

9. The above information about Ms. Goupil and her son was not known by my defense at the time of my trial. Though Ms. Goupil is not to be judged in the light of her son's criminal history, the fact remains that her credibility and motives during my trial would have been called into question by my defense since Ms. Goupil presented herself as an expert in recognizing victims of sexual abuse. The fact that Attorney Upton, to whom [REDACTED] went first with his claims, specifically chose Ms. Goupil as the therapist to work with [REDACTED] would also have been called into question.

10. A year after I came to the prison David Goupil approached me and asked to speak with me privately. His demeanor was courteous, but on this occasion he informed me that his mother told him of her involvement in my trial. Mr. Goupil asked me if I was fighting the case or had any plans to try to discredit his mother by divulging the charges against him. I told him that I did not think it would be appropriate to discuss this matter with him, and he has not brought it up again.

II: Re: Detective James McLaughlin

11. ¶100 through ¶104 of the Case History refers to Keene (N.H.) Police Detective James McLaughlin's investigation of me in 1988 following his reception of a letter from Ms. Sylvia Gayle a social worker and sexual abuse investigator with the New Hampshire Division of Children and Youth Services. The letter itself is referenced in ¶100 of the Case History. In this explosive letter Ms. Gayle stated that she has been given information from an unnamed employee of the Diocese of Manchester that I was a priest in Florida before coming to New Hampshire in 1982, that I molested two small boys in Florida, and that one of them was murdered and his body was found mutilated. Ms. Gayle's letter claimed that I was then sent by Church officials in Florida to New Hampshire to avoid the

investigation of this crime which remains unsolved. The letter indicated that this disturbing information was told to the unnamed diocesan employee by Msgr. John Quinn, the diocesan financial administrator, who was then Director of Catholic Social Services. Detective McLaughlin then proceeded to launch an exhaustive investigation of me in 1988 which is detailed in a seventy-two page report. Neither I nor legal counsel were aware of the existence of this investigation and report until 1994 while reviewing discovery following the charges brought by the [REDACTED] brothers. Near the end of his lengthy 1988 investigation report Detective McLaughlin wrote that he contacted Florida legal authorities and learned that the information about me being a priest in Florida was entirely false.

12. McLaughlin did report, however, that a Florida sheriff indicated that the rest of the information was true: i.e. that there was a priest in Florida in the 1980's who was being investigated for sexual abuse allegations and was transferred to New Hampshire. McLaughlin's report of his conversation with the Florida sheriff indicated that "the priest's name was not Gordon MacRae and (MacRae) is too young to be that individual." McLaughlin's report did not indicate the name of the priest alleged to have been transferred from Florida to New Hampshire.

13. During his investigation following Ms. Gayle's disturbing letter in 1988, Detective McLaughlin questioned a large number of individuals about me including [REDACTED], [REDACTED] and [REDACTED]. None of them claimed to have been a victim of abuse. One of the many individuals interviewed then by McLaughlin was a [REDACTED], a fifteen-year-old who had been a patient at the drug and alcohol treatment program I directed while on leave from diocesan ministry in 1987-1988. Almost three full pages of the written 1988 report details Detective McLaughlin's relentless questioning of [REDACTED] and his disbelief of [REDACTED] when the young man indicated that there was never anything of

which to accuse me. Of all the individuals questioned then by McLaughlin [REDACTED] had the most serious drug addiction problem and was an easy target of the kind of coercion McLaughlin put him through. Nevertheless, [REDACTED] maintained through the extensive interviews that I was never improper with him in any way.

14. In 1995 [REDACTED], who was then twenty-one years of age and who continued to have an active drug problem, was tried and convicted in a New Hampshire court of the crime of armed robbery. To obtain drug money [REDACTED] used a shot gun to commit a robbery at the same Keene retail business at which he was employed. [REDACTED] was sentenced to five years of imprisonment since this was his first violent offense, but because of ongoing involvement with drug traffic when he arrived at the New Hampshire State Prison [REDACTED] was transferred to a prison in Massachusetts to serve his sentence.

15. In early 1999 [REDACTED] was transferred again from a Massachusetts prison back to the New Hampshire State Prison where he was to prepare for his parole and return to society. In January, 1999, [REDACTED] was assigned, by coincidence, to the same prison unit in which I am assigned, and it was there that he approached me one day to talk with me. It was the first time he and I had spoken since prior to his interviews with Detective McLaughlin in 1988. [REDACTED] told me of McLaughlin's relentless repeated questioning of him in 1988 and of the fact that McLaughlin would not accept "no" as an answer. [REDACTED] then went on to say that he did not believe the charges brought in 1993/94 by the [REDACTED] brothers, and he said that he "knew" they had brought the allegations for money. I asked [REDACTED] how he knew this, and he said that for several years prior to his armed robbery charges which sent him to prison in 1995 he had repeated contacts with the Keene Police Department for a string of minor charges, most of which would land him for short stints in the county jail. [REDACTED]

said that most of these charges were drug related, and that he had been unable over the years to successfully treat his drug problem.

16. In early 1994, following the filing and publicity over the [REDACTED] lawsuits and criminal charges, [REDACTED] said that he was summoned to the Keene Police Department. He said that he was a regular "guest" of the Keene Police so he was not surprised to be summoned. [REDACTED] said that he was interviewed by Detective McLaughlin and another Keene officer whose name he could not recall. [REDACTED] said that McLaughlin asked him if he was aware of the charges brought against me by members of the [REDACTED] family and [REDACTED] reported that he answered that he had heard about the charges. [REDACTED] then told me that McLaughlin asked him if he also wanted to change his mind about accusing me of sexual misconduct. [REDACTED] again told McLaughlin that he had nothing to accuse me of. Following this [REDACTED] quoted McLaughlin as saying "That's kind of beside the point isn't it? The people who are accusing him are going to get a lot of money out of it so you might want to reconsider." [REDACTED] said that he asked "How much money?", and McLaughlin responded something to the effect of "A lot; and I thought you would do anything for money."

17. [REDACTED] told me (at the prison in early 1999) that at the time these comments were made he was deeply involved with a drug addiction and was desperate for money. He also said that because of his state of mind at the time he could not say with absolute certainty whether it was McLaughlin who made these comments or the other officer but he was certain that it was one of them, and that a veiled offer of money was being made. [REDACTED] said that he considered the offer and asked to be able to think about it more.

18. Prior to trial on the [REDACTED] charges, [REDACTED] said, he received a subpoena from Bruce Reynolds, the Assistant Cheshire

County Attorney who prosecuted my case. [REDACTED] said that he believed this was a few weeks before my trial, and he said that he brought the subpoena to ~~the~~ Mr. Reynold's office at the Court and told a secretary that this was a game and he didn't want to play it. He said that he had nothing to testify about and did not want any part of this trial. The secretary, he then said, took the subpoena into an office, and then returned and said "Mr. Reynolds said that we will not be needing your testimony after all." [REDACTED] said that he thought of trying to contact my attorneys to tell them about this at the time, but that he was afraid of McLaughlin and the police. [REDACTED] was paroled in April of 1999 and has returned to the Keene area. He told me that he believes others may have had similar interviews with McLaughlin and offered to send their names to Attorney Nevins if he becomes aware of any specific information. He was also, however, fearful that Detective McLaughlin would find a reason to violate [REDACTED] parole and return him to prison if he became aware of this.

19. In March, 1999 Detective McLaughlin was the subject of several Boston area and New Hampshire newspaper reports after he was severely reprimanded by a federal judge for attempting to entrap suspects by posing as a fictitious fourteen-year-old boy searching for sexual encounters with adults on the Internet. He was also reprimanded by a federal judge for being in violation of federal law by transmitting child pornography over the Internet in attempts to entrap other individuals. Several of the cases he brought for prosecution were dismissed when it was discovered the possession of child pornography for which an individual was charged actually originated with Detective McLaughlin himself. Other news accounts cited him with failures to obtain warrants before searching and confiscating computer equipment in other cases, and for failure to observe laws regarding the rights of suspects to confer with legal counsel.

III: Rev. Mark Gauthier, Rev. Mark Fleming, Rev. Stephen Scruton

20. ¶97 through ¶99 of the Case History describes my acquaintance with members of the [REDACTED] family having first met them when I was a seminarian intern at Sacred Heart Parish in Marlborough, NH in the Summer months of 1979 following my first year of theology at St. Mary's Seminary in Baltimore. The Case History makes some limited reference to this family's relationships with other priests of the Diocese of Manchester. One such relationship was with Father Mark Gauthier, who is now deceased. I excluded this information at the time the history was written because I was unaware of many details and connections, however information which has surfaced since the Case History was written requires a description of the Grover family's relationship with Father Gauthier.

21. I was twenty-six years of age when I first met the [REDACTED] family during the Summer of 1979. The family member with whom I was closest then was [REDACTED] who was 19 years of age and only seven years younger than me. [REDACTED] joined the army in the Fall of 1979 and by 1980 he became a military police officer. When he was home on leave we often spent time together, and he and I vacationed in Montreal and Quebec City in 1980 and in the Summer of 1981. Another close friend, Father Maurice Rochefort, accompanied us in 1981 on a trip to Montreal. My friendship with the rest of this family became more prominent in the Summer of 1980, and following a near drowning and rescue incident during which I revived [REDACTED] [REDACTED] then age five and the [REDACTED] family's youngest child. He was found unconscious in a swimming pool (as described in the Case History, ¶98). In the Summer of 1980, the year after I first met the [REDACTED] family, I was assigned to parish ministry as a seminarian intern at St. Margaret Mary Parish in Keene, five miles from Marlborough where the [REDACTED] lived. I had to drive through Marlborough on my way to or from Manchester, the Diocesan See, which was the case on the day I stopped at the