church activities that he was involved in?

[REDACTED] Yeah, being an altar boy.

SB You were an altar boy? And he was the head of that or ran that?

[REDACTED] Yeah.

SB He did.

[REDACTED] He was pretty much in charge of that. He took total charge of that.

SB Was your brother [REDACTED] an altar boy around the same time?

[REDACTED] Yes he was. He always scheduled us to serve mass at the same time.

SB Okay. Did Berard Connolly, while you were in school at St. Francis of Assisi ever make any sexual overtures toward you that you now consider inappropriate?

[REDACTED] At the school?

SB During that time.

[REDACTED] During that time.

SB Either at the private or public.

[REDACTED] Yes, okay, yes.

SB Can you explain to me what happened and approximately the time frame.

[REDACTED] He used to come by on a Friday night - or excuse me - Friday afternoon around 3:00, around 3 or 4:00, after everybody was home from school and want to take my brother [REDACTED] and I someplace. Sometimes we would go swimming, sometimes he'd drive us out to a lake or whatever. But most of it was pretty much around in the basic areas. He didn't go very far - a lots of times it was maybe five, ten miles.

SB Uh-huh.

[REDACTED] And usually we'd do - we did a lot of the swimming pool bit, renting a motel - he had a motel room and of course it had a swimming pool and he took us swimming.

SB Would he rent a motel room often to do this?

[REDACTED] Yep.

SB Really. Where at?

[REDACTED] It was downtown, that's all that I remember. Downtown on - it was just a little motel - Main or 1st. Something like that.

SB Do you remember a motel off of 2nd and Maple?

[REDACTED] Yeah, it could have been that one.

SB Okay.

[REDACTED] Could have been that one.

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SB Okay, and go ahead. Explain to me what might have occurred or what did occur.

Yeah, did a lot of unusual things, I thought. But to me, being my age - but anyway he - one time he wanted to go swimming. Or, he didn't want to go swimming - he always complained that he had a headache. He had lots of cameras, too.

SB Okay.

He always brought a camera with him.

SB Okay.

And he - we rented, he got the room, because he picked us up from our parents house and we just shot right down to that place, the motel. And wanted - he didn't really want to go swimming but he said "Go ahead and everybody get ready to swimming", so everybody gets down to their swim trunks. And then all of a sudden he wanted to pants me.

SB What'd he say?

He just said "Let's pants" and he laughed. "Let's pants" he yelled it real loud.

SB And who was with you?

My brother Just the three of us were in that room. And the blinds were drawn closed, I remember that. And my brother at his age, goes "Yeah, let's..." and, you know, we all just thought it was just fun. But I remember when it was over with I was laying on the ground - on my back - with my pants down.

SB Naked.

Yeah. Until I pulled them up...

SB Did Berard pull your pants down, too?

Oh yeah, he was the one, he did most of the pulling. Yeah, my brother was just kinda going like "Yeah", you know. But anyway, thenboy, this is rough. Then he - I pulled my pants back up and I said "Let's go swimming", something like that. And my brother said "Yeah, let's go swimming". So during that time Berard layed down on the bed that was sitting there, it was just a single bed. He layed down on the bed on his back with his lips protruded and said "Before you guys go swimming" - something like that - "I want to show

you mouth-to-mouth resuscitation" or something to do with mouth-to-mouth resuscitation. I didn't know what he meant - not being stupid but I just I didn't know what he meant so I kinda said "Let's go swimming [REDACTED] My brother [REDACTED] went up and proceeded to give him mouth-to-mouth resuscitation. But not for, for oh, maybe only five or ten seconds. And then [REDACTED] said some comment - "God, this is stupid, let's go swimming [REDACTED] So we just went out the door and went swimming. And in the mean time, we're out there swimming, you could look up at - the window was right not even twenty feet from the pool. He had the pool - the room right by the pool and we were the only ones out there, nobody else was out there swimming. And he opened up the drapes, drew the blinds, or whatever, so he could see out. We could see him and he could see us, of course. And we were just waving at him - you know, we were just kids, we didn't know. But [REDACTED] did something, went up to do something - to say something to Brother Berard, to come on out or some stupid thing, but it seems like he was masturbating.

SB Why do you think he was masturbating?

[REDACTED] He was staring at us and masturbating, is what I'm saying.

SB Why do you think he was masturbating?

[REDACTED] Just the way that his look was and from what [REDACTED] saw, [REDACTED] didn't see a lot of it, but now-days [REDACTED] I think realizes that probably what he was doing was masturbating. Standing in front of the window is what I'm saying.

SB Was there any other incidences that you recall that appeared inappropriate now or at that time?

[REDACTED] During that time, you mean?

SB Um-hum. (Affirmative)

[REDACTED] That happened again - unusual?

SB Yes.

[REDACTED] Not that I can recall, no.

SB Okay.

[REDACTED] No, just during that one time. During that time he used to get upset real quickly, I know that. Very upset, real jumpy. All of the sudden he'd just explode.

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SB Did he have any other favorites he would take places besides you and [REDACTED]

[REDACTED] Like what he did, you mean with some other people? Other kids at that school at our time?

SB Um-hum. (Affirmative)

[REDACTED] Yeah, he had a couple other favorites, I thought.

SB Do you remember who they are?

[REDACTED] Um-hum. (Affirmative)

SB Who?

[REDACTED] God, they're not going to like me.
(Laughter) [REDACTED] comes to mind at my age. [REDACTED] year, I know [REDACTED] something like that - I think that was his name. That's about all I can think of. I know there's others, too.

SB Have you ever had any contact with Berard since the time you've - how long was he there?

[REDACTED] At what, St. Francis?

SB Was he still there when you...

[REDACTED] When I left? Oh, yeah. He was there..

SB And you graduated in what year?

[REDACTED] I graduated in [REDACTED]

SB Okay. Have you had any other contact with Berard Connolly?

[REDACTED] Since [REDACTED]

SB Yes, that you felt was inappropriate.

[REDACTED] Yes.

SB I know it's probably difficult to talk about, but it's real important. Can you tell me what other contact you've had?

[REDACTED] When I was 20 years old, just moved out of the house, will you shut that thing off for a second?

SB Tape's off.

(Tape off)

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(Tape on)

SB Okay, the tape's back on. [REDACTED] you were starting to tell me about some other incidences and contacts you've had with Berard.

[REDACTED] I hadn't seen him since then. He had called, I know that, a number of times. I hadn't seen him since then but when I turned 20 years old I moved out of the house - my brother, [REDACTED] and I did. We rented a little shack just to get out of the house.

SB Where was that at?

[REDACTED] Down on [REDACTED]. Right by the police station area. And he called, my brother was going out on a date with his wife that he's married to, or the woman he's married to now. And he was gone and I was home alone. But anyway, he had called a couple days before that and said he was coming to town, and would I like to go out and - he'd like to see me is basically the way he said. Not go out, but he'd like to see me. I said "Well", so I gave him - "Well I need your address" so I gave him my address and said "Yeah, come on by". And it was a Friday or Saturday night he was supposedly coming by, I don't remember which, it's been so long. But anyway, he did come by and when he came by he was with a gal named [REDACTED]. Short little gal like me - brunette, pretty gal. She had long brunette hair. He was drunk and she - and in her eyes, she looked at me as - she was hysterical, I knew that. And he dumped her off to me, said "Here, take her". And he was drunk. He said "I've got to go do something", and he was gone for about an hour. I'm thinking what he wanted me to do was, well, you know. But the chick was, I knew something was wrong with her. She was upset about something but I didn't know what it was so I just sat down and we watched T.V., I think I had the T.V. on and all's we did was just kinda visit for about an hour. And then he came back.

SB So what year would this have been in?

[REDACTED] This would have been in 1972, '73, around there. So anyway, he came back like he said he would. And he was kinda surprised that we were sitting there just talking in the living room when he walked in. He figured - I think he wanted, he expected something else is what I'm saying. But I knew something wasn't right with her, I know that for a fact. And he came back, picked her up - yeah, picked her back up and said, "I gotta go". So basically, yeah, he said, "I gotta go" and I said "Oh, okay. Well, nice seeing you" and that was the last I saw of him.

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SB When he brought her in or took her out was he in any way intimate with her?

Yes, yes he was. Oh yeah. When he first brought her in, when he first knocked on the door, he was fondling her. And like I said, something to me, I just go "Wait a minute". Why would he, a Brother, of a diocese, be fondling some, and she was eighteen, I think. At the time he told me.

SB What do you mean by fondling her?

Uh, playing with her breasts. Uh, pinching her ass.

SB When he came in?

Oh yeah.

(End of side A)
(Tape over)

SB So basically, he came in the door with her and he was fondling her and touching her breast...

Right, touching her breasts, her buttocks and hanging all over her. And then he shoved her off onto me.

SB Okay, so he came back and he got her later?

Yes.

SB And left.

And left. And that was the last I saw of him that night and when he was in town the rest of that time, that was it.

SB Okay.- Any other contact?

During that time, yeah, he called me two or three times in between that time - uh, was in town, was only going to be there for a couple days. He flew in, he wanted to see me and a lot of times I was busy doing other things. And I never did see him. And then probably, I was probably about twenty-seven years old, I'm not sure of the exact age. Twenty-six to twenty-eight years of age. He, when my friend [redacted] my brother [redacted] got married and [redacted] and I were living together but we had moved out of that house. And I needed somebody to, my brother [redacted] was getting married and moving out and I needed somebody to help pay rent. I'd knew [redacted] since grade school from [redacted] [redacted] went to grade school but only for four years so he never saw Brother Berard

until that night. But, anyway, somewhere around that year, when I was twenty-seven or - twenty-six to twenty-seven or twenty-eight, he called again and he was in town and he'd be there for three days and he wanted to take me out for a beer. And I said "Sure, no problem". So I hung up and sure enough, a couple days later he calls back and wants to know if everything is going down, he said he'd be by about 8:00 that night - and [REDACTED] knows that because [REDACTED] was there at the house the whole time. Sure enough, about 8:00 he picked me up, came by, picked me up, he was sober. Not drugged out or nothing, just seemed like Brother Berard. He just said "Well, let's just go out, have a couple beers" and I said "Okay" so we just - I'd had dinner so we just jumped in his car. And we're heading out of the house and he never said - I did a lot of the talking, he wasn't saying too much. I did a lot of the talking, but I don't think he was listening. I look back at it now, he wasn't listening to me. So anyway, we're heading down Division Street, we get over to Division and Wellesley and we head south down Division. And we get - when you're getting over to where that Taco John's is - you've got that little hill that goes down Division Street...

SB Right.

[REDACTED] There's a motel on the side there.

SB Uh-huh. (Affirmative)

[REDACTED] And we got about four, five blocks from that. I didn't know where he was staying, but we got about four or five blocks from that and he said "I'll tell you what, before we go to the tavern why don't we go to my motel room and have a drink?" And I go "Well, I don't drink booze" and [REDACTED] knows that too. I'm a beer drinker. And he said "Yeah, but you can have one drink, can't you?" And I said "Yeah, one drink couldn't hurt me". So he took me to the room and as we were heading by the ice machine he grabbed a bucket of ice, went into the room, and I believe it was on the second floor. And opened up the door, went into the room and he said "I'll fix us a drink right away" and I said "Okay". He went into the other room, which I thought was unusual - but it didn't dawn on me at that time. He went into the other room to mix the drinks where I couldn't see him. All's I saw - he just stuck his head out by the corner of the wall and just talked to me, (inaudible - "How's work?") and then he was all of a sudden real talkative. He stuck his head over around the corner and started talking up a storm and in the mean time mixing the drinks. Then he brings the drinks out to me and gives me my drink and I lit up a ciga-

rette, took one sip off the drink - I don't remember what it was, but it was white - you could see ice and everything in it, it was a clear drink. I don't remember what it was but all's I remember is I took three drinks off this glass and I was out for nine hours.

(Tape off)

(Tape on)

SB We're back on the tape again. What happened when you woke up the next day?

I woke up about 7:00 or so in the morning. I drank that night about 8:15 is when I was at the motel. But I woke up about 7:00, a little after 7:00, and Berard was surprised to see me awake. And when I woke up, I was laying on the bed on my back, there was no covers on the bed, no pillow on the bed, the bed was just bare and then Berard was on top of me and he was - he had his finger of one of his, his finger was up my anus and was motioning up and down. He was performing oral sex with me and masturbating me at the same time. When I realized what was going on - but I was still pretty much drugged out - I just kinda jumped out of the bed and go "What the hell is going on here?". And that's when he said "Oh, you've gotta take a shower. So I said "Yeah". So I went into the shower and he tried to climb into the shower with me to help me wash myself and I said "Get out of here, I don't need that. I just want a ride home and I'm out of here". And then he just basically - he knew I was upset - and he just basically took me home, dropped me off and I just went into the house.

SB Is that the last contact you've had with him?

No. And then that night [redacted] had made a comment about "Hey, did you go out with your"....I had never, I didn't tell [redacted] any of this. Nobody knew anything about this. And my friend asked me, he made a comment about "Are you going out - or do anything with Berard tonight?" and I go "No". Flat-out just "No", I'm staying home. Well, Berard called the next night, about the same time, "Hey, would you like to go out again?" And I said "No way, I'm staying home". So I told him "No way". Anyway, he came by - I still hadn't told [redacted] what had gone down - and he came by the house and I finally just "No, I'm staying home, and that's all there is to it. Just leave me alone". So he left and then [redacted] at that time, asked me "Why were you so rude and just pushed him out of the house and this stuff to him?" Well finally I, I didn't want to, but I finally had to tell [redacted] what in the hell the guy did to me. So I told [redacted] kinda had a look like he

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didn't believe me, and I said [REDACTED] he's gonna call, and I know he's gonna call and want to go out still tonight." And [REDACTED] said "If that son-of-a-bitch calls I'll take the phone". And I said "Oh, okay", so [REDACTED] took - eventually, yeah - fifteen, twenty minutes later he did call back. And [REDACTED] goes, [REDACTED] got on the phone, he grabbed the phone and said "I'm gonna take this". And when [REDACTED] picked up the phone, and he knew it was Brother Berard because Brother Berard, or he knew - you know, because he asked for me, and he goes "Is this you, Brother Berard?" or Berard, or something like that and he of course said "Yeah". And he goes "I kinda know what's going on here" and that's when Berard spilled everything to [REDACTED] - that he put a mickey in my drink, he sodomized me, had oral sex with me, masturbated me all for a total of maybe nine or ten hours while I was asleep, while he put me out. And [REDACTED] then got very mad and said "If you ever come around here again I'm gonna beat the holy shit out of you and you're never gonna be able to walk away from here again" or something like that. And that's basically the last time I ever saw the guy.

SB Okay.

[REDACTED] Is that right, [REDACTED]

SB Anything else that you remember?

[REDACTED] During that time, or that night or something?

SB Or anything at all concerning Berard Connolly?

[REDACTED] No.

SB Do you remember, did he have any females he hung around...

[REDACTED] In my year?

SB Besides [REDACTED] that you saw?

[REDACTED] The only one I saw, [REDACTED] but he always talked - there's certain, there's one gal I do remember at St. Francis that he was always talking about.

SB Who is that?

[REDACTED]
SB Okay.

[REDACTED] He was always complimenting on how pretty she was, and she was a tall gal and she was pretty. But he

was always talking about her.

SB Okay. Anybody else that you ever saw him with, female, that he spent time with?

[REDACTED] That he spent time with? No.

SB That was it.

[REDACTED] That was it.

END OF INTERVIEW [REDACTED]

OFM CONW1
0586A



Pinnacle
Investigations, Inc.

CASE

INTERVIEW

BY: Sandra Brewer, Pinnacle Investigations, Inc.

Also present during this interview is [REDACTED]

SB [REDACTED] do I have your permission to tape this?

[REDACTED] Sure.

SB [REDACTED] what I want to ask you about is, [REDACTED] was mentioning earlier that he had told you what had happened to him in regards to Berard Connolly right after it happened. Do you remember this at all?

[REDACTED] Oh, sure, it's like it was yesterday.

SB Okay, can you tell me what you remember about it?

[REDACTED] Well, I remember that that next day, 'cause [REDACTED] didn't come home at all that night, and I thought that was kinda strange 'cause [REDACTED] normally would never do anything like that, especially with going out with another guy like that. And I remember that when [REDACTED] woke up the next morning that he was, when he finally came home, he was really strange. I mean I'd never seen him as strange as that he was and I remember that Brother Berard had called and asked to talk to [REDACTED] and [REDACTED] just like "No, I'm not here. I don't want to talk to the guy", and so I told him that "No, [REDACTED] wasn't at home" and I thought that was kinda strange, too. And then about fifteen, twenty minutes later Brother Berard pulls up and he comes in our house and he sits down in our living room and he acts like nothing's going on, you know, and he's trying to get [REDACTED] out of the house, to go again with him someplace. And [REDACTED] just, I mean he was like glued to that chair and he was not going to leave that house with this guy again. And so Brother Berard sat there for about another 10 minutes talking and then got up and left. And that's when [REDACTED] and I told [REDACTED] I said, "God, [REDACTED] that was kinda rude". You know, to be - 'cause I did not know at the time - and I said "That was kinda rude to the Brother to be that way". And [REDACTED] said "Well, I've gotta tell you some stuff". So then he pretty much basically told me what he has just told you, and like he said, at first I didn't believe it, but at the same time I wasn't not gonna believe [REDACTED]. And about - sure as shit - ten minutes later, Brother Berard called on the phone and he wanted to talk to [REDACTED] and I told him "No way". I told him that [REDACTED] had told me what he had done, you know, and as far as I was concerned that somebody like

OFM CONN 1

0587

him shouldn't be alive and that he should never, ever come over here again. Well, then he started to cry on the phone and tell how sorry he was and how sick he is and that it's something that he can't control, you know. And at the same time I asked him, I said "So you cannot control drugging people, and molesting them, and using them for your pleasures as however you want to do it?" And he continued to cry on the phone and he continued to want to talk to [REDACTED]. Well, no way was I going to let him talk to [REDACTED] at all. And I asked him about all the things that [REDACTED] had told me that he had done. And he said that "Yeah" he had done them but that, there again, too, he was sick and that I shouldn't hold that against him. And at the same time there too, I told him that if he ever came over to this house again, or ever had contact with [REDACTED] again, that I was going to beat the holy shit out of him and I would continue to, you know. And that his best bet in life would be to get the hell out of this area and never come back here again.

SB What did you tell him that [REDACTED] said he did?

[REDACTED] Well, basically [REDACTED] had told me that when he - the only thing that [REDACTED] remembers was going to the motel room and having two or three drinks off the drink and waking up with Brother Berard's fingers, and uh, inside [REDACTED]. And Brother Berard smelling his fingers as he pulled them out each time, and that, there too again, that he was uhm.....

SB Performing oral sex?

[REDACTED] Performing oral sex on [REDACTED] and at the same time too, [REDACTED] had told me that his butt was sore, and it was sore for a couple of days. And so.....

SB So basically, you told Berard all you knew, that [REDACTED] had told you, on the phone. Did Berard admit to actually performing sexual acts on [REDACTED]?

[REDACTED] Oh yeah, yeah. He told me that he couldn't control himself, that whatever he saw, he saw [REDACTED] laying there like that and he just had to do that, you know, and he just.... Yeah, he said he just could not control himself but that everything that [REDACTED] had said was true and that he was sorry and he just wanted forgiveness, you know, and the basic standard line that these kind of people give you, you know, to cover up their, whatever they do. I don't know. But basically, yeah. He admitted to basically doing everything that [REDACTED] had told me that he had done, right down to drugging him, right down to oral sex and masturbating him, putting his fingers inside of him, basically....

Sodomizing.

Yeah, sodomizing him. And, I don't know, maybe taking pictures, I don't know. But he - we never got into the picture part, but he basically admitted to doing every one of those deeds to [REDACTED]

SB Did you two guys, now I'm talking to both [REDACTED] and [REDACTED] ever think about reporting this?

Well, we had thought about it at first.

After it happened?

SB Yes.

Oh, yeah. We thought about it.

But then again, too, at the same time, which we now realize, and which you realize later, that you need to stop somebody at that time so they don't continue to go on and hurt other kids, or other things. But at the same time, too, we didn't want it to get on [REDACTED] - I mean, you know, [REDACTED] is a friend and I would not have let anybody do anything or say anything to make him feel, you know, like he feels now.

SB Does anybody else know about this?

I told a friend, a real good close friend of ours. And the only reason I told him was that if Brother Berard had come back again then this other friend wanted me to call him..

SB How long ago did you tell him? Right after it happened?

Oh yeah, three or four days after it had happened.

SB Who is he?

He's in jail.

SB I don't care where he is, but who is he?

Ron Rensing.

SB Ron Rensing?

RF Uh-hum. (Affirmative)

He's in Walla Walla, I think, right now or something.

OFM CONN 1

0589

SB Okay. [REDACTED] can I get the spelling of your last name?

[REDACTED]
SB [REDACTED]

[REDACTED] Uh-hum.

SB Okay. [REDACTED] have you went to any counseling because of this?

[REDACTED] No.

SB You haven't.

[REDACTED] No.

SB Do you feel it's affected you emotionally?

[REDACTED] Yeah. Oh yeah, it's changed my life around. At times it's pure hell, the last fourteen, about thirteen or fourteen years ago when he did it to me. It's at times hard to be with a women because you always think about that. It's hard when people pull, or say, talk about, make jokes about somebody sodomizing somebody for a joke, or you pull a joke. I don't, you know, I kinda laugh at it but deep down inside I'm crying. I see anything about it on T.V. it makes me sick to my stomach.

SB So it's had quite an impact on you.

[REDACTED] Oh, yeah. Um-hum. (Affirmative)

RF It's basically changed his whole life (inaudible)

[REDACTED] It's changed my whole life. It changed my life 360 degrees, Sandy.

RF 'Cause I've lived with [REDACTED] ever since that point and it's basically changed his thinking - he doesn't, he won't be alone with anybody that he doesn't know anymore. He doesn't go out anymore.

[REDACTED] No, I used to go out alot.

RF Doesn't make friends anymore, especially with people, with guys. Stays home a lot. He doesn't have any respect for the Catholic church anymore....

[REDACTED] No, I don't have any respect for the Catholic church, Catholic priests. Priests, brothers, nuns, or nothing. I want nothing to do with them, they mean - as a

matter of fact, ever since then I never went to church again. Never even, I would not go because I just didn't want to go to church. It just, it made me sick to my stomach.

RF Plus like [REDACTED] said, too, when people talk about - you watch T.V. or they'd say something about where, like in prison where they show guys getting gang raped and stuff like that, you can't say anything without thinking of that time. You have to be careful of what you say. I know I'm conscious of it every day.

SB That's very typical, though.

RF Yeah, there's day when I say something and I automatically think "Oops, I shouldn't have said that because now [REDACTED] gonna flash back or think of that incident.

SB Right.

[REDACTED] (Inaudible)

END OF INTERVIEW [REDACTED]

Catholics confront sex abuse Clergy screening still lax, critics say

By Tom Swart
Staff writer

Spokane's Catholic diocese, still with four accusations of sexual abuse by priests since 1989, no longer hides the problem.

In the past, the church's hidden history remained hidden, and offenders were shipped off to another assignment in a different city.

Church leaders now realize that approach failed because "this is not a hidden problem. It's a pervasive disorder and a moral disease," said the Rev. David Wright, general director of St. Luke's Hospital, a center treating abusive clergy outside Washington, D.C.

The other dioceses Spokane adopted a policy for dealing with sexual abuse in 1989.

Following suit, dioceses involving priests accused of molesting teenage boys.

But critics, who argue the church now handles such episodes more openly, argue that Spokane's Catholic diocese is not taking other steps to prevent future abuse.

"They say abuse problems will better as long as the diocese takes responsibility for its actions," said Wright.

"This is the church's duty to be secret," said the Rev. Richard McElroy, a Catholic bishop and columnist from the University of Notre Dame.

"You've got bishops and religious superiors who hold their noses and will accept almost anyone, because they want to keep the seminaries open," he said.

"The diocese has taken remedial action

on problems that have occurred," said William Barber, a Spokane psychologist who has worked as a church consultant. "But it hasn't moved toward some protection of young Catholics from more careful screening of candidates."

Barber and others, who in 1982 worked as coeditors on the Catholic Church's new code of ethics, argued for a better job of screening candidates.

One candidate for abuse that area psychologists' predictions accurately to screen candidates is the Rev. John Paul Ryan, a former director of the Oregon Province for the Society of Jesus.

Training and screening of clergy now dominates church discussion in the wake of recent national accusations of abuse by priests and others.

In December, Spokane's Bishop Thomas Monaghan filed suit against the diocese, the Archdiocese of Seattle and the Roman Catholic Diocese of Portland, Ore., for allegedly covering up abuse by priests.

Spokane is the only one of the four dioceses to file suit against the Spokane diocese, which covers all of Eastern Washington and about 10 priests, serving in 70 parishes and 11 schools.

In Spokane's case, the diocese responded with a letter published in its weekly newspaper signed by Bishop William Skelton and an offer to pay for her counseling.

Skelton said Spokane's diocese, like others around the country, now responds with more concern toward abuse victims.

Phone 344-1234/1235

CONTINUED FROM A1

clergy

worries more about training its.

Twenty years ago, if a priest had a pattern of constant contact with young boys, no one would have given twice about it. Now, it's a red flag," Skyles said.

Search leaders point out that cases of sexual abuse by priests rarely take most clergy who never use their vows.

But church must accept the difficulty of screening because of its role in society, said St. Luke's Bishop. We expect more from the church than from General Motors. When people in the church who should be trusted betray that trust by abusing children, the crime cries out for vengeance," he said.

Skyles, who was between 13 and 14 when the alleged abuse occurred, filed a court for damages from molestation, which occurred between 1968 and 1973, according to the suit.

Skyles refuses to discuss her case, but lawsuit does not outline what year abuse happened.

Recently who left Spokane around 1, received treatment and now is in California on administrative leave, according to official said.

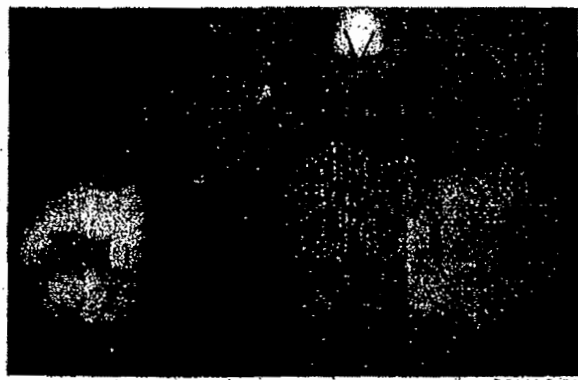
But the current response is limited, adding the abuse to church-related treatment centers for medical and psychological care.

In some cases, drugs are used to treat sexual drive. Abuse also requires intensive group and individual counseling.

While the church is finally accepting the value of psychology in dealing with abuse, not all dioceses use psychological consultation to weed out those likely sexual abusers or stalkers.

Spokane's diocesan center, the St. Joseph White Seminary, is the only of the city's three seminaries that requires psychological evaluation as a long list of written answers owned by a personal interview — are submitted into training.

The other two — St. Michael's, a three-year program for



Seminarians at the Bishop White Seminary are, from left, John Radinger, Steven Porter, Richard Sample and Paul Burch.

program for men entering the priesthood after 35 — use standardized tests before a person is admitted.

Bishop White Seminary once used such initial testing, but dropped that requirement several years ago, said the Rev. George Haspeds, the seminary director.

Critics like Barber and former Bishop White seminary rector, the Rev. Jim Kuhns, assert the seminary is asking for problems by taking a wait-and-see approach and not actively screening new seminarians.

In response, Skyles said psychologists have not found a set of tests that predict who will later become a sexual abuser.

Haspeds, defending the dropping of the initial psychological testing at Bishop White, said other means of evaluation are adequate.

Before starting, Bishop White seminarians must go through extensive interviews and written questions about their relationships, emotions and histories.

Each candidate also meets regu-

lational growth and the other for personal development.

By the fourth year, Bishop White seminarians take their first standardized psychological profile administered by a psychologist. That test is needed before moving to four more years of theological training.

But soon, Lisa Barber and Kuhns said that giving the evaluation in the fourth year is too late.

"Once you get someone in (the seminary), it's hard to get them out. Especially in an area where you have so few members joining the priesthood," Barber said.

By contrast, the Archdiocese of Seattle requires extensive personal interviews of all seminary candidates before admission. It also requires two personality profiles done by outside professionals. One is taken at the time of enrollment, the second two years later.

The Rev. Richard Root, the Spokane diocese's vocation director, agreed with Haspeds that an initial psychological evaluation isn't

"We have all sorts of other checkpoints, not just in the seminary but also in the theological school," said Root.

Root also insisted the Spokane Diocese does not relax its standards to keep people in the seminary.

"We are worried about numbers of people. But we are more worried about getting qualified priests who can function in a parish setting," he said.

Several years ago Bishop White Seminary had about 10 candidates living at the center year-round. This year the number is six.

The benefits of using psychological testing for seminarians is clear, said the Rev. James Gill, who trained as a physician at Sacred Heart Medical Center in 1964 before teaching for 25 years at Harvard University.

Those findings from full (psychological) evaluations are helpful as a source of discussion for the candidate in working with his spiritual director and other counselors," said Gill. Gill, a Jesuit, studied at Gonzaga University in the 1950s and is now a

Catholics disapprove of church's response to sexual abuse

Of those living up expectations of such policies

Of those in diocese where priest has been accused of abuse

Of those in diocese where priest has been accused of abuse

Of those in diocese where priest has been accused of abuse

Of those in diocese where priest has been accused of abuse

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Of those in diocese where priest has been accused of abuse

Bates Numbers 594-606 were removed by the Plaintiffs at the request of the Franciscans.



ST. FRANCIS OF ASSISI PARISH

October 17, 1992

Dear [REDACTED]

Yesterday Steve Barnufsky and I met with John Steiner, the Vicar General for the Spokane Diocese. Bishop Skystad joined us for part of the meeting. Fr. Steiner was fully aware of the history of the situation with [REDACTED] and Br. Berard. He had read the transcripts of the interviews that Sandra Brewer, the private investigator, had made. I told him it was our desire to respond in a caring and pastoral manner to anyone who may have been hurt emotionally because of inappropriate behavior by Br. Berard. I told him I would recommend to you and the Definitorium that we contact the people who Sandra Brewer had interviewed and offer them our support. I told him I'd further recommend that we offer to pay for psychotherapy for any of these people who request it. Then I asked Fr. Steiner for recommendations of psychotherapists in the area. In reply he recommended Lutheran Family Services as an agency in town that specializes in helping those who have been sexually abused. He suggested two people at this agency to contact, Jean McGann, a therapist who also does sex education programs for the Catholic schools, and Susan Fabricant. Fr. Steiner also suggested that we take "the high road". By that he meant that we consider making an announcement at all the Masses one Sunday addressing the fact that this has happened and that we are responding in a pastoral manner. The Bishop had joined us at this point. He concurred with Fr. Steiner on this approach and offered to come to the parish and make this announcement if we thought this would be helpful. Steve thanked the Bishop and said that he would not feel comfortable making such an announcement himself. We all recognized that we would need to consult with you, the Definitorium and our lawyer before deciding to take such a step. The Bishop had to leave then. We thanked him and he commiserated with us on the painful nature of this work. Fr. Steiner described their diocesan Sexual Abuse Committee and his work over the years in cases dealing with sexual abuse. He asked us to stay in touch with him about this situation and assured us of his support.

I tried to contact Lutheran Social Services but the therapists Fr. Steiner had recommended had left for the weekend. I will try again when I return Monday. Last night I met with the Friars and briefed them on this situation at Steve's request. I offered to be available to them privately if they wanted during the weekend. Steve has been approached by parishioners who were contacted by Sandra Brewer. Larry has been asked if he is familiar with the situation by Fr. Steiner and by the Bishop before I arrived. They all said they felt good about knowing what was going on. We discussed how they could respond if they were approached by parishioners with questions or concerns.

OFCM CONN 1
0607

Peace,
JSM

"Lord, make me an instrument of your peace."

0608
OFM CONN I

Confidential

Don Mel

Here's the letter in reply to the Bishop's request
I'll send it out along with the letters I fixed for
over the weekend after I hear back from you.

Most Rev. William S. Skylstad, D.D.
Bishop of Spokane
Post Office Box 1453
Spokane, Washington 99210

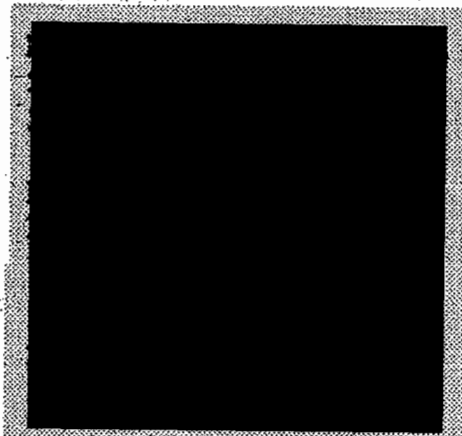
January 5, 1993

Dear Bishop Skylstad,

Thank you for your letter of December 31st. In which you requested
the addresses of the people I mentioned in my letter to you of December
11th. [REDACTED] lawyer sent us the transcripts of interviews
conducted by Ms. Sandra Brewer, a private investigator, with [REDACTED]

[REDACTED] Enclosed is a copy of the
letter we sent to each of them expressing our pastoral concern for their
welfare. As of this time we have not heard back from them.

Pursuant to your request their addresses are as follows:



I hope your Christmas was filled with peace and joy and that the new
year will be a truly happy one for you.

In Christ's Peace,

Tom West, O.F.M.
133 Golden Gate Ave.
San Francisco, Ca. 94102

O.F.M. CONN 1
0609

Bates Numbers 610-613 were removed by the Plaintiffs at the request of the Franciscans.

At my request I met with Bishop of Monterey, at 2:15PM on Tuesday, was in the Bishop's Office in the (Chancery). The meeting lasted about

I introduced myself to the Bishop in the diocese over a year and I met me. He seemed a bit unsure until I had spoken to him about me. He said all have made mistakes.

When I mentioned Utah he seemed relieved and immediately talked about his grandparents who settled in Salt Lake City and about his attendance last year at the rededication of the Cathedral of the Madeline in Salt Lake City.

I have the impression that the Bishop, like most bishops, hasn't the foggiest idea of what a Brother is. I started to talk about my abilities but we ended up saying a few words about retirement and prayer.

I asked for the Bishop's blessing and left, feeling pretty good.

Bishop Ryan was most gracious and pastoral. I felt good about our little meeting and appreciate what I perceive as his desire (and mine!) that I continue to stay out of the public eye, and that more was left unsaid to me than was said to the Provincial and Vicar.

A result of the meeting is that I no longer feel the need to "disappear" when Bishop Ryan visits St. Francis Retreat. I hope he also feels better after meeting me: monster, miscreant, fellow sinner, and just plain nice guy. We now have faces in our exchange.

Berard Connolly
June 18, 1994

c: Provincial Office

Mel - Perhaps you may want to keep this in that dark hole where my life is held - awaiting resurrection.

Bern



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

Brother Berard Connolly, OFM
St. Francis Retreat
549 Mission Vineyard Rd
Box 1070
San Juan Bautista, Ca. 95045

February 10, 1993

Dear Berard

Peace. I hope you are doing well; I'm glad to hear that you are enjoying the retreats. You're good at it, and that makes a lot of sense. I am really glad you can help at San Juan and continue to do Westfriars.

I have heard from the Institute of Living and would ask you to abide by the following regulations while living and working at San Juan Bautista:

- (1) You are to continue weekly outpatient therapy with a therapist recommended and contacted by Dr. Les Lothstein. You should make arrangements for this as soon as possible by contacting Dr. Lothstein if he has not already contacted you.
- (2) A support group is also necessary: this should be worked out between yourself and your therapist. I think this needs to be as supportive and professional as possible, at times confrontive. The members of the support group should be ones dealing with their own sexual history and in recovery from it. I think it would be best to consult with Tom West as to which type of group would be most appropriate, and I presume we will be talking about this in the future to see that we take the best possible steps now.
- (3) You must have a regular spiritual director; I would suggest meetings initially twice monthly, and then possibly monthly.
- (4) Your monitor will be Fr. Richard McManus, with whom you should meet in an official capacity at least twice monthly to discuss your progress and continued addressing of the issues.
- (5) You may have no contact with minors, either in a pastoral or personal capacity. Any departure from this should be discussed immediately with your therapist and Fr. Richard.

I would appreciate the details of your response to these requirements (numbers 1, 2, 3) as soon as possible.

OFM CONN 1
0615

Connolly, 2

Thanks for your cooperation, Berard. These restrictions are quite standard, and I know from our talks that you see them as important also. What I am happy about is your return to the province and the great contribution you have made and will continue to make.

God bless you. Please be assured of my continued support and prayers.

Fraternally



cc. Fr. Richard McManus, OFM

OFM CONN 1

0616

SAINT FRANCIS



RETREAT CENTER

May 12, 1993

Dear [REDACTED]

This is in response of an earlier letter from you asking me to do certain things for my mental and physical health. I am sorry for the delay: it did take awhile to find the "support group."

1) I have a Spiritual Director with whom I believe I am open and I celebrate the sacramental gift of reconciliation. I see him once a month. Father Bartholomew Welsh, Mission San Antonio, is my director.

2) Weekly I spend an hour with Dr. Wendy Sinclair-Brown, Ph.D. I find her professional, inciteful and caring. I am honest with her and have confidence in her abilities as a psychologist. Dr. Sinclair-Brown works with Dr. Dennis St. Peter, MD, a psychiatrist. I am seeing Dr. St. Peter once a month when he monitors the medication prescribed for me, Prozac and Valporic Acid

3) Monday evening, May 10, I attended my first SLAA support group in Pacific Grove. I told Dr. Sinclair-Brown about the meeting. She is not all that sure I need this particular group as she questions the intensity of the "addiction" in my life. I will return for several Wednesday meetings, keeping in touch with Dr. Sinclair-Brown. The SLAA group may be what I need or it may at least be a springboard to other support groups. These types of groups aren't that easy to find but now I have an in and will take it from here. I think I am looking for a "Aloness Group," if such exists!

4) My physical health is monitored by Dr. Benedict Carota, MD, Hollister.

5) I believe the greatest help is Fr. Richard McManus to whom I confide and in whom I have the greatest confidence. I am very open in sharing with him.

Thanks, [REDACTED] for your often heroic support.

OFM CONN 1

0617

Bates Numbers 618-624 were removed by the Plaintiffs at the request of the Franciscans.



From the desk of

Rev. Mel Jurisich, O.F.M.

1-25

Loren called. He is
following up on the "business
in Spokane". He has a
meeting w the people on
Feb 1st.

Oct 8, 1950
phone, 12-12:20 pm

Law - meeting of John & L. C. H., paid, no effort.

12-104 - under different place, good evidence, private place

bed, full of dirt, fresh mass, intermediate form, across narrow

but says this 10 Jan, not more than 1000 of each other, post

has been in his power

- Crawling - 2000m - beginning steps - when you, with 10002

Boecklinia *cinerea* *potatorum* f. *stria* *Willd.* The last part is written
of *Boecklinia* *cinerea* *potatorum* f. *stria* *Willd.*

he goes for and catches, unless the people come for

Animal: otter, fur, etc. exposed

See at loc 42 report to C.S. - the date reported

Examination 12 years ago

no getting of signatures

- no parties & animal litigation

— The real literature ground - starts from here.

He had two in latter summer of 1900

Debuta sed quæ peruenit hunc locum, cum transisset, hunc

sharp the way.

Low. she is warm, selfish, intelligent (they) and warm

In well judged, fairly extensive reports Mr. ...
 ...

Red Blood to go to go

② explosive substances - a) identification laws } offense violations

6) Indicates to young (the ability to catch fish)

new for 1992

③ with known injury

OFM CONN 1

0627



CONFIDENTIAL

CONFIDENTIAL

Nov. 16: spoke with Sandra Brewer, who said was working at.

Investigator - kind, friendly;

"I have been contacted to work officially."

- Abbeytown - talked to 15-20 former students & families; "a very kind man."

✓ (Sandra Brewer is working and getting ~~more~~ ^{more} work)

→ Joan Antonette ← work for her.

✓ 509-324-7000 - | N. 908 Howard
Spokane 99201.

✓ Sandy Miller - high assistant.

Sandra Brewer
Pinnacle Investigations
W. 1001 Augusta # 3
Spokane, WA

509-336-3073

(Bob Edwards)

OFM CONN 1

0629

Bates Number 630 was removed by the Plaintiffs at the request of the Franciscans.

COPY

Jan. 29, 1992

Dear Bro,

I was both relieved and sad (I cried) when I read your letter. Relieved - because I have known for sometime that there was an investigation going on - and sad to think what terrible pain you must have been going through these past months. It brings tears to my eyes everytime I think of how much you must be hurting. I wish I could be there to give you a big hug and tell you how much you mean to me.

It was sometime in August that an investigator called and informed us there had been some allegations they were looking into stemming from some 20 years ago. She called mom to get my phone number and [REDACTED] We all told her that we had known you for many years and that you had been a close friend of our family. We said that you were a very loving

So kind of like have you here with me. I laugh and also sometimes shed a tear.

Bro, you made such an impression on me! I will always remember the years we shared together. I know the good and loving person that you are.

Do you remember the card you sent me when I found out I had mono? It was a bright yellow "Peanuts" card that read - "We all need someone to kiss away our tears" - and then you added: "* but watch that mono!!!" You always had such a great way of writing and such a great sense of humor!

And then there was the letter you wrote from Sanpe De Cristo explaining Fr. [REDACTED] situation after he got married. I'm sure that was a terrible struggle for him making that decision. That didn't change our feelings for him - we love him as much as we did before.

Please, Bro, remember the good times

COPY

Dear Kathy,

I lack words to express how good it was to get a phone call from you last week. I thank you from the bottom of my heart. And because I lack words and courage, rather than call you I am writing.

As you may or may not know - I believe by now any friends I had are aware - I am not in the best of shape. Last year three women in Spokane claimed I acted improperly toward them when they were teenagers. They began an investigation into my past and have interviewed just about everyone I have known over a thirty year period. I have no idea what they will bring up since the smell of money can create memories.

In any case, Kathy, the Berard you once knew just isn't around any more. I am now a rather broken old man. A few months ago I was laid low with the shingles. Ouch! When I was diagnosed as having "clinical depression" and being suicidal, my Provincial sent me away for a month. I am more in control now but have no idea what the future will be. My nights are sleepless but at least my tears have stopped.

With whatever reputation I had destroyed, my life is pretty well over. I am paying for whatever wrongs I may have done.

I guess when all is said and done, I am just grateful that long ago I found friends like you, Jerry, Jackie and your folks. My love to them. I ask you to please be discrete with this letter, just in case somebody in Spokane still thinks well of me.

Thanks again for your call, Kathy. Please pray for me.

May 15, 1992 -

X Jackson Browne - I try to contact her, leave a message - not in.

- SD9-32C-3273

[Richard Roberts]

OFM CONN 1

0634

May 15, 1992 -

X Jordan Brown - I try to contact her; leave a message - not in.

- 509-326-3173 [Richard Roberts]

Bates Numbers 636-641 were removed by the Plaintiffs at the request of the Franciscans.

Nov 5th

Jack Ruby -

1pm

- BC - no knowledge of Higgins - not named
- entire list will be compiled & those with be furnished soon.
- Lethstein, Lake

Benson - 64 yrs old, not employable - seems himself as homeless -
no interest in past 10 yrs. If a public statement is necessary,
he should be consulted.

Psychotherapist/Patient Privilege

OFM CONN 1
0643

Psychotherapist/Patient Privilege

Sept 30 - Conversation f. Dr. Katchikstian in phone.

Phy -

- ① Merged mind integrating
on - thought intentions
not for mind getting out

- ② primary color therapy -

~~He is a Hippie~~

victim is Spahn -

- ① progress

- ② minor & clutter - positive victims
How to get information

- ③ display board -

X Progress very open, candid, great detail - cognitive/motivational -
no secretiveness -

Suicide - considered for moments

✓ he does admit them; began - hypoid rapid reaction,

Brother, relationship - born of love/fondness -

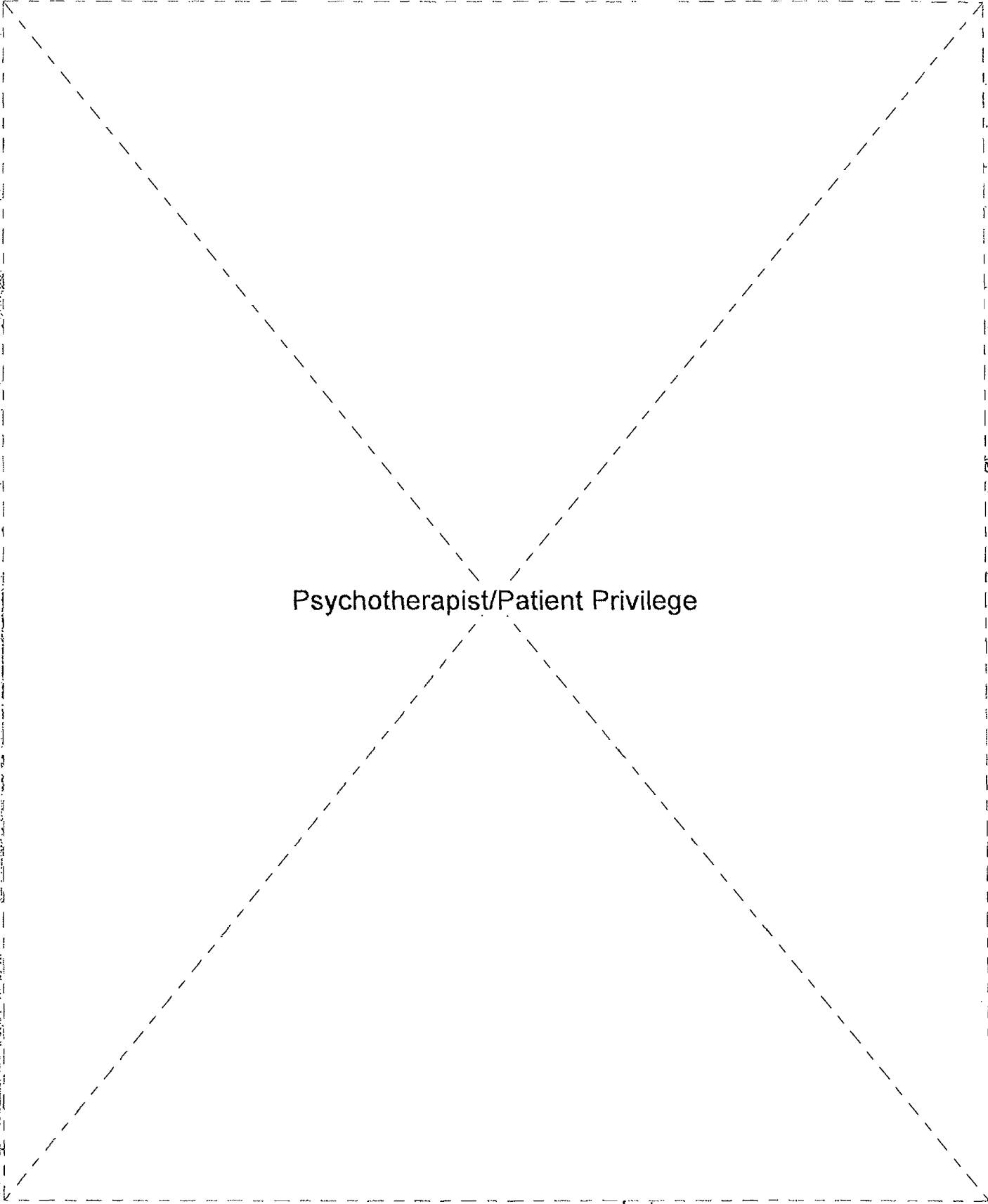
✓ not clearly a pathological; he is having disorder

✓ He will have intermittent, when needed; as his capacity, his
relationship are pathological.

✓ this hyp, entirely with conviction

X ① Spahn: convalling

X ② convalling / Spahn - Prager → with Michael Haggard



Psychotherapist/Patient Privilege

OFM CONN 1

0644

* note still possible -

~~I~~ I have in place where there is no provision.

Dr. Hobb -

I Low Blowing
← →

* He will talk to Brad & try to get information. I'll plan
on need to the practice place - Dr. Hobb will try
to get up before all the Brad & try to get up &
winter will possibly be blown up by low blowing - but
I will be in place at 5:00 PM / 5:15 PM of the day.
May, he will explain to Brad he may be there some time.
Dr. Hobb very cooperative.

December 10, 1992

Dear

I am writing to you on behalf of the Provincial Minister of the St. Barbara province of Franciscans. Your name was recently given to us by Ms. Sandra Brewer, a private investigator. During her investigation of a report of sexual misconduct by Br. Berard Connolly she informs us that she met and spoke with you.

Our province has had a sexual misconduct policy in place since 1988. We want to reach out to anyone who may have been emotionally hurt through inappropriate behavior on the part of Br. Berard. We wish to offer psychological and spiritual support to any such individuals. If you would like to talk with me in regard to any of these matters you may write or call Fr. Tom West OFM, 133 Golden Gate Ave. San Francisco, Ca. 94102, tel. (415) 863-0111. If you want to speak to a psychotherapist you may contact Mr. David Bruxer, Lutheran Social Services, South 7 Howard, Suite 22, Symons Building, Spokane, Washington, 99204, tel. (509) 747-8224.

We want to assure you of our concern for your spiritual and emotional well being.

In the Peace of Christ,

Fr. Tom West, OFM

Wednesday 12/9

Dear [REDACTED]

If this is O.K. I'll try to mail it out tomorrow or Friday. Tomorrow we have a day away at Davenport. I will leave here at 9:45 tomorrow morning after that you can see me as I leave.

OFM CONN 1
0645

From Steve

Woman says Marycliff cleric abused her

By Jeannette White
Staff writer

A Spokane woman is suing a Franciscan brother and the Roman Catholic Diocese of Spokane, claiming the cleric sexually abused her and other students at the now-defunct Marycliff High School.

Debbie Hatcher, the former student, said in the lawsuit filed in Spokane County Superior Court that she was sexually abused, harassed and intimidated by Brother Gerard Connelly at Marycliff High School, which she attended nearly 20 years ago.

Efforts to reach Hatcher and Connelly, who remains a member of the order and now lives in Tucson, Ariz., were unsuccessful Wednesday.

A former student sues the Diocese of Spokane, claiming sexual abuse.

Marycliff High School, an all-girls school, closed in 1979.

Connelly served as a teacher and Franciscan brother in charge of student affairs when Hatcher attended the school and St. Ann's parish from 1968 to 1971, says the complaint, which was filed Tuesday.

"Connelly continuously sexually abused, har-

assed and intimidated plaintiff and other students on parish premises and during parish-related activities and outings," the lawsuit states.

Parents and students complained about the teacher's behavior to his supervisors, but the complaints weren't properly investigated or reported, according to Hatcher's complaint.

"Defendants covered up and concealed Connelly's acts of sex abuse and harassment and complaints regarding his behavior," the lawsuit states.

In addition to Connelly, defendants in the suit include the Catholic Diocese of Spokane, the Catholic Bishop of Spokane, the Franciscan Friars, province of Santa Barbara, Calif., and the

Please see CHURCH SUIT, A6

CONTINUED: FROM A1

Church suit

Catholic Church.

The Most Rev. William Skylstad, bishop of the Catholic Diocese of Spokane, said he was surprised to hear about the claims.

"It came for us as kind of like a bolt out of the blue," he said.

"As far as I know, (the complaints) never reached the diocesan level. The only thing we can do is investigate the cases we are aware of."

The Rev. Larry Dunphy, of St. Ann's, said Connelly is still in the Franciscan order.

"There has been some investigation into it," Dunphy said, in reference to Hatcher's allegations. "Our superiors have talked to him about this. We are aware in general of the accusations."

Hatcher claims in the complaint that she has suffered severe physical, psychological and emotional pain as well as humiliation and anxiety as a result of the abuse.

She also attributes problems with relationships and the breakup of her marriage to the abuse, which led her to seek counseling.

Bishop Skylstad, who was not head of the diocese when the abuse allegedly occurred, said he will offer counseling to any victims.

Gennette
Wright

(800) 338-8801

Ext. ~~527~~

5427

Spokane

OEM CONN 1
0647

Baron C. Enigma cell, Dec 10, 13

① letter to [redacted] [redacted]
intipations in [redacted] [redacted] [redacted] [redacted]

References

② legal case - now being negotiated; Lopez will state

③ References

- 1) school not a threat to public
- 2) therapy workshop - group
- 3) program content of public
- 4) special placement

In Lohman, Broder, [redacted] [redacted] [redacted]

Clinical Review

B is current status - no knowledge of movement for 10 years

Lesson of liability - very multiple admissions

about 12 years for [redacted] [redacted] [redacted]

free, no sitting out. Still want part.

Intervening issues, [redacted] [redacted] [redacted]

community did provide him of [redacted] [redacted] [redacted]
from 1962.

What this can be put into place.

Based on past experience, therapeutic relationship

community group to be put in place; shall constitute a

individual work, not necessarily group work - group will

Help.

We have last placement for direct

Relay: This has been in community - Elizabeth Spencer say
B. very strong in community; up & down; in important part of
community Barbara - no residential program at Barbara
a primary community, very strong - relationship, in Spencer
feedback.

Team is very positive. The real survey paper.
The kids to minister.

Benny: future - big money - what is it? money and
for counseling, delivery work. Does he entire if
breakdown, entire of Spencer Barbara, but
Spencer story being picked up.

Spencer & what is Barbara Spencer, Barbara Spencer
Barbara Spencer. Does not feel like being in Spencer in Barbara Spencer
Counselor don't find civil society. Barbara Spencer / Barbara.
Much stronger Spencer.

Send a copy of Barbara.

Barbara

Benny:

* 15th / 16th

money -

fly

Barbara Spencer -

* Barbara Spencer

Barbara -

Barbara -

Barbara

Bates Numbers 650-651 were removed by the Plaintiffs at the request of the Franciscans.



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

FILE COPY

August 19, 1992

Joan L. Antonietti
Richter-Wimberly, P.S.
North 908 Howard Street
Post Office Box 5640
Spokane, WA 99205-0640

Dear Ms. Antonietti:

The Provincial Office is in receipt of your letter and materials in the matter relating to [REDACTED]. In view of the fact that Father [REDACTED] is away from the office for a few days and our Province attorney is away on vacation, I am requesting a 30 day extension to your deadline so that Father [REDACTED], in consultation with the Province attorney, can make an appropriate response to your letter.

Please advise me by return mail.

Sincerely,

Melvin A. Jurisich
(Rev.) Melvin A. Jurisich, OFM
Secretary of the Province

OFM CONN 1

0652



RICHTER-WIMBERLEY, P.S.

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DENNIS P. NESSON*
JOAN L. ANTONIETTI
OF COUNSEL:
PAUL H. RICHTER
WILLIAM P. WIMBERLEY (Ret.)
LESLIE L. WOODS (1916)

*ADMITTED IN IDAHO AND WASHINGTON

August 25, 1992

Rev. Melvin A. Jurisich, OFM
Franciscan Friars,
Province of Santa Barbara
1500 - 34th Avenue
Oakland, CA 94601

Re: [REDACTED]

Dear Rev. Jurisich:

Thank you for your letter of August 19th requesting a 30 day extension in which to respond to the claim of [REDACTED] This is acceptable. Please so advise Father [REDACTED] upon his return.

Very truly yours,

RICHTER-WIMBERLEY, P.S.

Joan L. Antonietti
BY: JOAN L. ANTONIETTI

PD/B

CC: [REDACTED]

ROCKFORD, WA 99030
(509) 291-4500

PARK CENTER BUILDING
NORTH 908 HOWARD STREET
POST OFFICE BOX 5640
SPOKANE, WA 99205-0640
(509) 326-7000
TELECOPIER (509) 326-5628

OFM CONN 1
0653

COEUR d'ALENE, ID 83814
(208) 667-6065

Bates Numbers 654-656 were removed by the Plaintiffs at the request of the Franciscans.



RICHTER-WIMBERLEY, P.S.

Attorneys at Law

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OF COUNSEL:
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WILLIAM F. WIMBERLEY (Ret.)
LESLIE L. WOODS (1986)

*ADMITTED IN IDAHO AND WASHINGTON

September 16, 1992

Fr. [REDACTED]

Dear Fr. [REDACTED]

I will be leaving Richter-Wimberley effective September 18, 1992 and temporarily relocating my office to the following address:

JOAN L. ANTONIETTI & ASSOCIATES
250 Lincoln Building
West 818 Riverside
Spokane, Washington 99201
Telephone: (509) 624-4291

I anticipate that as of November 1, 1992, my permanent office space will be completed. In the interim, you may contact me at the above address and telephone.

Thank you for your patience during this transition.

Very truly yours,

Joan L. Antonietti
JOAN L. ANTONIETTI

JLA/B

ROCKFORD, WA 99030
(509) 291-4500

PARK CENTER BUILDING
NORTH 908 HOWARD STREET
POST OFFICE BOX 5640
SPOKANE, WA 99205-0640
(509) 326-7000
TELECOPIER (509) 326-5628

OFM CONN 1
0657

COEUR d'ALENE, ID 83814
(208) 667-6065

January 3, 1990

Fr. [REDACTED]
[REDACTED]

Dear Fr. [REDACTED]

I am writing you this confidential letter to bring a case of sexual abuse by a member of your order, Br. Berard Connolly, to your attention. The motivation for writing this letter is to help bring about my own personal healing and closure to this issue of sexual abuse. I also want to protect others from the pain of betrayal, shame, and violation that results from sexual abuse. In light of statements he had made, and my own experience, his being around children concerns me greatly. It has been my experience coming from a dysfunctional family situation involving alcoholism and sexual abuse, that any pedophile must receive on going counseling and monitoring. Therefore, I would like a written reply confirming that Br. Berard will receive therapy as well as current monitoring of his activities or behaviors in dealing with children.

The abuse by Br. Berard has effected every aspect of my life and continues to play a role in my present views of God, the Church, love, trust, and this list is innumerable. When I was a young adolescent and all was chaotic in my family, I turned towards what appeared to be a safe and spiritual direction for protection from the sexual abuse and alcoholism at home, only to be guided step by step into further abuse. I only became more confused in my teen years by the mixed message of having Br. Berard not only as a friend, but also as a representation of the Church, providing instruction in religion courses in high school. Because of the role that he held in my life and the Church, coupled with the abuse, I felt that I had seduced God, when in reality it was Br. Berard who had neatly groomed me. The injustice of the matter was that he was the adult in the situation and exploited his position and the knowledge of my family situation to cross boundaries repetitively that should never be crossed.

I am requesting reimbursement for the counseling I have received over the last year, as well as any further counseling, with Sr. Cathy Beckley at St. Joseph Family Center in Spokane, WA.

Sincerely,
[REDACTED]

FRANCISCAN FRIARS PROVINCE OF SAINT BARBARA

[REDACTED]

January 17, 1990

Dear [REDACTED]

Peace and all good. It was with great concern that I read your letter to me of January 3, which arrived here just a few days ago.

The matters which you raise are of the utmost importance. I want to express to you my deepest concern, for yourself and for the suffering that has happened. I have dealt with some of these questions of abuse before, and I know that the agony the victim goes through can hardly be described. I am grateful that you have addressed these issues in such an honest and concerned manner in your letter.

In order that your own needs might be well met and your concerns for Brother Berard be more adequately addressed, I would appreciate some more information. I know that the matters you have touched on are of a very sensitive and personal nature, and I can assure you they will be treated with the utmost confidentiality. I have asked the chairman of our health and wellness committee, [REDACTED] O.F.M., to contact you either directly or through [REDACTED]. Father [REDACTED] is trained in psychology and has a good deal of experience. I hope that you will be able to talk with him as openly as you have written to me. Because this matter is of such concern (and it is important that it be addressed in an on-going way for all involved), it is vital that we proceed together to heal terrible hurts and make certain that such a thing does not happen again.

I hope that this suggestion is acceptable to you. Please be assured of my continued prayers and concern.

Sincerely

[REDACTED]

OFM CONN 1

0659

1500 thirty-fourth Avenue
Oakland CA 94601

cc. [REDACTED]

Provincial Minister (415) 536-3722
Provincial Office (415) 536-1766

Bates Numbers 660-667 were removed by the Plaintiffs at the request of the Franciscans.

Bates Numbers 668-669 were removed by the Plaintiffs at the request of the Franciscans.

Bates Numbers 670-672 were removed by the Plaintiffs at the request of the Franciscans.

SAINT ANTHONY SHRINE

FRANCISCAN FRIARS

100 ARCH STREET, BOSTON, MASS. 02107

*Barbara
Stations*

Dear [REDACTED]

I cannot begin to thank you
for taking time from your immense
schedule to come to Hartford.

When my fellow patients asked
about you + about our meeting, my
first response was a phrase "that's
because I belong to the Province
of St. Barbara!"

I might even say we were "temporarily
lost" on our way to the airport so
I could spend a little more time w/
you.

Thanks so much!

[Signature]

OEM CONN 1

0673



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

April 6, 1993

Berard Connolly, OFM
PO Box 1070
San Juan Bautista, CA 95045

Dear Berard,

It has been difficult for me to respond to your attorney's request for you to bring "anything legal" for your meeting with him.

I am sending you the letter that the Provincial received from [REDACTED] attorney informing him of a possible lawsuit and asking for a financial settlement. I am also sending a copy of the investigation report prepared by Pinnacle Investigations, Inc. This is a transcript of the investigator's interviews of the alleged victims. I thought that these would be helpful to the attorney since they would be the basis of the lawsuit.

Please inform Mr. Etter that the Province more specific information as is requested.

I hope that your visit goes well.

Faternally,

Mel Jurisich, OFM
Secretary of the Province

OEM CONN 1
0674



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

February 10, 1993

Dear Berard

Peace and good. Enclosed please find the official letter which details what we talked about in Hartford and what I have received from the Institute. Let me add a more personal note.

First, I want to welcome you back heartily to the province. These have been difficult days for the past three years, but I for one am happy you have stuck it out and persevered. It is not only an example to me but a real gift--you see, where would I be without faithful friends, ones who accept my own limitations and are willing even to be hurt by me at times but to still accept me. I thank you for that. And I want to say very clearly, that trying to address your situation has not been burdensome for me--you are not a burden, nor a mistake. You are a wonderful friar, one who contributes immensely to the province and the friars. This is how I feel--and I say this both as friend and as provincial.

I received your sample letter for Westfriars. As far as I am concerned, you may print what you like--it is your letter. If I may offer some personal counsel, I would think it better to talk it over with your therapist and also with Richard. They might have some good advice as to how to approach it and what exactly is best to say. From my perspective, I think you should emphasize that although difficult at first, you found the program beneficial, that you are happy to be back here (which I think you are), that you offer to help anyone who would like to speak with you about the experience, that you hope we can all face ourselves honestly--that is, turn it outward. The "stigma" is not a disease, but a gift to the community, and God has made this now part of yourself precisely for others. I think you should be proud of what you have done to handle all of this. I am.

Thanks for the invite to write on Clare. I think I will take you up on this--I will be giving a retreat to the Clare in June in SB, and plan to write up some of the conferences. Also, may I suggest that we try to dig up several conferences by David Temple and in honor of the centenary publish one with each edition of Westfriars. Dave left over fifteen feet of talks, many of them on Clare. Some are notes, but they are quite full. I can try to locate some when I am in SB; or perhaps you can go down there and look with Tim's help. It is just an idea.

OFM CONN I
0675

Dear [REDACTED]

Hope the Ministers' meeting went well!

In the past months I have received a few supportive letters and phone calls from friends of my past, like thirty years ago. I treasure each of them even though I destroyed the letters. However, when Kathy wrote me yesterday I thought I would send a copy on to you. Will you please add it to my file.

Why? Just so that whoever reviews my life will read that at one time I was a rather nice fellow, who was loving, and who even did some good in this world.

Desert mornings are cold but the day quickly warms up. We look forward to seeing the novices and, hopefully, yourself. Mission conservation goes well. It is especially good seeing the Tohono O'odham working along with the "Italians."

Peace!

Deney

OFM CONN 1

0676

[REDACTED]

[REDACTED]

May 16, 1992

The following is a summary of my interaction with [REDACTED]
[REDACTED] regarding Berard Connolly.

I received a copy of Fr. Chinnici's letter (dated January 17, 1990) to [REDACTED] and was asked to meet with her regarding her concerns.

On February 1, 1990, at 1:00pm, I met with [REDACTED] and Sister Cathy Beckley, M.S.W. [REDACTED] at [REDACTED]

[REDACTED] With [REDACTED] permission Sister Cathy audiotaped the session; and with [REDACTED] permission, I later had the audiotape transcribed. Later I mailed [REDACTED] a copy of the transcript. I also mailed her the original audiotape.

The transcript indicates the content of the session. (A copy of the transcript was sent to the Provincial Office) Some of the concerns that [REDACTED] and Sr. Cathy, who facilitated the meeting, brought up are the following (these are not quotations but the tenor of basic concerns):

1) Are the Franciscans willing to pay for [REDACTED] counseling?

2) Has Berard Connolly, received therapy? Is there ongoing monitoring going on. What kind of monitoring? Has anyone else ever come forward to accuse him? If so why hasn't there been some legal action? Has this issue of sexual abuse regarding Berard Connolly ever been addressed, and if it has, then why has he been allowed to just go on? Have the Franciscans simply protected him?

3) Down the road, Berard should claim responsibility as the perpetrator, to take responsibility for this situation for [REDACTED] sake. That is, [REDACTED] and her therapist would like to know that Berard can own the abuse to [REDACTED] They would like to meet with Berard. In the future, then, (after Berard has had some counseling) a meeting could be held in Spokane with [REDACTED] Sr. Cathy Beckley, Berard Connolly, ofm and [REDACTED]

5) In the future, Sr. Cathy would like to be in contact with Berard's therapist.

OFM CONN 1

0677

██████████ the Provincial Minister, met with Berard Connolly at the Franciscan Renewal Center in Arizona and addressed the situation with Berard. ██████████ was later brought into the meeting. ██████████ proceeded with the plan to bring Berard to an appropriate psychotherapist for diagnostic testing and assessment. A report with recommendations was to be sent directly from the therapist to ██████████

██████████ sought a reputable therapist in Arizona with expertise in counseling in the area of child sexual abuse. Dr. Gary Decker, a psychologist and a psychotherapy specialist in the area of child abuse was chosen (initially recommended, I believe, by the Diocese of Phoenix). Dr. Gary Decker, Ph.D., 10640 N 28th Drive, Suite C205, Phoenix Arizona 85029. Phone: (602) 375-9367.

██████████ accompanied Berard to the first session with Dr. Decker (March 19th, 1990). ██████████ presented the basic complaints made by ██████████ and requested diagnostic testing and assessment for Berard and a report with recommendations to be sent to Fr. ██████████. Berard began counseling with Dr. Decker and continues to be in counseling with him to this time (May 14, 1992).

██████████ continued correspondence with ██████████. The following are some examples of follow-up correspondence:

On March 5, 1992, I mailed the transcript of the audiotape to ██████████ along with a letter. In the letter A) I indicated that I hoped to reach her by phone before she received the transcript to share with her the current process (how we were proceeding with Berard Connolly); B) I encouraged her to read the transcript when she could have support from Sr. Cathy. (I was concerned that if she read the transcript by herself she might experience disturbing feelings with no one to be supportive to her.); C) I invited her to call me collect anytime or to send me a phone bill. I gave her my itinerary and phone numbers.

On March 15, 1992, I phoned ██████████. In this call she clarified that the incidents that she was concerned about with Berard took place between 1968 and 1973.

In other phone correspondence with [REDACTED] Berard, and attorney Richard Roberts, in my best memory, the following information was conveyed (I am not sure how many calls this entailed or the exact order or dates in which the matters were conveyed):

1) I asked [REDACTED] if she would be willing to give me the cost of her counseling. This would include what she had spent and what she felt she would still need to spend in the future. Would she accept a discerned amount from the Franciscans in one payment? I did not expect an answer at that moment.

2) I asked [REDACTED] about setting a date for the requested meeting with herself, Sr. Cathy, Berard Connolly and me. [REDACTED] indicated that Sr. Cathy was leaving Spokane soon. [REDACTED] also suggested that a letter from Berard would be sufficient, that it would also save the expense of travel. This letter should include his admission that this was a wrongful act and that it will not occur again (with other children), that he accept responsibility for his actions; that he state the fact that the role that he played with her life was morally wrong; that he holds some responsibility in the problems and issues that she is facing in life.

[REDACTED] phoned Berard. He indicated that he was quite willing to come to Spokane for the meeting unless [REDACTED] had a clear preference not to have the meeting or if it would be harmful to her. He indicated that he really did not want to hurt [REDACTED] any more than she had been hurt. Berard admitted his wrongness.

[REDACTED] called [REDACTED] to say that Berard was willing to come to Spokane to meet with her. Would it be possible to have the meeting before Sr. Cathy left Spokane. [REDACTED] suggested June 29, 1990 as a possible date if [REDACTED] could arrange it with Sr. Cathy.

On June 14th or 15th, 1990, Richard Roberts, an attorney in Spokane, phoned me [REDACTED] to let me know that he was helping [REDACTED] understand her rights regarding her concerns with Berard. He told me that he had told [REDACTED] not to communicate further with me. He mentioned that [REDACTED] felt bad about not answering my messages left on her phone recorder, so he was calling me so that I would understand why she would not be communicating with me. He was very courteous.

I asked Richard Roberts if he could be clearer as to what his procedure would be. He informed me that he would contact me through the mail so that there would be a record of his transaction. I indicated that he could also communicate with [REDACTED], the Provincial of the Province. Richard Roberts has never communicated with me in writing or by phone since that time. His phone number is (509) 838-0125).

[REDACTED] and I have not communicated since that time. No meeting with Sr. Cathy, Debbi, Berard and myself took place. [REDACTED] did not suggest a total amount for her counseling. To my knowledge, no money from the Province has been sent to [REDACTED] for counseling.

[REDACTED]

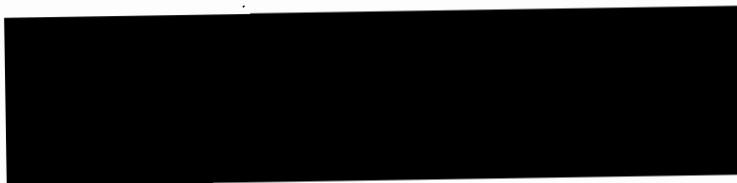


BISHOP

DIOCESE OF SPOKANE

POST OFFICE BOX 1453
SPOKANE, WASHINGTON 99210-1453
WEST 1023 RIVERSIDE AVENUE

October 16, 1992



Dear [REDACTED]

Thank you very much for your long letter with regard to Berard Connolly.

I really appreciate very much the information which you shared. We shall keep in touch.

Unfortunately, I am not going to be at the NABRS meeting this year because I am giving a retreat to the Chicago priests during that time. However, if there is any need to be in further contact, please don't hesitate to get in touch with me.

May God bless you and all of your good work.

Sincerely your brother in Christ,

William S. Skylstad
Bishop of Spokane

:sc

OFM CONN 1

0681



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (510)536-3722 Fax (510)536-3970

Most Rev. William Skylstad, DD
Bishop of Spokane
1023 W. Riverside Ave.
POB 1453
Spokane, Washington 99120

Dear Bishop Skylstad

Peace and good. I hope this letter finds you well.

Unfortunately, with this letter I have some bad news to communicate. One of our friars, Berard Connolly, a professed brother, has been accused of sexual molestation of one [REDACTED]

When this first came to our attention, we began to work with the victim through a counsellor. Brother Berard has admitted to the incidents. Apparently, [REDACTED] approached an attorney who then hired a private investigator. The report enclosed is that of the investigator. This is the first time I have heard of such extensive activity on the part of Brother Berard and appropriate action is being taken with him. We also intend to approach other possible victims in a pastoral way.

At the present time, only the province is involved. We have notified our insurance agents, and our attorney is in contact with Joan L. Antonietti, the attorney for [REDACTED]

Should your office wish to contact our attorney his address is: Brian P. Brosnahan, Heller, Ehrman, White & McAuliffe, 333 Bush St., San Francisco, California 94104-2878, 415-772-6000.

I relay this information to you to apprise you of the situation in case the diocese becomes a litigant in the future. At the moment that does not appear to be happening.

I am terribly sorry to bring this to your attention. I assure you of our fullest cooperation and continued desire to serve the Church in the best possible way.

Sincerely in Christ

[REDACTED]

OFM CONN 1

0682

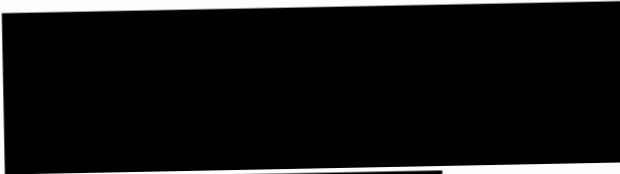


THE CHANCERY

DIOCESE OF SPOKANE

POST OFFICE BOX 1453
SPOKANE, WASHINGTON 99210-1453
WEST 1023 RIVERSIDE AVENUE

September 18, 1992



Dear [REDACTED]

Bishop Skylstad asked me to thank you for sharing with him the sad information of your recent communication. While he is out of town for most of the next fifteen days, he wanted me to assure you of his continued support and prayers as you work through this situation.

The Diocese is very grateful that you made us aware of this situation. We are able to be prepared to respond positively if the situation should become more public.

If there is anything which I can do to assist you, please feel free to contact me at the Catholic Pastoral Center (509-456-7100) or at my home phone (509-326-8748).

I pray that the Lord guides you in this difficult situation.

Sincerely yours in Christ,

Father John M. Steiner
Vicar General

OFM CONN 1
0683



Province of St. Barbara

FRANCISCAN FRIARS

1500 34th Avenue Oakland California 94601 (415)536-3722 Fax (415)536-3970

Nov. 15

I spoke with Sandra Brewer, who said she was working for Attorney Joan Antonetti of N. 908 Howard, Spokane, 99201.

Investigator is from Pinnacle Investigations, W 1001 Augusta # 3, Spokane, Washington, 509-326-3073.

She asked me if I was aware of allegations made against Brother Berard Connolly in late 1960's of sexual misconduct. I said it would be inappropriate for me to comment until contacted by someone in official capacity; she then asked what this would mean, I said, "I don't know."

She said she had been hired by families in Spokane with whom Berard had worked; talked to 15-20 former students and families; they said he was "a very kind man." But there are these allegations. Main concern of people is that he is getting counselling, not working around youth, etc.

The legal assistant of Joan Antonetti is Cindy Miller. Antonetti's number is 509-326-7000.

I think Brian Brosnahan should contact Antonetti to find out what is happening. I have furnished no information, confirming nor denying anything.

gnc

OEM CONN 1

0684

FRANCISCAN FRIARS PROVINCE OF SAINT BARBARA

[REDACTED]

January 17, 1990

Dear [REDACTED]

Peace and all good. It was with great concern that I read your letter to me of January 3, which arrived here just a few days ago.

The matters which you raise are of the utmost importance. I want to express to you my deepest concern, for yourself and for the suffering that has happened. I have dealt with some of these questions of abuse before, and I know that the agony the victim goes through can hardly be described. I am grateful that you have addressed these issues in such an honest and concerned manner in your letter.

In order that your own needs might be well met and your concerns for Brother Bernard be more adequately addressed, I would appreciate some more information. I know that the matters you have touched on are of a very sensitive and personal nature, and I can assure you they will be treated with the utmost confidentiality. I have asked the chairman of our health and wellness committee, [REDACTED], to contact you either directly or through St. Cathy Beckley at the Family Center in Spokane. [REDACTED] is trained in psychology and has a good deal of experience. I hope that you will be able to talk with him as openly as you have written to me. Because this matter is of such concern (and it is important that it be addressed in an on-going way for all involved), it is vital that we proceed together to heal terrible hurts and make certain that such a thing does not happen again.

I hope that this suggestion is acceptable to you. Please be assured of my continued prayers and concern.

Sincerely

[REDACTED]

OFM CONN 1

0685

1500 Third - Fourth Avenue
Oakland CA 94601

cc. [REDACTED]

Provincial Minister (415) 536-3722
Provincial Office (415) 536-1266

1 SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

2 [REDACTED] single woman,)

3 [REDACTED])
4 Plaintiff,)

5 vs.)

6 BROTHER BERARD CONNELLY, a)
7 Franciscan Brother; THE CATHOLIC)
8 DIOCESE OF SPOKANE; THE CATHOLIC)
9 BISHOP OF SPOKANE; THE FRANCISCAN)
10 FRIARS PROVINCE OF SAINT BARBARA;)
11 AND THE ROMAN CATHOLIC CHURCH OF)
12 THE PAPACY,)

13 Defendants.)

14 PLAINIFF'S FIRST SET OF
15 INTERROGATORIES AND
16 REQUESTS FOR PRODUCTION
17 OF DOCUMENTS PROPOUNDED
18 TO DEFENDANT THE
19 FRANCISCAN FRIARS
20 PROVINCE OF SAINT BARBARA

21 TO: DEFENDANT THE FRANCISCAN FRIARS PROVINCE OF SAINT BARBARA
22 and your attorney, C. Eugene Huppin

23 Pursuant to Rules 26, 33 and 34 of the Civil Rules for
24 Superior Court of the State of Washington, the Plaintiff
25 submits the following Interrogatories and Requests for
26 Production of Documents to be answered separately and
27 completely under oath within thirty (30) days of the service
28 thereof upon you. In answering, you are required to furnish
29 such information as is available to you, not merely the
30 information you know of your personal knowledge. This is
31 intended to include any information in the possession of your
32 agents, attorneys, or any investigators for you.

33 COURT RULES REQUIRE THAT THE ANSWERS BE PRECEDED BY THE
34 INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS AND
35 THUS EXTRA COPIES OF THESE INTERROGATORIES AND REQUEST FOR
36 PRODUCTION OF DOCUMENTS ARE BEING SERVED UPON YOU IN ORDER TO
37 EXPEDITE THE ANSWERING THEREOF. YOU MAY TYPE YOUR ANSWERS
38 IMMEDIATELY AFTER THE INTERROGATORIES AND REQUEST FOR
39 PRODUCTION OF DOCUMENTS AND THUS AVOID RETYPING THE
40 INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS.

41 THESE INTERROGATORIES AND REQUEST FOR PRODUCTION OF
42 DOCUMENTS ARE CONTINUING IN NATURE, AND THE PLAINTIFF HEREBY
43 DEMANDS THAT ANY ADDITIONAL INFORMATION COMING INTO YOUR
44 POSSESSION OR YOUR COUNSEL OR AGENTS POSSESSION THAT WOULD
45 CHANGE OR ADD TO YOUR ANSWERS IN ANY WAY BE PROMPTLY FURNISHED
46 TO THE UNDERSIGNED, IN ANY EVENT, NO LATER THAN THIRTY (30)
47 DAYS AFTER RECEIPT OF SUCH INFORMATION.

INTERROGATORIES AND REQUESTS - 1

OFM CONN 1
0686

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210

Moreover, pursuant to Rules 26 and 34 of the Civil Rules for Superior Court of the State of Washington, the Plaintiff herein requests that you produce and permit Plaintiff to copy documents described below which are now in your or your attorneys or agents possession, custody and/or control.

Unless otherwise mutually agreed to, inspection and/or copying shall take place at the offices of the Plaintiff's attorney, Joan L. Antonietti, P.S., W. 111 Cataldo, Suite 210, Spokane, WA 99201, during regular business hours until completed, not later than thirty (30) days from the date of service of these Requests. Visual inspection shall be made by the Plaintiff's attorneys, and copying shall be done by photocopying or other appropriate means.

DEFINITIONS

As used in these interrogatories, the following terms shall have the following meanings:

1. The term "you" means yourself and any of your agents, employees, representatives, predecessors and successors in interest, any and all other persons or entities acting on your behalf.

2. The term "and" and "or" shall, unless the context clearly indicates otherwise, embrace both the conjunctive and disjunctive.

3. In construing these interrogatories, the singular of each term shall include the plural, and the plural shall include the singular, and a masculine, feminine or neuter pronoun shall not exclude the other genders.

4. The term "document" means all written, graphic, or printed matter of any kind, however produced or reproduced, including all originals, drafts, working papers, and non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, and electronic, mechanical or electrical records or representations of any kind, transacted through detection devices into reasonably useable form. The term "document" includes, but is not limited to, papers, books, patents, book entries, accounts, letters, photographs, objects, tangible things, correspondence, telegrams, cables, telexes or telefax messages, memoranda, notes, data, notation, work papers, inter-office communications, inter-departmental communications, minutes, reports and records of any communications (including telephone or other conversations, interviews, conferences, or committee or other meetings),

1 affidavits, statements, summaries, opinions, reports, studies,
2 analyses, formulas, plans, specifications, contracts,
3 licenses, agreements, offers, acceptances, journals, books or
4 other records of accounts, summaries of accounts, bills,
5 receipts, balance sheets, income statements, advertisements,
6 desk calendars, appointment books, diaries, lists,
7 tabulations, charts, graphs, maps, surveys, sound recordings,
8 computer records or impressions, microfilm, and all other
9 records kept by electronic, photographic, or mechanical means,
10 and things similar to any of the foregoing, however
11 denominated.

12 5. The term "all documents" shall mean every document,
13 as defined above, whether an original or a copy, which is or
14 has been in your possession, custody, or control.

15 6. The term "person" includes any natural person, firm,
16 association, partnership and joint venture corporation, and
17 any other form of legal entity, and any city, state or federal
18 governmental entity or any agency, board, or court thereof.

19 7. The term "identify" means, with respect to a
20 document, to state its title, identifying number, type (e.g.,
21 letter, inter-office memorandum, etc.), date, author,
22 addressee, signatories, recipients, present location,
23 custodian, subject matter, and any other identifying
24 characteristics.

25 8. The term "identify" means, with respect to a person,
to state his or her full name, present or last known residence
address and phone number; present or last known business
address and phone number; present employer, job title,
responsibilities and duties; prior experiences and background,
including tenure in each title or position held to date; and
previous job title, responsibilities, and duties; and employer
and business address at the date of the event or transaction
referred to.

9. The term "identify" means, with respect to an oral
communication, to state the date of oral communication and the
place where it occurred, the persons present during such
communication, the person to whom such oral communication was
directed, the person who made such communication, and the
means by which such communication was transmitted (i.e., in
person, by recorded message, or by telephone).

10. The term "relate," "relating to," or "related to"
means directly or indirectly referring to, pertaining to,
discussing, describing, commenting on, constituting,
evidencing, referencing, comprising, or reflecting upon the
stated subject, in whole or in part.

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INSTRUCTIONS

1. These interrogatories and requests are intended to be continuing in nature, and any information which may be discovered by you subsequent to the service and filing of your answers and responses should be brought to the attention of the inquiring party, through supplemental answers and responses, within a reasonable time following discovery (30 days). If such responses are not furnished, this party will move at the time of trial to exclude from evidence any requested information not so furnished.

2. Each interrogatory and each subparagraph of each interrogatory is to be fully and separately answered, in writing, and under oath. Before each response is given, the paragraph and subparagraph number of the interrogatory to which the answer or response relates is to be set forth.

3. The answer to each interrogatory and response to each request for production of documents shall include such knowledge as is within your custody, possession or control or readily obtained by you including knowledge within the custody, possession or control of your attorneys, agents, and other representatives.

4. If you refuse to answer any interrogatory or request for production of documents, in whole or in part, identify the basis of your refusal to answer, including any claim of privilege, in sufficient detail so as to permit the Court to adjudicate the validity of your refusal to answer.

5. With respect to any interrogatory or request for production of documents contained herein, if you are able to provide some, but not all, of the information requested, provide such information as you can and specifically identify each item as to which you do not have the sufficient information to fully respond.

6. We have attempted to provide you with sufficient space under each interrogatory and request for production to state your answer or response. If the space provided is insufficient, please continue your answer or response on a separate sheet, and attach that sheet to the copies of this pleading which you return to us.


1
2 DATED this 10 day of December, 1993.

3 JOAN L. ANTONIETTI, P.S.

4 Joan L. Antonietti
5 JOAN L. ANTONIETTI
6 WSBA NO. 13795
7 Attorney for Plaintiff

8 INTERROGATORY NO. 1: Identify each and every person who
9 provided any information used in responding to these
10 Interrogatories and Requests for Production of Documents,
11 listing with respect to each the Interrogatory or Request for
12 Production for which the information was provided.

13 ANSWER:

14 
15 Brother Berard Connolly was consulted for Interrogatory
16 #3.

17
18 INTERROGATORY NO. 2: Please identify person(s)
19 designated as custodian(s) of any personnel records, other
20 documents and/or files regarding brother Berard Connolly for
21 the The Franciscan Friars, Province of Saint Barbara, by
22 stating as follows:

- 23 (a) Their name and title;
24 (b) Business address; and
25 (c) Business and home telephone number.

INTERROGATORIES AND REQUESTS - 5

OEM CONN 1
0690

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Sooke, WA 99201

ANSWER:



Fr. Mel Jurisich, OFM Provincial Secretary
1500 34th Avenue
Oakland, CA 94601
Business # 510 536-3722 Home # 510 540-6834

REQUEST FOR PRODUCTION NO. 1: Please produce all
personnel records, other documents and/or files regarding or
which in any manner relate to Brother Berard Connelly.

RESPONSE:

Brother Berard Connelly's personnel records are being
provided.

INTERROGATORY NO. 3: Please identify any persons who
acted in a supervisory capacity over Brother Berard Connelly
for the The Franciscan Friars, Province of Saint Barbara by
stating their:

- (a) Name, address and telephone number;
- (b) Title at present and while they supervised Brother
Connelly; and
- (c) Dates during which they supervised Brother Berard
Connelly.

1 ANSWER:

2 Please see attached sheets.
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8 INTERROGATORY NO. 4: Please provide a brief description
9 of Brother Berard Connolly's duties and responsibilities while
10 he was working in Spokane, Washington and set forth relevant
11 dates, if his duties changed during that period of time.
12

13 ANSWER:

14 Brother Berard Connolly worked internally as cook,
15 housekeeper, and porter, and conducted some
16 activities involved with religious education.
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1 INTERROGATORY NO. 5 : Has Brother Berard Connelly ever
2 been requested, by The Franciscan Friars, Province of Saint
3 Barbara, to undergo counseling, evaluation or treatment? If
4 your answer is in the affirmative, please state:

5 (a) The name, address and phone number of each
6 counselor, evaluator, psychologist, or psychiatrist who
7 has seen Brother Berard Connelly pursuant to your
8 request;

9 (b) The reasons why you requested Brother Berard
10 Connelly to undergo counseling, evaluation or treatment;
11 and

12 (c) The dates upon which you requested Brother Berard
13 Connelly to undergo counseling, evaluation or treatment.

14 ANSWER:

15 Yes, he was.

16 Please see attached sheet for the above information.
17
18
19
20

21 INTERROGATORY NO. 6: Have there been any complaints,
22 whether formal or informal, in any format including, but not
23 limited to letter, memo, verbal complaint or legal documents,
24 lodged or filed against Brother Berard Connelly for any reason
25 whatsoever?

ANSWER:

There have been no complaints lodged or filed against
Brother Berard Connolly except the one filed by

INTERROGATORY NO. 7: If your answer to the immediately
preceding interrogatory is in the affirmative, please state:

- (a) The nature of the complaint(s);
- (b) The date on which the complaint was made or filed;
- (c) Identify all persons who have knowledge of the
complaint by stating their name, address and phone
number; and
- (d) How the complaint was resolved if at all.

ANSWER:

See response to # 6.

1 REQUEST FOR PRODUCTION NO. 2: Please provide copies of
2 all documents which in any manner relate to any complaint
3 identified in response to the preceding interrogatory.

4 RESPONSE:

5 See response to Request for Production No. 1.
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11 INTERROGATORY NO. 8: Have there been any complaints,
12 whether formal or informal, in any format including but not
13 limited to letter, memo, verbal complaint or legal documents,
14 lodged or filed against any Catholic priest or brother who
15 resided or worked in Spokane, Washington either prior to or
16 during the time Brother Berard Connelly worked in Spokane,
17 Washington which were based on inappropriate conduct.
18

19 ANSWER:

20 Not to our knowledge, but we have done no investigation
21 into this matter.
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1
2 INTERROGATORY NO. 9: If your answer to the immediately
3 preceding interrogatory is in the affirmative, please state:

- 4 (a) The nature of the complaint(s);
5 (b) The date on which the complaint was made or filed;
6 (c) Identify all persons who have knowledge of the
7 complaint by stating their name, address and phone
8 number; and
9 (d) How the complaint was resolved, if at all.

10 ANSWER:

11 See response to #8.
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18 REQUEST FOR PRODUCTION NO. 3: Please provide copies of
19 all documents which in any manner relate to any complaint
20 identified in response to the preceding interrogatory.

21 RESPONSE:

22 See response to #8.
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INTERROGATORIES AND REQUESTS - 11

OFM CONN 1
0696

JOAN L. Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1
2 INTERROGATORY NO. 10: If you currently are or have been
3 a party to any litigation other than this lawsuit arising out
4 of the sexual abuse of the complaining party; state for each:

5 (a) The nature of the suit;

6 (b) The date, court, place and cause number for each
7 prior action;

8 (c) The full names and last known addresses of all
9 parties of each prior suit and their attorneys;

10 (d) The present status of each suit; and

11 (e) If concluded, the result or disposition of each
12 suit.

13 ANSWER:

14 This is irrelevant.
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19 INTERROGATORY NO. 11: Please state whether or not the
20 The Franciscan Friars, Province of Saint Barbara maintained
21 any procedures or policies regarding supervision of parish
22 students and/or children while on or at parish grounds,
23 schools, functions and/or activities during the period of time
24 that Brother Berard Connelly was working in Spokane County,
25 Washington.

ANSWER:

1 Brother Berard Connolly was governed by the Code of
2 Canon Law, the Rule and Constitutions of the Order of
3 Friars Minor.

4 It was the policy of the Franciscan Friars of the St.
5 Barbara Province that its members observe applicable
6 policies and procedures, if any, of the particular
7 diocese or parish in which they were working.

8
9
10 INTERROGATORY NO. 12: If your answer to the immediately
11 preceding interrogatory is in the affirmative, please state:

12 (a) The date the policy was implemented;

13 (b) Whether or not any training was provided regarding
14 said policy;

15 (c) Whether or not the policy or procedure provides any
16 direction to persons who witness inappropriate conduct
17 directed toward parish students and/or children; and

18 (d) To whom the policy was disseminated.

19 ANSWER:

20 Objection: see the Diocese's objection to the
21 comparable question.

1 REQUEST FOR PRODUCTION NO. 4: Please produce copies of
2 any policy identified in response to the immediately preceding
3 interrogatory.

4 RESPONSE:

5 These documents are publicly available.
6
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10 INTERROGATORY NO. 13: Please state whether or not the
11 The Franciscan Friars, Province of Saint Barbara maintained
12 any policies or procedures regarding inappropriate sexual
13 conduct on the part of priests or brothers while Brother
14 Berard Connelly was working in Spokane, Washington.

15 ANSWER:

16 See response to Interrogatory # 11.
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1 INTERROGATORY NO. 14: If your answer to the immediately
2 preceding interrogatory is in the affirmative, please state:

3 (a) The date the policy was implemented;

4 (b) Whether or not any training was provided regarding
5 said policy;

6 (c) Whether or not the policy or procedure provides any
7 direction to persons who witness inappropriate conduct;
8 and

9 (d) To whom the policy was disseminated.

10 ANSWER:

11 Objection: see the Diocese's objection to comparable
12 question.
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18 REQUEST FOR PRODUCTION NO. 5: Please produce copies of
19 any policy identified in response to the immediately preceding
20 interrogatory.

21 RESPONSE:

22 These documents are publicly available.
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25

1 INTERROGATORY NO. 15: Identify all persons who are
2 witnesses to any of the incidents complained of by Plaintiff
3 by setting forth their:

- 4 (a) Name, address, and telephone number; and
5 (b) The substance of what they witnessed.

6 ANSWER:
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14 INTERROGATORY NO. 16: Identify all witnesses you intend
15 to call at trial by setting forth their:

- 16 (a) Name, address, and telephone number; and
17 (b) A summary of their expected testimony.

18 ANSWER:
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1 INTERROGATORY NO. 17: Identify all expert witnesses you
2 intend to call at trial by setting forth their:

- 3 (a) Name, address, and telephone number and their title;
4 (b) The subject matter on which the expert is expected
5 to testify;
6 (c) A summary of their expected testimony; and
7 (d) The basis for their expected testimony.

8 ANSWER:

9 ~~Brother Berard Connolly left Spokane, Washington, for~~
10 ~~sabbatical in which he took updating theological courses~~
11 ~~and after that was assigned to Provo, Utah.~~

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15
16 INTERROGATORY NO. 18: Please state the reasons why
17 Brother Berard Connolly ceased working in Spokane, Washington.

18 ANSWER:

19 Brother Berard Connolly left Spokane, Washington, for
20 a sabbatical in which he took updating theological
21 courses and after that was assigned to Provo, Utah.
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INTERROGATORIES AND REQUESTS - 17

OFM CONN 1
0702

Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane, WA 99201

1 STATE OF WASHINGTON)
2 County of Spokane) ss.

3 [REDACTED] being first duly sworn on oath,
4 deposed and states.

5 I am the Provincial of The Franciscan Friars,
6 Province of Saint Barbara, and I am authorized to execute
7 these Interrogatories and Requests for Production of Documents
8 on behalf of The Franciscan Friars, Province of Saint Barbara.

9 I have read the answers to the foregoing Interrogatories
10 and Requests for Production of Documents, know the contents
11 thereof, and state that they are true and correct to the best
12 of my knowledge.

13 SUBSCRIBED AND SWORN TO before me this 27 day of
14 January, 1994.



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Rose Rosinski
NOTARY PUBLIC in and for
the State of California,
residing at Hayward.
My commission expires:
May 16, 1997

The undersigned attorney for the party responding to the
above discovery matters signs this response in compliance
with Rule 26(g) of the Superior Court Civil Rules.

DATED this ____ day of _____, 1994.

C. Eugene Huppin
WSBA # _____

INTERROGATORIES AND REQUESTS - 18

OFM CONN 1
0703

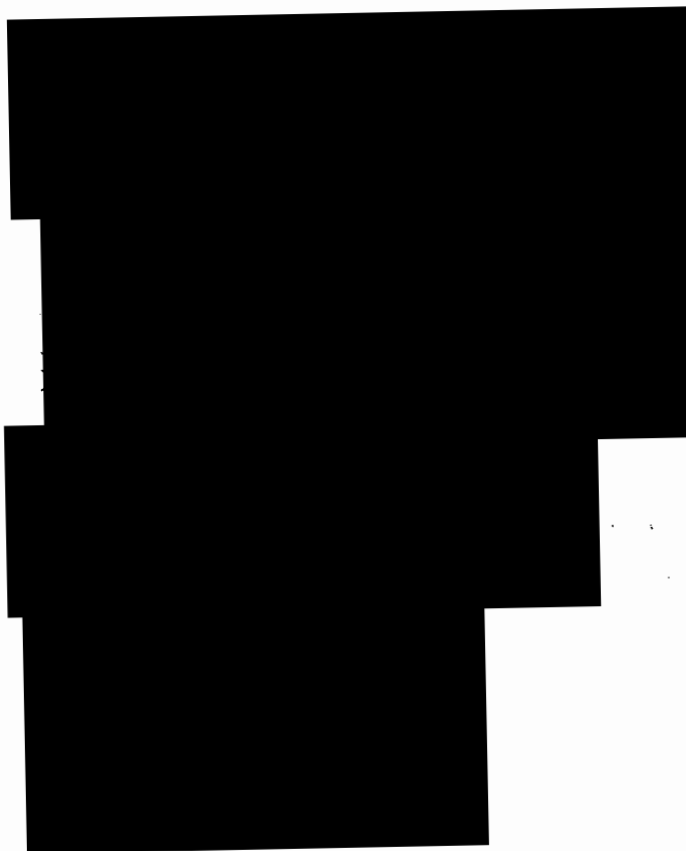
JOAN L. Antonietti P.S.
ATTORNEY AT LAW
111 West Cataldo, Suite 210
Spokane WA 99201

Response to Interrogatory 3#:

Provincial Ministers (Superiors) from 1945 to the present

Rev. Gregory Wooler, OFM	1945 - 49	(deceased)
Rev. Augustine Hobrecht, OFM	1949 - 52	(deceased)
Rev. David Temple, OFM	1952 - 61	(deceased)

Rev. Terence Cronin, OFM 1961 - 67
133 Golden Gate Ave.
San Francisco, CA 94102
415 863-0111
Present title: Associate Pastor



Local Superiors from 1945 to the present

1945	Old Mission San Luis Rey:	Bertrand Hobrecht, OFM (deceased)
1946	Mission Santa Barbara:	Robert Schmidt, OFM (deceased)
		Urban Habig, OFM (deceased)
1947	Old Mission San Luis Rey:	Edmund Austin, OFM (deceased)
1948	Old Mission San Miguel:	Matthew Poetzel, OFM (deceased)

1949 St. Joseph, Los Angeles: Bertrand Hobrecht, OFM (deceased)

1950 St. Francis Retreat, San Juan Bautista, CA
Owen da Silva, OFM (deceased)
Gregory Wooler, OFM (deceased)

1953 Serra Retreat, Malibu, CA Hugh Noonan, OFM (deceased)
Dermot McLaughlin (deceased)

1958 Ascension, Portland, OR William Sisk, OFM
N. 4420 Jefferson Street
Spokane, WA 99202
509 325-1321
Present title: retired

Clarence Manns, OFM (deceased)
Basil Kelly, OFM (deceased)

1964 St. Francis, Spokane, WA John Fowlie, OFM
133 Golden Gate Avenue
San Francisco, CA 94102
415 863-0111
Present title: Associate Pastor, St. Boniface

Jordan Donovan, OFM (deceased)

1968 St. Ann's, Spokane, WA Tom Frost, OFM
Gu Achi Trading Post
Sells, AZ 85634
602 361 - 2202
Present title: Pastor, San Solano Missions

1971 St. Francis, Provo, UT Howard Hall, OFM
Box 249
Three Rivers, CA 93271
209 561-4595
Present title: retreat master
St. Anthony's Retreat

Michael Dallmeier, OFM
1950 W. San Xavier Road
Tucson, AZ 85746
602 294-2624
Present title: Pastor, Mission San Xavier
del Bac

Linus Hohendorf, OFM
Old Mission
Santa Barbara, CA 93105

	805 682-4713 Present title: retired
	John Fowlie, OFM 133 Golden Gate Avenue San Francisco, CA 94102 415 863-0111 Present title: Associate Pastor, St. Boniface
1978 Novitiate, Oakland, CA	Brian Flynn, OFM PO Box 767 Danville, CA 94526 510 837-9141 Present title: retreat master San Damiano Retreat
1980 St. Anthony's Seminary Santa Barbara, CA	Robert Van Handel, OFM Box 1070 San Juan Bautista, CA 95045 408 623-4234 Present title: retreat house staff
1986 St. Francis, Toledo, WA	Stephen Barnufsky, OFM N. 4420 Jefferson Street Spokane, WA 99205 509 325-1321 Present title: Pastor, St. Francis
1988 San Xavier del Bac, Tucson, AZ	Michael Dallmeier, OFM 1950 W. San Xavier Road Tucson, AZ 85746 602 294-2624 Present title: Pastor, San Xavier del Bac
1993 St. Francis Retreat, San Juan Bautista, CA	Richard McManus, OFM Box 1070 San Juan Bautista, CA 95045 408 623-4234 Present title: Director & Local Superior

Response to Interrogatory #5:

- a. Dr. Gary Decker
10640 N. 28th Drive, Suite C 205
Phoenix, AZ 85029
602 375-9367

Brother Berard Connolly was requested to go for evaluation after the allegations with respect to [REDACTED] came to my attention.

Date of evaluation: March 19, 1990

- b. Dr. Lester Lothstein
Institute of Living
400 Washington Street
Hartford, CT 06106
203 241-8000

Brother Berard Connolly was requested to go to the Institute of Living in response to having received the report of the investigation of Sandra Brewer.

Date: September 17, 1992

- c. Dr. Wendy Sinclair-Brown
POB 643
San Juan Bautista, CA 95046-0643
408 637-8816

Brother Berard Connolly was requested to see Dr. Sinclair Brown in order to continue his aftercare program.

Date: February, 1993.