

Holy Trinity Rectory  
404 High Street  
P.O. Box 350  
Somersworth, N.H. 03878  
November 6, 1994

Re: Personal and Confidential  
Father George Robichaud

Mr. Raymond Dumont  
Gallagher Basset Services  
P.O. Box 10148  
Bedford Commons  
Bedford, N.H. 03110-148

Dear Mr. Dumont,

After a private and personal conversation with Bishop O'Neil, he referred me to you, our Diocesan insurance company.

I lived with Gordon McCrae in Hampton, N.H. for six months in 1982 but knew nothing of his activities in Keene. In September, I was subpoenaed to appear in Keene Superior Court from September 12 - September 30 in regards to the Gordon McCrae case and assumed I would be subpoenaed in all four cases against Gordon.

I contacted my Therapeutic Community of Saint Michael's, run by the Servants of the Holy Paraclete, in St. Louis, Missouri. I was aware of certain confidential matters that would have been damaging to the Diocese in the Gordon McCrae case. I was guilty of no wrong doing but implications could also have hurt my reputation. My therapeutic community referred me to a firm in Boston that has defended and prosecuted priests involved in pedaphilea.

My referral went to Mr. Norman Zalkind; and, after agreeing that my confidential information could hurt the Diocese, he agreed to take my case. He advised me to tell absolutely no one of this information.

Mr. Zalkind called the County attorney and with his professional qualifications was able to keep me out of court on a daily basis. He was in constant contact with the County attorney and myself. His advise was to plead the Fifth Amendment to prevent damage to the Diocese or myself.

As it turned out, I was not called to testify. I thought I would be called in the next three cases but Gordon pleaded guilty to the charges.

Mr. Zalkind asked for \$5,000.00 up front to defend my rights. This forced me to put the maximum on a credit card and has placed me in a great financial bind.

Mr. Zalkind was very professional and has returned the unused portion of the original \$5,000.00 fee. I was pleased with his work.

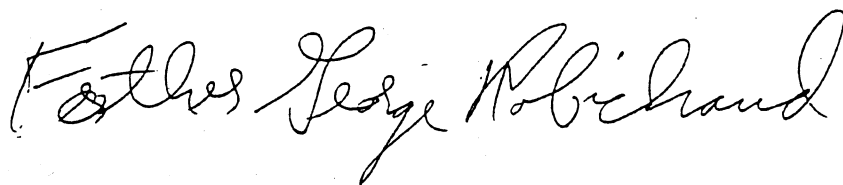
My therapeutic community and Mr. Zalkind know all the confidential material I am aware of and insisted I needed this legal council.

Enclosed is his bill. If you need the subpoena or other pertinent information please contact Mr. Norman Zalkind.

Thank you for your attention, and I hope you can reimburse my legal fees.

In correspondence to me, please put personal and confidential on the envelope. Due to the delicacy of this matter, I want absolutely no one, including my secretary, to see this information.

In Christ,

A handwritten signature in cursive script that reads "Father George Robichaud". The signature is written in dark ink and is positioned above the typed name.

Father George Robichaud

Father George Robichaud  
Holy Trinity Parish  
P.O. Box 350  
Somersworth NH 03878-0350

Page: 1  
10/13/94  
ACCOUNT NO: 5343-00M  
STATEMENT NO: 1

Witness

		HOURS	
09/07/94			
	JW Telephone conference with client, Atty Zalkind.	1.00	250.00
	JW Telephone conference with client, Atty Zalkind.	1.00	250.00
09/08/94			
	NSZ Talk with Atty John Ward re: client.	.30	75.00
09/09/94			
	NSZ Initial interview; talk with County attorney.	1.20	300.00
09/13/94			
	NSZ Calls to County attorney and client.	.60	150.00
09/14/94			
	NSZ Talks with client and prosecutor's office delaying.	.60	150.00
	JW Fifth amendment research.	2.50	625.00
	JW Fifth amendment research.	2.50	625.00
09/16/94			
	JW Conference with Atty Zalkind. Draft memorandum re: fifth amendment.	.90	225.00
	NSZ Talks with D.A.'s office and client.	.60	150.00
	JW Confer with Atty Zalkind. Draft memorandum re: fifth amendment.	.90	225.00
09/19/94			
	NSZ Conference with D.A.	.40	100.00
	NSZ Talk with client.	.30	75.00

Father George Robichaud

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STATEMENT NO: 1

Witness

— 6940

	HOURS	
09/21/94 NSZ Read newspaper articles.	.20	50.00
09/22/94 NSZ Talk with client.	.30	75.00
09/23/94 NSZ Talk with client.	.30	75.00
09/26/94 NSZ Review news article.	.20	50.00
	-----	-----
FOR CURRENT SERVICES RENDERED	13.80	3450.00
09/16/94 Fax charges.		6.00
09/29/94 Photocopy charges - September.		1.50
		----
TOTAL EXPENSES		7.50
0/13/94 Client Refund.		1542.50
		-----
TOTAL ADVANCES		1542.50
TOTAL CURRENT DUE		5000.00
09/09/94 Payment - Thank you.		-5000.00
BALANCE DUE		\$0.00
		====

Total Charges

\$ 3,457.50

Mr. Norman Zalkind

COPY COURT CLERK

SUPERIOR COURT  
CHESHIRE, SS.

WRIT OF SUMMONS

"JOHN DOE", A MINOR BY HIS  
MOTHER AND NEXT FRIEND  
KEENE, NEW HAMPSHIRE 03431

vs. GORDON MACRAE  
C/O ST. MICHAEL'S PARISH  
9 LINCOLN STREET  
EXETER, NEW HAMPSHIRE 03833  
AND  
THE ROMAN CATHOLIC BISHOP OF MANCHESTER  
153 ASH STREET  
MANCHESTER, NEW HAMPSHIRE 03105

To the Sheriff of Any County or His Deputy:

WE COMMAND YOU TO SUMMON  
GORDON MACRAE AND THE ROMAN CATHOLIC BISHOP OF MANCHESTER, INC.  
if to be found in your precinct, to appear at the SUPERIOR COURT at KEENE, in said County of Cheshire on the  
first Tuesday of JUNE, 19 91, to answer to the plaintiff(s). In a plea of

SEE ATTACHED.

To the damage of the plaintiff, as he says, ~~to the extent~~ in an amount within the jurisdictional limits ~~of this Court~~ and make return of this writ with your doings therein. of this Court.

Witness RICHARD P. DUNFEY, Esquire, the  
Chief Justice

19<sup>th</sup> day of APRIL

A.D., 19 91

GREEN, MCMAHON AND HEED  
28 MIDDLE STREET  
KEENE, NEW HAMPSHIRE 03431

*Stillman D. Rogers*, Clerk  
STILLMAN D. ROGERS

BY *Peter W. Heed* ATTORNEY  
PETER W. HEED, ESQUIRE

## THE STATE OF NEW HAMPSHIRE

CHESHIRE, SS.  
DOCKET NUMBER:

SUPERIOR COURT  
APRIL 1991 TERM

"JOHN DOE", A MINOR BY HIS MOTHER AND NEXT FRIEND

VS

GORDON MACRAE AND THE ROMAN CATHOLIC BISHOP OF  
MANCHESTER, INC.

DECLARATION

1. Plaintiff is a minor residing in Keene, New Hampshire.
2. Defendant Gordon MacRae is a resident of 52 Summit Road in Keene, New Hampshire.
3. The Roman Catholic Bishop of Manchester, Inc. has its principal place of business in the City of Manchester, New Hampshire, and administers St. Bernard's Parish in Keene, New Hampshire.

COUNT I

4. From approximately April 1, 1986 to November, 1988, Defendant MacRae engaged in a course of conduct destructive to the psychological and physical well being of the Plaintiff, a minor; said conduct consisted of repeated sexual, psychological and emotional abuse.

5. During said period of time, Defendant MacRae engaged in unlawful and unpermitted contact with the minor Plaintiff, including creating photographs of the minor in lewd positions.

6. Defendant MacRae acted willfully and intentionally, or recklessly, in committing said harmful and offensive contact to the Plaintiff. As a direct result of said sexual abuse, the minor Plaintiff was damaged and caused to suffer severe sexual, psychological and emotional injury and will continue to suffer the same in the future.

COUNT II

7. The Plaintiff restates the allegations made in Paragraphs One through Six as if restated herein.

8. At all times material to this Complaint, Defendant MacRae had a duty to use reasonable care in his relationship with the minor and to act in a manner that would not create foreseeable and unreasonable risks of harm to the minor and to obey the laws of the State of New Hampshire, including RSA 639:3 (endangering the welfare of a child).

9. That Defendant Gordon MacRae breached his statutory and common law duties to the minor Plaintiff by deliberately engaging in sexual contact to the Plaintiff, creating photographs of the minor Plaintiff, soliciting the minor Plaintiff to engage in sexual acts and engaging in harmful and unlawful, offensive and unpermitted physical contact with the minor Plaintiff.

10. As a proximate cause of Defendant MacRae's breach of said duty, the Plaintiff was caused to suffer severe sexual, psychological and emotional damage and will continue to suffer such damage in the future.

COUNT III

11. The Plaintiff restates the allegations contained in Paragraphs One through Ten as if restated herein.

12. The Plaintiff was a parishioner of St. Bernard's Parish in Keene, New Hampshire.

13. The Defendant, as priest of the said parish, had a duty of care to act responsibly toward all parishioners, including the Plaintiff.

14. The Defendant, as priest of the said parish, had a duty to exercise the influence of his position in a responsible, benign and constructive manner.

15. The Defendant, as priest of the said parish, had a duty to the Plaintiff to avoid and refrain from abusing the authority and leadership conferred upon him by his position.

16. The Defendant breached the said duties of care and responsibility toward the Plaintiff by engaging in illegal and unpermitted sexual activities with the Plaintiff and inducing the Plaintiff to engage in harmful sexually oriented activities.

17. As a direct and proximate result of the Defendant's breach of care, the Plaintiff suffered severe sexual, psychological and emotional damage, and will continue to suffer such damage.

#### COUNT IV

18. Plaintiff restates the allegations made in Paragraphs One through Seventeen as if restated herein.

19. At the time of the alleged improper conduct with the minor Plaintiff by the Defendant MacRae, the Defendant Roman Catholic Bishop of Manchester, Inc., conducted its business through various parishes within the State of New Hampshire.

20. The Defendant Gordon MacRae was an agent of the Defendant Roman Catholic Bishop of Manchester, Inc., in that he was employed and worked for the interest of the Diocese as its agent at St. Bernard's Parish.



21. The Defendant Roman Catholic Bishop of Manchester, Inc. owes a duty to the parishioners of St. Bernard's Parish, and the Plaintiff, as it is aware that its agents and representatives are accorded special trust, confidence and respect from their respective parishioners.

22. The Defendant MacRae is subject to the direct supervision, control and discretion of the Roman Catholic Bishop of Manchester, Inc.

23. The Defendant Roman Catholic Bishop of Manchester, Inc., has breached its duty of care to the Plaintiff by the acts of its agent, as previously set forth in this Writ.

24. The Defendant Roman Catholic Bishop of Manchester, Inc. is particularly responsible for this breach of duty where it knew, or should have known, that its agent was a risk to the Plaintiff and to the parishioners, and therefore a risk to breach this duty of care.

25. As a direct and proximate result of this breach of its duty of care, the Plaintiff suffered severe sexual, physical and emotional damage.

#### COUNT V

26. The Plaintiff restates the allegations made in Paragraphs One through Twenty-Five as if restated herein.

27. In 1983, the Defendant Gordon MacRae, was involved in an episode of sexual abuse with a minor while a parish priest in Hampton, New Hampshire. As a result of this incident, Gordon MacRae was transferred to St. Bernard's Parish of Keene, New Hampshire by the Defendant Catholic Bishop of Manchester, Inc.

28. The Catholic Bishop of Manchester, Inc. had a duty to use reasonable care to act in a manner that would not create foreseeable and unreasonable risks of harm to the minor Plaintiff and others and to avoid endangering the minor Plaintiff's health, safety and welfare.

29. Yet wholly unmindful of said duty and in breach thereof, the Roman Catholic Bishop of Manchester, Inc., with knowledge of Gordon MacRae's dangerous propensities, transferred him to St. Bernard's Church of Keene, New Hampshire without advising the Parish or the parish priests of Gordon MacRae's dangerous propensities.

30. As a direct, proximate and foreseeable result of the negligence of the Roman Catholic Bishop of Manchester, Inc., the minor Plaintiff was caused severe sexual, psychological and emotional abuse and damage and will continue to suffer such damage in the future.

#### COUNT VI

31. The Plaintiff restates all the allegations of Paragraphs One through Thirty as if restated herein.

32. The Roman Catholic Bishop of Manchester, Inc. had knowledge that in his capacity as a parish priest, the Defendant Gordon MacRae would come in contact with minor children, especially altar boys and choir members, and members of the church youth group.

33. The Roman Catholic Bishop of Manchester, Inc. had knowledge that in his capacity as a parish priest, the Defendant Gordon MacRae would occupy a place of special confidence and trust in the lives of numerous minors.

34. As a result of prior episodes in the life of the Defendant Gordon MacRae, of which the Roman Catholic Bishop of Manchester, Inc. had knowledge, the Defendant Gordon MacRae had proven himself unworthy of that special confidence and trust and had proven an inability to conduct himself appropriately in his relationships with minor children.

35. The Roman Catholic Bishop of Manchester, Inc. had a duty to employ and retain as priests only those persons who could conduct themselves adequately in their relationships with children and were worthy of the place of special trust and confidence that priests hold in the lives of parishioners.

36. Yet wholly unmindful of said duty and in breach thereof, the Defendant Roman Catholic Bishop of Manchester, Inc. did employ and retain Gordon MacRae as a parish priest.

37. As a direct, proximate and foreseeable result of the negligence of the Roman Catholic Bishop of Manchester, Inc., the minor Plaintiff suffered severe sexual, psychological and emotional damages and shall continue to suffer such damage in the future.

#### COUNT VII

38. The Plaintiff restates and realleges the allegations set forth in Paragraphs One through Thirty-Seven as if the same were fully set forth herein.

39. The Defendant Roman Catholic Bishop of Manchester, Inc. had knowledge that its agents gave counseling, supervision, direction and spiritual guidance to young people.

40. The Defendant Roman Catholic Bishop of Manchester, Inc. knew, or should have known, that the Defendant Gordon MacRae would be involved in like activities at St. Bernard's Church.

41. The Defendant Roman Catholic Bishop of Manchester, Inc., had a duty to properly train, supervise and control its agent priests to insure that its agents priests, especially those who are known or suspected risks to the mental or physical health of any member of the church, did not have the ability or opportunity to inflict injury on a member of the church.

42. Despite information that the Defendant Gordon MacRae was a known or suspected threat to the physical or mental well being of young people, the Defendant Roman Catholic Bishop of Manchester, Inc., breached its duty of care to properly train and supervise the Defendant Gordon MacRae.

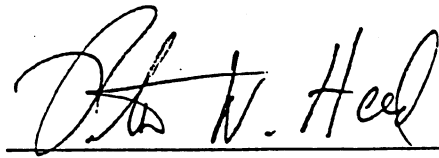
43. As a direct and proximate result of the Defendant Roman Catholic Bishop of Manchester, Inc.'s breach of the duty of care, the Plaintiff suffered sexual, physical, mental and emotional damage.

#### COUNT VIII

44. The Plaintiff repeats and realleges the allegations contained in Paragraphs One through Forty-Three as if the same were fully set forth herein.

45. The Plaintiff is entitled to enhanced compensatory damages, since the acts by the Defendant Gordon MacRae are willful and malicious, and the acts and omissions by Defendant Roman Catholic Bishop of Manchester, Inc., are wanton and reckless.

WHEREFORE, the Plaintiff demands judgment against the Defendants, said judgment being within the jurisdictional limits of this Court, as well as attorneys' fees and costs, based upon the malicious and wanton nature of the acts of the Defendant, as well as costs. Plaintiff demands a trial by jury.



Peter W. Heed, Esquire

McMAHON  
EED

8 MIDDLE STREET  
NEW HAMPSHIRE 03431



## THE STATE OF NEW HAMPSHIRE

CHESHIRE, SS.

APRIL TERM, 1992

## SUPERIOR COURT

"John Doe," A Minor By His Mother  
And Next Friend

v.

Gordon MacRae  
and  
The Roman Catholic Bishop of Manchester, Inc.

91-C-149

FIRST SET OF INTERROGATORIES PROPOUNDED BY  
THE DIOCESE OF MANCHESTER  
TO BE ANSWERED UNDER OATH BY JOHN DOE

NOW COMES the Defendant, Diocese of Manchester, in the above-entitled matter and propounds the following interrogatories to be answered under oath by the Plaintiff.

I. INTRODUCTION AND DEFINITIONS

A. These interrogatories shall be deemed to seek answers as of the date hereof but shall be deemed to be continuing so that any additional information relating in any way to these interrogatories which defendant acquires or which becomes known to defendant up to and including the time of trial shall be furnished to the plaintiff promptly after such information is acquired and becomes known.

B. "Identify", or to give the identity of, means:

(i) In the case of a natural person, to state:

(a) name;

- (b) last known residence address;
  - (c) employer or business affiliation;
  - (d) occupation and business position held;
- (ii) in the case of a corporate entity, to state:
- (a) name;
  - (b) place of incorporation;
  - (c) address and principal place of business;
  - (d) identity of persons having knowledge of the matter with respect to which the Company is named;
- (iii) in the case of a document, to state:
- (a) the identity of the person or persons preparing it and the sender;
  - (b) its title or a description of the general nature of its subject matter;
  - (c) the identity of the addressees, if any;
  - (d) the dates of preparation;
  - (e) its date and manner of distribution and publication, if any;
  - (f) location of each copy and identity of present custodian;



- (g) identity of persons who can identify it;
- (h) if privilege is claimed, the specific basis thereof;
- (i) the substance of the document.

C. As used herein, the term "document" means all original writings of any nature whatsoever and all non-identical copies thereof, in your possession, custody or control, regardless of where located, or in the possession of any expert witness expected to be called by you at trial.

II. INTERROGATORIES

1. Please state your name, age, current address, social security number, date of birth, martial status, business address, and name and address of employer.

ANSWER:

[REDACTED]

18 .

[REDACTED]

[REDACTED]

SINGLE

[REDACTED]

2. Please describe in detail each and every one of the incidents of misconduct by Gordon MacRae alleged in your amended Writ. Please be sure to include the following: the exact date, day, time of day, and location of each incident; all witnesses to the incident; all statements made by the participants in the incident; all actions taken by participants in the incident; the events and circumstances both leading up to and occurring immediately after the incident. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

SEE TWO-PAGE ANSWER ATTACHED.

## ANSWER TO INTERROGATORY #2:

2. The following is a summary of the events alleged in the writ as best as I am able to recall them at this time: I met Father Gordon at St. Bernard's Church when I was 9. He was a favorite priest among all the children of the parish. Over the next few years, Father Gordon and I became very close. He was like the father I never had. We would get together several times a week. We would go out for pizza or see a movie. Sometimes we'd just drive in his car and talk. I trusted Father Gordon because he was my priest and my friend. He was the only person who seemed to understand me. Because he was a priest, I felt that he always had my best interest in mind and would never do anything to harm me.

During the winter 1988 and early spring 1989, I was alone with Father Gordon on many occasions. When I confided in him about my personal and financial problems, he would steer the conversation toward sex. He would say things like: "there is plenty of money if you know how to earn it." He told me he had a male friend who was a prostitute making \$600 an hour. This kind of talk confused me. I told Father Gordon that I thought homosexuality was sick. He asked me what I thought of cuddling or touching someone of the same sex in bed. I told him I didn't agree with it and he would close the subject by saying something like "I'm just letting you know." This same general conversation took place on a number of occasions.

In the summer of 1988, Father Gordon often put his arm around me and tickled me. I would ask him to stop. When he asked if it was all right to put his arm around me, I said "yes" because I thought he was my friend, the loving father I never had, and I didn't want to hurt his feelings. He was a priest and I didn't think he would do anything wrong or anything that would hurt me.

On a Sunday in October, I confided in Father Gordon that I needed money for a dance. He had often made gifts and loans of money to me in the past. Father Gordon again steered the conversation to sex. He asked "what if I'm only interested in picture?" I was upset and very confused. I tried to play stupid. Father Gordon explained what kind of pictures he was after. Father Gordon was my friend and my priest, I wanted to please him so I agreed to do what he wanted.

Father Gordon took me to his apartment. He took a camera out of a case and instructed me to undress in the bathroom. I complied with his instructions. Father Gordon told me to lie on my stomach and took pictures of me in several poses which he instructed me to assume, including holding my genitals in my hand. When Father Gordon ran out of film, he took me home and gave me a twenty, some ones and some change.

Later that week, Father Gordon picked me up. I asked him


## ANSWER TO INTERROGATORY #2, CONTINUED.

for \$10. He asked me if I wanted to do some more pictures. Again, I was confused and uncertain as to what I should do. We went to Father Gordon's apartment much the same as before. This time Father Gordon told me to give myself an erection. When he had run out of film, he gave me \$50. Later that same day, we were riding in his car and he gave me \$5 to buy him some cigarettes; when I tried to give him the change, he told me to keep it.

The following weekend, Father Gordon and I were riding in his car. During the conversation, I mentioned that I needed some money. He wanted to take more pictures. This third session was much the same as the others, except this time, Father Gordon instructed to ejaculate, and I did. After Father Gordon ran out of film, he took me home. Please see Exhibit A (statement made by [REDACTED] to Keene Police Department) and Exhibit B (Keene Police Department reports).

3. State in chronological order all communications, whether written or oral, that you have had with anyone concerning each of the incidents described in your answer to interrogatory #2. Be sure to identify the persons with whom you held these communications, state whether the communications were written or oral, state the substance of each communication in detail, and state the circumstances under which the communication was held including the date of, day of, time of, location of, and all witnesses to the communication. Be sure to include communications, if any, you have had with Gordon MacRae, Defendant in this action. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

1. DETECTIVE JAMES MCLAUGHLIN  
KEENE POLICE DEPT.  
11 WASHINGTON STREET  
KEENE, NH 03431  
ORAL AND WRITTEN  
SEE ATTACHED EXHIBIT B.
2.   
ORAL  
NUMEROUS CONVERSATIONS WITH MY PARENTS BUT I HAVE NOT DISCUSSED THE FULL DETAILS OF FATHER GORDON'S CONDUCT TO THEM.  
  
PLAINTIFF OBJECTS TO THIS QUESTION BECAUSE IT IS IMPERMISSIBLY BROAD AS IT REQUIRES INFORMATION WHICH IS PRIVILEGED.
3. WILLIAM BALLENTINE  
CLAREMONT COUNSELING CENTER  
CLAREMONT, NH  
MARCH TO AUGUST, 1989  
ORAL
4. RAY BOLLERUDE, 196 WASHINGTON ST., KEENE, NH  
A COUNSELLOR IN KEENE  
1988 AND 1990-91
5. TIMOTHY TUFTS  
ORION HOUSE  
46 MAIN ST, NEWPORT, NH  
ORAL, MARCH TO AUGUST 1989
6. HOWARD CANDY  
ORION HOUSE, 46 MAIN ST., NEWPORT, NH  
ORAL, MARCH TO AUGUST 1989
7. PETER HEED, ESQ., GREEN, MCMAHON AND HEED  
28 MIDDLE STREET, KEENE, NH 03431
8. DOUGLAS A. G. THORNTON, ESQUIRE; GREEN, MCMAHON AND HEED  
28 MIDDLE STREET, KEENE, NH 03431

## CONTINUING ANSWER TO INTERROGATORY #3:

9. Doctor Burt Hollenbeck  
Granite Hills Clinical Consultants  
181 Washington Street  
Keene, New Hampshire 03431  
Oral, Fall 1992
  
10. Mario Cossa  
Monadnock Family Services  
331 Main Street  
Keene, New Hampshire 03431  
Oral, 1992

4. Please describe in detail any other incidents of sexual misconduct in which you have been involved whether as victim or as perpetrator. Please be sure to identify all participants and to include in your description of each incident the following: the exact date, day, time of day, and location of each incident; all witnesses to the incident; all statements made by the participants in the incident; all actions taken by participants in the incident; the events and circumstances both leading up to and occurring immediately after the incident. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

OBJECTION, THIS QUESTION REQUIRES INFORMATION WHICH IS NOT DISCOVERABLE AS I WAS A MINOR. TO THE BEST OF MY RECOLLECTION, THE FOLLOWING EVENTS OCCURRED:

1. IN LATE 1989, TIMOTHY SMITH, ORGANIST AT THE UNITED CHURCH OF CHRIST WHERE I WAS A MEMBER OF THE CHOIR ASKED ME TO PERFORM ORAL SEX ON HIM WHILE VISITING HIS PARENTS' HOUSE IN SUNAPEE, NH. I SAID NO. I DISCUSSED THIS WITH THE POLICE AND TOOK A POLYGRAPH TEST.
2. IN MARCH OR APRIL, 1991, I WAS HITCHHIKING TO WORK IN CLERMONT, FLORIDA. A MAN PICKED ME UP AND REQUESTED SEX. I SAID NO AND HAD HIM STOP THE CAR SO I COULD GET OUT. I THEN CALLED THE POLICE.



5. State in chronological order all communications, whether written or oral, that you have had with anyone concerning each of the two or more incidents described in the response to interrogatory #4. Be sure to identify the persons with whom you held these communications, state whether the communications were written or oral, state the substance of each communication in detail, and state the circumstances under which the communication was held including the date of, day of, time of, location of, and all witnesses to the communication. Be sure to include communications, if any, you have had with Gordon MacRae, Defendant in this action. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

1. A. DETECTIVE JAMES MCLAUGHLIN, KEENE POLICE DEPT.  
11 WASHINGTON STREET, KEENE, NH 03431
- B. POLYGRAPH OPERATOR  
ROCKINGHAM COUNTY JAIL
- C. [REDACTED]
2. A. CLERMONT, FLORIDA POLICE
- B. [REDACTED]
- C. [REDACTED]

SEE ANSWERS TO INTERROGATORIES 2, 3, 4, & 5.

6. Please describe in detail any allegations you have made to law enforcement or other authorities claiming sexual misconduct by others. Please include the following information concerning each allegation: the exact date, day, time of day, and location of each incident; all participants in and witnesses to the incident; all statements made by the participants in the incident; all actions taken by participants in the incident; the events and circumstances both leading up to and occurring immediately after the incident; whether an investigation was initiated pursuant to your allegations and what the outcome of any such investigation was. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

SEE ANSWERS TO INTERROGATORIES 2, 3, 4, & 5.

7. To the full extent of your knowledge, please state all officials, clergy, or employees of the Diocese of Manchester who were or became aware of the incidents you allege in the amended Writ occurred between yourself and Gordon MacRae. Also please state how and when any such officials became aware of those incidents or your allegations concerning those incidents. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

I DON'T KNOW. I NEVER SPOKE TO ANYONE AT THE DIOCESE AND THEY NEVER TRIED TO CONTACT ME BEFORE OR AFTER THESE EVENTS BECAME PUBLIC KNOWLEDGE. I BELIEVE THAT MY MOTHER SPOKE TO SOMEONE FROM THE DIOCESE.

8. Please describe in detail the history and nature of your relationship with Gordon MacRae. Please include: the date and circumstances under which you first met Gordon MacRae; the date and circumstances under which you last saw Gordon MacRae; all intervening occasions and the attendant circumstances on which you saw Gordon MacRae; the nature of the relationship between yourself and Gordon MacRae, including the full extent to which that relationship was in any way sexual. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

PLEASE SEE ANSWERS TO INTERROGATORY #2, TOGETHER WITH EXHIBIT A (STATEMENT OF ██████████ GIVEN TO KEENE POLICE DEPARTMENT) AND EXHIBIT B (KEENE POLICE DEPARTMENT REPORTS).

9. Please describe in detail all occasions in addition to the incidents described in your amended writ during which you feel Gordon MacRae conducted himself sexually inappropriately or inappropriately in any other manner. Please be sure to include the following: the exact date, day, time of day, and location of each incident; all witnesses to the incident; all statements made by the participants in the incident; all actions taken by participants in the incident; the events and circumstances both leading up to and occurring immediately after the incident. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

PLEASE SEE ANSWERS TO INTERROGATORIES 2 TO 8.

10. Please describe in detail any occasions on which you were ever alone with Gordon MacRae other than those already described in the preceding interrogatories. Please be sure to include the following: the exact date, day, time of day, and location of each incident; all witnesses to the incident; all statements made by the participants in the incident; all actions taken by participants in the incident; the events and circumstances both leading up to and occurring immediately after the incident. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

PRIOR TO THE EVENTS DESCRIBED IN THE ANSWERS TO THE PRECEDING INTERROGATORIES, I WAS ALONE WITH FATHER GORDON ON OCCASIONS TOO NUMEROUS TO SPECIFICALLY RECALL THE DETAILS. SOMETIMES WE GOT TOGETHER AT THE RECTORY AT ST. BERNARDS, SOMETIMES WE WOULD GO OUT FOR PIZZA, TO HIS OFFICE, HIS APARTMENT, AND OTHER PLACES. OTHERWISE, SEE MY ANSWERS TO INTERROGATORIES #2 AND #8.

11. Please describe in detail all conversations or other communications you have had with Gordon MacRae concerning sexual issues including sexual preferences. Be sure to state whether the communications were written or oral, state the substance of each communication in detail, and state the circumstances under which the communication was held including the date of, day of, time of, location of, and all witnesses to the communication. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

PLEASE SEE ANSWERS TO INTERROGATORIES 2, 8, AND 10.

12. Please state the total amount, nature, and every element and source of all damages claimed in this case. Please itemize medical and other expenses claimed, giving the provider, services provided, and dates of service. Please identify all documents evidencing or relating in any way to the damages claimed. Please execute and return the medical release forms appended to these interrogatories, and be sure to provide your address, date of birth, and social security number on each form.

ANSWER:

I DO NOT KNOW THE MONETARY DAMAGES THAT EXIST. I HAVE BEEN TO A NUMBER OF COUNSELORS (SEE ANSWER TO INTERROGATORY #3) BUT THEY DID NOT SEND ME ANY BILLS. THEY MAY HAVE SENT SOME BILLS TO MY PARENTS. I WOULD BE AGREEABLE TO ALLOWING YOU TO OBTAIN COPIES OF THE BILLS FROM MY COUNSELORS. I OBJECT TO ALLOWING YOU TO HAVE THE GENERAL RECORDS OF ALL MY COUNSELORS. MY ATTORNEYS WILL SUPPLEMENT THIS ANSWER WHEN FURTHER DETAIL ON THE MONETARY DAMAGES IS OBTAINED.



13. Please state whether the incidents alleged in your amended writ resulted in the aggravation of any pre-existing physical conditions or injuries. If so, please describe any such conditions or injuries and any medical treatment you received prior to April 1986, giving the name of the provider and the date and nature of the services provided. Please identify all documents relating in any way to any such medical treatment.

ANSWER:

I HAD NO PREEEXISTING PHYSICAL CONDITIONS OR INJURIES WHICH WERE AGGRAVATED BY FATHER GORDON'S ACTIONS, TO THE BEST OF MY KNOWLEDGE.

14. Please describe in detail any therapy, rehabilitation, or other counseling of whatever kind you have undergone for sexual issues and/or misconduct of any kind. Please be sure to include the following with respect to any such therapy, rehabilitation, or counseling: dates, days, times, and locations; therapists, counselors, or other participants; whether undertaken voluntarily or involuntarily, and, if involuntarily, state the entity directing or compelling your participation; the cause and purpose; the therapeutic method employed; whether you successfully completed a defined course of therapy, rehabilitation, or counseling or otherwise were able to resolve the underlying issues. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer. Please execute and return the medical release forms appended to these interrogatories, and be sure to provide your address, date of birth, and social security number on each form.

ANSWER:

SEE ANSWER TO INTERROGATORY #3. I OBJECT TO GIVING MEDICAL RELEASES AT THIS TIME AS SOME MATERIAL IN THE MEDICAL RECORDS IS IRRELEVANT.

15. Please state in detail the extent to which you have engaged in homosexual or bisexual practices. Please be sure to state whether or not you are or have ever been an actively practicing homosexual or bisexual. Also, please describe in detail any homosexual or bisexual experiences you have had and be sure to include the following: the exact date, day, time of day, and location of each incident; all witnesses to the incident; all statements made by the participants in the incident; all actions taken by participants in the incident; the events and circumstances both leading up to and occurring immediately after the incident. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

I HAVE NO HOMOSEXUAL OR BISEXUAL EXPERIENCES OTHER THAN HAVE BEEN DESCRIBED IN ANSWERS TO OTHER INTERROGATORIES.

16. Please describe in detail any criminal arrests or convictions you have had. Please be sure to describe the nature of the underlying offense and include the following: the exact date, day, time of day, and location of each incident; all witnesses to the incident; all statements made by the participants in the incident; all actions taken by participants in the incident; the events and circumstances both leading up to and occurring immediately after the incident. Please state the law enforcement agencies involved, and the courts involved and be sure to include the charges brought, the dispositions thereof, and the docket numbers of those cases. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

OBJECTION. THIS INTERROGATORY REQUIRES REVEALING JUVENILE RECORDS AND MATTERS WHICH ARE NOT DISCOVERABLE.

17. Please describe in detail any and all allegations of sexual misconduct ever made against you. Please be sure to state who made the allegation, when it was made, the approximate date and time of the incident alleged, and the content of the allegation to the best of your knowledge. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

OBJECTION. THIS INTERROGATORY REQUIRES INFORMATION WHICH IS NOT DISCOVERABLE AND IS IRRELEVANT.

18. Please describe in detail any and all allegations of sexual misconduct ever made by you to non-officials. Please be sure to include the person against whom the allegation was made, the person to whom the allegation was made, when the allegation was made, the approximate date and time of the incident alleged, and nature of the misconduct alleged. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

PLEASE SEE ANSWERS TO INTERROGATORIES 2 TO 9.

19. Please describe in detail your educational and employment histories, explaining any periods of unemployment and/or non-matriculation. Be sure to include the names of all educational institutions and employers, the dates of your attendance or employment, and the reason for your leaving each educational institution and/or employment. Be sure to include the addresses of each educational institution and each employer.

ANSWER:

OBJECTION. THIS INTERROGATORY IS OVERBROAD AND REQUIRES REVEALING SOME JUVENILE RECORDS WHICH ARE NOT DISCOVERABLE.

A. EDUCATION:

- 1. [REDACTED]
- 2. [REDACTED]
- 3. [REDACTED]
- 4. [REDACTED]
- 5. [REDACTED]
- 6. [REDACTED]
- 7. [REDACTED]
- 8. [REDACTED]

B. EMPLOYMENT:

- 1. [REDACTED]
- 2. [REDACTED]
- 3. [REDACTED]
- 4. [REDACTED]
- 5. [REDACTED]
- 6. [REDACTED]
- 7. [REDACTED]
- 8. [REDACTED]

21. Please state the basis for your claim in paragraph 25, Count Four of your amended writ that Gordon MacRae was subject to the direct supervision, control and discretion of the Diocese of Manchester. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

SEE MY ANSWERS TO QUESTIONS #2 AND EXHIBITS A AND B. I DO NOT KNOW ABOUT LEGAL CLAIMS OR THEORIES. PLEASE SEE MY ATTORNEYS FOR THAT INFORMATION. I CAN ONLY TELL YOU THAT I KNOW FATHER GORDON WAS A PRIEST WORKING WITH THE CATHOLIC CHURCH.



22. Please describe the precise nature of the duty of care you allege at paragraph 24, Count Four of your amended writ is owed by the Diocese to its parishioners. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

I DO NOT UNDERSTAND THIS QUESTION. PLEASE SEE MY ATTORNEYS REGARDING LEGAL CLAIMS AND THEORIES.

23. Please describe in detail precisely how the Diocese of Manchester through the acts of Gordon MacRae breached the duty of care described in your answer to interrogatory 22. Please be sure to state what the Diocese of Manchester could have done to avoid this alleged breach of duty. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

I DO NOT UNDERSTAND THIS QUESTION. PLEASE SEE MY ATTORNEYS REGARDING LEGAL CLAIMS AND THEORIES. GENERALLY, SEE MY PREVIOUS ANSWERS AND ANSWERS OF FATHER GORDON MACRAE TO INTERROGATORIES, WHICH ARE ATTACHED HERETO AS EXHIBIT C.

24. Please describe in detail precisely how the Diocese of Manchester failed to properly train and supervise defendant Gordon MacRae, as alleged in paragraphs 44 and 45, Count Seven of your amended writ and be sure to state what the Diocese of Manchester could have done that would have constituted proper training and supervision of Gordon MacRae. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

I DO NOT UNDERSTAND THIS QUESTION. I DON'T KNOW ABOUT LEGAL THEORY, I CAN ONLY TELL YOU THAT I NEVER OBSERVED ANY SUPERVISION OF FATHER GORDON BY ANY OTHER PRIEST.

25. Please state the basis for your claim in paragraph 48, Count Eight of your amended writ that the acts of the Diocese were wanton and reckless. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

I DO NOT UNDERSTAND THIS QUESTION. PLEASE SEE MY ATTORNEYS FOR ANSWERS REGARDING LEGAL CLAIMS AND THEORIES.

26. Have you been examined medically, received any kind of medical care and/or treatment, or professional counseling or therapy, or have you been admitted to any hospitals or medical institutions since April 1986 for the injuries allegedly sustained as a result of the incidents involved in this case? Yes \_\_\_\_\_ No \_\_\_\_\_ If yes, please state:

- a. The names, addresses, and telephone numbers of any and all physicians or other health care practitioners, hospitals, medical institutions, counselors or therapists who or which rendered services to you.
- b. The date or dates of examination, care, or treatment by each such physician, other health care practitioners, counselor or therapist, and the date or dates of admission and discharge as to each hospital or medical institution.
- c. The nature of the care or treatment rendered by each such physician, other health care practitioner, counselor or therapist, hospital, or other medical institution and the reason or reasons for such treatment or hospitalization.
- d. List any expenses incurred, the portion of the expenses which has been applied and the name and address of each person paying a portion or all of said expenses.
- e. Did you have any form of medical insurance or reimbursement which covered any of the medical expenses arising out of the incident involved in this litigation? If so, please state the name and address of the insurer or other person who reimbursed you and the amount so paid.
- f. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.
- g. Please execute and return the medical release forms appended to these interrogatories, and be sure to provide your address, date of birth, and social security number on each form.

ANSWER:

PLEASE SEE ANSWER TO INTERROGATORY #3.

27. Have you or your attorney received any written report by any physician, other health care practitioner, counselor or therapist, or by any hospital or health care facility concerning your medical or mental condition as a result of the incidents involved in this litigation?  
Yes \_\_\_\_\_ No XX If so, please state:

- a. The date the report was made.
- b. The name, address, and profession or occupation of the person making the report.
- c. The name and address of the person who has present custody of the report or any copy of it.
- d. A description of the contents of the report.
- e. Please attach a copy of each such report to your answers to these interrogatories.

ANSWER:

AT SUCH TIME AS THE INFORMATION REQUIRED BY THIS INTERROGATORY BECOMES AVAILABLE, PLAINTIFF WILL PROPERLY SUPPLEMENT HIS ANSWERS HERETO.

28. State whether you have been unable to perform satisfactorily any of your normal daily activities or any of the duties required of you in any of your employments since the date of the incident, indicating with particularity what daily activities or duties you were unable to perform, and the names and addresses of all persons having knowledge of such facts, including your supervisors, employers, and instructors at the time of such incapacities. Please identify all documents that evidence or relate in any way to your answer to this interrogatory and affix copies of those documents to your answer.

ANSWER:

THE INCIDENTS ALLEGED HAVE LEFT ME SUSPICIOUS OF OTHERS. I AM OVERCAUTIOUS AND UNTRUSTING IN MY RELATIONSHIPS BECAUSE OF THESE EVENTS. THESE EVENTS HAVE DAMAGED MY RELATIONSHIPS WITH MY FAMILY, ESPECIALLY MY FATHER. I HAVE HAD SEVERE EMOTIONAL DIFFICULTIES STEMMING FROM THESE EVENTS WHICH HAVE CAUSED ME TO HAVE TO LEAVE MY HOME AND SCHOOL FOR TREATMENT. THESE EMOTIONAL DIFFICULTIES ARE NOT YET COMPLETELY RESOLVED. THE EMOTIONAL PROBLEMS I HAVE HAD AND CONTINUE TO HAVE, HAVE MADE IT DIFFICULT FOR ME TO MAINTAIN A JOB.

29. Please make full disclosure of any expert witnesses and related materials as required by Superior Court Rule 35(f).

ANSWER:

EXPERT WITNESSES HAVE NOT BEEN ASCERTAINED AT THIS TIME. YOU WILL BE PROPERLY NOTIFIED AT SUCH TIME AS EXPERT WITNESSES ARE RETAINED. SEE ALSO LIST IN ANSWER #3.





I met Gordon when I was 9 our, relationship stemmed from a friend of mine, [REDACTED]. On our first meeting we went to Papa Gino's for lunch. Over the next few years Gordon was like a father I never had. We usually went out on Sunday for a matinee movie or lunch, Gordon always had to bring me home before 5 because he had a meeting to go to. Then in early 1988 Gordon said he had taken a leave of absence from the priesthood. He claimed he didn't like it anymore. He started making offers to me about sex saying that there was alot of money out there if I knew how to earn it. He kept mentioning a friend of his that was a prostitute and that he made like \$600 for an hours work. I then told him it was against my morals. One day right after my 14th birthday we were painting a desk and he mentioned it again, I repeated as above and he said he wasn't interested in most things just cuddling and hugging. I told him that any act of homosexuality was gross and that I wasn't inteerested. The conversation was dropped. In October after several more offers were made I needed money for a homecoming dance. He again made the same offer. He said : he only wanted pictures. I said ok, because I had already tried pot on several occasions and liked it I figured if I let him take some pistures I would be able to use it as a way out of dealing with my problems. We went back to his house and I undressed in the bathroom. He had a camera and a tri-pod. When I came out he asked me to lay down on my stomach, and I repeated several positions and he ran out of film. so he took me home and I got \$20 and some change and a few ones. So later that week I needed more pot so I told him I had goty in some trouble and some kids wanted to beat me up. I then asked him for \$10 He asked me if I wanted to do some more pictures, this wass the second of three times that I agreed. It was the same as before. He asked me if I could get hard and I did. Then he ran out of film. I recieved \$50 this time plus he gave me \$5 to go in and get some cigarettes so I went in and got them. I tried to give him the change but he said to keep it. This was on a wednesday or thursday. The first time I believe was on a Sunday. The second time was on the following weekend and I let him take more pictures. No questions asked about why I needed the money so we went back to hiws house and he took some more pictures and it went the same as before edxcept he asked me to ejaculate. i finally did after an unknown amount of film. Then two weeks after Detective McLaughlin called me in.