



3307

City of Keene

Police Department 11 Washington Street New Hampshire 03431

January 7, 1994

MSGR. Christian
215 Myrtle Street
Manchester, New Hampshire 03104

Dear Sir,

I want to say that I enjoyed meeting both you and MSGR. Quinn on January 6th. I can appreciate the burden that you both have been under as a result of this criminal proceeding and the civil actions.

To follow up on our conversations, you were going to give us either telephone numbers or addresses for Father Stephen Scruton and Father Michael Barrett.

In reviewing documents, an additional question came up. In the December 5th, 1983 memo was a reference to a young man Father MacRae was involved with who was from Florida. Do you have this person's name or any information that would help to identify him? Did Father MacRae come into contact with this young man in New Hampshire, Baltimore or in the State of Florida?

Once again it was a pleasure meeting both you and MSGR. Quinn.

Sincerely,


James F. McLaughlin
Detective

cc: Bruce Reynolds
Robert Gainor
file

FAX 357-9823

Mayor 357-9804 • Manager 357-9804 • Accounting 352-1013 • Airport 357-9835 • Assessor 352-2125 • Attorney 357-9806
City Clerk 352-0133 • Fire 352-1291 • Health 352-5440 • Human Services 357-9809 • Information Management Services 357-9802
Inspections 352-5440 • Juvenile Conference Committee 357-9810 • Parks & Recreation 357-9829 • Planning 352-5474 • Police 357-9815
Public Works 352-6550 • Purchasing 357-9800 • Tax Collector 357-9801 • Wastewater Treatment Plant 357-9836 • Water & Sewer 352-3239
Area Code 603



NEW HAMPSHIRE CATHOLIC CHARITIES, INC.

MOST REV. ODORE J. GENDRON, D.D.
President

REV. JOHN P. QUINN
Diocesan Director

MAIN OFFICE:
15 Myrtle St. - P.O. Box 686
Manchester, NH 03105
Tel.: (603) 669-3030
Toll free: 1-800-562-5249

June 3, 1986

OTHER SERVICE LOCATIONS:

- 2 Gilbert St
RINDEN, NH 03570
2-1325
- 2 So. Main St
CONCORD, NH 03301
8-1108
- 2 Middle St
LITTLETON, NH 03431
7-3093
- 1 Calford Ave
WATERBURY, NH 03246
8-3035
- Commercial Bldg - Suite 11
BANDON, NH 03766
8-5151
- Cottage St - P.O. Box 323
LITTLETON, NH 03561
4-7727
- 5 Lake St
ASHUA, NH 03060
9-0
- 10 G
KELLEY, NH 03867
2-7701
- 5 Main St
LITTLETON, NH 03079
3-1971

Marilyn E. Fraser, ACSW
Department of Health & Human Services
DIVISION FOR CHILDREN AND YOUTH SERVICES
6 Hazen Drive
Concord, NH 03301

RE: [REDACTED]
DOB: 10/8/69

Dear Ms. Fraser:

[REDACTED] was referred to the Salem Office of New Hampshire Catholic Charities by Father Gordon MacRae on 9/20/83 for individual counseling. The presenting problem at the time of intake was [REDACTED]'s depression, feelings of rejection especially by his peers and behavior problems at home.

[REDACTED] was seen for weekly treatment by Mrs. Judith K. Paterson, MSW. In the beginning of therapy, the issue of mistrust and betrayal was the focus of treatment. These feelings surfaced with [REDACTED] reporting his being sexually molested by his local parish priest, Father Gordon MacRae. [REDACTED] stated that Father Gordon had invited [REDACTED] to sit on his lap and that fondling by Father Gordon took place. There was no reporting to us by [REDACTED] of any sexual penetration. [REDACTED] disclosure to Mrs. Paterson took place in 11/83, at which time, due to the delicate nature of this situation, Mrs. Paterson reported it directly to the Director of NHCC, Father John P. Quinn who then reported this incident to the appropriate authority. The incident had taken place while Father Gordon had been assigned to [REDACTED] local parish. At the time of the report, Father Gordon was no longer at this parish and [REDACTED] was no longer at risk. To our knowledge, Father Gordon, once transferred, had never attempted to contact [REDACTED] again. [REDACTED], however, did try to contact Father Gordon, but Father never responded.

RE: [REDACTED]

Page 2

[REDACTED], according to Mrs. Paterson, made many gains in counseling. While in treatment, he worked around his feelings of anger, betrayal and mistrust towards Father Gordon. He needed to also grieve the loss of this relationship. Also discussed were appropriate and non-appropriate signs and demonstrations of affection. [REDACTED] feeling around Father Gordon were compounded by family conflicts.

[REDACTED] parents were at times involved in his treatment. Due to scheduling problems on the part of the parents, their participation in therapy was inconsistent. The parents were aware of the Agency's report to the State. Father John Quinn offered to meet with [REDACTED] and [REDACTED], but they refused his offer.

While in treatment, it was recommended by Mrs. Paterson that [REDACTED] be placed in a smaller school system. The public high school did not appear clinically to be appropriate for [REDACTED]. It was at this time that Mrs. Paterson requested financial assistance from Father Quinn so that [REDACTED] could attend St. Thomas Aquinas. The Diocese granted the request and paid [REDACTED] tuition to St. Thomas Aquinas.

From 12/1/83 to 12/30/83, just after [REDACTED] disclosure to Mrs. Paterson regarding the incident with Father Gordon, [REDACTED] was hospitalized at Hampstead Hospital, a psychiatric facility.

Mrs. Paterson terminated her counseling with [REDACTED] in April of 1985 due to her own termination with New Hampshire Catholic Charities. [REDACTED] was very upset with this information. Mrs. Paterson worked with [REDACTED] and his parents around an appropriate discharge plan. As an agency, we offered the family the opportunity to work with the Supervisor of our Rochester District Office. Due to scheduling problems, they did not follow through. A second option was offered them and a referral made to Ted Parkman, a private practitioner who was willing to see [REDACTED] on Saturday mornings. The family was in agreement with this referral.

If there are any questions regarding the above material or any other information that is needed, please contact me at the Salem Office of NHCC at 893-1971.

Sincerely,

Janet O'Connell, ACSW
District Office Supervisor

JOC:eg



3310

CONSULTATION SERVICE FOR CLERGY and RELIGIOUS

282 CONCORD STREET

MANCHESTER, N. H. 03104

603-668-0014

May 28, 1986

Reverend John P. Quinn
New Hampshire Catholic Charities, Inc.
215 Myrtle Street, P.O. Box 686
Manchester, New Hampshire 03105

Dear Father Quinn:

I write to you in response to the request that you have received that I remit to the proper authorities a report of my counseling relationship with the Reverend Gordon MacRae.

I have been seeing Father MacRae weekly for more than three years. During that time, we have dealt with the incident that was reported from the East coast of New Hampshire. I feel that we have delved into this incident so as to bring about helpful insights that Father MacRae can use. Also, Father MacRae has seen fit to continue his visits here since that time to deal with matters that are not related to this incident in any way.

As regard the query you made about the "spider game", it was never brought up in therapy. Also, when presented with this query, Father MacRae said he did not know what it could mean. Having dealt with Father MacRae for a long period of time I feel confident that he is telling the truth.

I also feel confident in the growth that Father MacRae has exhibited and I feel that this matter has been dealt with and resolved on his part. I feel strongly that harm may come by the resurrection of this incident at this time.

Father MacRae is aware of the re-emergence of this matter at this time. He has given me the proper release to communicate with you, or with any other appropriate person about the status of his progress at this time.

Sincerely,

Henry P. Guertin-Ouellette, Ph.D.
Director

HG-0:ae



OFFICE OF THE AUXILIARY BISHOP

DIOCESE OF MANCHESTER
153 Ash Street
Manchester, N.H. 03105

3311

Most Reverend Joseph J. Gerry, O.S.B., Ph.D.

July 14, 1988

Gordon J. MacRae
52 Summit Road - Apt. 12
Keene, New Hampshire 03431

Dear Gordon:

Having just been informed of the "incident" referred to in the letter just written, I hasten to pen this more informal note to let you know that the action I have taken is that recommended by the legal division of NCCB. You have read enough, I know, to realize that the decision to suspend you from faculties in no way is meant to be judgemental on the "incident", but to safeguard the Church so that she cannot be accused of knowing and still letting the priest operate under her auspices when he could be taking advantage of adolescents.

I was sorry to hear of your accident. I assure you of my prayers that the good Lord watch over you and guide you and support you with his powerful arm during this difficult period. If I can be of any assistance to you, do not hesitate to get in touch.

Sincerely in the Lord,

+ Joseph J. Gerry *JS*
Auxiliary Bishop of Manchester

January 11, 1994

CONFIDENTIAL

James F. McLaughlin
Detective
Police Department
11 Washington Street
Keene, NH 03431

Dear Detective McLaughlin:

In response to your letter of January 7th, 1994, I am pleased to provide you with the following information.

The address of Stephen Scruton is 57 Highland Avenue, Haverhill, Massachusetts 01830. The address for Father Michael D. Barrett is San Alphonso Retreat House, Post Office Box 3098, 755 Ocean Avenue, Long Branch, New Jersey 07740.

In response to your inquiry about the young man from Florida, I would offer the following reflection as clearly as I can recall my conversation of December 5th, 1983, with Gordon MacRae. While I am not positively sure of this fact, it seems to me that the young man in Florida had been someone with whom Gordon MacRae had worked during his years in the seminary while he was in Baltimore and working with the Baltimore police. In other words, this young man had originally been from the Baltimore area and had relocated in Florida. It seems to me that Gordon MacRae had indicated that he was no longer in contact with this young man. I do not have a name or any other specific information in this regard, and it is possible that some of my recollection of the details of that conversation could be faulty. I am sorry that I cannot be more helpful to you in this regard.

In closing, let me assure you of the willingness of the Diocese to be of any assistance that we can be to you in this or in any other case.

Sincerely,

(Msgr.) Francis J. Christian
Secretary
Chancellor

cc: Ass't. County Atty. Bruce Reynoldx



City of Keene

Police Department 11 Washington Street New Hampshire 03431

January 7, 1994

MSGR. Christian
215 Myrtle Street
Manchester, New Hampshire 03104

Dear Sir,

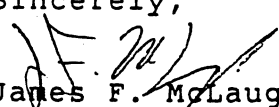
I want to say that I enjoyed meeting both you and MSGR. Quinn on January 6th. I can appreciate the burden that you both have been under as a result of this criminal proceeding and the civil actions.

To follow up on our conversations, you were going to give us either telephone numbers or addresses for Father Stephen Scruton and Father Michael Barrett.

In reviewing documents, an additional question came up. In the December 5th, 1983 memo was a reference to a young man Father MacRae was involved with who was from Florida. Do you have this person's name or any information that would help to identify him? Did Father MacRae come into contact with this young man in New Hampshire, Baltimore or in the State of Florida?

Once again it was a pleasure meeting both you and MSGR. Quinn.

Sincerely,


James F. McLaughlin
Detective

cc: Bruce Reynolds
Robert Gainor
file

FAX 357-9823

January 20, 1994

TO: Attorney James E. Higgins
FROM: Msgr. Francis J. Christian
RE: The Following

The enclosed is self explanatory, to be added to the ever-increasing bulk of the file.

I have now been informed that Gordon has filed a lawsuit against Atty. Dickson and Atty. Gleichman as well.

Willsborough, SS.
Northern District

Superior Court

[REDACTED]

VS

GORDON MACRAE

AND

THE ROMAN CATHOLIC BISHOP OF MANCHESTER, INC.

FIRST SET OF INTERROGATORIES PROPOUNDED BY THE PLAINTIFF
TO BE ANSWERED BY THE DEFENDANT GORDON MACRAE

The following constitute interrogatories propounded by the Plaintiff, [REDACTED], to be answered by the Defendant, Gordon MacRae, under oath, pursuant to and within the time prescribed by New Hampshire Superior Court Rule 36. All answers must be answered in full and contain all facts and evidence which substantiate the answer as it is given and which would be presented to the Court. When a question calls for the possibility of either an affirmative or a negative answer, do not limit your answer to a simple negative or affirmative, -- explain in detail. State the facts and reasons for your answer fully and completely. If there are any documents which substantiate any answer, or any explanation to any answer, please specifically refer to them and attach copies to these interrogatories, whether or not they are requested.

These interrogatories shall be deemed continuing so as to require supplemental answers if the Plaintiff or his attorney obtains further information between the time answers are served and the time of a hearing on the merits regarding this matter.

1. Please identify yourself stating the following:
 - A. Your full name and any other names by which you have been known.
 - B. Your date and place of birth.
 - C. Your present address.
 - D. Your occupation.
 - E. Your business address

- A. My full name is Gordon James MacRae. I have never used another name.
- B. Date of Birth: April 9, 1953
Place of Birth: Beverly, Massachusetts
- C. Present Address: Post Office Box 10, Route 4, Jemez Springs, New Mexico 87025-0010 Tel: (505)842-1987.
- D. I am currently unemployed due to the bringing of false charges by Plaintiff [REDACTED] and members of his family.
- E. I have no business address.

2. Please identify each and every employee, former employee which you worked with, and or lived with at the Hudson Rectory and St. Bernard's Rectory in Keene, New Hampshire.

ANSWER:

a) I have never lived or worked at the Hudson Rectory. I was, however, a resident of the Town of Hudson, New Hampshire from 1975 to 1978, but not at St. John the Evangelist Rectory. I was ordained at St. John the Evangelist Church on June 5, 1982 and had my first Mass there on June 6, 1982 as it was customary to be ordained at either the diocesan cathedral or one's home town. Since I had lived in Hudson prior to joining the Diocese of Manchester as a seminary student I chose to be ordained there. I had close friends in Hudson whom I visited each time I went to Hudson. These were Mr. and Mrs. Leo Demers (a family of three), Mr. and Mrs. Ron Houseman (a family of eight), and Mr. and Mrs. Alphonse Ratte (a family of six). When I would visit them in Hudson I would sometimes stay overnight at the Hudson Rectory so I knew the staff there well though I never lived or worked there. The following are the names of these staff whom I recall: Rev. Gerard Boucher, Rev. Norman Carrier, Rev. Leo LeBlanc, Rev. Paul Groleau, Rev. Mark Fleming, Rev. Stephen Scruton, Rev. Henry Huot, Mr. Christopher Lyons (A Hudson Police Officer who lived in the guest room of the Rectory in 1982/1983), Miss Jeanne Pinard, Mr. Wayne Thurston, Mrs. Connie St. Jean, Mrs. Diane Geehan, Mrs. Patricia Roebke, Mrs. Simone Therrien, other staff whose names I cannot recall.

b) The following are the individuals whom I lived and/or worked with at St. Bernard's Rectory in Keene, New Hampshire: Rev. Stephen Scruton, Rev. Daniel Dupuis, Rev. Michael Barrett, Rev. Gabriel Houle, Rev. Paul Pouliot, Rev. Wilfrid Bombardier, Mrs. Jeannette Barlow, Miss Lorraine Ouellette, Mrs. Bertha Houle, Mrs. Rita Suarez, Miss Pauline Chabot, Miss Andrea Hall, Mr. Robert Moynihan, Mr. Frederick Laffond, Mr. Robert Short, Mr. Michael Donnellan, One other secretary, named Gina, and her daughter, whose last name I cannot recall, also lived in the Rectory.

NB: Forty-Seven (47) of the above individuals have been contacted. Not one has ever seen [REDACTED] in either rectory, nor has any of them ever seen Gordon MacRae accompanied by [REDACTED]. All forty-seven (47) of these individuals intends to testify to this, and to other issues which demonstrate that [REDACTED] (and family) is fabricating this story. Three other individuals in the above list are deceased.

3. Please list all of those people referred to interrogatory #2 who wore a beard at any time, including both rectories, Hudson and Keene, and specify for each.

A. Of the people in which you worked with or lived with who ever wore a beard, give all the full names of each and their occupation.

B. Describe if any, in regards to those listed, any and all contacts that you are aware of between these people and the plaintiff at both the Hudson and Keene Rectories and specify.

ANSWER:

A. To reiterate, I never lived or worked at the Hudson Rectory. However, I am aware that, between 1979 (the first time I ever visited there) and 1983 there were two individuals there with beards. These were Rev. Leo LeBlanc and Rev. Norman Carrier. I do not believe they were in Hudson at the same time. As I have been away from the Diocese for a long time I do not know their current occupations. Both were short (much shorter than [REDACTED]), thin individuals in their thirties at the time. I am not aware of any other person in Hudson or at the Keene rectory who had a beard.

B. I am not aware of any contact between these individuals and Plaintiff [REDACTED] in either Hudson or Keene. Up until my ordination on June 5, 1982, I was stationed 150 miles from Hudson in the town of Groveton, New Hampshire. I went to St. John's in Hudson only the day before the ordination ceremony. Five friends from Baltimore (all five were police officers) were with me and stayed as guests there and in another nearby rectory.

One of them videotaped the ordination. I do not have this tape but I have reviewed it. [REDACTED] is clearly visible at the ordination on June 5, 1982 and first Mass on June 6, 1982 because he towers over everyone in the church. He may have seen these individuals there, but I am not aware of any other contact he could have had with them. Of course, I am making efforts to obtain this tape and have it reviewed by the forty-seven individuals mentioned in Interrogatory #2 to ascertain whether [REDACTED] is recognized by any of them.

4. Please describe in detail any and all known investigations regarding sexual assault, solicitation or any other investigations involving children, young adults and minors involving you.

- A. Describe the nature of all abuses or alleged crimes involving these children, youths and minors.
- B. Describe how you came in contact with these victims.
- C. List the dates of the alleged crimes.
- D. List all church officials who had knowledge of these alleged crimes throughout your priesthood.
- E. List names of all police officers, counselors, detectives or anyone involved in each of these investigations.
- F. Attach any letters or documents pertaining to your answers.

Answer: In November of 1983, five months after I left the parish in Hampton, NH, I was accused by a Hampton youth of having hugged and kissed him in an incident alleged to have happened before I left there in April or May, 1983. There were no other details presented about the allegation. I was seeing a therapist, Dr. Henry Guertin-Ouellette at his office in York, Maine. The youth apparently told his counselor who told my therapist who then reported it to State of New Hampshire officials. I admitted that I did hug him, and that this was inappropriate in a pastor/parishioner relationship. I was never aware of, nor involved in, any investigation of this matter. I knew this youth as he had come to me with repeated problems with being harassed in and out of school by his peers. He was never an altar boy contrary to what has been reported in the media. In May of 1986 this individual reported the incident to another counselor in apparent retaliation for having been dismissed from a Catholic high school. The new counselor reported it not knowing that it had been reported three years earlier. The youth then added a new allegation that he was fondled by me during this incident. I was not aware of the investigation, and was never approached by investigators, but I have now learned that the investigation was closed and determined to be unfounded according to documentation from the Division of Children and Youth Services. In 1988 this same youth again contacted investigators and made still further claims. In 1993, after reading the false allegations brought by your client and members of his family, this same youth again contacted police investigators with still further claims of a more serious and bizarre nature. I am not certain as to who, exactly, he contacted.

Page 5(b)
#4 (continued)

The only church official whom I am aware was notified of the investigation by DCYS is Msgr. Francis Christian, Ph.D., Chancellor of the Diocese of Manchester.

In June of 1987 I left ministry in the Diocese of Manchester of my own accord. In November, 1988, while director of Monadnock Region Substance Abuse Services, I agreed to a guilty plea of endangering a minor, i.e. attempting a verbal solicitation of a fifteen year old male. This individual was not a client of Monadnock Region Substance Abuse Services, nor was he a parishioner of St. Bernard Church in Keene. I knew this person and his parents as friends who often called my home. The investigation was conducted by Det. James McLaughlin of the Keene, NH, police department. Because I was no longer assigned by the Diocese of Manchester I am not aware of any Church officials who were notified.

In 1993 your client and two members of his family brought false allegations of having been sexually assaulted by me and other, unnamed, priests in the early 1980's. There are no dates I can provide for these alleged crimes, or church officials who were aware of them, because the alleged crimes did not take place. The only police officer I am aware of having investigated this is Det. James McLaughlin of the Keene Police Department. I knew your client and his family first when I served a Summer internship as a graduate student in their parish for eight weeks in 1979, then as a family friend for the following several years.

5. From the first set of interrogatories, you answered that you declined to form a youth ministry at St. Bernard's Parish in Keene, New Hampshire. Why did you decline to do so?

ANSWER: I am not certain what "first set of interrogatories" this refers to however this is the answer to the question: Youth ministry was not a part of the job description of the person I was replacing. It generally involves a lot of organizing and larger parishes generally hire someone for youth ministry. Asking me to do it was a way of trying to save money. I declined because it would only have exacerbated an already overburdened work load in the parish and I did not see it as my job.

6. Please state the person or persons who offered this position to you?

ANSWER:

No one "offered" it to me. Rev. Gabriel Houle, the pastor, asked if I would consider doing it. As indicated above, I declined.

7. Please state what you recall you gave to the above named person or persons as to the reason for declining.

ANSWER:

I gave Rev. Gabriel Houle the same answer I have provided hereinabove.

8. Was your real reason for declining based on your sexual misconduct, feelings or history with the minor boys you have been in contact with throughout your priesthood?

ANSWER:

There was no allegation of sexual misconduct at the time I declined youth ministry, there were not, and are not, feelings as inferred above, there was no history as inferred above, I had been a priest for only a year at the time I declined to do this, and there is no other reason than what I have presented hereinabove.

9. Please attach a copy of every sheet of paper, notes, records, or any type of documentation relating to the Plaintiff in this case, including personal notes, correspondence, writings to or from the Plaintiff which is or was ever in your possession.

ANSWER:

I have no personal notes, correspondence or writings to or from Plaintiff [REDACTED] nor were there ever any in my possession, nor have I ever been aware of any.

10. State the name of the probation officer you claim to have given the letter, or a copy of the letter, you claim to have received from the Plaintiff in 1989.

ANSWER: I have never claimed to have received a letter from Plaintiff [REDACTED] in 1989 or at any other time.

11. Please give detailed descriptions, including when and where, any and all physical contacts and/or sexual contacts with the Plaintiff occurred, but not limited to the following:

- A. Hugging;
- B. Kissing;
- C. Touching;
- D. Fondling;
- E. Masturbation;
- F. Massages;
- G. Anal intercourse

I have never engaged in any of the above behaviors with Plaintiff [REDACTED].

12. Please describe in detail what the "spider game" is, including whom you have played this game with and when.

I have no knowledge of exactly what this refers to. Another individual used this term in an unfounded allegation against me in 1986 however the investigative report indicates that this was the individuals own terminology and not mine. I have never "played this game" with anyone.

13. Does the above stated game involve physical contact, if so what kind? Please describe in detail.

ANSWER:

As stated hereinabove, i have no knowledge of what, exactly, this term refers to.

14. State names, addresses, ages and occupations of any expert witnesses you expect to be called to the trial.

ANSWER: I am not certain what trial this question refers to. If it refers to the expected criminal trial over the allegations brought by other members of Plaintiff [REDACTED] family then I expect to have a list of expert witnesses and their credentials soon.

If this question refers to the civil trial over the allegations brought by Plaintiff [REDACTED] then I expect to use the same list of expert witnesses.

Respectfully submitted,



By his Attorneys
ABRAMSON, REIS & BROWN
1819 Elm Street
Manchester, New Hampshire 03104
(603) 647-0300

Dated: December 3, 1993

By: Mark A. Abramson
Mark A. Abramson, Esquire
1819 Elm Street
Manchester, NH 03104
(603) 647-0300

December 30th, 1993
Dated

Gordon MacRae
Gordon MacRae

STATE OF NEW HAMPSHIRE
Hillsborough, SS.
Northern District

Personally appeared the above named Gordon MacRae, who upon oath declared that the statements in the foregoing Interrogatories by him subscribed are true to the best of his knowledge and belief.

Dolores J. Malpass
~~Justice of the Peace/Notary Public~~

MY COMMISSION EXPIRES: Oct. 30, 1996

THE STATE OF NEW HAMPSHIRE

Hillsborough, SS
Northern District

Superior Court

[REDACTED]
vs.

Gordon MacRae

and

The Roman Catholic Bishop of Manchester, Inc.

PLAINTIFFS FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT GORDON MACRAE

NOW COMES [REDACTED], plaintiff in the above-captioned matter, and requests that in accordance with Superior Court Rule 35, that defendant, Gordon MacRae, produce within thirty (30) days the following documents and things for inspection and copying:

INTRODUCTION AND DEFINITIONS

A. All documents or other information produced in response to these requests should be either (1) produced in original file folders or in other original means of segregation as maintained by the defendant, or (2) organized and identified in accordance with each specifically numbered request below to which your production is responsive.

B. 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, and includes, but is not necessarily limited to, the following terms, whether printed or recorded, or filmed, or reproduced by any other mechanical process, or written or produced by hand, or whether or not claimed to be privileged

against discovery on any ground, and in the case where original and/or non-identical copies are not available, identical copies of original documents and copies of non-identical copies, namely: contracts, agreements, communications, correspondence, tapes recordings, cablegrams, radiograms and telegrams, minutes, notes, memoranda, telephone slips, studies, reports, summaries, agenda, bulletins, notices, announcements, instructions, charts, manuals, brochures, schedules, price lists, sketches and drawings, plans, specifications, purchase orders, bids, photographs, opinions, reports of consultants, personal calendars, ledgers, diaries, medical records or histories, and any other documents.

C. As used herein, the term "communication" means the act or fact of communicating, including telephone conversations, letters, memoranda, or other written communication, meetings or any occasion of joint or mutual presence as well as the transfer of any document from one person to another.

D. The acts of any corporation, partnership, trust or other association referred to herein are defined to be the acts of its present or former:

1. Directors
2. Officers
3. Employees
4. Representatives
5. Agents
6. Attorneys
7. Affiliated or related companies acting with respect to or in conjunction with the transactions at issue.

E. As to any document related to matters described herein which is not in your possession but which you know to exist, you are requested to identify such document and indicate to the best of your ability its present or last known custodian.

F. In the event you claim that any of the materials requested herein are privileged against discovery, please identify the document, communication or source of information you claim as privileged and set forth the precise grounds on which the privilege is asserted.

REQUESTS FOR PRODUCTION

1. All records, reports, memoranda, correspondence, minutes, tapes, notes, or any other papers or documents of any description which in any way relate to the Plaintiff, including all of those to and from Plaintiff, throughout the entire period of 1978 to present.

RESPONSE: I am not aware of the existence of any of the above requested documents.

2. All statements, correspondence, investigation reports, written or taped recollections, accounts or other descriptions of the incidents or contentions described in Plaintiff's writ of summons or events or circumstances related to such incidents or contentions.

RESPONSE: Any of the above which does exist is in the possession of the Rockingham and Cheshire County attorneys.

3. All letters, notes, postcards or any other written or taped correspondence between yourself and the Plaintiff at any time.

RESPONSE: I am not aware of the existence of any of the above requested documents.

4. All documents maintained by the Roman Catholic Church identifying the dates and personnel involved in each known investigation of yourself pertaining to the Plaintiff and or all other known investigations relating to sexual abuse, sexual misconduct or solicitation of minors.

RESPONSE: I am not certain what is meant by "The Roman Catholic Church". If you are referring to the Diocese of Manchester, then I am not aware of the existence of any of the above requested documents and would have no access to them if they did exist.

- 4 -

5. Any discipline records, reprimands, notes, memos, reports, or any other document related to your professional competence, or your abilities as a Priest.

RESPONSE: I am not aware of the existence of any of the above requested documents.

6. All reports, orders, minutes, notes, correspondence or other documents involving the Priests and or staff at the Church which relates in any way to the Plaintiff or the matters alleged in Plaintiff's writ of summons.

RESPONSE: I am not aware of the existence of any of the above requested documents and would have no access to them if they did exist.

7. All Church reports or minutes, reports to the Bishop, or other documents relating to Church committees, or other governing bodies within the Church or relating to the staff of the Church and involving or dealing with the Plaintiff or other matters alleged in Plaintiff's writ of summons.

RESPONSE: I am not aware of the existence of any of the above requested documents and would have no access to them if they did exist.

8. All records, reports, findings, correspondence, recommendations or guidelines which relate in any way to the conduct, skill or actions of yourself in relation to the Plaintiff and the matters alleged in plaintiff's writ of summons.

RESPONSE: I am not aware of the existence of any of the above requested documents and would have no access to them if they did exist.

- 5 -

9. All Church By-laws or rules and regulations, priests By-laws or rules in effect from the time period of 1978 to present.

RESPONSE: I am not aware of the existence of any of the above requested documents and would have no access to them if they do exist.

10. All written procedures or policies which the Church routinely followed relating to the sexual misconduct, sexual abuse and/or solicitation by it's Priests involving minors during the following periods of time: 1978 - Present.

RESPONSE: I am not aware of the existence of any of the above requested documents and would have no access to them if they did exist.

11. A list of names and addresses of all Priests, staff, persons living at, including those who stayed overnight on an occasional basis, and who were employed at the Hudson Rectory from 1978-1983.

RESPONSE: As I never lived and/or worked at the Hudson Rectory, and have never been on staff or employed there, and only infrequently visited there, I am not aware of the existence of the above requested list, and would have no access to it if it did exist. You may refer to Interrogatory # 2 for a partial list of names. I do not know the current addresses of the individuals on this list.

12. A list of names and addresses of all Priests, staff, persons living at, including those persons who stayed overnight on an occasional basis, and who were employed at the Keene rectory from 1983-1987.

RESPONSE: I am not aware of the existence of the above requested list and would have no access to it if it did exist. I did not personally maintain such a list when I was assigned to St. Bernard Rectory. You may refer to Interrogatory #2 for a partial list of names. I do not know the current addresses of the individuals on this list.

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13. Any contracts or agreements between the Church and yourself, Gordon MacRae, pertaining to sexual relations, sexual misconduct, sexual abuse or sexual solicitation while affiliated with The Roman Catholic Church.

RESPONSE: I am not certain what is meant by "while affiliated with the Roman Catholic Church." I have been affiliated with the Roman Catholic Church since I was baptized at, approximately, the age of one month. Nevertheless, I am not aware of the existence of any of the above requested documents.

14. Any professional or commercial agreement, including contracts and amendments thereto, between the Church and yourself, Gordon MacRae, relating to sexual relations, sexual misconduct, sexual abuse or sexual solicitation while affiliated with The Roman Catholic Church.

RESPONSE: I am not aware of the existence of any of the above requested documents.

15. All records, reports and files pertaining to your treatment/counselling by Judith Patterson of the Catholic Charities pertaining in any way to the Plaintiff, sexual relations, abuse or solicitation of any minor.

RESPONSE: I have never met a "Judith Patterson" nor have I ever been treated/counseled by any person in connection with the Catholic Charities.

16. All records, reports, and files pertaining to your treatment and or counselling provided by the House of Affirmation in Massachusetts.

RESPONSE: I have never been treated/counseled at the House of Affirmation in Massachusetts. I did undergo assessment there in 1988 and was self-referred. The House of Affirmation closed in 1989. I do not have possession of, or access to, the records or files of House of Affirmation and no knowledge of whether they continue to exist and/or where, but I am aware that these records, if they do exist, are confidential and protected by psychotherapist-patient privilege.

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17. All records, reports and files pertaining to your treatment and counselling at Villa Louis Martin in New Mexico.

RESPONSE: I do not have possession of, or access to, the records or files of Villa Louis Martin in New Mexico. These records are confidential and protected by the doctor-patient and psychotherapist-patient privilege. Villa Louis Martin closed and merged with another program in 1991. A check with their attorneys indicates that their policy is that files will be released only by signed patient authorization and only to licensed physicians and/or psychotherapists.

18. All records, report and files pertaining to your treatment and counseling at the Strafford Guidance Center.

RESPONSE: I was never treated and/or counselled at the Strafford Guidance Center. I did undergo a brief, outpatient assessment there in January, 1989. I do not have possession of this assessment, but I do know that it is confidential and protected by psychotherapist-patient privilege.

19. Any and all police reports, investigations, memos, letters pertaining to this case, the Plaintiff or any other alleged sexual misconduct, sexual abuse or solicitation of minors.

RESPONSE: Any of the above requested documents which may exist are in the possession of the Cheshire and/or Rockingham County Attorney.

- 8 -

20. All records, reports, files pertaining to your treatment and counselling for sexual misconduct, sexual abuse, solicitation, including treatment records, reports and files pertaining to your alleged seizure disorder by Dr. Douglas W. Barrett.

RESPONSE: Any of the above which may exist is confidential and protected by physician-patient and/or psychotherapist-patient privilege.

21. All records reports and files pertaining to your treatment and/or counselling by Dr. Guertin-Ouellette.

RESPONSE: Dr. Guertin-Ouellette is retired and living in the State of Maine. I am not aware of, nor do I have access to, his files. Any which do exist are confidential and protected by psychotherapist-patient privilege.

22. All records, reports, letters, notes, correspondence to or from any and all of your probation officers.

RESPONSE: These documents are privileged and confidential and can only be released by court order.

N.B. By acknowledging the existence, or possible existence, of any medical care, psychotherapy, assessment or evaluation, residential or outpatient treatment I have received, I do not and will not waive any rights I have under federal law and/or laws specific to the State of New Hampshire, the Commonwealth of Massachusetts, the State of New Mexico or the State of Maine, where some of the documentation of this treatment may exist, to protection by physician-patient, psychotherapist-patient, priest-penitent, attorney-client privileges, privilege against self-incrimination and/ or any other privilege or rights assigned to me by law.

signed: _____

Gordon J. MacRae December 30, 1993

Gordon J. MacRae

February 9, 1994

Peter Lechner, s.P., S.T.L., Ph.D.
Program Director
The Jemez Program
Jemez Springs, New Mexico 87025-0010

Dear Dr. Lechner:

Please complete the attached Questionnaire in as much detail as possible and return it to my office as soon as possible in the enclosed, postage paid envelop. Please use additional paper if needed. Your cooperation is deeply appreciated. Please note the attached release of information formed signed by Gordon MacRae.

Sincerely,

Ron Koch
Attorney at Law

-
1. Please indicate the dates and length of time in which Gordon MacRae was in the residential treatment program at Villa Louis Martin:
 2. Please list the professional staff members who were involved with his therapy program and their credentials:
 3. Please present a brief description of the Villa Louis Martin program:
 4. Please describe how Gordon MacRae came to be referred to the Villa Louis Martin program:
 5. A Treatment Summary was prepared by you on December 26, 1989, and sent to the Cheshire County Department of Probation. Who was this report sent to?
 6. Does the report, and any other reports prepared by you, generally reflect a collaborative effort by the treatment staff listed above?
 7. In this report cited above, you make reference to three other reports or evaluations. On page one of your report you quoted the House of Affirmation evaluation as indicating that "Father MacRae is a sexual offender who currently is not able to curtail such behavior without professional support." Was this the view of you and the Villa Louis Martin staff or were you only quoting the House of Affirmation report?

8. How long was Gordon MacRae at the House of Affirmation?
What is the current status of the House of Affirmation and how can they be contacted?
10. Do you and the staff of Villa Louis Martin agree that Gordon MacRae is a "sexual offender" and was not able to curtail such behavior without professional support?
11. Also in the Villa Louis Martin report you cited the Strafford Guidance Center report as indicating that "Mr. MacRae appears to fit the description of a fixated sexual offender, a man who has a primary sexual interest in children, usually males." Was this the view of you and the Villa Louis Martin staff or were you only quoting the Strafford Guidance Center report?
12. Was the Strafford Guidance Center evaluation an inpatient or outpatient process? If inpatient, how long was it? If outpatient, how many sessions did Gordon MacRae have there?
13. Can you provide the name and academic degree of the person who conducted the evaluation and prepared the Strafford Guidance Center report?
14. Do you and the staff of Villa Louis Martin agree with the Strafford Report that "Mr. MacRae appears to fit the description of a fixated sexual offender, a man who has a primary sexual interest in children, usually males" ?
15. Are you aware that the comments cited in the above two reports from House of Affirmation and Strafford Guidance Center have been repeatedly attributed to you and the Villa Louis Martin program in New Hampshire press reports?
16. Can you comment on whether the press reports attributed to you have been accurate?
17. What is the average length of stay in the Villa Louis Martin program? Is it somewhat unusual for an individual to spend a year in this particular residential treatment program?
18. Why was Gordon MacRae in the Villa Louis Martin program for one year?
19. Please describe the diagnoses and prognoses of the treatment staff of Villa Louis Martin regarding Gordon MacRae.

20. Please summarize the December 1988 report prepared by Dr. Guertin-Ouellette, Ph.D. which you refer to in your December, 1989 report.
21. How long was Gordon MacRae in weekly outpatient therapy with Dr. Guertin-Ouellette, according to this report?
22. Of the three reports cited above, from the House of Affirmation, the Strafford Guidance Center, and Dr. Guertin-Ouellette, and after one year of residential treatment of Gordon MacRae, did the Villa Louis Martin staff have a sense that any one of these reports more accurately reflected Mr. MacRae's diagnostic issues than the others?
23. Did the professional staff of Villa Louis Martin feel that Gordon MacRae was honest and successful in treatment?
24. In his one year of treatment at Villa Louis Martin, did Gordon MacRae ever make reference to having been sexually involved or inappropriate in any way with [REDACTED], [REDACTED] or [REDACTED] from Keene, New Hampshire? If so, which one, in what way, and how often?
25. In his one year of treatment at Villa Louis Martin, did Gordon MacRae ever make reference to having been sexually involved or inappropriate in any way with [REDACTED] [REDACTED] from Hampton, New Hampshire, other than the incident of hugging which he has acknowledged as having happened in 1983? If so, in what way, and how often?
26. In his one year of treatment at Villa Louis Martin, did Gordon MacRae ever make reference to having been sexually involved or inappropriate in any way with [REDACTED] from Keene, New Hampshire, other than the incident of inappropriate and solicitous comments which he pleaded guilty to in 1988? If so, in what way, and how often?
27. Did Gordon MacRae discuss with the therapists at Villa Louis Martin the allegation later brought by [REDACTED] that Gordon MacRae took lewd photographs of him? What was Gordon MacRae's and the staffs' disposition regarding this allegation?
28. Do you wish to add any further information?

signed:

Peter Lechner, Ph.D.

Date: _____

Notarization of Signature:

Notary Public / Justice of the Peace

- 1. Please indicate the dates and length of time in which Gordon MacRae was in the residential treatment program at Villa Louis Martin:**

From March 13, 1989 to April 25, 1990. The length of time was about 13 months.

- 2. Please list the professional staff members who were involved with his therapy program and their credentials:**

Jack Ellis, M.D., Psychiatrist: Individual Therapist.
Robert Goodkind, Ph.D., Psychologist: Group Therapist.
Cynthia Corbett, Ph.D., Psychodramatist: Group Therapist.
Nancy Rosborough, M.A., A.T.R.: Art Therapist;
Marty Green, R.N., Group Therapist.
Bridget Cannon, O.P.: Spiritual Director
Richard Drabik, M.I.C.: Spiritual Director
Corinne Taylor, M.A.: Cognitive Therapist.
Hemming Atterbom, Ph.D., Physiologist
Richard Pappenfuss, Ph.D., Physiologist
Peter Lechner, s.P., Ph.D.: Program Director

- 3. Please present a brief description of the Villa Louis Martin program:**

The Villa Louis Martin program was a holistic care program for priests and brothers suffering from psychological, behavioral, or vocational issues. The program employed individual psychotherapy, various forms of group therapy, didactic seminars, and a disciplined spiritual life in order to assist those participating in the program. The process typically followed by program participants was one of greater awareness and insight into one's patterns of behavior, working through core issues underlying behavior, development of sustained appropriate coping mechanisms and behaviors versus formerly disruptive, self-defeating or inappropriate behaviors. The ultimate purpose was a life style consistent with values appropriate for priests and religious brothers.

- 4. Please describe how Gordon MacRae came to be referred to the Villa Louis Martin program:**

Referral came from the Department of Probation and the Stafford Guidance Clinic.

- 5. A Treatment Summary was prepared by you on December 26, 1989, and sent to the Cheshire County Department of Probation. Who was this report sent to?**

Karen Grovier, Probation Officer
Henry Guertin-Ouellette, Ph.D., Psychologist
David Forrest, Attorney

6. Does the report, and any other reports prepared by you, generally reflect a collaborative effort by the treatment staff listed above?

Yes, at weekly staff meetings the treatment and progress of priests and brothers in treatment was discussed by all the therapists and spiritual directors participating in each individual's program. Reports were based on the collective contribution of staff members.

7. In this report cited above, you make reference to three other reports or evaluations. On page one of your report you quoted the House of Affirmation evaluation as indicating that "Father MacRae is a sexual offender who currently is not able to curtail such behavior without professional support." Was this the view of you and the Villa Louis Martin staff or were you only quoting the House of Affirmation report?

This was not the view of myself and the staff. I was only quoting the House of Affirmation report.

8. How long was Gordon MacRae at the House of Affirmation?

Five days.

9. What is the current status of the House of Affirmation and how can they be contacted?

The House of Affirmation is no longer in existence.

10. Do you and the staff of Villa Louis Martin agree that Gordon MacRae is a "sexual offender" and was not able to curtail such behavior without professional support?

Gordon was referred to us as a "sexual offender" who needed professional treatment. During the course of treatment it became evident that his sexual offenses consisted in limited sexual activity with adults before ordination, some sexual activity with adult prostitutes after ordination (for the Villa Louis Martin program this was regarded as a moral offense and unacceptable behavior for a priest), as well as having a young man sit on his lap, hugging him and attempting to kiss him (Gordon had been drinking alcohol at the time), and in imprudent conversation with a young man who said he would do anything for money. We were aware of no other sexual offenses.

If by "sexual offender" the above question is indicating that Gordon admitted, in a court of law, to solicitation of a minor, then, in that sense we accepted that Gordon was a "sexual offender". We understand that what happened is that the youth in question had a conversation with Gordon in which the youth said he would do anything for money. Gordon asked if he meant "anything" and when the youth indicated he meant "anything" Gordon responded that that type of talk could get him into trouble. When charged, Gordon pleaded guilty in order to avoid adverse publicity for the Church. If by "sexual offender" the above question is indicating someone who repeatedly sexual abused others in an illegal fashion and was likely to continue doing so without professional help, I believe we did not consider Gordon to be a sexual offender.

11. Also in the Villa Louis Martin report you cited the Strafford Guidance Center report as indicating that "Mr. MacRae appears to fit the description of a fixated sexual offender, a man who has a primary sexual interest in children, usually males." Was this the view of you and the Villa Louis Martin staff or were you only quoting the Strafford Guidance Center report?

This was not the view of the Villa Louis Martin Staff; I was only quoting what had been said by the Strafford Guidance Center report. In the report to Probation Department I had said that although other reports have indicated a compulsive quality to his sexual acting out, he did not present as someone obsessed by sexual fantasies or driven to sexual acting out.

12. Was the Strafford Guidance Center evaluation an inpatient or outpatient process? If inpatient, how long was it? If outpatient, how many sessions did Gordon MacRae have there?

Outpatient; the report indicates that 2 hours were billed for the evaluation.

13. Can you provide the name and academic degree of the person who conducted the evaluation and prepared the Strafford Guidance Center report?

Adam Stern, M.A.

14. Do you and the staff of Villa Louis Martin agree with the Strafford Report that "Mr. MacRae appears to fit the description of a fixated sexual offender, a man who has a primary sexual interest in children, usually males" ?

No, Mr. MacRae does not fit this description.

15. Are you aware that the comments cited in the above two reports from House of Affirmation and Strafford Guidance Center have been repeatedly attributed to you and the Villa Louis Martin program in New Hampshire press reports?

Yes.

16. Can you comment on whether the press reports attributed to you have been accurate?

The reports are inaccurate in saying that the Villa Louis Martin Program diagnosed Gordon MacRae as a fixated sex offender.

The media report that Gordon was making slow progress was also misleading. In a report to the Probation Department (Report to Mr. Thomas Tewhey, Dept. of Corrections: August 4, 1989) I had said that: "In the judgment of the staff, he (MacRae) is dealing effectively with the primary issue that brought him here, his sexual behavior, and evidences a genuine sense of repentance for past misbehavior. As is typical in the treatment of sexual difficulties, other issues have also surfaced in the course of therapy and are likewise being dealt with. His therapy here is, in a sense, still in "midstream." In the only other report I believe I sent to the probation department I had said "my impression is that in his nine months at VLM Gordon had made significant progress."

17. What is the average length of stay in the Villa Louis Martin program? Is it somewhat unusual for an individual to spend a year in this particular residential treatment program?

The average length of stay is a few weeks over 6 months. Staying for a year is not unusual in the sense that "unusual" might imply resistance to treatment, poor progress or poor prognosis. Individuals who stay for a year typically experience a more profound process of recovery.

18. Why was Gordon MacRae in the Villa Louis Martin program for one year?

Gordon MacRae was in the Villa Louis Martin program for one year because of the depth of issues related to abuse he received as a child. Temporal lobe epilepsy was also involved. Gordon himself requested that he stay for a year because he had fairly good insight into his issues and recognized that six months were not sufficient to deal adequately with them.

19. Please describe the diagnoses and prognoses of the treatment staff of Villa Louis Martin regarding Gordon MacRae.

Gordon was charged and admitted to solicitation of a minor, as indicated in number 10 above. This was the immediate reason for his being referred to Villa Louis Martin. Two other incidents of sexual impropriety with youth were brought forward against Gordon, one which he admitted to and the other he consistently claimed never happened. A previous evaluation referred to Gordon as "a sexual offender who currently is not able to curtail such behavior without professional support" and another report said that he "fitted the description of a fixated sexual offender, a man who has a primary sexual interest in children, usually males." These reports drew conclusions on the basis of a few hours or few days of observation. The Villa Louis Martin accepted these diagnoses as working hypotheses, but, in time, came to see that Gordon was not fixated, definitely had control over his sexual behavior, but had, however, paid adults for sexual favors. In time it became evident that Gordon's behavior was affected by factors other than sexual drive. Dr. Guertin-Ouelette earlier had observed, after extensive psychotherapy with Gordon that, sexuality was not the primary issue for Gordon¹. These factors are:

Alcoholism: By his own admission Gordon was an alcoholic, with this disease being in remission for approximately six years before entering the program at Jemez Springs. There have been no indications of a return to alcoholic behavior from the time he entered the Jemez Program until the present.

Depression, suicidal ideation and suicide attempt: Gordon had attempted suicide shortly before entering the VLM program. (There is a history of suicide in Gordon's family.) He was depressed when he entered Villa Louis Martin. The depression was related to accusations made in his regard, as well as to a compulsive style of work and assumption of responsibility for others. Childhood events had probably disposed him toward depression. Rather than experiencing clearly defined depressive feelings, however, Gordon suffered from a lack of awareness of his feelings, albeit feelings were present. His being "out of touch" with his feelings seems to have been related to the abuse he suffered when he was a child, and to temporal lobe epilepsy.

¹. While the two reports mentioned earlier, one from House of Affirmation where Gordon was for only five days and the other from Strafford Guidance Clinic where Gordon was evaluated, according to the report, for two hours, arrived at far-reaching, all-embracing and definitive conclusions in regards to Gordon, the staff at VLM believes that such time periods would be inadequate to properly understand the complex problems which Gordon had. The conclusions arrived at with regards to Gordon at VLM came after many months and were similar to those arrived at by Dr. Guertin Ouelette after four years of psychotherapy with Gordon.

In October of 1989 an EEG was administered to Gordon and indicated that he was suffering from temporal lobe epilepsy. He was prescribed trilaon. He responded well to drug therapy for a representable period of time. His psychological/emotional functioning was quite different since beginning anticonvulsant medication, most noticeably in his greater awareness and expression of feelings.

Psychological consequences of physical, emotional, and sexual abuse. One of the apparent effects of the serious abuse Gordon suffered during his childhood was his penchant for taking on responsibility and caring for the needs of others -- more than for himself. This went to the extent of his assuming responsibility for the misdeeds of others. He also suffered from a feeling that he had hurt or exploited others and was not able to forgive himself for that².

In time this became the major therapeutic issue in Gordon's therapy. In therapy with Dr. Ellis Gordon came to realize that, as a child, he always believed that he had the problems and was at fault rather than his father. In therapy Gordon came to realize how disturbed his father was. This observation came after exploration of terrifying events he experienced as a child, e.g., his father wrapping him in a blanket or rug and then beating him while he was immobilized. On another occasion Gordon was tied to a tree while his father held a gun to his head, deciding whether or not to shoot him.

Gordon's progress in the program was excellent. He took personal responsibility for past and future behavior. He demonstrated an appreciation of and fidelity to ethical standards, and had an empathy and respect for others. He demonstrated god insight into past attitudes, behavior, feelings and thoughts, and was highly motivated to avoid past behavior.

The staff did not consider Gordon to be at risk for acting out behavior.

20. Please summarize the December 1988 report prepared by Dr. Guertin-Ouellette, Ph.D. which you refer to in your December, 1989 report.

Summary of December 1988 report by Dr. Guertin-Ouelette, Ph.D.:

Gordon came to Consultation Service for Clergy and Religious 4 years previous, suffering from alcoholism, regarded as self destructive behavior. After some time an allegation of improper behavior with a young boy was reported to Dept. of

² Dr. Guertin-Ouelette in his brief summary points out certain consequences that Gordon suffered from being abused: self destructive behavior, feeling responsible for everyone and taking on responsibility for anything that happens around him, being undeserving of anything, poor self-esteem.

Social Services but was dropped as being questionable. Gordon had a tendency to initiate close relationships with younger boys. These proved to be very straight forward and altruistic types of relationships, chosen in order to be kind in order (Dr. Guertin-Ouelette's assumption) to treat himself the way he wished his parents had treated him.

Gordon was emotionally and physically abused by his father. This had led to feelings of abandonment, of being responsible for everyone, and of being undeserving of anything -- traits typical of the abused child. As a result he suffered from poor self esteem and self destructive tendencies. One of Gordon's strongest traits is his self destructive tendency.

Another aspect of the abused child that Gordon took on was a sense of responsibility for anything that happened around him. This might explain his eagerness in pleading guilty to the charge of endangerment. He was never been able to place blame on others. In the face of any apparent injustice Gordon finds reasons why this was due to him.

Some progress has been made in therapy, but Gordon was still in denial (regarding the above mentioned personality dynamics). Dr. Ouelette recommended that future therapy address obsessive compulsive behavior, particularly in regards to alcoholism, and make him aware of self-destructive tendencies. Dr. Ouelette felt that Gordon needed to work on self-concept and self esteem. Twelve step groups were recommended, and it was recommended that he go to a residential treatment center.

21. How long was Gordon MacRae in weekly outpatient therapy with Dr. Guertin-Ouellette, according to this report?

Four years.

22. Of the three reports cited above, from the House of Affirmation, the Strafford Guidance Center, and Dr. Guertin-Ouellette, and after one year of residential treatment of Gordon MacRae, did the Villa Louis Martin staff have a sense that any one of these reports more accurately reflected Mr. MacRae's diagnostic issues than the others?

My impression is that the staff's sense of Mr. MacRae's diagnosis was that Dr. Guertin-Ouellette's report, which was written after four years of psychotherapy, reflected his diagnostic issues more accurately than the reports from the House of Affirmation, where Gordon was for only five days, and the Strafford Guidance Center, where Gordon was tested for approximately two hours, according to the report itself.

Did the professional staff of Villa Louis Martin feel that Gordon MacRae was honest and successful in treatment?

Yes.

24. In his one year of treatment at Villa Louis Martin, did Gordon MacRae ever make reference to having been sexually involved or inappropriate in any way with [REDACTED] [REDACTED] from Keene, New Hampshire? If so, which one, in what way, and how often?

Gordon MacRae never made reference to having been sexually involved or inappropriate in any way with [REDACTED] or [REDACTED] from Keene, New Hampshire.

25. In his one year of treatment at Villa Louis Martin, did Gordon MacRae ever make reference to having been sexually involved or inappropriate in any way with [REDACTED] from Hampton, New Hampshire, other than the incident of hugging which he has acknowledged as having happened in 1983? If so, in what way, and how often?

Gordon MacRae never made reference to having been sexually involved, etc., with [REDACTED] other than the incident mentioned.

26. In his one year of treatment at Villa Louis Martin, did Gordon MacRae ever make reference to having been sexually involved or inappropriate in any way with [REDACTED] from Keene, New Hampshire, other than the incident of inappropriate and solicitous comments which he pleaded guilty to in 1988? If so, in what way, and how often?

In his year of treatment at Villa Louis Martin Gordon only made reference to a remark he made to [REDACTED] when [REDACTED] said he needed money and would do anything for money. I believe that Gordon asked if he meant "anything" and added that [REDACTED] needed to be careful because that could get him into trouble.

27. Did Gordon MacRae discuss with the therapists at Villa Louis Martin the allegation later brought by [REDACTED] that Gordon MacRae took lewd photographs of him? What was Gordon MacRae's and the staffs' disposition regarding this allegation?

Gordon did discuss with the staff the accusation that he made lewd photographs of a youth -- at least with Dr. Ellis. Gordon maintained that he had never done this.

Dr. Ellis checked into this and felt that Gordon was not withholding. Gordon also spoke with me about this.

28. Do you wish to add any further information?

When Gordon first came to us, his presence was preceded by reports from House of Affirmation and Strafford Guidance Clinic. The House of Affirmation report was written after Gordon was there for five days and the Strafford Guidance Clinic report was written, according to their report, after two hours of interviewing -- lengths of time that would not seem adequate to accurately evaluate the complex problems Gordon suffered from. These reports were very condemnatory of Gordon and pictured him as a child offender with little conscience. It was only after time that it became clear that Gordon did not fit the description of the House of Affirmation and Strafford Guidance Clinic. He had a depth of conscientiousness and sensitivity to others, and a very high degree of ethical concern that did not fit with what the reports said of him. These conclusions were more consonant with the conclusions of Dr. Guertin-Ouelette who had seen Gordon in psychotherapy for a period of four years.

In a report to the Department of Probation I mentioned the accusations that had been made in the above mentioned reports by way of background information regarding what had been said about him. I indicated that Gordon did not present as someone obsessed by sexual fantasies or driven to sexual acting out. I then went on to speak about Gordon's progress as well as the issues he was currently working on in therapy. I feel I tried to be very honest. I was later dismayed to find out how my reports were misinterpreted, and positive statements that were essential to understanding Gordon and his therapy were left out. This I feel was a serious injustice.

From the vantage point of time, having come to understand Gordon better and having given careful consideration to all that has happened, I now feel that a dominant influence in Gordon's life has been his tendency to take responsibility for others, even to the point of taking blame on himself for the misdeeds of others. This appears to stem from the tragic events of his childhood, which I believe Dr. Guertin-Ouelette correctly understood, and were worked on successfully in Gordon's treatment here.

An incident from Gordon's time here has always remained deeply impressed on my consciousness and illustrates the personality dynamics just referred to. At one time, while directing the Villa Louis Martin Program, I found it necessary to dismiss a particular priest for not complying with program expectations. This individual belonged to a small therapy group which consisted of about seven members, one of whom was Gordon. The group became very angry toward me for dismissing their fellow group member. In one of their group sessions, under the direction of

the art therapist, the group vented their anger in regards to me until Gordon took the stance that it was really his and the group's fault that their fellow group member had been dismissed. Gordon lead the group to believe that it was his and their fault because they had not dealt with his resistance. In reality the "resistance" of that individual was related to personal decisions he made and was not the responsibility of his group.

Note this report is being sent directly to Mr. Ron Koch, without Gordon seeing its contents.

COPY

signed: _____
Peter Lechner, Ph.D.

*original signed and
notarized*

Date: _____

Notarization of Signature:

Notary Public / Justice of the Peace

gnatures require that you type first the name of the
elow it a signature line frequently preceded by the
r will sign for the corporation. The corporate offi-
ow the signature line, centered and capitalized. If
rship rather than an officer of a corporation, the
signature but the title is omitted.

required to attest to the fact that the
the corporation. When a corporate seal is to be
ll indicate if it is to be attested), the word ATTEST
and below the signature line, as shown here. The
word Secretary.

XYZ CORPORATION

By _____
Vice-President

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wo and, in the case of single-spaced lines, three)
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be carried over. This prevents the unauthorized
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signatures be witnessed. In these cases, an attes-
s of the attesting witnesses. The attestation clause
the will illustrated on pages 425-427, or it may
e presence of." A common form of the clause is
delivered in the presence of."

v typed on the left side of the page, directly op-
r side. Below the attestation clause, a
a two parties to an agreement are not
e in separate attestation clauses and separate
d opposite the signature lines for the two parties.

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signature of the testator and may be typed from
often indented on the left side or on both sides.
is often lengthy, it is usually single-spaced. It
in the presence of the testator and of each other
to witness the will; the clause may also include
in the will.

r the addresses as well as the signatures of the
ave to be located when the will is ready for pro-
re lines for witnesses are illustrated here: one for
y client document.

The foregoing instrument, consisting of four (4) pages,
including this page signed by the witnesses, was on the date
hereof signed by the said MARTIN PETER CUTHBERTSON and declared
by him to be his last will and testament, and at his request, and
in his presence, and in the presence of each other, we have
subscribed our names as witnesses to the said will.

_____ Address _____
_____ Address _____

In the Presence of:

_____ SEAL
CHARLES H. McCORMICK

_____ SEAL
NANCY K. PATTERSON

All signatures on a will should appear on the same page. The ideal arrangement is for
at least the last two lines of the text of the will, the testimonium clause, the testator's
signature, the attestation clause, and the signatures of all witnesses to be all on one
page. If it is impossible for the signatures to be all on one page, an alternative is to
type at least one line of the attestation clause on the signature page, with the remain-
der of the clause on the last page with the witnesses' signatures.

ACKNOWLEDGMENT

Certain documents must be subscribed to in the presence of a notary public before
they can be recorded or filed. They must bear a certificate of acknowledgment that is
annexed to the document. An acknowledgment is a formal declaration in which a
notary public or other authorized individual affirms that the signature is genuine and
that the person signing the document did so as his or her own act. The acknowledg-
ment may be either single- or double-spaced, and it must contain the following: (1)
a statement of venue, (2) the date, (3) the purpose of the acknowledgment, and (4)
the signature and frequently the seal and the expiration date of the commission of
the notary public. Each of these parts is described in the paragraphs below.

Acknowledgment forms vary from state to state. The two acknowledgments illus-
trated on these pages—one an individual acknowledgment, one a corporate acknowl-
edgment—are only two of many possible forms. Two other forms are shown in Chap-
ter 11. Since you will be typing many certificates of acknowledgment, you will need
to have the appropriate samples in your form file. It is important to remember that the
form of the acknowledgment is determined by the state where the instrument is to be
recorded, not by the state in which the instrument or the acknowledgment was pre-
pared. If your office is involved in interstate legal work, it would be wise to include
acknowledgment forms from other states in your form file. Or you may refer to one
of the form books listed in the Appendix to this book.

Ron Koch, P.A.

ATTORNEY & COUNSELOR AT LAW

3358

March 7, 1994

Rev. Msgr. Francis Christian, Ph.D.
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

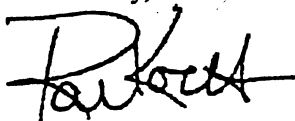
Dear Msgr. Christian:

I have enclosed a photocopy of a letter sent by you to Detective James F. McLaughlin of the Keene Police Department dated January 11, 1994. In this letter you make reference to a letter from Detective McLaughlin to you dated January 7, 1994.

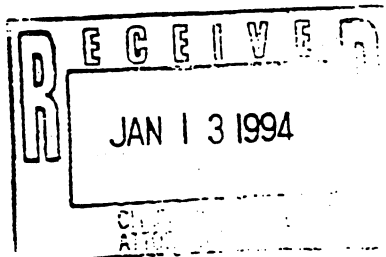
Would you kindly send me a copy of Detective McLaughlin's letter?

Thank you for your cooperation in this matter.

Sincerely,



Ron Koch
Attorney at Law



January 11, 1994

CONFIDENTIAL

James F. McLaughlin
Detective
Police Department
11 Washington Street
Keene, NH 03431

Dear Detective McLaughlin:

In response to your letter of January 7th, 1994, I am pleased to provide you with the following information.

The address of Stephen Scruton is 57 Highland Avenue, Haverhill, Massachusetts 01830. The address for Father Michael D. Barrett is San Alphonso Retreat House, Post Office Box 3098, 755 Ocean Avenue, Long Branch, New Jersey 07740.

In response to your inquiry about the young man from Florida, I would the following reflection as clearly as I can recall my conversation of December 5th, 1983, with Gordon MacRae. While I am not positively sure of this fact, it seems to me that the young man in Florida had been someone with whom Gordon MacRae had worked during his years in the seminary while he was in Baltimore and working with the Baltimore police. In other words, this young man had originally been from the Baltimore area and had relocated in Florida. It seems to me that Gordon MacRae had indicated that he was no longer in contact with this young man. I do not have a name or any other specific information in this regard, and it is possible that some of my recollection of the details of that conversation could be faulty. I am sorry that I cannot be more helpful to you in this regard.

In closing, let me assure you of the willingness of the Diocese to be of any assistance that we can be to you in this or in any other case.

Sincerely,

(Msgr.) Francis J. Christian
Secretary
Chancellor

Asst. County Atty. Bruce Reynolds

B225

March 8, 1994

CONFIDENTIAL

Ron Koch
Attorney & Counselor at Law
503 Slate Avenue, N.W.
Albuquerque, NM 87102

Dear Attorney Koch:

In response to your letter of March 4, 1994, I am pleased to provide you with the following information.

Father Steven Scruton became pastor of St. Bernard's in Keene on June 20, 1985. Prior to that date he was serving as temporary administrator of another parish in the diocese. He remained pastor of St. Bernard's for approximately two years. He was suspended and removed as pastor in the month of May 1987.

Trusting this information is helpful to you I am

Sincerely,

(Msgr.) Francis J. Christian
Secretary
Chancellor

Ron Koch, P.A.

ATTORNEY & COUNSELOR AT LAW

3361

March 4, 1994

Rev. Msgr. Francis Christian, Ph.D.
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

Dear Msgr. Christian:

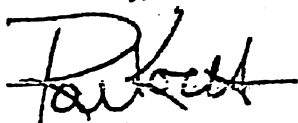
The following information appears in a police report prepared by Detective McLaughlin of the Keene Police Department dated December 7, 1993. This is part of Detective McLaughlin's re-interview of each of the [REDACTED] brothers bringing allegations against Father MacRae:

"I spoke with [REDACTED] and asked him to think about the two incidents of fellatio by MacRae which took place in the rectory during the Summer of 1983 (93-S-0224 93-S-0228). I asked him to give this some thought and that we wanted to give the defense specifics about these two incidents so they can be differentiated. I asked [REDACTED] about who might have seen him stay the night in the rectory. [REDACTED] stated that Father Scruton was a witness to his having stayed the night. I asked about Freddie Laffond and [REDACTED] said that he was around during the day but not at night. [REDACTED] mentioned that a cook would see him in the morning. He does not recall her name but stated that she was elderly at the time."

Msgr. Christian, would you kindly review Father Scruton's personnel file and indicate the dates of Father Scruton's assignment to St. Bernard Parish in Keene?

Thank you for your cooperation in this matter.

Sincerely,



Ron Koch
Attorney at Law

6/20/85

6/24/87



Secretariat for Pastoral Services
Diocese of Manchester

3362

May 2, 1994

MEMORANDUM

TO: Atty. Jim Higgins
FROM: Msgr. Francis Christian

I approve of your suggested letter to
Atty. Koch. Go ahead and send it.
I will keep your FAX for our files.



ATTORNEYS AT LAW

May 2, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Ron Koch, Esquire
Ron Koch, P.A.
503 Slate Avenue, NW
Albuquerque, NM 87102

Re: State v. Gordon MacRae

Dear Mr. Koch:

Monsignor Christian has forwarded to me your letter of March 23rd. In connection with your inquiry, we have the following responses.

1. Monsignor Christian did talk to Father Gorski. Father Gorski's response as you have reported it constitutes a misunderstanding. Monsignor Christian's conversation with Father Gorski involved non-sacramental matters, was substantially the same as the initial allegation made by [REDACTED] to Judy Patterson and reported by Monsignor Quinn to the State, and shed little new light on the subject. You are free to talk with Father Gorski about this.

2. The Diocese has no knowledge of the State of New Hampshire's actions in 1983 or subsequently concerning [REDACTED] allegations. The Diocese certainly is not aware of how a "founded" ruling was made if in fact it was.

3. The report to the State of New Hampshire in November of 1983 was made by Monsignor Quinn, not Judy Patterson. The Diocese has no knowledge concerning any interviews between State investigators and Judy Patterson or of anything she might have said to the State at that time.

4. Your statement that Father MacRae was not part of the "process" concerning allegations which had been brought forward is not true. Mr. MacRae was personally interviewed by Monsignor Christian in regard to the [REDACTED] allegations, clearly understood what was happening, and the entire matter is contained in a memo which I believe you have.

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Ron Koch, Esquire
May 2, 1994
Page 2

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5. Concerning the press releases, you certainly know their author through separate correspondence. The Bishop is communicating directly with Mr. MacRae in connection with these press releases.

Sincerely yours,

James E. Higgins

JEH/slb

cc: Monsignor Francis Christian
Mr. Raymond Dumont