

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 1

DISTRICT COURT
CLARK COUNTY, NEVADA

-----)
)
JOHN DOE 119,)
)
Plaintiff,)
)
vs.)
)
ROMAN CATHOLIC BISHOP)
OF LAS VEGAS and His)
Successors, a Corporation)
Sole, f/k/a DIOCESE OF)
RENO-LAS VEGAS and its)
Predecessors and Successors,)
the CATHOLIC DIOCESE OF)
GREEN BAY, INC., and)
FR. JOHN PATRICK FEENEY,)
)
Defendants.)
-----)

Case No. A555265
Dept. No. II

CERTIFIED
TRANSCRIPT

VIDEO DEPOSITION OF FR. ROBERT VANDENBERG
Friday, November 5, 2010
125 South Jefferson Street, Suite 205
Green Bay, Wisconsin

COURT REPORTER: Jeffrey J. Watczak
VIDEOGRAPHER: Depo International, Inc.

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 2	Page 4
<p>1 Video Deposition of FR. ROBERT VANDENBERG, taken in</p> <p>2 the above-entitled matter before Jeffrey J. Watezak, a</p> <p>3 Notary Public, at 125 South Jefferson Street, Suite 205,</p> <p>4 Green Bay, Wisconsin, on Friday, November 5, 2010,</p> <p>5 commencing at approximately 9:23 a.m.</p> <p>6</p> <p>7</p> <p>8 APPEARANCES:</p> <p>9 Mr. Michael Finnegan</p> <p>10 Jeff Anderson & Associates</p> <p>11 366 Jackson Street</p> <p>12 Suite 100</p> <p>13 St. Paul, Minnesota 55101</p> <p>14 On behalf of the Plaintiff.</p> <p>15</p> <p>16 Mr. Peter Mazzeo</p> <p>17 Barron & Pruitt</p> <p>18 3890 West Ann Road</p> <p>19 North Las Vegas, Nevada 89031</p> <p>20 On behalf of the Defendants.</p> <p>21</p> <p>22 ALSO PRESENT:</p> <p>23 Deacon Timothy Reilly</p> <p>24</p> <p>25</p>	<p>1 INDEX (cont'd)</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 OBJECTIONS: Pages 7, 8, 10, 12, 14, 15, 16, 19, 21, 22,</p> <p>11 24, 26, 32, 36, 38, 44, 45, 49, 56, 58, 59,</p> <p>12 62, 64, 67, 69, 70, 71, 72, 74, 77, 78, 79,</p> <p>13 81, 83, 85, 86, 87, 88, 89, 90, 91, 92, 93,</p> <p>14 94, 95, 96, 97, 98, 99, 100, 102, 103, 105,</p> <p>15 113, 114, 120, 122, 127, 132, 137.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
Page 3	Page 5
<p>1 INDEX</p> <p>2 DEPONENT: Fr. Robert Vandenberg</p> <p>3 EXAMINATION: PAGES:</p> <p>4 Mr. Finnegan 5 - 136</p> <p>5 Mr. Mazzeo 136 - 141</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10 EXHIBIT IDENTIFICATION: PAGE:</p> <p>11 Original Notice of Taking Deposition ---</p> <p>12 No. 60 - 9/14/83 Memo Re: Accusations Regarding</p> <p>13 Reverend John P. Feeney 131</p> <p>14 No. 77 - 9/25/84 Letter to Msgr. Thomas Meger</p> <p>15 from Rev. David Kiefer 128</p> <p>16 No. 77a - 12/12/84 Letter to Rev. Robert Vandenberg</p> <p>17 from Rev. Msgr. Thomas Meger 128</p> <p>18 No. 77b - 12/13/84 Letter to Rev. Robert Vandenberg</p> <p>19 from Rev. Msgr. Thomas Meger 126</p> <p>20 No. 77bb - 12/12/84 Letter to Rev. Robert Vandenberg</p> <p>21 from Rev. Msgr. Thomas Meger ---</p> <p>22 No. 77c - 12/20/84 Letter to Rev. John Feeney from</p> <p>23 Rev. Robert Vandenberg 129</p> <p>24 No. 77e - 5/10/85 Letter to Rev. John Feeney from</p> <p>25 Rev. Robert Vandenberg 129</p> <p>No. 77f - 5/16/85 Letter to Rev. John Feeney from</p> <p>Rev. Fr. Gilbert J. Canuel, Jr. 129</p> <p>No. 81a - 4/7/86 Letter to Rev. Gilbert Canuel, Jr.</p> <p>from Rev. Msgr. Paul Koszarek 131</p>	<p>1 FR. ROBERT VANDENBERG,</p> <p>2 after having been duly sworn, testifies as follows:</p> <p>3 EXAMINATION</p> <p>4 BY MR. FINNEGAN:</p> <p>5 Q. Father Vandenberg, I introduced myself outside,</p> <p>6 but I'm Mike Finnegan. I'll be asking most of the</p> <p>7 questions here today. First off, have you ever had your</p> <p>8 deposition taken before?</p> <p>9 A. No.</p> <p>10 Q. Let me -- let me go over a couple of ground</p> <p>11 rules with you. Counsel may have went over some of them,</p> <p>12 but just so that we have a clear understanding, first</p> <p>13 off, you understand that you're under oath today?</p> <p>14 A. I understand that.</p> <p>15 Q. And you understand that what you say today could</p> <p>16 be used in a court of law?</p> <p>17 A. I guess so.</p> <p>18 Q. And one of the other ground rules, if you don't</p> <p>19 understand a question that I ask, I want you to stop me</p> <p>20 and say I don't understand that. Does that make sense?</p> <p>21 A. Okay.</p> <p>22 Q. Couple other ground rules are for the court</p> <p>23 reporter's benefit. A lot of times when we're in normal</p> <p>24 conversation we'll nod our heads like that, he can't get</p> <p>25 that down. And so if you do that, if you nod your head</p>

2 (Pages 2 to 5)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 6	Page 8
<p>1 sometimes for an answer, I'll say, you know, Father, was</p> <p>2 that a yes or was that a no? And I'm not doing that to</p> <p>3 badger you. It's just so that the court reporter can get</p> <p>4 that down. Does that make sense?</p> <p>5 A. Okay.</p> <p>6 Q. Another one that we do all the time in normal</p> <p>7 conversation is we'll -- we'll go hmm-mmm, umm-mmm. Same</p> <p>8 thing, if you do that, I'll say, Father, was that a yes</p> <p>9 or was that a no? And that's just so that the court</p> <p>10 reporter can get an accurate transcript of it. Make</p> <p>11 sense?</p> <p>12 A. Okay.</p> <p>13 Q. The -- the last one that -- that we normally do</p> <p>14 a lot in normal conversation is we tend to talk over each</p> <p>15 other a fair amount, and there will be questions that I</p> <p>16 ask where you know where I'm going with the question, but</p> <p>17 what I need you to do in this process is wait until I'm</p> <p>18 fully done with the question, start your answer, and then</p> <p>19 I'll wait until you're done with your answer to do the</p> <p>20 next question, and that -- that's for the court</p> <p>21 reporter's benefit as well. Make sense?</p> <p>22 A. Okay. I'll do the best I can.</p> <p>23 Q. Another -- another big ground rule for you is</p> <p>24 this isn't a marathon. If you need to take a break at</p> <p>25 any time, we can take them any time, as many as you need,</p>	<p>1 objection?</p> <p>2 MR. MAZZEO: Okay. The standing objection</p> <p>3 is I anticipate that you're going to ask Father</p> <p>4 Vandenberg questions about a number of documents that</p> <p>5 were created and drafted some time after the incidents</p> <p>6 that occurred in this case, primarily the incidents</p> <p>7 occurred in 1984 -- alleged to have occurred in 1984 and</p> <p>8 the spring of 1985. To the extent you're going to ask</p> <p>9 Dr. -- or Father Vandenberg about documents that were</p> <p>10 created after the time of the alleged incidents, I'm</p> <p>11 going to object on the grounds of relevancy. To the</p> <p>12 extent that you ask Father Vandenberg questions about</p> <p>13 documents that he did not draft, I'm going to object on</p> <p>14 the ground -- I'm going to have a standing objection on</p> <p>15 the grounds of lack of foundation, lack of personal</p> <p>16 knowledge, lack of authenticity. So I just want to --</p> <p>17 MR. FINNEGAN: Those are --</p> <p>18 MR. MAZZEO: -- I may -- I may --</p> <p>19 MR. FINNEGAN: Those are fine, and yeah, I</p> <p>20 think it will speed it along to have those -- those</p> <p>21 standing objections. I would agree that you can have</p> <p>22 those --</p> <p>23 MR. MAZZEO: All right.</p> <p>24 MR. FINNEGAN: -- on those issues.</p> <p>25 MR. MAZZEO: All right. Now, with that</p>
Page 7	Page 9
<p>1 so don't -- don't hesitate to ask if you're feeling that</p> <p>2 you need to take a break.</p> <p>3 A. Is this a place for me to lay down a ground rule</p> <p>4 also?</p> <p>5 Q. What do you got? Yeah, what -- what's your --</p> <p>6 what's your ground rule, Father?</p> <p>7 MR. MAZZEO: Well, it's -- is it</p> <p>8 consistent with this, the deposition?</p> <p>9 THE WITNESS: Well, yes. I'm a</p> <p>10 sacramental minister and I hear confessions, and I want</p> <p>11 to protect the seal of the confessional. That's a</p> <p>12 primary concern of mine.</p> <p>13 BY MR. FINNEGAN:</p> <p>14 Q. Fair enough. Any other ground rules that you'd</p> <p>15 like to lay down for this deposition, Father?</p> <p>16 A. Well, if I think, you know, --</p> <p>17 MR. MAZZEO: Yeah, but, Father, Father</p> <p>18 Vandenberg, if you would, just wait for the question and</p> <p>19 then you can respond appropriately at the time.</p> <p>20 THE WITNESS: All right.</p> <p>21 MR. MAZZEO: All right. And before we</p> <p>22 begin the questioning, I would just -- I want to go on</p> <p>23 the record with a standing objection to -- to your</p> <p>24 questions about various documents, okay?</p> <p>25 MR. FINNEGAN: What's the standing</p>	<p>1 said, I still may make objections during the course of</p> <p>2 the deposition.</p> <p>3 MR. FINNEGAN: I understand.</p> <p>4 MR. MAZZEO: All right.</p> <p>5 BY MR. FINNEGAN:</p> <p>6 Q. Father Vandenberg, could you state your full</p> <p>7 name and spell your last name for us, please?</p> <p>8 A. My name is Father Robert H. Vandenberg, and my</p> <p>9 last name is spelled all in one word,</p> <p>10 V-A-N-D-E-N-B-E-R-G.</p> <p>11 Q. What's your date of birth, Father?</p> <p>12 A. February 4th, 1926.</p> <p>13 Q. And you were -- you were ordained to the</p> <p>14 priesthood in 1958?</p> <p>15 A. Right.</p> <p>16 Q. And at that time at your ordination, you made a</p> <p>17 promise of obedience to the then bishop, Bishop Bona, and</p> <p>18 his successors?</p> <p>19 A. Yes.</p> <p>20 Q. And what did that promise of obedience mean to</p> <p>21 you?</p> <p>22 A. Well, when Bishop Bona was our bishop, he took</p> <p>23 that promise very seriously, so we had no personnel</p> <p>24 department. He did all the assignments.</p> <p>25 Q. Has there ever been a point in your 50 plus</p>

3 (Pages 6 to 9)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 10	Page 12
<p>1 years of being a priest where you've disobeyed an order 2 of the bishop? 3 MR. MAZZEO: Objection, overly broad, 4 vague. You can answer. 5 THE WITNESS: Well, I don't know. 6 BY MR. FINNEGAN: 7 Q. You don't remember or you don't know? 8 A. I don't remember. You know, you're asking -- 9 I'd have to think about that for a while, if I've ever 10 disobeyed my bishops. 11 Q. Yes. 12 A. Is that what you're asking me? 13 Q. Yes. 14 A. Not deliberately, but I might have accidentally 15 or not being adequately attuned to what was going on or, 16 you know. 17 Q. So it's accurate to state that you never 18 intentionally disobeyed your bishop, that that 19 statement's correct, isn't it? 20 A. Well, I would say that's close, you know. 21 Q. Tell me if you can, Father Vandenberg, what's 22 your -- what's your current position right now within the 23 diocese? 24 A. I am a senior priest. I'm retired. 25 Q. Do -- do you reside at one of the -- one of the</p>	<p>1 A. He's a member of the board. 2 Q. Is he the president of the board? 3 A. No -- well, I guess he is legally, but -- 4 MR. MAZZEO: Objection as to time frame. 5 Go ahead. 6 THE WITNESS: Huh? 7 MR. MAZZEO: Objection as to time frame. 8 Continue. 9 THE WITNESS: The bishop is -- his 10 position is stated in our -- our rules and regulations 11 for -- for the Leo Benevolent. 12 BY MR. FINNEGAN: 13 Q. And do you know what -- 14 A. It's defined there. 15 Q. Do you know what -- what his position is defined 16 there in the -- 17 A. And he -- he can be -- we have a vice president 18 who chairs the meetings, and the bishop I think is 19 president of the board, whoever the bishop is, which 20 changes quite often. 21 Q. The person who's the president of the board 22 changes because the bishops change often, is that 23 correct? 24 A. You're right. 25 Q. And so it's -- the whole time that you were</p>
Page 11	Page 13
<p>1 rectories? 2 A. No. I have my own facility. 3 Q. Do you still do any type of services for the 4 Diocese of Green Bay? 5 A. Well, I'm a consultant to the Board of Directors 6 for the Leo Benevolent Association, which is a charitable 7 institution, benevolent, founded in 1878, an association 8 or fraternal organization of priests. And I served as 9 treasurer to that organization for 40 years. And so in 10 my active years, I was the manager of the day-to-day 11 affairs of the association and the treasurer. 12 Q. During those years that you were managing the 13 day-to-day affairs of the Leo Benevolent Association, 14 did you also have a parish assignment as well? 15 A. Yes. 16 Q. Who -- who funds the Leo Benevolent Association? 17 A. Those who have the benefit of priestly ministry. 18 The priests in 1878 voluntarily formed an association to 19 take care of the sick and elderly in their midst, and 20 they are a separate corporation incorporated in the State 21 of Wisconsin I think a year or two after 1878, 22 approximately about that time. You can find our charter 23 with the State of Wisconsin. 24 Q. And who -- what role does the Bishop of Green 25 Bay play in the Leo Benevolent Association?</p>	<p>1 associated with the Leo Benevolent Association, whoever 2 the then presiding bishop for the diocese was was the 3 president? 4 A. Yeah, I guess you'd say that. Those are the 5 rules of the association. 6 Q. And who else is on the -- on the board for the 7 Leo? 8 A. Fellow priests. They are elected by the whole 9 presbyterate. 10 Q. During your time on the Leo Benevolent 11 Association, how many priests were on the board 12 generally? 13 MR. MAZZEO: At any given time? 14 BY MR. FINNEGAN: 15 Q. Yeah. I mean has it -- has it always remained 16 the same? 17 A. Yeah, it's about -- let's see, I think it's 18 about seven of us, and we have some volunteers that are 19 laypeople also. 20 Q. Are the people that actually sit on the board, 21 are they all -- all clergy of the Diocese of Green Bay? 22 A. For the most part except for volunteers like a 23 few laypeople we've had over the years. And we've had 24 attorneys that sat on the board with us. 25 Q. But during your -- during your time and your</p>

4 (Pages 10 to 13)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 14

1 experience on the Leo Benevolent Association, the
2 majority of people on the board were always clergy of the
3 Diocese of Green Bay?
4 **A. Well, the association, of our priest**
5 **association, yes.**
6 **Q. But those -- those clergy --**
7 **A. They are all --**
8 **Q. -- all priests of the diocese?**
9 **A. -- incardinated in the Diocese of Green Bay.**
10 **Q. Thanks. Do they do -- does the Leo Benevolent**
11 **Association handle anything else besides charity to -- to**
12 **their fellow priests?**
13 **A. No, that's pretty much it. We cover not only**
14 **retirement but disability as well.**
15 **Q. Where does the Leo Benevolent Association get**
16 **the money to do its charitable works?**
17 **MR. MAZZEO: Asked and answered.**
18 **THE WITNESS: We are determined to have**
19 **the Leo Benevolent Association funded by those who are a**
20 **benefit from the ministry of priests, which would be the**
21 **people of God and the Diocese of Green Bay. And with**
22 **most of the priests being pastors, we -- we have operated**
23 **the Leo Benevolent on a cost basis. They are very**
24 **sensitive to, you know, the taxation of people and the**
25 **cost to the people of God, so we have always tried to**

Page 15

1 operate on what they call a current normal cost, as cheap
2 as we can do it or as inexpensive as we can do it.
3 **BY MR. FINNEGAN:**
4 **Q. Father, I'd like to focus on John Feeney here**
5 **for a little while. When was the first time that you can**
6 **remember meeting John Feeney?**
7 **A. Some years after I was ordained. Takes a while**
8 **to get to know the priests in the diocese.**
9 **Q. Do you remember -- do you have a memory of how**
10 **you first came into contact with him?**
11 **A. No, I don't remember the first time.**
12 **Q. Are you -- would you consider John Feeney a**
13 **friend of yours?**
14 **MR. MAZZEO: Objection as to time frame.**
15 **Do you understand the question?**
16 **THE WITNESS: Well, generally when you're**
17 **a priest, all your priests are your friends. Then there**
18 **are priests that you choose as friends who share your**
19 **likes and dislikes. I have hunting friends and fishing**
20 **friends and golfing friends and so on, you know. He is**
21 **not one of those, okay.**
22 **BY MR. FINNEGAN:**
23 **Q. Is he someone that historically that you've**
24 **socialized with outside of your priestly duties?**
25 **A. No.**

Page 16

1 **Q. When -- when is the first time, if ever, that**
2 **you served at the same assignment as John Feeney?**
3 **MR. MAZZEO: Object -- objection, lacks**
4 **foundation.**
5 **THE WITNESS: What is the question?**
6 **BY MR. FINNEGAN:**
7 **Q. Sure, I can ask it again. Have you ever served**
8 **at any parish with John Feeney?**
9 **A. Yes.**
10 **Q. When is the first time that you served at a**
11 **parish with John Feeney?**
12 **A. You mean the year, the date, the year?**
13 **Q. Or if you remember the parish, we can start with**
14 **that.**
15 **A. Well, yeah, it was at St. Therese.**
16 **Q. Is that in Appleton?**
17 **A. Yep.**
18 **Q. Other than St. Therese in Appleton, was there**
19 **ever any other assignments where you served at the same**
20 **time that John Feeney was there?**
21 **A. No.**
22 **Q. Did -- during the time at St. Therese, did you**
23 **live with John Feeney?**
24 **A. We all lived in the same house, all the priests**
25 **did.**

Page 17

1 **Q. Was it called a rectory then or was it a**
2 **separate house at St. Therese?**
3 **A. It's called a rectory.**
4 **Q. Was it attached to the church at St. Therese?**
5 **A. Yes. Physically in every way, I guess you'd**
6 **say.**
7 **Q. Any other times besides St. Therese in Appleton**
8 **that you lived in the same facility as John Feeney?**
9 **A. No. Except perhaps on retreats or something**
10 **like that.**
11 **Q. Who else lived at the rectory at St. Therese in**
12 **Appleton, if anyone, besides you and John Feeney?**
13 **A. It changed over the years.**
14 **Q. Do you remember anyone else that lived with**
15 **you?**
16 **A. I was there nine years. Yes, Father Milborrow,**
17 **Father Coleman, Father Dainan, Father Samborski, Father**
18 **...**
19 **Q. Did -- did any of the priests that you just**
20 **mentioned, do you remember any of them living with --**
21 **with you and John Feeney at St. Therese?**
22 **A. No. These -- these were different priests that**
23 **came and went -- came and went over the years, you know**
24 **so I don't know their connection. Well, I suppose you**
25 **could get it down to the years. John Feeney was there**

5 (Pages 14 to 17)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 18	Page 20
<p>1 about -- about a year and a half or two years, something</p> <p>2 like that.</p> <p>3 Q. Do you remember what years or year, year and a</p> <p>4 half or two years, which years it were at --</p> <p>5 A. No, I don't remember, but I suppose I could sit</p> <p>6 down and figure it out.</p> <p>7 Q. Do you remember what year you were assigned to</p> <p>8 St. Therese in Appleton?</p> <p>9 A. 1958.</p> <p>10 Q. That was your first assignment?</p> <p>11 A. Huh?</p> <p>12 Q. That was your first assignment?</p> <p>13 A. My first assignment.</p> <p>14 Q. So you were there until approximately 1967?</p> <p>15 A. That's right, nine years.</p> <p>16 Q. And you were an associate at St. Therese?</p> <p>17 A. Yes.</p> <p>18 Q. And John Feeney was also an associate at St.</p> <p>19 Therese?</p> <p>20 A. Yes.</p> <p>21 Q. What was the -- during the time that John Feeney</p> <p>22 and you lived at the rectory at St. Therese, do you</p> <p>23 remember what the layout was as far as where the bedrooms</p> <p>24 were at the rectory?</p> <p>25 A. Yeah, I know where all the bedrooms were and</p>	<p>1 A. We had construction while he was there, and so</p> <p>2 he moved around, you know, from one to the next.</p> <p>3 Q. Did he --</p> <p>4 A. He was to the front of the house.</p> <p>5 Q. Was John Feeney always on the second floor</p> <p>6 during the time that he was at St. Therese at the</p> <p>7 rectory?</p> <p>8 A. His bedroom?</p> <p>9 Q. His bedroom, yes.</p> <p>10 A. Yes.</p> <p>11 Q. And was your bedroom always on the second floor</p> <p>12 during the years --</p> <p>13 A. Mine was on the back side, his was on the front</p> <p>14 side.</p> <p>15 Q. And both of -- both of you were always on the</p> <p>16 second floor at St. Therese rectory?</p> <p>17 A. Oh, yeah.</p> <p>18 Q. During that time when you lived with John Feeney</p> <p>19 at St. Therese, did you consider him one of your friends</p> <p>20 at that point?</p> <p>21 A. Yes, we were always on a friendly basis, so I</p> <p>22 would say he was a friend. We shared athletic games and</p> <p>23 stuff in the parish and so on, you know. We were not at</p> <p>24 loggerheads or anything like that.</p> <p>25 Q. Do you know why -- why John Feeney left St.</p>
Page 19	Page 21
<p>1 where the living room was and all this and that --</p> <p>2 Q. Could you --</p> <p>3 A. -- offices.</p> <p>4 Q. Could you explain it for me, the layout of --</p> <p>5 was there more than one floor to the rectory? We'll</p> <p>6 start with that. Was there -- was it one floor, two</p> <p>7 floors, three floors?</p> <p>8 A. Two floors, well, and a basement.</p> <p>9 MR. MAZZEO: And I would just object, have</p> <p>10 a standing objection as to the -- this line of</p> <p>11 questioning regarding the layout of the rectory.</p> <p>12 MR. FINNEGAN: What's the legal basis?</p> <p>13 MR. MAZZEO: You can -- relevancy.</p> <p>14 MR. FINNEGAN: Fair enough.</p> <p>15 BY MR. FINNEGAN:</p> <p>16 Q. Two floors and a basement at the rectory at St.</p> <p>17 Therese?</p> <p>18 A. Yes.</p> <p>19 Q. And were the bedrooms at the rectory, were those</p> <p>20 on the second floor?</p> <p>21 A. Some. One was down -- let's see, there was --</p> <p>22 there was one downstairs and there was one, two -- four</p> <p>23 of them upstairs.</p> <p>24 Q. Do you remember where John Feeney's bedroom was</p> <p>25 at that time when you were both at St. Therese?</p>	<p>1 Therese after the one and a half or two years?</p> <p>2 A. I think the -- I think the pastor asked to have</p> <p>3 him removed because he felt that -- and this is the</p> <p>4 reason why he was moved so many times, he had a</p> <p>5 tendency -- well, he didn't -- he didn't have any reason</p> <p>6 for the pastor to move him between the pastor and</p> <p>7 himself, and it was -- I think it was mainly because the</p> <p>8 pastor felt that he was --</p> <p>9 MR. MAZZEO: Objection.</p> <p>10 MR. FINNEGAN: He's in the middle of his</p> <p>11 answer here, Pete, and --</p> <p>12 MR. MAZZEO: And with regard --</p> <p>13 MR. FINNEGAN: -- let him finish his</p> <p>14 answer out.</p> <p>15 MR. MAZZEO: -- to what the pastor felt,</p> <p>16 I'm going to object as to speculation as to the state of</p> <p>17 mind.</p> <p>18 MR. FINNEGAN: Yeah, standing objection.</p> <p>19 Go ahead, Father. Now that Counsel's interrupted you, do</p> <p>20 you remember where you are?</p> <p>21 MR. MAZZEO: You were saying the pastor</p> <p>22 felt.</p> <p>23 THE WITNESS: Well, I'll dramatize it for</p> <p>24 you. I drove the pastor to -- on retreat when all the</p> <p>25 priests were on retreat, and one of his friends said,</p>

6 (Pages 18 to 21)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 22	Page 24
<p>1 Well, Lenny, I haven't seen you for a long time, how you 2 been, you're looking really good. And he shook hands and 3 he says, How's Feeney? In other words, that he was stuck 4 with that and that was communicated right there, you 5 know, and so because his personality was such that it was 6 so strong, he was a very brilliant guy, John Feeney was, 7 and the pastor made a mistake, John would tell him about 8 it, you know, and so he was hard to bear. I see that the 9 media with the whole problem that John got into, they -- 10 the big thing is his sexuality when we all know it's his 11 personality getting under the skin of pastors, and so the 12 pastors had him out of there. 13 BY MR. FINNEGAN: 14 Q. So you think -- is it your opinion that all the 15 -- all the sexual stuff that's come up about Feeney that 16 it's all made up? 17 MR. MAZZEO: Objection, misstates the 18 witness's testimony. 19 THE WITNESS: I don't know about that. I 20 don't know about that. But I do know that his abrasive 21 personality, you know, to the one in charge was always -- 22 was a -- it was a constant, you know, and so, you know, 23 we just accepted that, that's who he was and, you know. 24 BY MR. FINNEGAN: 25 Q. Did you have any -- any problems with him at St.</p>	<p>1 A. Well, -- 2 MR. MAZZEO: Objection, vague. 3 THE WITNESS: That they personally were 4 having problems? 5 BY MR. FINNEGAN: 6 Q. Yeah. I mean did anybody report to you when you 7 were at St. Therese that they were having problems with 8 John Feeney? 9 A. Well, because of his personality, they thought 10 he was fantastic, but he couldn't stand his guts. There 11 weren't many in between. 12 Q. Did -- during the time that you were at St. 13 Therese, did you ever hear anything negative about John 14 Feeney and his involvement with children? 15 A. He was very much involved with sports, and so as 16 far as high school kids and all this and that, you know, 17 he had a good relationship with them. 18 Q. Anything that -- did you hear anything that was 19 negative, have any negative connotation involving Feeney 20 and youth? 21 A. Well, with people that couldn't stand his guts 22 and people that thought he was fantastic, I've heard it 23 all. 24 Q. What did you hear about John Feeney that was 25 negative with kids during that time?</p>
Page 23	Page 25
<p>1 Therese, with John Feeney? 2 A. Me personally? 3 Q. Yeah, you personally. 4 A. Did I personally have any problems with him? 5 Well, I learned not to ride with him as we went to ball 6 games because he had a tendency to go through red lights. 7 So, you know, that was about it. So I learned not to do 8 that. And he'd get up just before he would have the next 9 mass and he'd say, Bob, what did you preach about today? 10 And the bishop was assigning the topics, then I would 11 tell him what the topic was and then he'd say, What 12 did you say, what did you say? And I would tell him, 13 give him an outline of my homily. What's your main point 14 again, what's your main point? And he'd go out there and 15 preach my sermon better than I did in about five minutes. 16 I don't know if that's a problem. It was odd. 17 Q. Was that Ed -- Ed Wagner that was the pastor at 18 St. Therese? 19 A. Yeah. 20 Q. He's -- he's passed away, is that correct? 21 A. Oh, yeah. 22 Q. Did -- did you ever hear anything from any of 23 the parishioners that they were having problems with John 24 Feeney at all when you were at -- when you were at St. 25 Therese?</p>	<p>1 A. Well, I started a Little League within -- we had 2 three classes of every grade level so lots of kids, 1200 3 kids, and I started a touch football league amongst -- in 4 -- in-house, you know, amongst the grades. And John 5 would go out there and play quarterback for every team he 6 could, which kind of spoiled it, and so there was 7 complaints about that, you know. 8 Q. Anything besides him playing quarterback that -- 9 A. Yeah, well, just -- 10 Q. Any other complaints? 11 A. Imposing himself, you know, on the -- on the 12 whole athletic scene there. 13 Q. Anything else that you heard negative about John 14 Feeney and his involvement with youth during the time at 15 St. Therese? 16 A. Well, people had their different opinions, so, 17 you know, there would be a lot of different opinions. He 18 was a forceful personality, you know, very talented and 19 so on, so I never registered any of the -- insofar as 20 their importance, you know, any negativities that -- 21 there's got to be negativity about everybody. Nobody is 22 -- pleases everybody at any one time. We priests are 23 very sensitive to that, we can't please them all, you 24 know. 25 Q. I understand. Any --</p>

7 (Pages 22 to 25)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 26	Page 28
<p>1 A. So, you know, that's -- that's all I wanted to 2 say about it, you know. 3 Q. Did -- was there ever any point when you were at 4 St. Therese or any point that you were concerned about 5 John Feeney's involvement with the boys at St. Therese? 6 MR. MAZZEO: Objection, lacks foundation, 7 speculation. 8 THE WITNESS: Well, he would -- well, I 9 knew about his driving, and sometimes he'd have a car 10 full of kids going to a ball game or something, you know, 11 and I always was concerned about that, you know, and not 12 a good example and . . . 13 BY MR. FINNEGAN: 14 Q. Did it ever seem to you at that point, Father, 15 at St. Therese that Father Feeney had, you know, much 16 more than normal interest in boys? 17 A. No, that didn't -- that didn't occur to me, you 18 know. I -- I thought he had a lot more interest in boys 19 than in girls always, you know, but I thought that was a 20 normal situation. It wasn't something abnormal, you 21 know. 22 Q. Did he -- to your knowledge, did he ever have 23 any boys in his rectory bedroom with him? 24 A. Not to my knowledge. 25 Q. Did anybody ever tell you that, that John Feeney</p>	<p>1 with John Feeney, did he ever discuss with you any sexual 2 relations that he had had with anyone? 3 A. No, he never discussed any sexual relationships 4 with me that I knew of, you know. 5 Q. Did you -- did you ever hear about John Feeney 6 swimming with any of the boys at St. Therese in the nude? 7 A. Oh, yeah, hot summer, private pools and so on. 8 Well, if he was -- so I've heard that, you know. 9 Q. Didn't that concern you at all? 10 A. Well, it was a matter of prudence, and he was 11 quite bereft in prudence, you know, that's the way I 12 looked at it. 13 Q. Is that something that you ever did? 14 A. I never discussed that with him or anything like 15 that, you know. 16 Q. Did you ever discuss it with -- with Father 17 Wagner? 18 A. No. Having been in the military and so on, we 19 always swam in the nude, so it wasn't a big deal for me, 20 you know. 21 Q. Did -- did you swim in the nude with boys at St. 22 Therese? 23 A. Did I? 24 Q. Yeah. 25 A. No, I didn't, but in the military I did all the</p>
Page 27	Page 29
<p>1 had boys in his rectory bedroom? 2 A. No. 3 Q. Did you ever hear about -- 4 A. And, you know, our rooms up there were 5 interconnected and so on, you know. There weren't locked 6 doors between us, you know, so wide open. 7 Q. Did you ever hear about John Feeney going to 8 visit some of the boys' houses from the St. Therese 9 parish at night? 10 A. Not to my knowledge. I mean he -- there were 11 basketball games into the evening and so on and he was 12 hauling kids around and stuff like that, you know, coming 13 back from a game or something like that. But I don't 14 know that he was making special -- special visits with 15 particular individuals or anything like that. 16 Q. Never heard that from anybody? 17 A. I thought it was kind of a general -- his 18 relationship was on a very general basis. 19 Q. Were there any -- any boys in particular during 20 the time that you were at St. Therese with John Feeney 21 that -- that he seemed to be interested in more than the 22 other boys? 23 A. Not to my knowledge because I wasn't there to 24 monitor John Feeney, so I don't know, you know. 25 Q. During the time that you were at St. Therese</p>	<p>1 time. They didn't want to have fibers clogging up the 2 system in the swimming pool and so on, and I was being 3 trained as a pilot in the Navy and we had to know how to 4 swim. 5 Q. And do -- do you think that there's a difference 6 between a group of adult men that are in the military all 7 swimming nude together versus an adult priest swimming 8 with boys in the nude? 9 A. Yeah, I would say that that wasn't a prudent 10 thing to do, you know, even though I was -- it was part 11 of my training and I was accustomed to it. And I think 12 that Father John thought he was God's gift to young 13 people. I heard some of his talks on retreats, you know, 14 he disarmed them about their fear and uptightness over 15 sexuality. He was always right upfront, you know. But I 16 would say that I never heard him say anything that -- let 17 me say it this way: With my background there was an 18 openness and acceptance to swimming in the nude from my 19 military experience, and so I didn't see it a problem. 20 Somebody's mother might think it was a problem. 21 Q. Did anybody -- any mothers ever report to you 22 that they were concerned about John Feeney -- 23 A. No. 24 Q. -- swimming in the nude? 25 A. No. Not that I can remember.</p>

8 (Pages 26 to 29)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 30

1 Q. Any -- any fathers, any dads ever report to you
2 that they were concerned about their sons swimming in the
3 nude with John Feeney?
4 A. Not to my knowledge. I can't remember.
5 Q. What about John Feeney showering in the locker
6 rooms after games in the nude with boys, did you ever
7 hear about that?
8 A. I heard something about towel snapping or
9 something like that, you know.
10 Q. What -- what did you hear about towel
11 snapping?
12 A. That it was going on, you know, that -- how kids
13 are, you know.
14 Q. Who -- who told you about the towel snapping?
15 A. I can't remember.
16 Q. Do you remember, did -- did you hear that John
17 Feeney was doing the towel snapping to the boys?
18 A. Not directly, but I think it was -- might have
19 been implied. I don't know.
20 Q. Did that concern you at all?
21 A. Well, not exactly. I just kind of wrote it off.
22 It's part of his personality, you know. I wasn't there
23 to monitor him or correct him or, you know, ask him about
24 that stuff.
25 Q. You definitely didn't think it was prudent for a

Page 31

1 priest to engage in towel snapping --
2 A. No, I --
3 Q. -- with children?
4 A. -- I wouldn't think it would be prudent, you
5 know.
6 Q. Was -- was it Xavier High School in Appleton
7 that was -- or in De Pere that was kind of the high
8 school that a lot of the kids went to?
9 A. Yes.
10 Q. And did -- during the time that you were at St.
11 Therese, was John Feeney also involved with Xavier High
12 School?
13 A. I think only on a voluntary basis. He was
14 friends of the coach, coaches there and etcetera, because
15 he was very much into athletics.
16 Q. Did -- did you ever hear about John Feeney
17 asking sexual questions of children at any point when you
18 were at St. Therese?
19 A. You mean in a formal way in a classroom?
20 Q. Anyplace.
21 A. Well, I -- I heard -- I'd have to say as a
22 special -- I think I may have heard of one family, the
23 mother saying something about John asking if -- if a kid
24 could spell penis, you know, and -- or he asked the kid
25 if he knew what that was and that it had a name and if he

Page 32

1 could spell it, I've heard that, you know. And I thought
2 that that was part of John's way of disarming people from
3 being up so tight about their sexuality.
4 Q. That was -- at the time you considered that to
5 be imprudent for John?
6 A. Well, I would -- I would think it would be
7 imprudent, yeah.
8 MR. MAZZEO: And I would just --
9 THE WITNESS: And some others may not.
10 MR. MAZZEO: I would just object and move
11 to strike the prior answer by Father Vandenberg insofar
12 as it's not based on his own personal knowledge, it's
13 based on hearsay.
14 BY MR. FINNEGAN:
15 Q. Do you remember the -- did you hear that more
16 than once or just one time that John Feeney had asked a
17 boy to spell penis or if he could spell penis?
18 A. I only heard that once.
19 MR. MAZZEO: Same objection to the extent
20 that it's not based on Father Vandenberg's --
21 MR. FINNEGAN: I'll give you a standing
22 objection on those.
23 MR. MAZZEO: -- personal -- personal
24 knowledge.
25 BY MR. FINNEGAN:

Page 33

1 Q. You can answer the question. You may have. Did
2 -- did you hear that more than once or just once?
3 A. Once, I think, maybe twice, I don't know. Maybe
4 more than one person, you know. But like I said, you
5 know, my orientation to all of that was affected by my
6 military experience and so on, so it didn't upset me, you
7 know, and . . .
8 Q. Do you remember the -- and I just want a yes or
9 no on this, do you remember the name of the mother that
10 told you that? I don't want you to say the name out
11 loud, but just if you remember it, yes or no.
12 A. Yeah.
13 Q. When --
14 A. She had been our cleaning lady in the rectory
15 for some time.
16 MR. FINNEGAN: Let me, if we can, I'd like
17 to have him write that name down. I don't necessarily
18 want to put that name out there if it's a potential
19 survivor, potential victim. What I'd like to do is just
20 create a separate piece of paper here. We can make
21 copies of it, make it an exhibit. Does that work for
22 you?
23 MR. MAZZEO: That's -- that's fine, no,
24 yeah.
25 MR. FINNEGAN: I think some of the letters

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 34

1 are already used, so I'm just going to go with Exhibit E.
2 BY MR. FINNEGAN:
3 Q. Father Vandenberg, what I've done here is
4 created another document and put Exhibit E at the bottom
5 and a No. 1 up here. What I'd like you to do is write
6 the name of the mother who had told you about John Feeney
7 either asking the child to spell penis or asking whether
8 or not he could spell penis. And I don't want you to say
9 the name on the record.
10 MR. MAZZEO: And just so we're clear with
11 regard to this exhibit, it's your intention to attach
12 this to the deposition transcript?
13 MR. FINNEGAN: No.
14 MR. MAZZEO: Okay.
15 MR. FINNEGAN: My intention is to make a
16 copy so that we both have a copy of it but not -- not put
17 that name out there.
18 MR. MAZZEO: Okay.
19 THE WITNESS: No, I'd prefer not to sign
20 anything because it's all kind of hearsay stuff, you
21 know.
22 MR. FINNEGAN: Well, we have a right to
23 know what your knowledge is, and if you know the name of
24 this woman, I'm asking you to write it on there. The
25 procedure that -- that we're using, Father, is to try and

Page 35

1 -- the reason why we're doing this is to protect that
2 person's identity, and that -- that's the reason why I'm
3 not having you say it out loud on the record. This is a
4 form that -- that I'm using so that we can hopefully
5 protect that person.
6 MR. MAZZEO: And I would just like to
7 clarify something. Did you say that you have personal
8 knowledge that someone told you that this woman, the
9 mother of the son, had reported this to you directly or
10 you overheard this woman saying it to someone?
11 THE WITNESS: I can't discern if that is
12 hearsay or --
13 MR. MAZZEO: Well, don't worry about --
14 MR. FINNEGAN: Regardless of what the --
15 MR. MAZZEO: Yeah, don't worry about the
16 term.
17 MR. FINNEGAN: -- what you're saying and
18 regardless of even your question, I think that you have
19 the name, you know the name, I'd like you to write it on
20 here, Father, on Exhibit E, please.
21 MR. MAZZEO: But for the record, I can ask
22 him later, but I want -- since we're on this topic, I do
23 want the clarification. Don't worry about whether it's
24 hearsay or not. My question to you is I wanted to know
25 if -- if you had any -- if this woman, this mother, had

Page 36

1 reported this to you directly or did you overhear this
2 woman reporting it to someone else or did you hear it
3 from someone else that this woman had reported it?
4 MR. FINNEGAN: Asked and answered, but you
5 can answer it again.
6 THE WITNESS: It was hearsay, and -- but I
7 knew this woman, you know, and --
8 MR. MAZZEO: When you say hearsay, she
9 didn't report it to you directly?
10 THE WITNESS: No.
11 MR. MAZZEO: Okay.
12 THE WITNESS: She didn't -- in other
13 words, if that was reported to me personally as a cleric
14 or as a priest, I think I would have to not answer the
15 question because of my professional position.
16 BY MR. FINNEGAN:
17 Q. And people -- any -- anything that anybody tells
18 you as a priest, you can't talk about, is that your --
19 your position?
20 A. Well, yeah, you know, if it was something done
21 in confidence, you know, confidentiality. And I think if
22 it's something like this, knowing that person, I think
23 she would have expected confidentiality, you know, so I
24 don't think I can be involved with that.
25 Q. So you're refusing to write down the name or

Page 37

1 give us the name. I'll ask you what -- what is the name?
2 If you're not going to write it down, that was to try and
3 protect this person, but if you're going to not do that,
4 what's the name of the person that you're talking about
5 here?
6 MR. MAZZEO: I'd rather it not go on the
7 record. I'd rather it --
8 MR. FINNEGAN: So would I, but if he's
9 going to refuse to --
10 MR. MAZZEO: -- I'd rather it remain
11 confidential. If you put it on the paper, it will remain
12 confidential, you understand?
13 THE WITNESS: Oh, I see.
14 MR. MAZZEO: If you testify -- if you
15 testify openly to it, it's going on the record. The
16 court reporter's to your right.
17 THE WITNESS: So this is, you know, this
18 is tough, you know, for me and -- and the confidentiality
19 of a parish priest, you know, and sometimes things are
20 hearsay and sometimes they're not and sometimes they're
21 in a confessional and all that. So, you know, you're --
22 you're driving us on the spot.
23 MR. FINNEGAN: Well, I think --
24 THE WITNESS: You know.
25 MR. FINNEGAN: -- John Feeney drove some

10 (Pages 34 to 37)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 38

1 people into a spot, but I don't need to argue about that.
2 MR. MAZZEO: Objection to those
3 comments.
4 THE WITNESS: He probably did.
5 MR. FINNEGAN: Yeah.
6 MR. MAZZEO: You don't have to -- there's
7 no question. You don't have to respond to that.
8 THE WITNESS: But --
9 MR. MAZZEO: Father Vandenberg, --
10 MR. FINNEGAN: Do you want to take a
11 break? Do you want to talk to him?
12 MR. MAZZEO: We can take -- we can take --
13 off the record, please.
14 (A break was taken at this time.)
15 BY MR. FINNEGAN:
16 Q. Father, there was some discussion off the record
17 now about whether or not you could say the name, and I
18 guess it's been decided that you can say the name. So
19 who was the person you were talk -- the family that
20 you're talking about with the -- that you had heard had
21 --
22 A. Well, this was -- did not happen while I was at
23 St. Therese, so that's one distinction right there, you
24 know. And Sharon DeBrune (phonetic), was, oh, a young
25 woman or a teenager that cleaned our rectory. And later

Page 39

1 years when she had children, she felt that she knew us
2 priests because she was in our household there, you know,
3 so she had John Feeney over, and that's where I heard it
4 from there, from her.
5 Q. So Sharon DeBrune told you that Feeney had asked
6 one of her boys whether he could spell penis or asked him
7 to spell penis?
8 A. Yeah.
9 Q. And when -- when did she tell you that?
10 A. Her -- she's married now, you know, and of
11 course with kids. And this is way after my St. Therese
12 experience, you know. She grew up, got older, got
13 married, had children and so on, and of course she had a
14 familiarity with us because she cleaned our house, so
15 that's her connection with Feeney.
16 Q. Where -- where was this conversation that you
17 had with Sharon? Her married name is Merryfield, is that
18 correct?
19 A. Yeah.
20 Q. Where -- where did you have this conversation
21 with Sharon Merryfield?
22 A. I wouldn't recall that and I was in my own
23 parish, a different parish, and just bumped into her or
24 something, shopping on the street, or, I don't know, you
25 know.

Page 40

1 Q. What -- what parish were you at at the time?
2 A. I was at St. Paul's in Combined Locks. I was
3 only there 34 years.
4 Q. Do you remember, was -- was this conversation
5 that you had with Sharon Merryfield, was this during the
6 time that Feeney was at -- at her parish?
7 A. No, I think it was -- I think it was after,
8 because he moved around pretty speedily. I think it was
9 after.
10 Q. Do you remember if it was when John Feeney was
11 still here in the Diocese of Green Bay, living here?
12 A. That I don't -- can't remember either. He might
13 -- he might have been gone already to Los Angeles or
14 wherever he went, you know.
15 Q. Did it -- did that concern you at all when
16 Sharon Merryfield told you that?
17 A. No, because that fit into his penchant for
18 disarming youth about being uptight about sexuality, you
19 know.
20 Q. Tell me more about that. He had a philosophy or
21 tell me more, anything that you know about that about him
22 disarming youth about sexuality and not being uptight
23 about it.
24 A. That was just my own personal opinion, you know,
25 that's all. I don't know that it's not something

Page 41

1 that . . .
2 Q. What -- what was your opinion based on, Father?
3 A. Well, it was -- it was in -- in keeping with his
4 modus agendi, the way of acting, you know, the way he
5 was.
6 Q. So did you -- did you hear about that when he
7 was at St. Therese that -- that he had a way of speaking
8 to youth about sexuality that was disarming?
9 A. Well, he was involved with youth retreats and
10 different things like that, giving talks and so on, you
11 know.
12 Q. So you did hear that at some point when -- when
13 he was at St. --
14 A. Yeah.
15 Q. -- St. Therese?
16 A. Yeah. And I thought I understood it, you
17 know.
18 Q. Did you hear from anyone else besides Sharon
19 Merryfield that John Feeney had asked -- asked a child, a
20 youth, questions about -- about sexuality?
21 A. I think it's kind of hard for me to discern from
22 hearsay and conversation, you know. I heard that all
23 over, but nobody came to me specifically as a complaint
24 or -- you know, but I just heard that in general.
25 Q. So in general during the time that John Feeney

11 (Pages 38 to 41)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 42	Page 44
<p>1 was at St. Therese, it's correct to say that you heard</p> <p>2 that -- that Feeney would ask --</p> <p>3 A. I don't know if that was after -- after he was</p> <p>4 at St. Therese, you know, I think it was after. Who</p> <p>5 brought things because he -- he moved around quite a bit.</p> <p>6 I was concerned about his being moved around, you know.</p> <p>7 And I had a signal at the dinner table for him if he</p> <p>8 started pushing the pastor, which he was liable to do. I</p> <p>9 would go like this (indicating). He's making a cement</p> <p>10 wall and the wall's getting higher and thicker, and he</p> <p>11 shut up like he got hit with a two-by-four, you know,</p> <p>12 because he was pushing the pastor. And then, of course,</p> <p>13 being associates, then we would get regulations and stuff</p> <p>14 you couldn't do. We're not free to act because the</p> <p>15 authority was pushed to the wall, you know, and made a</p> <p>16 decision about it. And so I would signal to him to lay</p> <p>17 off so that that didn't happen, you know.</p> <p>18 Q. During the time that John Feeney was at St.</p> <p>19 Therese, did you hear any -- any rumors from anybody at</p> <p>20 the parish that -- that he was involved sexually with any</p> <p>21 of the children at St. Therese?</p> <p>22 A. Well, I think people were asking about in</p> <p>23 general, you know, about his prudence about that. Like I</p> <p>24 said, it depends upon where you're coming from. Guys</p> <p>25 that have military experience, it was different than</p>	<p>1 Feeney during the time that he was at St. Therese about</p> <p>2 any of the things that you thought were imprudent that he</p> <p>3 was doing with children?</p> <p>4 A. Did I?</p> <p>5 Q. Yeah, did you have a conversation with him?</p> <p>6 MR. MAZZEO: And I would just object to</p> <p>7 the extent that it hasn't been established as to what</p> <p>8 things he might have been doing that were -- would be</p> <p>9 deemed imprudent, but to the extent you can answer it,</p> <p>10 you can.</p> <p>11 THE WITNESS: I didn't take up -- I don't</p> <p>12 think I took up any personal thing that was happening to</p> <p>13 any person or to a kid or something with him, had a</p> <p>14 discussion with him, no. Like I say, I listened to some</p> <p>15 of his thoughts, you know, on youth retreats and --</p> <p>16 but -- in other words, were things so bad that the people</p> <p>17 were making accusations against Feeney in his</p> <p>18 relationships with their children personally that that</p> <p>19 came to me, is that what you're asking?</p> <p>20 BY MR. FINNEGAN:</p> <p>21 Q. You can answer that question. That wasn't what</p> <p>22 I asked, but you can -- what's the answer to that one?</p> <p>23 A. Well, I -- you know, I didn't get involved into</p> <p>24 anything like that. It was all kind of general and</p> <p>25 upfront, outside, public, everybody knew that, you know</p>
Page 43	Page 45
<p>1 somebody's mother, you know. And so in general, that's</p> <p>2 all I'd have to say about that.</p> <p>3 Q. And again, do you think -- do you see that</p> <p>4 there's a difference between the military experience</p> <p>5 where it's all adults and a situation where you have</p> <p>6 adult priests and children?</p> <p>7 A. Oh, yeah, I see that, I see that, yeah. You</p> <p>8 know, I don't know that our meaning is to discern whether</p> <p>9 sex education shouldn't be in the hands of clergy or in</p> <p>10 the hands of parents, you know. I don't think that's our</p> <p>11 purpose.</p> <p>12 Q. During the time that John Feeney was at St.</p> <p>13 Therese in Appleton, did you hear about him going on</p> <p>14 overnight, out-of-town trips with boys?</p> <p>15 A. No, I don't think I heard about that or observed</p> <p>16 that or experienced that.</p> <p>17 Q. Ever hear about him taking boys to Cubs game,</p> <p>18 Chicago Bears game, anything like that and staying</p> <p>19 overnight in a hotel?</p> <p>20 A. He might have done that because he was very</p> <p>21 sports minded. I don't know. Or he would go down and</p> <p>22 see a professional, Sonny Liston or somebody boxing or</p> <p>23 something like that, but I don't know that he had kids</p> <p>24 with him.</p> <p>25 Q. Did you ever have any conversations with John</p>	<p>1 You're asking me if there was a --</p> <p>2 MR. MAZZEO: Well, wait for -- wait for</p> <p>3 the question. I would ask that it be restated or reasked</p> <p>4 of him because I'm not clear what the question is at this</p> <p>5 point.</p> <p>6 MR. FINNEGAN: I think he was answering</p> <p>7 his own question is what --</p> <p>8 MR. MAZZEO: Well, which he did, --</p> <p>9 MR. FINNEGAN: -- he was doing last.</p> <p>10 MR. MAZZEO: -- and then he went on to</p> <p>11 answer I guess another question that was pending or that</p> <p>12 was out there, so you can wait for the question to be</p> <p>13 reasked or wait for a new question.</p> <p>14 BY MR. FINNEGAN:</p> <p>15 Q. Did you ever have any discussions with any of --</p> <p>16 any of the Christian brothers that were at Xavier High</p> <p>17 School about John Feeney's involvement with boys?</p> <p>18 MR. MAZZEO: Objection as to time frame.</p> <p>19 THE WITNESS: No, I had -- I don't think I</p> <p>20 did.</p> <p>21 BY MR. FINNEGAN:</p> <p>22 Q. Your having any conversations with any -- any</p> <p>23 teacher, coach, official at Xavier High School about John</p> <p>24 Feeney's involvement with youth at the high school?</p> <p>25 MR. MAZZEO: Objection as to vague.</p>

12 (Pages 42 to 45)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 46	Page 48
<p>1 THE WITNESS: I don't believe I have. I 2 can't remember. 3 BY MR. FINNEGAN: 4 Q. Have you ever had any conversations with John 5 Feeney at any point since you've known him about any -- 6 any allegations of sexual improprieties on his part with 7 youth? Have you had any conversations with him about 8 that? 9 A. I think that infringes on my -- my professional 10 position as a priest, you know. 11 Q. So are you refusing to answer that question, 12 Father? 13 A. Well, you know, yeah, I think that -- I don't 14 think I should be asked that question. 15 Q. Well, you are asked that -- I did ask the 16 question, it's still pending. I'd like you to answer it, 17 and what I need to know is if you're going to refuse to 18 answer it? 19 A. Would you repeat it? 20 Q. Sure. At any point have you ever had a 21 conversation with John Feeney about any of the 22 allegations of sexual improprieties on his part with 23 youth? 24 A. No, -- 25 MR. MAZZEO: And to the extent it entails</p>	<p>1 people about John Feeney being involved with children, 2 sexually involved with children? 3 A. Well, yeah, some others, you know, people that 4 he was giving retreats, etcetera, you know, there was a 5 little of that in general. 6 Q. Who were the -- who were the mothers and dads 7 that you had those conversations with? 8 A. All kinds of -- all kinds of parishioners who 9 had kids of that age or that they were exposed to John 10 Feeney's theology or philosophy or, you know. 11 Q. And did -- did those parents tell you that John 12 Feeney had engaged in some sort of sexual contact with 13 their children? 14 A. No, that I didn't -- 15 Q. What did -- what did they tell you? 16 A. -- that I didn't hear. 17 Q. What did they tell you? 18 A. Well, they just talked about it in general. 19 Q. What did they talk about in general? 20 A. Boy, I don't like when -- I couldn't -- I 21 couldn't quote them, you know, at this stage of the 22 game. 23 Q. What did they -- what did they generally tell 24 you? 25 A. And how long ago --</p>
Page 47	Page 49
<p>1 or it encompasses the priest penitent, confession, 2 confessional privilege, then I would ask the witness to 3 assert that if it does fall within that parameter. Go 4 ahead. You can answer it. 5 THE WITNESS: No, I don't -- not that it 6 was something between he and me personally. You know, I 7 -- 8 BY MR. FINNEGAN: 9 Q. What do you mean by that, Father? 10 A. Well, I don't know. You know, there was general 11 conversation and hearsay, this is especially after him 12 being at St. Therese, you know, but I don't think I ever 13 got into any personal discussion with John while he was 14 living at St. Therese -- 15 Q. What was the -- 16 A. -- about him having a personal sexual 17 relationship with anybody. 18 Q. But sometime after he was at St. Therese, you 19 did hear about that? 20 A. Then some of -- after that, then some of that 21 was talked about, and, you know, and so I picked that 22 stuff up. But I didn't ever have a personal conversation 23 with John about -- about that. He personally, you know, 24 being involved with a kid, you know. 25 Q. Did -- but you have had conversations with other</p>	<p>1 Q. I'm not asking for an exact quote, Father. 2 MR. MAZZEO: You're not expected to guess 3 either, so only if you recall you can testify to it. 4 THE WITNESS: I can't recall really, you 5 know. It's just all the conversation that was going on, 6 you know, so I wouldn't be able to specify. 7 BY MR. FINNEGAN: 8 Q. Was there a good amount of conversation? 9 A. No, there wasn't that much. 10 Q. Was this pretty soon after Feeney left St. 11 Therese? 12 A. No, you know, I wouldn't be able to put a time 13 on it. 14 Q. But it was -- it was -- 15 A. It was a -- because it was a long time that I 16 was at St. Therese and it's always a long time that, you 17 know, after he was gone and -- and it was a long time 18 after he was shipped out and so on, so I -- 19 Q. But these were conversations that you heard -- 20 A. Well, -- 21 Q. -- when you were still at St. Therese, is that 22 correct? 23 MR. MAZZEO: Objection, that misstates the 24 witness's testimony. He just -- 25 THE WITNESS: I wouldn't be able to</p>

13 (Pages 46 to 49)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 50	Page 52
<p>1 discern that.</p> <p>2 MR. MAZZEO: Wait one second, Father. He</p> <p>3 just testified that it was a long time after Feeney was</p> <p>4 shipped out.</p> <p>5 BY MR. FINNEGAN:</p> <p>6 Q. I'm asking the question. Was it --</p> <p>7 A. I wouldn't be able to discern that, you know. I</p> <p>8 wouldn't be able to discern that.</p> <p>9 Q. So I mean you were hearing about John Feeney for</p> <p>10 years and years after you were at St. Therese, is that</p> <p>11 your testimony?</p> <p>12 A. Yeah, I guess you could say that, here and</p> <p>13 there, you know.</p> <p>14 Q. What about --</p> <p>15 A. General conversation, you know.</p> <p>16 Q. What about since -- since you were at St.</p> <p>17 Therese, you said that -- you said while you were at St.</p> <p>18 Therese you never had a conversation with -- with John</p> <p>19 Feeney about his sexual activity with any youth.</p> <p>20 A. No.</p> <p>21 Q. What about after St. Therese, have you had any</p> <p>22 conversations with John Feeney about his sexual activity</p> <p>23 with youth?</p> <p>24 A. I think that would -- that pushes me again to --</p> <p>25 I served as a sacramental minister to Feeney when he was</p>	<p>1 Q. You don't know whether --</p> <p>2 A. No, I'm not his regular confessor. I never was</p> <p>3 his regular confessor, no. I don't know who his</p> <p>4 confessor was. But there were times when I was</p> <p>5 administering the sacraments for him, you know.</p> <p>6 Q. When -- when did you administer the sacrament of</p> <p>7 confession for John Feeney?</p> <p>8 A. When?</p> <p>9 Q. When.</p> <p>10 A. Well, now, is that getting into -- into the</p> <p>11 seal?</p> <p>12 Q. I'm not asking you what was said in the</p> <p>13 confessional. I'm trying to --</p> <p>14 A. Did John come to confession to me or did he go</p> <p>15 to the other two guys that were there at Fox Lake?</p> <p>16 Q. I'm asking you. I don't know.</p> <p>17 A. I don't think I could say one way or the other</p> <p>18 in order to protect the seal of the confessional.</p> <p>19 Q. Was there ever a time that John Feeney came to</p> <p>20 you for confession?</p> <p>21 A. I don't think that that's a question I have to</p> <p>22 answer.</p> <p>23 MR. MAZZEO: Do you understand that he's</p> <p>24 not asking you to testify to any conversation or</p> <p>25 confession that took place?</p>
Page 51	Page 53
<p>1 incarcerated, and, in other words, I can't discern, you</p> <p>2 know, say just on a friendly basis in conversation or</p> <p>3 whether I was his confessor or what. So I would ask to</p> <p>4 be excused from that kind of conversation or answer or</p> <p>5 question in order to preserve the integrity of the seal</p> <p>6 of the confessional and spiritual direction that a cleric</p> <p>7 gives, whether to one cleric or another or other people,</p> <p>8 you know. I think that asking me that as I served as a</p> <p>9 sacramental minister when he was incarcerated at</p> <p>10 Outagamie County Jail as well as when I got involved at</p> <p>11 Fox Lake on merey Sunday to hear confessions of the</p> <p>12 prisoners and say mass with them with two other priests.</p> <p>13 So okay, how do you discern all that, you know?</p> <p>14 Q. Let's --</p> <p>15 A. I'm the wrong guy to ask. I'm saying that I</p> <p>16 would ask that professionally I be exempt from that kind</p> <p>17 of a question.</p> <p>18 Q. I don't think that's -- that's possible here,</p> <p>19 but we'll try and -- try and break it down for you and</p> <p>20 see if -- if it does make some sense to you. At any</p> <p>21 point in your 50 plus years of priests, have you been</p> <p>22 John Feeney's confessor?</p> <p>23 A. At any point?</p> <p>24 Q. Any point.</p> <p>25 A. I don't -- I don't know.</p>	<p>1 THE WITNESS: Is he or isn't he?</p> <p>2 MR. MAZZEO: He's not asking that.</p> <p>3 THE WITNESS: Well, that's what it sounds</p> <p>4 like to me.</p> <p>5 MR. MAZZEO: He's just asking if -- if</p> <p>6 John Feeney was at any point or when he was incarcerated</p> <p>7 was -- was --</p> <p>8 MR. FINNEGAN: The question was whether --</p> <p>9 MR. MAZZEO: -- were you the confessor?</p> <p>10 MR. FINNEGAN: -- did he ever come to you</p> <p>11 for confession? Do you know the answer to that, Father?</p> <p>12 MR. MAZZEO: Hold on, excuse me one second</p> <p>13 before you answer that. All right. To the -- to the</p> <p>14 extent -- to the extent that Father Vandenberg believes</p> <p>15 that he'll break the seal by admitting that Feeney was --</p> <p>16 had confessed -- had been a -- had confessed to him</p> <p>17 anything, that -- I believe that's your understanding</p> <p>18 that that will break the seal?</p> <p>19 THE WITNESS: Well, like we just had a</p> <p>20 statement in a -- in a bulletin --</p> <p>21 MR. FINNEGAN: Father, if you can here,</p> <p>22 all that I'm trying to do is establish foundation and</p> <p>23 whether or not there is an actual privilege. I don't</p> <p>24 believe there is, but I want to know, you know, one, was</p> <p>25 there a confession in a confessional situation, that's</p>

14 (Pages 50 to 53)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 54	Page 56
<p>1 all that I'm trying to get at, when it happened. I'm not 2 asking what was said inside the confessional, and to 3 establish that, those are questions that are foundational 4 questions that you absolutely have to be able to answer. 5 MR. MAZZEO: I under -- I understand, and 6 I think Father Vandenberg did respond to that by saying 7 that the conversations while John was incarcerated are 8 protected by the seal, the confessional seal. 9 MR. FINNEGAN: I don't think that's at all 10 what he said and I'm trying to break that down, so . . . 11 MR. MAZZEO: Father Vandenberg, -- 12 MR. FINNEGAN: Father -- 13 THE WITNESS: Our -- our diocesan bulletin 14 warned us about issuing a certificate for first 15 confession, children that are seven, eight years old and 16 said do not issue a certificate that they made their 17 first confession because that would be tampering with the 18 seal of the confessional. Now, this came out in our 19 chancellor's bulletin to warn us priests about that. And 20 so this is what I -- you know, you're asking me -- 21 MR. FINNEGAN: Well, we -- we can raise it 22 with the Court. What I'm going to need you to do then is 23 refuse to answer these questions and you can make the -- 24 make the assertion of privilege if you want. I don't 25 think that the foundational questions at all impinge upon</p>	<p>1 A. Are you intimidating me? 2 Q. Not at all, not at all, Father. All I'm trying 3 to do is establish whether or not there was a confession. 4 I'm not trying to badger you at all. I'm trying to be 5 fair with you. I'm not -- 6 A. I don't think I can answer that. 7 MR. MAZZEO: Wait for the question -- 8 MR. FINNEGAN: Wait for the question and 9 then -- 10 MR. MAZZEO: -- and I'll state my 11 objection on the record. 12 MR. FINNEGAN: -- and then you can -- you 13 can answer it however you want or refuse to answer it. 14 BY MR. FINNEGAN: 15 Q. The question, Father, is at any point since 16 you've been a priest, have you ever heard John Feeney's 17 confession? 18 MR. MAZZEO: Before you answer, let me 19 state an objection. To the extent that you're admitting 20 that you heard a confession breaks the seal, the priest 21 penitent privilege, and the seal of the confession, then 22 I'm going to ask you to assert that right and that 23 privilege, not answer the question and I'm asking you to 24 invoke the priest penitent privilege. 25 THE WITNESS: Okay. I do. That's what</p>
Page 55	Page 57
<p>1 that under the Wisconsin law. Might be different under 2 something else, but Wisconsin law I don't think it does. 3 And all that I'm trying to do is find out whether or not 4 there was actually a confession with John Feeney. I'm 5 not asking you for the contents of it. And so, one, have 6 you ever -- 7 THE WITNESS: Well, that, like I said, our 8 chancellor bulletin said do not issue a certificate that 9 Little Joe made his first confession because that tampers 10 with the seal of the confessional. 11 BY MR. FINNEGAN: 12 Q. Well, then I'm going to ask you a question. 13 A. I'm just not telling you that. 14 Q. Listen, all right -- 15 A. You're asking me, did John Feeney -- 16 Q. Father -- 17 A. -- come to me for confession. 18 Q. -- I don't want to -- I don't want to argue with 19 you. All I want you to do is listen to the question. If 20 you're going to refuse to answer it, that's fine, I don't 21 have a problem with that. You can refuse to answer 22 anything that you want. You might have to take it up 23 with the Court later, but it -- so let me answer the -- 24 ask the questions, you answer it however you want, they 25 can make whatever objections they want --</p>	<p>1 I'm trying to say. 2 BY MR. FINNEGAN: 3 Q. So you're -- you're refusing to answer that 4 question, Father? 5 A. That's right. I don't think you have a -- I 6 don't think you have -- what is your faith? 7 Q. I grew up Catholic, but we're not going to get 8 into that. We can get into it off the record here, but 9 -- 10 A. Well, just -- so you should -- 11 Q. Let's -- hold on, Father. 12 A. -- probably have a handle then on it. 13 MR. MAZZEO: Father -- 14 BY MR. FINNEGAN: 15 Q. I do, and I don't think at all that whether or 16 not somebody went to -- we're not going to argue about 17 that, all right? Just listen to the questions. I'm 18 going to lay the foundation. You guys make your 19 objections, and we'll make a clean record of it, all 20 right, Father? So what -- what we're going to do now is 21 I'm going to ask you some questions, and if you want to 22 refuse to answer them, that's fine. Like I said, they 23 can instruct you not to answer, all right? At any point 24 in your priesthood, have you ever been Father John 25 Feeney's regular confessor?</p>

15 (Pages 54 to 57)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 58

1 MR. MAZZEO: And I'll just -- just object
2 to the extent it violates the priest penitent privilege
3 pursuant to canon law.
4 THE WITNESS: That answers it, I guess,
5 huh?
6 BY MR. FINNEGAN:
7 Q. Are you refusing to answer that question,
8 Father?
9 A. Yeah.
10 Q. Have you ever had any conversations with John
11 Feeney that you consider to be outside the confessional?
12 A. Any conversation with John Feeney outside the
13 confessional? Well, living in the same house, we had
14 conversations all the time.
15 Q. Have you ever had any conversations with John
16 Feeney about his sexual activity with youth outside of
17 what you perceived to be the confession?
18 A. I don't think I could answer that
19 professionally.
20 Q. Are you refusing to answer that question,
21 Father?
22 A. Yeah.
23 MR. MAZZEO: Okay. And I would just --
24 Father, I would just -- to the extent it's not protected
25 by privilege, you're obligated to answer that question to

Page 59

1 the extent that you had any conversations with John
2 Feeney that are not protected by the priest penitent
3 privilege.
4 THE WITNESS: Well, on a friendly basis we
5 discussed sports and all kinds of things.
6 MR. MAZZEO: But the question was --
7 MR. FINNEGAN: That wasn't my question.
8 MR. MAZZEO: -- with regard to --
9 BY MR. FINNEGAN:
10 Q. I'll say it again, Father. Outside, so I'm
11 asking you outside of -- of what you perceive to be the
12 confessional, outside of that, have you ever had a
13 conversation with John Feeney about his sexual activity
14 with youth?
15 MR. MAZZEO: And I would just object to
16 time frame, but you -- you can answer.
17 THE WITNESS: I don't think so. I don't
18 think so. I just assumed that there wasn't any, but I
19 may have been naive.
20 BY MR. FINNEGAN:
21 Q. Assumed that there wasn't any what, Father?
22 A. Activity, sexual activity as you say it, you
23 know.
24 Q. Do you believe Feeney's innocent?
25 MR. MAZZEO: Objection as to -- objection

Page 60

1 as to time frame, lack of foundation, speculation, lack
2 of personal knowledge, assumes facts not in evidence.
3 BY MR. FINNEGAN:
4 Q. You can answer.
5 A. Just don't have any recollection of that.
6 Q. Let me -- let me go back to the confessional for
7 a little bit here, Father, and I'm not -- not asking
8 specific to anyone. I'd just like to know a little bit
9 more in general about the sacrament of confession and
10 when that takes place. What's the -- what's the process
11 for one to come to you and establish a confessional, a
12 confession to you? What has to happen?
13 A. By a cleric or by a parishioner or by a child or
14 --
15 Q. Just if you can explain the whole process to me.
16 A. How is the sacrament administered?
17 Q. Yeah, what -- what happens? I mean for someone
18 that doesn't know what -- what has to take place for a
19 conversation with you to be considered a confession?
20 A. Well, when a priest sins, he can't look in a
21 mirror and give himself absolution, okay? He's got to go
22 to another priest and say, Father, will you hear my
23 confession and confess to another priest, okay?
24 Q. So is that how -- in order for it to be a
25 confession, does the penitent have to ask you, Father,

Page 61

1 will you hear my confession or something like that?
2 A. No. Sometimes, you know, opportunities for the
3 sacrament are set up in school and the whole class goes
4 and they don't ask the priests individually whether he
5 would hear their confessions. They all pass through him.
6 It's something like being run over by a truck.
7 Q. Was there ever any time that -- did you ever
8 administer the sacrament of confession to John Feeney in
9 an actual confessional?
10 A. Well, confessional is a piece of furniture. In
11 order to administer the sacrament of penance, you don't
12 need to have furniture. I used to confess my sins to
13 Father McEvoy walking down Wisconsin Avenue at Marquette
14 University in between classes, so there was no
15 confessional. Buses and trucks and people on the
16 sidewalk, and I would receive the sacrament of penance
17 from Father McEvoy. So I'm trying to explain to you if I
18 ever -- you asked a question did I ever have --
19 administer the sacrament of penance in a confessional to
20 John Feeney. Well, if I was in a confessional and he
21 came in there, yes. If I -- but I don't know. And
22 sometimes you have to realize that a confessional is
23 built so that there's privacy for the penitent and for
24 the priest. He doesn't know who's there. He doesn't
25 know sometimes if it's male or female, so you know.

16 (Pages 58 to 61)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 62	Page 64
<p>1 Q. So the question again, Father, was whether or</p> <p>2 not you have any memory of John Feeney coming to you for</p> <p>3 confession in an actual confessional?</p> <p>4 A. No, I wouldn't.</p> <p>5 MR. MAZZEO: Same objection as earlier.</p> <p>6 BY MR. FINNEGAN:</p> <p>7 Q. What -- what was your answer, Father?</p> <p>8 A. I couldn't answer that. I wouldn't know.</p> <p>9 Q. Has there ever been a time that you've heard</p> <p>10 John Feeney's confession in an open confessional?</p> <p>11 MR. MAZZEO: Same objection, and to the</p> <p>12 extent it violates the priest penitent privilege pursuant</p> <p>13 to canon law.</p> <p>14 BY MR. FINNEGAN:</p> <p>15 Q. Do you have an answer?</p> <p>16 A. I'd go with that.</p> <p>17 Q. Are you refusing to answer, Father?</p> <p>18 A. Yeah.</p> <p>19 Q. Do you understand what the term regular</p> <p>20 confessor is?</p> <p>21 A. I think I do.</p> <p>22 Q. And what -- what is that, Father?</p> <p>23 A. Well, that would be a priest confessor that</p> <p>24 would be chosen by a penitent on a regular basis. And</p> <p>25 the penitent has discretion as to whom he wants to</p>	<p>1 sexually abused a child?</p> <p>2 A. Not to my knowledge. You mean in a regular</p> <p>3 conversation?</p> <p>4 Q. Anytime I'm asking.</p> <p>5 MR. MAZZEO: Objection to the extent it's</p> <p>6 protected by the priest penitent privilege, so if you can</p> <p>7 answer that, and I think you did answer it. He said not</p> <p>8 to his knowledge.</p> <p>9 THE WITNESS: Yeah.</p> <p>10 BY MR. FINNEGAN:</p> <p>11 Q. And then you qualified it, so I'll ask you</p> <p>12 again. Did John Feeney ever tell you that he sexually</p> <p>13 abused a child?</p> <p>14 A. Not to my knowledge, no I'd say.</p> <p>15 Q. When -- when, Father, when is the first time</p> <p>16 that you heard John Feeney's confession?</p> <p>17 MR. MAZZEO: Same objection. Objection to</p> <p>18 the extent that it's protected by the priest penitent</p> <p>19 privilege pursuant to canon law. Can you answer that</p> <p>20 question, yes or no?</p> <p>21 THE WITNESS: Well, you answered it for</p> <p>22 me.</p> <p>23 MR. MAZZEO: I made an objection. If it's</p> <p>24 protected by the privilege, then you can state that.</p> <p>25 THE WITNESS: Okay. The clergy priv --</p>
Page 63	Page 65
<p>1 receive -- through whom he wants to receive the</p> <p>2 sacrament. It's all at the discretion of the penitent.</p> <p>3 Q. Has John Feeney ever told you, Father, that --</p> <p>4 that he sexually abused a child?</p> <p>5 A. I wouldn't be able to answer that question</p> <p>6 whether -- what happened or not.</p> <p>7 Q. I'm not asking you what happened. I'm asking</p> <p>8 you did John Feeney ever tell you that he sexually abused</p> <p>9 a child?</p> <p>10 MR. MAZZEO: You can answer it to the</p> <p>11 extent that it's not protected by the priest penitent</p> <p>12 privilege.</p> <p>13 THE WITNESS: I won't -- I won't be able</p> <p>14 to discern that. See, this -- this gets --</p> <p>15 BY MR. FINNEGAN:</p> <p>16 Q. Can you explain that to me, Father?</p> <p>17 A. Well, there's a professional relationship that a</p> <p>18 priest has with whoever comes to him and confidentiality</p> <p>19 and so on. And as far as being a regular confessor, I</p> <p>20 think I probably have served that for some people in the</p> <p>21 past, but I would not be able to say that I was regular</p> <p>22 confessor for John Feeney.</p> <p>23 Q. That wasn't -- wasn't my question, Father. I</p> <p>24 think we asked -- asked that one and answered it before.</p> <p>25 The question was: Did John Feeney ever tell you that he</p>	<p>1 the clergy privilege.</p> <p>2 BY MR. FINNEGAN:</p> <p>3 Q. What's -- what's the clergy privilege now,</p> <p>4 Father, what's that? Is that something different or is</p> <p>5 that --</p> <p>6 A. Protected by the professional and seal of the</p> <p>7 confessional principal, I wouldn't be able to answer</p> <p>8 that.</p> <p>9 Q. So you're refusing to answer that question?</p> <p>10 A. Right.</p> <p>11 Q. Is there a difference between the confessional</p> <p>12 privilege and this clergy privilege that you're talking</p> <p>13 about?</p> <p>14 A. Under the seal of the confessional, a priest</p> <p>15 would give his life before he reveals what he heard in a</p> <p>16 confessional, okay, or that a person was there. He</p> <p>17 doesn't have to reveal whether a person came to him or</p> <p>18 not.</p> <p>19 Q. Did you understand my question, Father? My</p> <p>20 question was: Is there a difference -- you just said</p> <p>21 that there was a clergy privilege, and I'm asking whether</p> <p>22 or not --</p> <p>23 A. Oh.</p> <p>24 Q. -- there's a difference between this clergy</p> <p>25 privilege and the confessional privilege?</p>

17 (Pages 62 to 65)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 66	Page 68
<p>1 A. Well, the clergy privilege, many people come to 2 the priests in confidence as a professional, and so to be 3 professional he can't reveal what people have entrusted 4 to him. 5 Q. And this -- this -- 6 A. That's different than the seal of the 7 confessional, you know, but it's still -- you're a 8 professional man yourself, you ought to -- ought to 9 know what that means. 10 Q. Are you -- are you refusing to answer some of 11 these questions on the basis of -- of this clergy 12 privilege? 13 MR. MAZZEO: And I -- I think we need some 14 clarification as to the clergy privilege. Is it a clergy 15 counseling type privilege where you act as a counselor? 16 THE WITNESS: A clergy privilege, yes, and 17 the seal of the confessional, yes, there's a difference. 18 But, you know, on what basis am I refusing to answer? 19 BY MR. FINNEGAN: 20 Q. Yeah. Are you asserting that the clergy 21 privilege is preventing you from answering some of these 22 questions? 23 A. Sure, I can say that. 24 Q. Before -- before John Feeney was in either of 25 the jail or prison facility, had you ever heard his</p>	<p>1 these questioning. I'm not trying to badger you at all. 2 You're refusing to answer them, so legally I need to 3 establish where you're drawing those lines. Is there 4 some sort of seal that you do generally in the confessional 5 that -- that makes it a confession, makes it within the 6 priest penitent? 7 A. I don't understand your question. 8 Q. I'm -- I'm just asking generally about the -- 9 about the confessional and what -- what makes a 10 conversation a confessional versus the other confidential 11 talk that you had talked about before which you were 12 saying was the clergy privilege. 13 A. I can't answer you. I can't answer your 14 question. 15 MR. MAZZEO: Do you understand the 16 question? He's asking you generally the difference 17 between the priest penitent privilege and the clergy 18 counseling privilege. 19 MR. FINNEGAN: I'd say that the counseling 20 was in his answer, but you can go ahead, Father. 21 THE WITNESS: What's the difference? 22 BY MR. FINNEGAN: 23 Q. Yeah. 24 A. What's the difference between confession and a 25 personal professional responsibility?</p>
Page 67	Page 69
<p>1 confession before that? 2 MR. MAZZEO: Objection, assumes facts not 3 in evidence. 4 THE WITNESS: Yeah. 5 MR. MAZZEO: And to the extent it violates 6 the priest penitent privilege -- 7 THE WITNESS: That's right. 8 MR. MAZZEO: -- pursuant to canon law. 9 THE WITNESS: You're pushing me on the -- 10 my professional position and especially on the seal of 11 the confessional and I prefer not to answer. 12 MR. MAZZEO: And the questions are 13 bordering since they've been repetitive along this area 14 of the priest penitent privilege, they're bordering on 15 harassment and argumentative with the witness. 16 THE WITNESS: Very good. I'd agree with 17 that. 18 BY MR. FINNEGAN: 19 Q. Are you refusing to answer that question, 20 Father? 21 A. Yes. 22 Q. And, Father, and counsel -- counsel obviously 23 knows, but what I'm trying to do is establish some 24 foundation for what the -- what these lines are that 25 you're drawing, and that's -- that's why I have to ask</p>	<p>1 Q. Yeah. 2 A. Not much. 3 Q. What are the -- are there any formal things that 4 -- that are done to make something into a confession? 5 A. Well, I don't know. A person asks will you hear 6 my confession, that's -- that's it. If a person comes in 7 and just wants counseling, that's it, but it's still 8 under a professional relationship. 9 Q. Has John Feeney ever asked you, Father, will you 10 hear my confession? 11 MR. MAZZEO: Objection to the extent it 12 violates the priest penitent privilege pursuant to canon 13 law. 14 THE WITNESS: Yeah, that's a violation of 15 the seal what you're asking me. We can't even -- and we 16 are counseled against even putting out a certificate for 17 a child that they made their first confession because 18 that's an infringement -- infringement on the seal. 19 BY MR. FINNEGAN: 20 Q. Do you understand that -- 21 A. Now the questions you're asking -- 22 Q. This question is -- 23 A. -- are -- are improper, they're not -- you're 24 not -- 25 Q. I'm asking you whether or not John Feeney ever</p>

18 (Pages 66 to 69)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 70

1 said those words to you? And if the answer is no, that
2 doesn't violate the privilege, is that right?
3 MR. MAZZEO: Same objection.
4 MR. FINNEGAN: The question --
5 MR. MAZZEO: You can answer it if you can.
6 THE WITNESS: You know, let's get off
7 this, you know. You know, this is -- you're I think out
8 of bounds.
9 BY MR. FINNEGAN:
10 Q. I'm trying to establish where these lines are
11 that you've drawn, Father, and it's -- it's -- and I
12 understand it's frustrating for you --
13 A. Well, if you don't understand, that's your
14 problem, okay, but I'm -- I'm not giving in, okay? If
15 you don't understand them, that's your problem.
16 MR. MAZZEO: I'm going to ask that we take
17 a break at this time.
18 MR. FINNEGAN: Sure.
19 (A break was taken at this time.)
20 BY MR. FINNEGAN:
21 Q. Father Vandenberg, I want to start out asking
22 you some questions about any conversations that you had
23 with John Feeney outside the confessional, does that --
24 A. All right.
25 Q. -- does that make sense as far as a parameter?

Page 71

1 A. Okay.
2 Q. So I'm talking about stuff that's outside the
3 confessional. Have you ever had any conversations with
4 John Feeney about his sexual activity with youth outside
5 of the confessional?
6 A. I don't recall any.
7 Q. Did you ever have any conversations with John
8 Feeney outside the confessional about his sexual
9 activity?
10 A. I never discussed his sexual activity with him
11 --
12 Q. Did you ever --
13 A. -- that I can remember.
14 Q. Did you ever have any conversations with John
15 Feeney outside the confessional that dealt with any of
16 the allegations against him made by youth?
17 A. Not -- no, not that -- not that I can
18 remember.
19 Q. Did you ever have any conversations with John
20 Feeney outside the confessional that dealt with -- that
21 dealt with his criminal case?
22 MR. MAZZEO: Objection as to lack of
23 foundation.
24 THE WITNESS: I don't recall.
25 BY MR. FINNEGAN:

Page 72

1 Q. Did you ever have any conversations with John
2 Feeney outside the confessional that dealt with -- with
3 any problems that he had with youth?
4 A. I really don't recall.
5 Q. Generally, Father, is there a way to discern
6 whether a conversation is a confession or whether it's
7 something outside the sacrament?
8 MR. MAZZEO: Objection, asked and
9 answered, but you can answer.
10 THE WITNESS: Okay. To confect a
11 sacrament, there has to be matter and form. The matter
12 is false or sins actually committed that are confessed
13 by the penitent and the words of absolution by the
14 priest.
15 BY MR. FINNEGAN:
16 Q. Did you ever have any conversations with John
17 Feeney about any allegations of sexual improprieties on
18 his part where during that conversation you did not give
19 words of absolution?
20 A. Not to my knowledge.
21 Q. Anything else that -- that are benchmarks or
22 markers for what is a confession and what isn't a
23 confession besides the manner and forms which you talked
24 about, which is the penitent confessing his or her sins
25 and the priest giving words of absolution?

Page 73

1 A. What about that?
2 Q. Is there anything else that helps discern
3 whether or not something's within the sacrament of
4 confession versus outside the sacrament besides the
5 penitent confessing his or her sins and the priest giving
6 words of absolution?
7 A. Not to my knowledge.
8 Q. Do you ever make notes of what's -- what's said
9 in the confessional?
10 A. Never.
11 Q. So anything that -- it's correct to say that
12 anything that's written down would all be outside the
13 confessional?
14 A. I would -- yeah, I would say that.
15 Q. Did you ever --
16 A. I've had deaf people bring in their sins written
17 down that were deaf and dumb, but nothing that I wrote
18 Q. Did -- did you ever take any notes or any -- jot
19 down any thoughts during any conversations that you had
20 with John Feeney?
21 A. Not to my knowledge.
22 Q. Did you ever tell anyone else or did you ever
23 have any conversations with any fellow priests in the
24 Diocese of Green Bay about Feeney being accused of
25 sexually abusing kids?

19 (Pages 70 to 73)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 74	Page 76
<p>1 A. I have joined in conversations about that.</p> <p>2 Q. How often?</p> <p>3 A. I have no -- no idea.</p> <p>4 Q. Do you remember when the first time was that you</p> <p>5 had a conversation with any of your fellow priests of the</p> <p>6 Diocese of Green Bay about John Feeney being accused of</p> <p>7 sexually abusing kids?</p> <p>8 A. No.</p> <p>9 Q. Do you remember who -- who you talked to about</p> <p>10 John Feeney being accused of sexually molesting kids?</p> <p>11 A. No.</p> <p>12 Q. So as you sit here today, you can't remember --</p> <p>13 it's correct to say that you can't remember the name of</p> <p>14 any other priests that you've ever discussed John Feeney</p> <p>15 being accused of sexually molesting youth?</p> <p>16 MR. MAZZEO: I just object to time frame.</p> <p>17 THE WITNESS: I'm friends with all the</p> <p>18 priests in the diocese, so I would not give any other</p> <p>19 personal names connected with John Feeney.</p> <p>20 BY MR. FINNEGAN:</p> <p>21 Q. You're refusing to give other names or --</p> <p>22 A. Well, it's too big a blur, you know. Sure, I</p> <p>23 discussed things that came up that are public and so on</p> <p>24 with fellow priests in general, I'd say, yeah, okay.</p> <p>25 Q. And what I'm asking you is do you remember the</p>	<p>1 In general terms and in a general way.</p> <p>2 Q. Did -- did you ever discuss with John Feeney the</p> <p>3 deposition that he gave in these cases?</p> <p>4 A. I don't recall. John Feeney's been out of the</p> <p>5 diocese for a long time, so I don't have much contact</p> <p>6 with him.</p> <p>7 Q. How many times have you been to the prison to</p> <p>8 see John Feeney?</p> <p>9 A. I was not there to -- ever went there to see</p> <p>10 John Feeney. I was there to accommodate Mercy Sunday at</p> <p>11 the prison.</p> <p>12 Q. How many times were you there on Mercy Sunday</p> <p>13 that you saw John Feeney?</p> <p>14 A. Once.</p> <p>15 Q. And the -- the time that you saw him, was that</p> <p>16 at Fox Lake Correctional?</p> <p>17 A. Was that at what?</p> <p>18 Q. The name of the prison.</p> <p>19 A. Oh, Fox Lake, yeah. And before I went, I --</p> <p>20 MR. MAZZEO: Wait for the question.</p> <p>21 THE WITNESS: Okay.</p> <p>22 BY MR. FINNEGAN:</p> <p>23 Q. What were you going to say, Father, about before</p> <p>24 you went to Fox Lake?</p> <p>25 A. I sought the pastor of the place who's</p>
Page 75	Page 77
<p>1 names of any of those priests that you've had discussions</p> <p>2 with?</p> <p>3 A. No.</p> <p>4 Q. Before the deposition today, did you have any</p> <p>5 discussions with -- with any of your fellow priests about</p> <p>6 the deposition?</p> <p>7 A. Just in general as to what do I expect, what do</p> <p>8 I have to do.</p> <p>9 Q. And who -- who did you have those conversations</p> <p>10 with?</p> <p>11 A. A number of guys.</p> <p>12 Q. Do you remember the names of any of them?</p> <p>13 A. Well, one that had a recent -- recent experience</p> <p>14 and he's in my support group and he mentioned that he had</p> <p>15 experienced a deposition. It was Ralph Merkatoris.</p> <p>16 Q. And did -- did Father Merkatoris, did he tell</p> <p>17 you anything about the deposition process?</p> <p>18 A. No, not much, except that you ask questions. I</p> <p>19 was asking because I never experienced this, general</p> <p>20 questions.</p> <p>21 Q. Anybody else besides Father Merkatoris that you</p> <p>22 talked to about your upcoming deposition?</p> <p>23 A. Not that -- not that I can recall. There are a</p> <p>24 lot of people that we share with with the problem of sex</p> <p>25 abuse as a general question, that's generally discussed</p>	<p>1 responsible for the prisoners so that I had his knowledge</p> <p>2 of my being there and my administration of sacraments.</p> <p>3 Q. And did -- on that one visit when you went to</p> <p>4 Fox Lake, did you talk to John Feeney?</p> <p>5 A. Yes.</p> <p>6 Q. Who else was present, if anyone, during the time</p> <p>7 that you talked to John Feeney at Fox Lake the one time</p> <p>8 that you were there?</p> <p>9 MR. MAZZEO: Objection as to relevance.</p> <p>10 THE WITNESS: It was a big room full of</p> <p>11 people and my two companions were with me.</p> <p>12 BY MR. FINNEGAN:</p> <p>13 Q. And did you talk to John Feeney with your two</p> <p>14 companions when you were at Fox Lake?</p> <p>15 A. I don't recall if we were all together or not at</p> <p>16 the time, so I -- I don't know how to answer that.</p> <p>17 Q. During that conversation that you had with John</p> <p>18 Feeney, was it all within this larger room that you're</p> <p>19 talking about?</p> <p>20 A. Yes, it was in this -- with a lot of other</p> <p>21 people around.</p> <p>22 Q. And what did -- what was going on in the room?</p> <p>23 Why -- why were all the people there?</p> <p>24 A. To celebrate the sacraments of eucharist and</p> <p>25 penance.</p>

20 (Pages 74 to 77)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 78	Page 80
<p>1 Q. Was there a separate area where the penance was</p> <p>2 heard or was it just in the big room?</p> <p>3 A. It was --</p> <p>4 MR. MAZZEO: You know, before you answer,</p> <p>5 I'm going to object to this whole line of questioning</p> <p>6 insofar as it is not relevant to the -- any of the</p> <p>7 allegations in the Complaint in this case.</p> <p>8 THE WITNESS: It was all done in a large</p> <p>9 room which was used as a chapel.</p> <p>10 BY MR. FINNEGAN:</p> <p>11 Q. Was there a section of that large room that was</p> <p>12 designated for the sacrament of penance?</p> <p>13 A. The confessors were distributed all around the</p> <p>14 room.</p> <p>15 Q. And were they -- were the confessions private or</p> <p>16 were they heard by everybody in the room? How did that</p> <p>17 work?</p> <p>18 A. They were all private.</p> <p>19 Q. And were you in a private room with the person?</p> <p>20 MR. MAZZEO: Objection. This is --</p> <p>21 BY MR. FINNEGAN:</p> <p>22 Q. Or were the confessors in private rooms or was</p> <p>23 it just in this --</p> <p>24 A. It was in a chapel --</p> <p>25 Q. -- big general room?</p>	<p>1 BY MR. FINNEGAN:</p> <p>2 Q. So are -- are you refusing to answer that</p> <p>3 question, Father?</p> <p>4 A. What was the question again?</p> <p>5 Q. The question was during the conversation that</p> <p>6 you had with John Feeney during the one time that you</p> <p>7 went to Fox Lake, did you absolve John Feeney of his sins</p> <p>8 during that conversation?</p> <p>9 MR. MAZZEO: Same objection to -- to the</p> <p>10 extent it violates the priest penitent privilege</p> <p>11 protected by canon law.</p> <p>12 THE WITNESS: I don't -- I can't answer</p> <p>13 that. I don't know.</p> <p>14 BY MR. FINNEGAN:</p> <p>15 Q. You don't know or are you refusing to answer?</p> <p>16 Those are two different things, Father.</p> <p>17 MR. MAZZEO: Are you asserting the priest</p> <p>18 penitent privilege, Father?</p> <p>19 THE WITNESS: Yeah.</p> <p>20 MR. MAZZEO: Okay.</p> <p>21 BY MR. FINNEGAN:</p> <p>22 Q. And so you're refusing to answer that question,</p> <p>23 Father?</p> <p>24 A. I am.</p> <p>25 Q. Is it -- was the whole conversation that -- that</p>
Page 79	Page 81
<p>1 A. -- like. A room that they use as a place where</p> <p>2 they have Sunday worships for the general population of</p> <p>3 the prison.</p> <p>4 Q. And does that chapel area have a separate</p> <p>5 confessional in it?</p> <p>6 A. Not that I was aware of.</p> <p>7 Q. How many times -- or you said -- is that the</p> <p>8 only time that you've gone to Fox Lake for the, what</p> <p>9 did you call it, the Sunday -- what did you call the --</p> <p>10 going there for the -- like you had a name for it, the</p> <p>11 Sunday --</p> <p>12 A. Mercy Sunday?</p> <p>13 Q. Yeah.</p> <p>14 A. Yes, that was the only time I went. I didn't go</p> <p>15 the second year or I don't think they held it again.</p> <p>16 Sunday obligation can be fulfilled by the chaplain in the</p> <p>17 prison on Thursdays, so we did not expect a large</p> <p>18 crowd.</p> <p>19 Q. During that conversation that you had with John</p> <p>20 Feeney, did you absolve him of his sins?</p> <p>21 MR. MAZZEO: Objection to the extent that</p> <p>22 this breaches and encroaches upon the priest penitent</p> <p>23 privilege protected by canon law.</p> <p>24 THE WITNESS: Okay. So I'd say I can't</p> <p>25 answer that, I don't know.</p>	<p>1 you had with John Feeney at Fox Lake Correctional</p> <p>2 Facility the one time that you were there, was that all</p> <p>3 within the confessional?</p> <p>4 MR. MAZZEO: Objection, same objection.</p> <p>5 BY MR. FINNEGAN:</p> <p>6 Q. The entire conversation?</p> <p>7 A. Can't answer that.</p> <p>8 Q. So you're refusing to answer it?</p> <p>9 A. (Witness nods head.)</p> <p>10 Q. Did you have any -- any conversation with John</p> <p>11 Feeney while at Fox Lake that was outside the</p> <p>12 confessional?</p> <p>13 A. There were no confessionals, so it was all in</p> <p>14 the visiting -- I visited --</p> <p>15 MR. MAZZEO: Do you understand the</p> <p>16 question? Did you have any informal conversations with</p> <p>17 John Feeney at the correctional center?</p> <p>18 THE WITNESS: I'd say yes, informal</p> <p>19 conversations with other people, people around.</p> <p>20 BY MR. FINNEGAN:</p> <p>21 Q. What -- what did John Feeney tell you in those</p> <p>22 conversations?</p> <p>23 A. I don't think I have to tell -- answer that.</p> <p>24 MR. MAZZEO: Father, that's -- if it's not</p> <p>25 protected by a privilege and it's informal, then I</p>

21 (Pages 78 to 81)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 82

1 would -- you have an obligation to answer that question.
2 Remember, it's an informal conversation.
3 THE WITNESS: The only thing I remember is
4 that John said that during recreation, one of the
5 prisoners said you've got to be at least a 4 star
6 general, and Feeney's answer was not a 4 star.
7 BY MR. FINNEGAN:
8 Q. Is that the -- the only thing you remember John
9 Feeney telling you?
10 A. That's all I can remember. Typical Feeney.
11 Q. Who else was there with you during the
12 conversation with John Feeney?
13 A. Well, there was movement around there, so I
14 wouldn't be able to say. People moving around and
15 stuff.
16 Q. Was there a designated time when you started and
17 stopped a confession with John Feeney?
18 A. I can't answer that.
19 Q. You're refusing to answer that, Father?
20 A. (Witness nods head.)
21 Q. Is that a yes?
22 MR. MAZZEO: Verbally, you have to answer.
23 MR. FINNEGAN: Is that a yes?
24 THE WITNESS: It's a --
25 MR. MAZZEO: Priest penitent privilege?

Page 83

1 THE WITNESS: Yeah.
2 MR. MAZZEO: Okay.
3 BY MR. FINNEGAN:
4 Q. Did you hear anyone else's confession -- or
5 strike that. Did you hear any confessions besides John
6 Feeney's at Fox Lake?
7 MR. MAZZEO: Objection, assumes facts not
8 in evidence. This witness did not testify that he ever
9 heard John Feeney's confession.
10 THE WITNESS: Yeah, I -- clergy privilege.
11 MR. FINNEGAN: Clergy privilege now?
12 THE WITNESS: Well, --
13 MR. MAZZEO: I'm not directing -- just so
14 you understand --
15 MR. FINNEGAN: All I want to do is just --
16 MR. MAZZEO: -- I'm not directing him not
17 to answer.
18 MR. FINNEGAN: Yeah, and all I'm doing is
19 excluding Feeney is what I want to do.
20 MR. MAZZEO: Excluding -- excluding Feeney
21 --
22 MR. FINNEGAN: Yeah.
23 MR. MAZZEO: -- he's not asking you about
24 any specific person. He's asking did you hear
25 confessions when you went to Fox Lake Correctional

Page 84

1 Center?
2 THE WITNESS: I was there to hear
3 confessions, and it was available to the whole prison.
4 BY MR. FINNEGAN:
5 Q. Who else went with you? Who were the other two
6 people that went with you?
7 A. I wouldn't want to implicate them.
8 Q. Are you refusing to answer that question,
9 Father?
10 A. Yes.
11 MR. MAZZEO: You can -- you can answer.
12 THE WITNESS: I don't want to implicate
13 anybody else to have to go through something like this.
14 BY MR. FINNEGAN:
15 Q. So again, you're refusing to give me the two
16 names of the people that went with you to Fox Lake?
17 A. That's right.
18 Q. Are they both priests?
19 A. Of course. Only a priest can forgive sins.
20 Q. We hadn't established that they were also doing
21 confessions. So the other two people that went with you,
22 they were both priests of the Diocese of Green Bay?
23 A. Yeah. And whether Feeney went to them or to me,
24 can't answer that.
25 Q. After you left Fox Lake Correctional -- did you

Page 85

1 drive with the two other priests to Fox Lake?
2 A. Yes.
3 Q. On the way back from Fox Lake Correctional, did
4 the three of you have a conversation about -- about John
5 Feeney and about his sexual abuse of kids?
6 MR. MAZZEO: And I'll just -- I know I
7 stated earlier that I have a standing objection. My
8 standing objection continues to this whole line of
9 questioning with regard to Father Vandenberg's visit and
10 travels to and from the Fox Lake Correctional Center as
11 being irrelevant to the issues in this case. You can
12 answer.
13 THE WITNESS: I don't recall.
14 BY MR. FINNEGAN:
15 Q. Was it just the three of you that went? Was
16 there anybody else that drove up or came back with you?
17 A. Only the three of us.
18 Q. Outside of the one time that you went to see
19 John Feeney at Fox Lake, did you see him --
20 A. I didn't go to see John Feeney. I went to hear
21 confessions of the entire prison.
22 Q. Outside of the one time that you went to Fox
23 Lake to hear confessions, did you ever go and see John
24 Feeney at Outagamie Jail?
25 MR. MAZZEO: Objection, relevance.

22 (Pages 82 to 85)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 86

1 THE WITNESS: I ministered to him in
2 Outagamie County Jail when he was there for a short
3 time.
4 BY MR. FINNEGAN:
5 Q. What do you mean by ministered to him, Father?
6 A. Brought him sacraments.
7 Q. Where did you meet with John Feeney when he was
8 --
9 A. In the facilities.
10 Q. In his jail cell?
11 A. No, not his cell, in the visiting facilities.
12 MR. MAZZEO: And I'm going to assert a
13 standing objection to this line of questioning with
14 regard to Father Vandenberg's visits to Outagamie County
15 Jail subsequent to the alleged incidents in this case
16 based on relevance.
17 BY MR. FINNEGAN:
18 Q. How many times did you see John Feeney at the
19 Outagamie Jail?
20 A. I wouldn't be able to answer that.
21 Q. Did you see John -- do you have a ballpark
22 range? Were you going to say something?
23 A. A few times. I don't recall how long -- he
24 wasn't there very long.
25 Q. Did you see him more than ten times?

Page 87

1 A. No.
2 Q. More than five times?
3 A. No.
4 Q. Less than five times? Is that a yes, Father?
5 A. Once or twice.
6 Q. On -- on the one or two times that you went to
7 see John Feeney, did you have any conversations with him
8 at the Outagamie Courthouse that were outside the
9 sacrament of confession?
10 A. Just had a general visitation.
11 Q. So you didn't administer confession to him at
12 the Outagamie Courthouse?
13 MR. MAZZEO: Objection to the extent that
14 it's protected by the priest penitent privilege pursuant
15 to canon law.
16 THE WITNESS: I don't recall that I
17 administered the sacrament of penance to him at all at
18 Outagamie County, I don't recall that.
19 BY MR. FINNEGAN:
20 Q. Did -- did you have any discussion at Outagamie
21 at the jail there with John Feeney about the allegations
22 against him?
23 MR. MAZZEO: Objection, vague.
24 THE WITNESS: I don't recall.
25 BY MR. FINNEGAN:

Page 88

1 Q. Do you remember having any conversation with
2 John Feeney at the Outagamie Courthouse about Todd
3 Merryfield?
4 A. No, not specifically.
5 Q. What do you remember about the conversation that
6 -- that wasn't specific?
7 A. Some very general things.
8 Q. Such as?
9 A. I don't recall.
10 Q. Had Father Feeney during the conversation, the
11 one or two conversations at Outagamie Courthouse, did he
12 admit to you that he had made a mistake with some of the
13 kids?
14 MR. MAZZEO: Objection, relevance.
15 THE WITNESS: Not to my knowledge.
16 BY MR. FINNEGAN:
17 Q. During the one or two conversations that you had
18 with John Feeney at the Outagamie Courthouse, did -- did
19 he admit to any wrongdoing with any of the kids to you?
20 A. Not to my knowledge.
21 Q. Did John Feeney during those conversations at
22 the Outagamie Courthouse, did he deny that he had engaged
23 in some sexual misconduct with kids?
24 A. He neither denied or admitted. I didn't
25 question that.

Page 89

1 Q. Did you go alone on those visits?
2 A. Yes.
3 Q. The time that you saw him up at Fox Lake, was
4 that before or after his -- his conviction?
5 A. Well, that had to be a couple years after.
6 Q. At any point, has any -- any person ever told
7 you that John Feeney sexually molested him or her as a
8 child?
9 A. I don't recall.
10 Q. Do you think that there possibly was, or what
11 are you --
12 A. No.
13 Q. Any time that a parent ever told you that --
14 that they suspected that John Feeney had sexually
15 molested their child?
16 A. No.
17 Q. Any time that a child ever told you that Feeney
18 did something that was -- that you felt was sexually
19 inappropriate --
20 MR. MAZZEO: Objection as --
21 MR. FINNEGAN: -- to a child?
22 MR. MAZZEO: Sorry. Objection as to time
23 frame, relevance.
24 THE WITNESS: Not that I can remember.
25 BY MR. FINNEGAN:

23 (Pages 86 to 89)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 90	Page 92
<p>1 Q. Any parent ever tell you anything about John 2 Feeney that you thought was sexually inappropriate with a 3 child? 4 MR. MAZZEO: Objection, asked and 5 answered, time frame, relevance. 6 THE WITNESS: I don't understand the 7 question. 8 BY MR. FINNEGAN: 9 Q. Was there ever a -- at any point in your 10 priesthood, has there ever been a parent that came to you 11 and told you about some activity that John Feeney engaged 12 in with their child that you thought was sexually 13 inappropriate? 14 A. No. 15 MR. MAZZEO: Same objection. 16 BY MR. FINNEGAN: 17 Q. The answer is no, Father, is that what you 18 said? 19 A. I just said no. Yeah. 20 Q. Before -- and I'm just using this as -- as a 21 time frame. Before Fox Lake, before that time, which you 22 said was a couple years after John Feeney's conviction, 23 before that, had you ever heard John Feeney's confession? 24 MR. MAZZEO: Objection, time frame, 25 relevance, and also the priest penitent privilege</p>	<p>1 think he did answer it. 2 BY MR. FINNEGAN: 3 Q. There's been a couple different pieces on it. 4 A. Whatever you want to choose. 5 Q. I don't want to choose. I just -- I want an 6 answer. If you're -- I mean do you have something in 7 your mind that -- that you're saying I can't do this 8 because of the priest penitent privilege or do you truly 9 not -- not have a memory either way? 10 A. I'd say both. 11 MR. MAZZEO: You got two answers out of 12 that. 13 MR. FINNEGAN: Two answers, just what we 14 needed. 15 BY MR. FINNEGAN: 16 Q. Have you ever had a conversation with John 17 Feeney about his time in seminary in Denver? 18 A. Not that I can recall. 19 Q. Have you ever had a conversation with John 20 Feeney about allegations that were made against him by 21 some girls at Monte Alverno Retreat House? 22 MR. MAZZEO: Objection, asked and 23 answered. 24 THE WITNESS: Not that I can remember. 25 BY MR. FINNEGAN:</p>
Page 91	Page 93
<p>1 pursuant to canon law. 2 THE WITNESS: Can't answer that. I don't 3 know. 4 BY MR. FINNEGAN: 5 Q. You don't know or you're -- you're refusing to 6 answer it? 7 A. Both. 8 Q. You understand that, Father, that if you didn't 9 hear his confession before that that obviously wouldn't 10 violate the privilege, so if you know -- if the answer is 11 no, you should be able to answer that, do you understand 12 that? 13 A. Yeah, I wasn't his regular confessor or anything 14 like that. 15 Q. So before in time wise, time frame wise, before 16 Fox Lake, you had never heard John Feeney's confession, 17 is that a correct statement? 18 MR. MAZZEO: Same objection. 19 THE WITNESS: Can't answer that. 20 BY MR. FINNEGAN: 21 Q. Because of? 22 A. Time, memory, you know, I don't know. 23 Q. Are you refusing to answer it or are you just 24 saying you don't know? 25 MR. MAZZEO: Well, I think he just -- I</p>	<p>1 Q. Did you ever have any conversations with John 2 Feeney about any allegations made against him by girls at 3 any retreat? 4 A. No. 5 Q. Did you ever -- 6 A. No, I just -- no. 7 Q. Did you ever hear about that from anybody, 8 anybody at all that there was -- that Feeney had been 9 accused of kissing girls at a retreat? 10 A. I don't -- I know there was something with 11 girls, but I didn't understand what it was. I don't 12 remember what -- what specifically it was. 13 Q. Do you remember who told you whatever you'd 14 heard about Feeney and girls? 15 A. No. General conversation. 16 Q. Do you remember when -- when you heard something 17 about Feeney and girls? 18 A. No. 19 MR. MAZZEO: Objection, lack of personal 20 knowledge. 21 BY MR. FINNEGAN: 22 Q. Did you ever hear about John Feeney going to see 23 Dr. Kelley? 24 A. Going to Dr. Kelley? 25 Q. Yeah.</p>

24 (Pages 90 to 93)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 94	Page 96
<p>1 A. I don't recollect that name at all.</p> <p>2 Q. I believe it's Dr. James Kelley. Does that ring</p> <p>3 a bell for you at all?</p> <p>4 A. Doesn't ring a bell.</p> <p>5 Q. Did John Feeney, did he ever tell you that he</p> <p>6 went and saw a therapist or a psychologist about any</p> <p>7 accusations against him?</p> <p>8 A. He -- I know that he was in for treatment.</p> <p>9 Q. What do you know about that?</p> <p>10 MR. MAZZEO: Objection as to time.</p> <p>11 THE WITNESS: Just in general that he was</p> <p>12 being -- undergoing treatment.</p> <p>13 BY MR. FINNEGAN:</p> <p>14 Q. And when --</p> <p>15 A. I don't know --</p> <p>16 Q. Do you know when he was undergoing treatment?</p> <p>17 A. No.</p> <p>18 Q. Was it here in -- in Wisconsin that he was</p> <p>19 getting treatment?</p> <p>20 A. I don't know. I don't know that.</p> <p>21 Q. Did -- did you ever talk to Feeney about him</p> <p>22 going to the Bernardine Clinic in Maryland, St. Luke's?</p> <p>23 MR. MAZZEO: Objection as to relevance,</p> <p>24 time frame.</p> <p>25 THE WITNESS: I thought it was in New</p>	<p>1 Q. Did -- did you post bond for Feeney when -- when</p> <p>2 he was in jail?</p> <p>3 A. Did I correspondence with him?</p> <p>4 Q. Post bond.</p> <p>5 A. Oh, post bond.</p> <p>6 MR. MAZZEO: Objection, relevance.</p> <p>7 THE WITNESS: Oh, when he was released,</p> <p>8 yes, I was there. That was something that happened while</p> <p>9 we were waiting for the elevator to go up and down and</p> <p>10 the defense attorney, who was Doyle I think, asked me if</p> <p>11 I would take care of that so that he could get on the</p> <p>12 road to go back to Milwaukee while we were standing at</p> <p>13 the elevator.</p> <p>14 BY MR. FINNEGAN:</p> <p>15 Q. And how did you take care of it?</p> <p>16 A. We had to wait until the paperwork was done</p> <p>17 upstairs until they called me on the PA system at the</p> <p>18 waiting station by the elevator.</p> <p>19 Q. What -- what were you doing in the jail at that</p> <p>20 point?</p> <p>21 MR. MAZZEO: Same objection, standing</p> <p>22 objection to this line of questioning based on relevance.</p> <p>23 THE WITNESS: It had something to do with</p> <p>24 the defense attorney calling me to accommodate an</p> <p>25 exchange of clothing or a suitcase or something like</p>
Page 95	Page 97
<p>1 Mexico or someplace is my recollection. But that's all I</p> <p>2 -- don't remember St. Luke's.</p> <p>3 BY MR. FINNEGAN:</p> <p>4 Q. Did -- did John Feeney talk to you about going</p> <p>5 to the facility in New Mexico?</p> <p>6 MR. MAZZEO: Same objection.</p> <p>7 THE WITNESS: I don't think I had a</p> <p>8 conversation with Feeney about that.</p> <p>9 BY MR. FINNEGAN:</p> <p>10 Q. You had a conversation with somebody else about</p> <p>11 it?</p> <p>12 MR. MAZZEO: I'm going to have a standing</p> <p>13 objection to all questions with regard to -- to treatment</p> <p>14 that John Feeney received after the ineidents alleged in</p> <p>15 the Complaint.</p> <p>16 BY MR. FINNEGAN:</p> <p>17 Q. You can answer it.</p> <p>18 A. Well, I wouldn't -- I wouldn't be able to answer</p> <p>19 that. I just don't know.</p> <p>20 Q. You don't know --</p> <p>21 A. I don't know when that happened, you know,</p> <p>22 general conversation and so on with fellow priests and so</p> <p>23 on, so I -- I don't have any specific memory of it.</p> <p>24 Q. Do you have any memory of who told you?</p> <p>25 A. No.</p>	<p>1 that.</p> <p>2 BY MR. FINNEGAN:</p> <p>3 Q. And why -- why would he call you? Why did he</p> <p>4 pick you, if you know?</p> <p>5 MR. MAZZEO: Objection, speculation.</p> <p>6 THE WITNESS: Apparently because of my</p> <p>7 contact with John on behalf of the LBA. And there was --</p> <p>8 there was a suit -- suitcase of clothing involved that</p> <p>9 John's nephew in California packed, and we had to try to</p> <p>10 get that into the custody of John, because he was taken</p> <p>11 with the clothes on his back and five minutes to get</p> <p>12 ready, and so he made some connection with that nephew.</p> <p>13 BY MR. FINNEGAN:</p> <p>14 Q. Did -- do you know where the money came from to</p> <p>15 post bond for John Feeney?</p> <p>16 A. No, that never was revealed to me.</p> <p>17 Q. There's -- it looks like there may have been an</p> <p>18 organization involved?</p> <p>19 A. I picked it up and transferred it to the</p> <p>20 attorney.</p> <p>21 Q. Who did you pick it up from?</p> <p>22 A. The bank.</p> <p>23 Q. Do you know how -- who put the money in the</p> <p>24 bank?</p> <p>25 A. Not exactly, this was not clear.</p>

25 (Pages 94 to 97)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 98

1 Q. What do you know about --
2 A. **I was not -- I was not privy to that.**
3 Q. How did -- how did you have access to be able to
4 get the money out of that account at the bank?
5 MR. MAZZEO: Continuing objection to this
6 line of questioning on the grounds of relevance.
7 THE WITNESS: I don't recall, but somebody
8 arranged that.
9 BY MR. FINNEGAN:
10 Q. Do you have any knowledge about how the money
11 got into that account that you took out of the bank for
12 John Feeney's bond?
13 A. **Just general suspicions or private opinion.**
14 Q. What do you know generally or what --
15 A. **Don't really know.**
16 Q. What do you think?
17 A. **People from his former parish.**
18 MR. MAZZEO: Objection, speculation.
19 BY MR. FINNEGAN:
20 Q. How much money was it?
21 A. **Pretty sizable. I think it was -- I can't**
22 **remember if it was 50,000 or 100,000. I don't recall**
23 **really.**
24 Q. Do you know, did the -- did the diocese
25 contribute to that bond at all for Feeney?

Page 99

1 A. **Not to my knowledge. I'd say no. I don't know.**
2 **I thought it was something that came out of -- out of his**
3 **parish.**
4 Q. Which parish? He was at quite a few, it sounds
5 like.
6 A. **I think. I think. He moved around to so many.**
7 **I think it was St. Nicholas.**
8 MR. MAZZEO: Objection to the extent that
9 the answer is based on speculation and guess as opposed
10 to actual personal knowledge.
11 BY MR. FINNEGAN:
12 Q. After -- after you posted bond for Feeney,
13 did you talk to him after that, after the -- did you have
14 a conversation with him right after you posted bond?
15 A. **Yes.**
16 Q. Did it involve any discussion about -- about his
17 sexual abuse of kids?
18 A. **No.**
19 Q. Did -- did John Feeney come to live with you
20 after that?
21 A. **He stayed overnight until somebody picked him up**
22 **the next day. And his first request was when we drove in**
23 **there at night was do you think I could say mass.**
24 Q. Did he say mass?
25 A. **Yeah, that evening.**

Page 100

1 Q. Just to you?
2 A. **Yes.**
3 Q. That night did you have any discussions with
4 John Feeney about any of the allegations against him
5 involving kids?
6 A. **Not that I can recall.**
7 Q. Do you know where he moved to after that first
8 night with you?
9 A. **Some friend from the lakeshore, and I'm not**
10 **sure. Lakeshore meaning Two Rivers, Manitowoc,**
11 **Keewaunee, some friend from out there.**
12 Q. At that point when Feeney stayed with you
13 overnight, were you worried about him possibly abusing
14 kids?
15 MR. MAZZEO: Objection to this whole line
16 of questioning with regard to Feeney's -- the witness's
17 knowledge of Feeney's actions after --
18 THE WITNESS: Yeah, I didn't know what --
19 MR. MAZZEO: -- after -- hold on, after
20 the bond was posted and Feeney was released from jail on
21 grounds of relevance and speculation, lack of personal
22 knowledge.
23 THE WITNESS: I didn't talk about his --
24 his case or whether he was guilty or whether -- what he
25 did or anything like that.

Page 101

1 BY MR. FINNEGAN:
2 Q. My question was were -- were you concerned about
3 that, about him, you know, reoffending when he was
4 staying with you?
5 A. **Not at all.**
6 Q. Other than that one night, did Feeney stay with
7 you any other nights after the -- after you posted
8 bond?
9 A. **No.**
10 Q. What I want to do here, Father, is -- I'll come
11 back to that. What I've done here, Father and counsel,
12 is we have an Exhibit A, which is a list of names of some
13 of the kids that were around John Feeney. And I don't
14 want to put their names on the record, and so I want to
15 respect these people's privacy. I just want to show you
16 Exhibit A, which I've given a copy to counsel of and
17 we'll retain this. And so I'm going to refer to these
18 people. You'll see, Father, that -- and it says John Doe
19 up there and then it says 1 and then has -- has a name.
20 I'll just say, you know, do you know John Doe 1 and then
21 ask you those questions, you know, about some of these
22 guys. And the reason I'm doing that, what I'd like you
23 to do is not -- not say their names out loud, all right?
24 Does that make sense?
25 A. **All right.**

26 (Pages 98 to 101)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 102

1 MR. MAZZEO: And I'm going to ask that we
2 go off the record for a moment.
3 MR. FINNEGAN: Sure.
4 (A break was taken at this time.)
5 BY MR. FINNEGAN:
6 Q. Father, I've given you -- given you Exhibit --
7 Exhibit A, and I want to, as we talked about before, not
8 -- not use these names on the record, and so I'd ask you
9 just not to say the names out loud and we'll just refer
10 to them by the John Doe number on the list.
11 MR. MAZZEO: However, before any questions
12 are asked, I do have an objection with regard to this
13 exhibit list. I know that it's not going to be included
14 as an exhibit to the transcript. However, I'm going to
15 object to this list on several grounds. We had an
16 off-the-record conversation a few moments ago with regard
17 to this list. The list does contain -- under John Does
18 it contains some 34 names. Under Jane Does it contains
19 two names. And -- and pursuant to the conversation I had
20 with Mr. Finnegan, plaintiff's counsel, it's my
21 understanding that some, not necessarily all of the names
22 that are on this list, are children that have made or on
23 their behalf have had allegations made on their behalf
24 with respect to sexual misconduct or inappropriateness by
25 John Feeney. And there's -- there's no -- there's no

Page 103

1 time frame as to when any of these allegations might have
2 occurred. I'm going to object to any questions of Father
3 Vandenberg with regard to any allegations that might have
4 been made on behalf of any of these kids after the time
5 of the alleged incidents that are stated in the
6 Complaint. I'm going to object on the grounds that this
7 is -- this is -- appears to be a fishing expedition on
8 behalf of plaintiff's counsel to ascertain if -- if -- if
9 there are any other further allegations that were made
10 with respect to any of the children on this list that
11 were not already disclosed publicly, so I'm objecting on
12 grounds of relevance, speculation, lack of personal
13 knowledge of this witness. That's all.
14 BY MR. FINNEGAN:
15 Q. Father, looking at Exhibit A, I want to direct
16 your attention to John Doe 1, the first name there. Do
17 you recognize that name?
18 A. Yeah.
19 Q. And John Doe 1, he was a student at St. Therese
20 when you were there?
21 A. Yeah.
22 Q. Did -- did you ever have any suspicions that
23 John Feeney during the time that he was at St. -- St.
24 Therese, did you have any suspicions that John Feeney was
25 acting sexually inappropriate with John Doe 1?

Page 104

1 A. Not directly, but indirectly by the way his
2 mother spoke about Feeney.
3 Q. John Doe 1's mother told you something that --
4 that raised the concern that -- with you at least at that
5 time when you were at St. Therese that John Feeney was
6 acting sexually inappropriate with John Doe 1?
7 A. It wasn't put that way to me, you know. It was
8 just kind of a general complaint about his behavior.
9 Q. With John --
10 A. So I didn't realize it was sexual.
11 Q. What did -- what did John Doe 1's mother tell
12 you?
13 A. I don't really recall specifically how she --
14 what she said, but she was just, oh, negative in her
15 conversation about Feeney.
16 Q. And what did -- did you have one conversation or
17 more than one conversation with John Doe 1's mom about,
18 I'm sorry, about Feeney?
19 A. She did not specifically tell me what was going
20 on but was negative towards Feeney, and that may have
21 showed up a couple times. I don't know. She was very
22 much around, so, you know. If -- if I would have been
23 aware that there was some sort of sexual misbehavior
24 going on between Father Feeney and that No. 1, I would
25 have done something about it, but I wasn't -- it wasn't

Page 105

1 that specific to me.
2 Q. Did you -- did you ask John Doe 1's mother if
3 there's anything of a sexual nature going on between John
4 Feeney and John Doe 1?
5 A. No.
6 Q. Why not?
7 A. I didn't know that there was. It was -- like I
8 told you, there were so many people, they thought he was
9 fantastic or they thought they couldn't stand his guts.
10 And I didn't know that it was as sexual as it apparently
11 was, but I didn't realize that.
12 Q. Did --
13 MR. MAZZEO: Objection, move to strike the
14 nonresponsive portion of the witness' answer, assuming
15 that references to the individuals on this list pertain
16 to sexual allegations of misconduct concerning Feeney.
17 Okay. Next question.
18 BY MR. FINNEGAN:
19 Q. Father, with John Doe 1, did -- did he ever come
20 to you and tell you anything about his relationship with
21 John Feeney at any point?
22 A. No. Kids didn't, no.
23 Q. Did you ever go and ask John Doe 1 about his
24 relationship with John Feeney?
25 A. No.

27 (Pages 102 to 105)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 106

1 Q. Did -- did John Doe 1's mother, did she tell you
2 that John Doe 1 and John Feeney had gone swimming in the
3 nude?
4 A. No.
5 Q. Did John Doe 1's mother tell you anything about
6 John Feeney showering with John Doe 1 in the nude?
7 A. No.
8 Q. Did John Doe 1's mother tell you anything about
9 John Feeney coming to John Doe 1's house late at night?
10 A. No. None of this, it was just kind of
11 general.
12 Q. Did you know that -- that John Feeney allowed
13 John Doe 1 when he was still a child and under the legal
14 age for -- for driving, that he allowed John Doe 1 to
15 drive his car?
16 A. No, I didn't. There was none of those specifics
17 ever revealed to me. If they would have been, I probably
18 would have done something as a -- as a priest about it.
19 But I didn't know that. I just knew -- but like I say,
20 there was -- how do you discern? I discerned the general
21 reaction to -- to John Feeney, either they thought he was
22 fantastic or they couldn't stand his guts. And I didn't
23 know why they couldn't stand his guts, just that he
24 strutted around and, you know, people have their own
25 opinions, and I didn't know that all this personal sexual

Page 107

1 contact was going on. I didn't know that.
2 MR. MAZZEO: Father Vandenberg, don't make
3 assumptions about that. You're not --
4 THE WITNESS: I'm just --
5 MR. MAZZEO: You're not here to guess or
6 speculate.
7 BY MR. FINNEGAN:
8 Q. Father Vandenberg, did you do any type of
9 investigation into why there was a negative reaction by
10 some people to Feeney?
11 A. No.
12 Q. Let's -- let's move on to John Doe 2. Do you
13 recognize that name?
14 A. Yes.
15 Q. And did -- did you ever have any concerns about
16 John Feeney's relationship with John Doe 2?
17 A. No.
18 Q. Did John Doe 2's parents ever come to you and
19 discuss Feeney's --
20 A. No.
21 Q. -- relationship with John Doe 2?
22 A. No.
23 Q. What about John Doe 3, do you know who he is?
24 A. He's -- I think he died early. I think he's
25 dead.

Page 108

1 Q. Did you ever get any information that John
2 Doe -- or that John Feeney had had any type of
3 inappropriate relationship with John Doe 3?
4 A. No.
5 Q. Any complaints that you got regarding Feeney and
6 John Doe 3?
7 A. Not that I can recall. Just general negative
8 feelings on the part of his family or his parents.
9 Q. Do you remember any -- any conversations that
10 you had with John Doe 3's parents about Feeney?
11 A. No, not specifically. I can't recall. They had
12 15 kids.
13 Q. What about John Doe 4, do you recognize that
14 name, Father?
15 A. Yeah.
16 Q. And did -- did you ever have any concerns about
17 John Feeney's relationship with John Doe 4?
18 A. No.
19 Q. Did -- did you ever have any conversations with
20 John Doe 4's parents about John Feeney?
21 A. No, that I can remember. Not that I can
22 remember.
23 Q. Did you ever hear from any source that John
24 Feeney had acted in an inappropriate sexual way with John
25 Doe 4?

Page 109

1 A. No, I never heard that.
2 Q. And rather than going through all these, why
3 don't you take a look through here, Father, and let me
4 know if -- if there are any other names that you
5 recognize on here and then just tell me which John Doe
6 number they are.
7 A. Well, there's George.
8 Q. Just tell me the John Doe number. You're all
9 right, just tell me the --
10 A. No. -- No. 11 and 28 I assume are relatives.
11 Q. Other than No. 11 and No. 8 (sic), any of the
12 other names besides the ones that we talked about that --
13 that you recognize there on this list? And just tell me
14 the John Doe -- the number if you do remember them.
15 A. I remember some names as parishioners at St.
16 Therese.
17 Q. Which -- which ones are those? Which numbers,
18 just give me the number?
19 A. 14, 15, 18. I think that's all.
20 Q. John Doe 14, did you ever hear from any source
21 anything that indicated that John Feeney had had any
22 sexual relationship with John Doe 14 when he was a
23 child?
24 A. No, not specifically, no.
25 Q. Did you hear something generally about John Doe

28 (Pages 106 to 109)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 110

1 14 and John Feeney having a sexual relationship?
2 A. No.
3 Q. And John Doe 15, did you ever hear from any
4 source that John Feeney had had some sort of sexual
5 relationship with John Doe 15 when he was a kid?
6 A. No.
7 Q. Did you ever have any conversations with John
8 Doe 15's parents about John Feeney's relationship with
9 John Doe 15?
10 A. No, --
11 Q. What about --
12 A. -- not that I can remember.
13 Q. What about John Doe 14, did you ever have any
14 conversations with his parents about Feeney's
15 relationship with John Doe 14?
16 A. No.
17 Q. John Doe 18, did you ever have any conversations
18 with John Doe 18's parents about Feeney and John Doe
19 18?
20 A. Yes.
21 Q. And when -- when did you have those
22 conversations, do you remember?
23 A. Oh, I wouldn't be able to discern whether it was
24 when he was still at St. Therese or after, I wouldn't be
25 able to discern that. No. 18's father and I were friends

Page 111

1 and classmates at Marquette University.
2 Q. Did John Doe 18's father ever tell you that --
3 that John Feeney had had a sexual relationship with John
4 Doe 18?
5 A. Not specifically.
6 Q. Did he tell you something that --
7 A. Well, he made some kind of overtures about it,
8 but not specifically that it was sexual.
9 Q. Was it enough -- that conversation enough that
10 -- that it made you think that -- that he was talking
11 about a sexual relationship between John Doe 18 when he
12 was a kid and John Feeney?
13 A. Possibly.
14 Q. And what -- what did you do with that
15 information when you got it?
16 A. Nothing.
17 Q. Why?
18 A. Because the way it was put to me it didn't sound
19 that serious at the time. If I would have felt that my
20 friend's son was being sexually abused by Feeney, I would
21 have done something about it.
22 Q. Any -- any kids that aren't on this list, and I
23 don't -- don't want you to say their names, but just a
24 yes or no, are there other kids that were at St. Therese
25 that -- that you had conversations with their parents

Page 112

1 back then about John Feeney?
2 A. Not that I recognize right now.
3 Q. Out -- outside of this list, so outside of this
4 list, just off your memory, are there other people that
5 aren't listed here, other families that you had
6 conversations with the parents while you were at St.
7 Therese about Feeney's involvement with their sons?
8 A. Yeah.
9 Q. And do you remember the names? Don't say the
10 names, but I just want to know if you do remember. It's
11 just a yes or no, Father. Sorry if you're -- are you
12 still thinking about it? Do you remember the name, yes
13 or no?
14 A. Yeah.
15 Q. What I'd ask you to do, so I'll give you Exhibit
16 E back again, is write down the name. I don't want you
17 to say it out loud. We'll just work off of that.
18 MR. MAZZEO: Before you write down the
19 name, I would ask that we establish a time frame as to
20 when these conversations took place, as to when any
21 alleged allegations of any sexual misconduct took place.
22 MR. FINNEGAN: If you want -- if you want
23 an objection, I think he's already testified to some of
24 that, but if you want an objection on relevancy or --
25 MR. MAZZEO: Well, --

Page 113

1 MR. FINNEGAN: -- I think he should write
2 down the name.
3 MR. MAZZEO: Yeah, little further than
4 that.
5 MR. FINNEGAN: You can -- you can ask any
6 follow-up questions that you want, but --
7 MR. MAZZEO: Also -- also objecting on the
8 grounds of whether any --
9 MR. FINNEGAN: I don't want you -- I don't
10 want you to coach this witness.
11 MR. MAZZEO: That's fine. We can go --
12 MR. FINNEGAN: Just state what the legal
13 objection is and --
14 MR. MAZZEO: Okay.
15 MR. FINNEGAN: -- we're good.
16 MR. MAZZEO: Objection based on anonymity
17 to protect any confidential privilege that exists with
18 the alleged victim, so I'm going to direct --
19 MR. FINNEGAN: That's the reason why I
20 wanted to --
21 MR. MAZZEO: Well, --
22 MR. FINNEGAN: -- use this procedure. I
23 mean I can ask him what the name is if you want me to do
24 that if you guys want --
25 MR. MAZZEO: You can ask him and then I'll

29 (Pages 110 to 113)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 114

1 direct the witness not to answer it. If -- if the
2 witness has -- or if the alleged victim has or the
3 parents have requested anonymity, I'm going to direct
4 this witness not to answer that question. It's not going
5 to be disclosed on the record or to you or on that paper.
6 MR. FINNEGAN: Privilege in what way?
7 MR. MAZZEO: Privileged in what way?
8 MR. FINNEGAN: Yeah, what's the privilege,
9 the protection?
10 MR. MAZZEO: If it was -- if it was
11 something that was disclosed in a confession, whether it
12 was -- whether the parents requested anonymity.
13 BY MR. FINNEGAN:
14 Q. Did -- did you see these, the parents, the name
15 that you know about, did they come to you in the
16 confessional?
17 A. Now that -- if you can't write out a certificate
18 about whether a kid made his first confession, that's --
19 Q. Did the parent come to you?
20 A. -- kind of a -- kind of a breaking the seal type
21 of thing. He's molesting it or attacking it.
22 Q. Did -- did this parent that -- that you're
23 talking about at St. Therese, did this parent tell you
24 about their child in the confessional?
25 A. I can't answer that.

Page 115

1 Q. Why not?
2 A. Because it would be an infringement on the seal
3 of the confessional.
4 Q. Where was this conversation that you had with
5 the parent?
6 A. In general.
7 Q. Where was it, what location?
8 A. Oh, probably on a trout stream.
9 Q. Were you doing a confession on the trout stream
10 with this parent?
11 A. No, no.
12 Q. So this -- this conversation had nothing --
13 A. Just general conversation.
14 Q. -- had nothing to do with the confessional, is
15 that right?
16 A. Right, and it was just an implication.
17 Q. Will you write down the name of the family?
18 A. No, I don't think I want to implicate them in
19 any way.
20 Q. So you're refusing to write down the name?
21 A. Yeah.
22 Q. Other than this one family, is there any other
23 family at St. Therese that -- that reported to you any
24 type of concerns about John Feeney's relationship with
25 their son?

Page 116

1 A. Not that I can recall. Maybe these people
2 dropped stuff off and I didn't pick it up, I don't know,
3 you know.
4 Q. What do you mean people maybe dropped stuff
5 off?
6 A. The person that I had in mind was a friend and a
7 fishing friend and stuff and he just kind of didn't
8 specifically say, but just kind of in general alluded to
9 misbehavior.
10 Q. With -- with his son?
11 A. Didn't say what or how or to what extent.
12 Q. Between John Feeney and his son?
13 A. Or that -- that was -- something was going on,
14 yeah.
15 Q. And is -- is this person still alive today?
16 A. I hope so.
17 MR. MAZZEO: And just to be clear, I was
18 only directing him not to answer if anyone had -- if
19 there was -- if it was protected by the priest penitent
20 privilege and if anyone requested anonymity. That's --
21 that's the only grounds that I was requesting that he --
22 MR. FINNEGAN: I don't think the second
23 one's a valid reason to instruct, but we'll get it to
24 find out.
25 BY MR. FINNEGAN:

Page 117

1 Q. Did -- did this person who you had this
2 conversation with, was it a man, was it the dad?
3 A. And he dropped that off as a friend of mine to
4 me so that I'd be a little bit aware, I think.
5 Q. So that you could watch out, watch Feeney a
6 little bit?
7 A. Or, you know, that -- that I won't be just, you
8 know, totally dumb about everything, you know.
9 Q. Did he ask you --
10 A. I think that was kind of the implication.
11 Q. Did he ask you to keep an eye out on Feeney?
12 A. No.
13 Q. Did you keep an eye out on Feeney after that?
14 A. Oh, in a kind of a general way, but not -- I did
15 not confront him or report it or anything like that
16 because it was just a general reference, you know.
17 Q. And did this person who you're talking about,
18 this dad, did he specifically tell you not to tell
19 anybody else about this, did he tell you that?
20 A. No, I don't think it was that big of a thing and
21 he just kind of made kind of an offhand remark about his
22 son being turned off with Feeney, okay.
23 Q. And I'll ask you general, Father, on Exhibit E,
24 will you write the name down of the father who told you
25 that?

30 (Pages 114 to 117)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 118	Page 120
<p>1 A. I better do this?</p> <p>2 MR. MAZZEO: I'm not telling you not to,</p> <p>3 so you're --</p> <p>4 THE WITNESS: I don't want to implicate</p> <p>5 people into getting called up for some -- for</p> <p>6 investigation or anything like that.</p> <p>7 MR. MAZZEO: Well, if there's no privilege</p> <p>8 --</p> <p>9 THE WITNESS: It's just a -- just a good</p> <p>10 dad and just kind of dropped off a remark, you know,</p> <p>11 about his kid being turned off with Feeney. So I heard a</p> <p>12 lot of that, you know.</p> <p>13 BY MR. FINNEGAN:</p> <p>14 Q. There was -- you got a lot of reports like</p> <p>15 that?</p> <p>16 A. No, not like that, but that people were turned</p> <p>17 off with John, you know, implications and --</p> <p>18 Q. This -- this report by this -- this dad was</p> <p>19 different, though?</p> <p>20 A. Yeah, he said a little bit more. He said a</p> <p>21 little something was going on, you know, that his kid was</p> <p>22 so turned off with him.</p> <p>23 Q. What did he say? What -- what was the little</p> <p>24 something that he said was going on between Feeney and</p> <p>25 his son?</p>	<p>1 name down on Exhibit E, Father?</p> <p>2 A. Well, --</p> <p>3 MR. MAZZEO: I would just object to</p> <p>4 grounds of relevance, but if you know the name.</p> <p>5 THE WITNESS: Like I say, I -- I</p> <p>6 professionally do not want to implicate anybody into</p> <p>7 having to go through a deposition or be questioned or</p> <p>8 followed up on, okay? I don't want to -- as a friend and</p> <p>9 parish priest, I don't want to put people into hot water</p> <p>10 or give them any problems.</p> <p>11 BY MR. FINNEGAN:</p> <p>12 Q. I'm not asking you to put anybody in hot water.</p> <p>13 I'm asking you what the name is.</p> <p>14 A. And I'm telling you you're pushing me.</p> <p>15 Q. Are you refusing to answer or to write it on the</p> <p>16 paper?</p> <p>17 A. Yeah.</p> <p>18 Q. All right. Then I'll -- I'll ask you on the --</p> <p>19 also on the record just so we can have a better record of</p> <p>20 it: What's the name of -- of the dad that you've been</p> <p>21 talking about?</p> <p>22 A. What is this now? I don't understand.</p> <p>23 Q. I'm not asking you to write it. I'm just asking</p> <p>24 you, if you're not going to -- I'd rather have you write</p> <p>25 it, that would protect their name more, but if you're not</p>
Page 119	Page 121
<p>1 A. He didn't say.</p> <p>2 Q. What was your understanding at that time? What</p> <p>3 was your -- your thought at that time when you got that?</p> <p>4 A. What was my feeling about that? It was -- I</p> <p>5 didn't know enough about it and it wasn't very specific</p> <p>6 and it was general. And I lived with that, with</p> <p>7 generalizations, you know.</p> <p>8 Q. And what did -- what did this dad say that was</p> <p>9 different or more specific than some of the other people</p> <p>10 that had concerns that were turned off by Feeney?</p> <p>11 A. Well, what was different about it was that his</p> <p>12 kid was so vehemently turned off, that's all I could</p> <p>13 say.</p> <p>14 Q. Did you -- did you ask any follow-ups, questions</p> <p>15 of -- of this dad to find out what he was talking</p> <p>16 about?</p> <p>17 A. No.</p> <p>18 Q. Did you talk to this son's -- this son's, excuse</p> <p>19 me, strike that. Did you talk to this father's son to</p> <p>20 ask him what was going on with Feeney?</p> <p>21 A. No.</p> <p>22 Q. Did you ask John Feeney what was going on with</p> <p>23 -- with this child?</p> <p>24 A. No.</p> <p>25 Q. I'll ask you again: Are you going to write the</p>	<p>1 going to write it, I'm asking you what is the name of the</p> <p>2 dad that gave you this report when you were fishing with</p> <p>3 him?</p> <p>4 A. And if I refuse to answer?</p> <p>5 Q. That's your choice, and then we have to go to --</p> <p>6 A. Like I told you --</p> <p>7 Q. -- go to court over it.</p> <p>8 A. -- I don't want to involve people that are</p> <p>9 friends and good people, you know, into -- into your --</p> <p>10 or who's -- who's behind all this, Jeff Anderson? Is he?</p> <p>11 You refuse to answer?</p> <p>12 MR. MAZZEO: Father, just listen -- just</p> <p>13 listen for the question.</p> <p>14 BY MR. FINNEGAN:</p> <p>15 Q. I'm just collecting myself, Father, so that I</p> <p>16 don't get upset. There's quite a few people here that</p> <p>17 were all sexually abused by John Feeney.</p> <p>18 A. I see that.</p> <p>19 Q. Those are the people that I represent, and</p> <p>20 that's why I'm asking these questions. I'm not here to</p> <p>21 badger you or badger anybody else. I'm trying to get to</p> <p>22 the bottom of it. And my question is you can have the</p> <p>23 option of putting it on here, I'd rather not have you say</p> <p>24 it out loud, but if that's what it's going to be, then --</p> <p>25 A. I think he was probably doing a favor to me to</p>

31 (Pages 118 to 121)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 122

1 let me know that something was going on, you know. I
2 think that's what he was trying to do.
3 MR. MAZZEO: Objection as to
4 speculation.
5 THE WITNESS: And I don't want to -- oh,
6 for his doing that, that was very kind and supportive of
7 a parish priest and I don't want to implicate him in
8 future questioning or being called in or giving his time
9 to Feeney's problem.
10 BY MR. FINNEGAN:
11 Q. Did you -- did you take any action responsive to
12 -- to this father telling you about Feeney's relationship
13 with his son?
14 A. I didn't take any -- well, I didn't know what it
15 was, he didn't tell me.
16 Q. The question, though, Father, was did you take
17 any -- any action?
18 A. I didn't have enough information.
19 Q. Did you do anything to try and get more
20 information?
21 A. No.
22 Q. Looking back, do you wish you would have?
23 MR. MAZZEO: Objection, speculation.
24 THE WITNESS: Perhaps I could have done
25 some good, I don't know, if I would have investigated it,

Page 123

1 but I didn't investigate it. And in his kindness and in
2 his friendship and in his closeness to me, he was trying
3 to nudge me I think, as I reflect on it now, you know,
4 that something was going on, that his son was so
5 vehemently opposed to him, so . . .
6 BY MR. FINNEGAN:
7 Q. And so I'll ask it to you again just so we have
8 a clear -- I haven't had a clear answer on it. I'd like
9 you to say if you're not going to answer it, say I refuse
10 to answer that question. And if you want to take the
11 opportunity to write it on there, you can. But it sounds
12 like you're not going to. So what was the name of the
13 person, of the dad that told you about his son and John
14 Feeney who we've just been talking about?
15 A. I don't know that you have a right to ask
16 that.
17 Q. Are you refusing to answer this question?
18 A. Yes.
19 Q. All right.
20 MR. MAZZEO: Do you want to take a break
21 for lunch?
22 MR. FINNEGAN: Sure.
23 (A break was taken at this time.)
24 MR. FINNEGAN: Pete, did we reach any
25 understanding on -- on writing the name?

Page 124

1 MR. MAZZEO: I think we did. If you want
2 to, yeah, ask him again to put the name on the -- on that
3 Exhibit E.
4 BY MR. FINNEGAN:
5 Q. Father, I'd ask you on Exhibit E here to write
6 the name of the -- of the dad that we were talking about
7 before on the record. I don't want you to say his name
8 out loud and I won't say his name out loud either so it's
9 not on this record.
10 A. Okay. And there was no implication that this
11 was sexual, it was just that his son had such strong
12 feelings against Feeney.
13 Q. You've already testified to -- to what you knew,
14 so if you can just write his name down, that would --
15 that'd be helpful.
16 A. (Witness complies.)
17 Q. And if you don't mind, I'm going to handwrite
18 underneath it what I think this is. I'm not going to say
19 it out loud, then we can ask him if that's -- I'm going
20 to print it, yeah. You will see, Father, on Exhibit E
21 underneath where you handwrote the name, I printed the
22 name. Did I -- did I get that correct from your --
23 A. That's an L.
24 Q. For -- oh, I get it, all right. So I'm going to
25 cross out the first name that I wrote before and write

Page 125

1 the second one. Is that the -- as I've written it now,
2 is that --
3 A. No.
4 MR. MAZZEO: No, it's a D.
5 BY MR. FINNEGAN:
6 Q. Oh, now I get it, now I get it, I get it. You
7 don't have to say it. Now I get it. I thought it was --
8 I thought that's what -- I thought I had the first letter
9 right. Now I'm going to write it above where I wrote the
10 other one. There you go.
11 A. Yeah, that's right. Now what do you want me to
12 do with that?
13 Q. That's all, just -- just -- and you're
14 acknowledging that on Exhibit E at No. 1 you handwrote
15 the gentleman's name who we talked about that had a
16 discussion with you about Feeney and his son. And then
17 underneath that I correctly printed his name, is that
18 correct?
19 A. Yeah.
20 MR. FINNEGAN: And, Pete, on all these
21 that I gave you, do you want me to go through each of
22 them individually or collectively? Do you want to -- how
23 do you want to handle that?
24 MR. MAZZEO: If you --
25 MR. FINNEGAN: All that I'm -- all that I

32 (Pages 122 to 125)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 126

1 want to ask him is --
2 MR. MAZZEO: If you want to go through the
3 ones that he authored and the ones that he was cc'd on --
4 MR. FINNEGAN: That's all of them except
5 the --
6 MR. MAZZEO: And the ones that were sent
7 directly to him. I think you have three separate groups
8 there.
9 MR. FINNEGAN: And do you -- do you have
10 an objection to -- I mean what I want to know is just --
11 MR. MAZZEO: You can -- you can start your
12 questions. I mean I --
13 BY MR. FINNEGAN:
14 Q. I'll have you take a look at these, Father, and
15 we'll just take the time to go through them each. I'm
16 going to hand you a stack of documents, Father, and
17 rather than take all the time to go through each one, the
18 basic set of questions that I'm going to ask you is
19 whether you remember seeing this -- getting this or not
20 and whether you dispute getting it if you don't remember.
21 A. Yes.
22 Q. Do you remember getting that document?
23 A. Yes.
24 Q. Now looking at 77b, you see that it's addressed
25 to you. Do you remember getting that document?

Page 127

1 A. Yes.
2 Q. Where -- where did this document go after you
3 got it, do you remember?
4 A. File -- in managing the Leo Benevolent, we kept
5 a record of all the paperwork that went on with the
6 office and individual priests. We always kept a paper
7 trail for all that.
8 MR. MAZZEO: And I just want to restate
9 and reiterate what I stated at the beginning of this
10 deposition, that I'm objecting to any -- any questions
11 and answers with regard to these documents which are
12 dated after the alleged incidents in the Complaint.
13 BY MR. FINNEGAN:
14 Q. And so did any of the priests that were getting
15 some sort of benefits from the Leo Benevolent, did you
16 have a separate file on each of those priests at the --
17 wherever the office is for the Leo Benevolent
18 Association?
19 A. Whatever correspondence went on between our
20 office and an individual priest we kept a record -- put
21 that in that priest's record, so we tried to keep a paper
22 trail.
23 Q. Did you have -- were these files that were
24 separate from the chancery or are these --
25 A. Yes.

Page 128

1 Q. And so the Leo Benevolent had their own files --
2 A. Yes.
3 Q. -- on each priest that was dealing --
4 A. It was a separate corporation.
5 Q. And does -- does the Leo Benevolent still have
6 separate files on each of the priests that it's dealt
7 with?
8 A. Yes, as far as I know. We've made some changes,
9 so how that's being handled, I don't -- I'm not too sure,
10 but ...
11 Q. This next one is marked 77a, you see that your
12 name's up here on the top, Father. Do you remember
13 getting this document?
14 A. Yes.
15 Q. And you don't -- on any of the documents that
16 I've shown you, you don't dispute the -- the date on
17 these, do you? Do you have any dispute about the --
18 A. No.
19 Q. -- dates on them?
20 A. As far as I can remember.
21 Q. And you see this one down here, Exhibit 77,
22 you're cc'd down at the bottom?
23 A. Yes.
24 Q. Do you remember getting this one?
25 A. Yep.

Page 129

1 Q. And is that your writing up top of 77?
2 A. No.
3 Q. Somebody else. Do you know what that means,
4 vault file?
5 A. I kind of know, but not for sure. I'm not --
6 I'm not sure about that.
7 Q. Showing you 77e. You see that it looks like a
8 copy of a letter that you wrote and sent to John Feeney
9 in Las Vegas. Looking at this, do you remember writing
10 this, Father?
11 A. Yeah, that looks like my work.
12 Q. And do you remember sending this to John Feeney
13 when he was in Las Vegas?
14 A. Yep. It was my secretary's work.
15 Q. You see Exhibit 77e, a document that has your
16 name on it, and is that your signature on 77e, Father?
17 A. Yes, yeah, that's me.
18 Q. And was this also a document that you sent or
19 had your secretary send to John Feeney in Nevada?
20 MR. MAZZEO: If you recall.
21 THE WITNESS: Yes.
22 BY MR. FINNEGAN:
23 Q. Exhibit 77f, Father, is a document to John
24 Feeney from the vice chancellor of the Diocese of
25 Reno-Las Vegas. You see down at the -- at the bottom

33 (Pages 126 to 129)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 130

1 it's copied to the Leo Benevolent Association. Back in
2 1985, do you remember receiving this -- this document?
3 MR. MAZZEO: Don't guess.
4 THE WITNESS: Yeah, I guess so. I'm not
5 specific -- I can't -- I don't recall when the mailman
6 brought that, but I remember the goings on --
7 BY MR. FINNEGAN:
8 Q. And did --
9 A. -- in general.
10 Q. When -- back in 1985 when a letter was written
11 to the Leo Benevolent Association, was it the common
12 practice back then that you would have seen any letters
13 that were copied to the Leo Benevolent Association
14 dealing with one of the priests?
15 A. That -- that they would have come before me?
16 Q. Yes.
17 A. Yes.
18 Q. So you don't dispute that you saw this letter
19 back in 1985?
20 A. No.
21 Q. It's -- I think we got crossed up there. It's
22 correct to say that you're not disputing that you saw
23 this letter back in 1985. That's -- that's a correct
24 statement, isn't it?
25 A. Yes.

Page 131

1 Q. And then you see Exhibit 81a, Father, you're
2 cc'd down at the bottom, it looks like, and this
3 document, do you remember seeing this document?
4 A. Yeah.
5 Q. I just have a couple more to show you, Father,
6 and then I'll be done. This is Exhibit 60.
7 A. Am I to read this?
8 MR. MAZZEO: Wait for a question.
9 BY MR. FINNEGAN:
10 Q. Just -- just look it over and see if -- if you
11 recognize it first.
12 A. (Witness complies.)
13 Q. Father, rather than having you read the whole
14 thing, just after reading, it looks like you've read
15 through at least the first page. Does this look familiar
16 to you at all, this document?
17 A. Well, I don't think we priests were privy to
18 this kind of material about a fellow priest ever, and I
19 don't think I was.
20 Q. Let me -- what I'd like to do, Father, is ask
21 you a specific question about Page 3. Could you read
22 that first paragraph up there, it's labeled E?
23 A. Yeah.
24 Q. Just read that to yourself and I'll ask you a
25 question.

Page 132

1 A. (Witness complies.) Yes.
2 Q. And during the time that you were at St. Therese
3 in -- in Appleton, would you -- would you agree with the
4 -- with the statement here in Exhibit 60 at Page 3 that
5 there were widespread accusations, allegations and rumors
6 regarding sexual improprieties on the part of Father
7 Feeney?
8 MR. MAZZEO: I'd object. This witness has
9 already testified to numerous questions regarding his
10 knowledge regarding accusations, allegations, regarding
11 sexual improprieties concerning Father Feeney while he
12 was assigned --
13 MR. FINNEGAN: Is there a legal objection
14 there?
15 MR. MAZZEO: -- while he was assigned to
16 St. Therese. It's asked and answered.
17 MR. FINNEGAN: All right. You can answer
18 it.
19 THE WITNESS: Well, I -- I was not aware
20 of all the sexual improprieties. In fact, when my friend
21 whose name I put down there, he just said how vehemently
22 his son was opposed to Feeney, he didn't say because of
23 sexual activity. He was nudging me to say, hey, you
24 know.
25 BY MR. FINNEGAN:

Page 133

1 Q. It could be sexual?
2 A. It could be sexual, it could be problems, you
3 know. He was just kind of nudging me to let me know that
4 the strong feelings of his kid and that it wasn't, you
5 know, for nothing. I didn't know exactly what it was,
6 but there were a lot of people, like I said right at the
7 outset, they either were for him or they were against
8 him. So that's where I was, you know.
9 MR. FINNEGAN: And then I'm going to --
10 what I'd like to do on this one is -- I'm not sure if
11 this one is in the record or not. You definitely have
12 it. It's 117. It's the police report. You can keep
13 that, but rather than putting this whole thing in the
14 record, what I'd like to do is direct him to read one of
15 the -- one of the pages in here and ask him a question
16 about it. And I don't really want to put this into the
17 record. I'm not sure if it is yet or not, but it's got a
18 whole bunch of names in it that are possible survivors.
19 MR. MAZZEO: That's fine. What page in
20 particular?
21 MR. FINNEGAN: I'd like to ask him about
22 Page 37.
23 MR. MAZZEO: This only goes up to 34.
24 MR. FINNEGAN: There should be -- there's
25 a -- that's a 41 down there, sorry.

34 (Pages 130 to 133)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 134

1 MR. MAZZEO: Oh, oh, down on the -- oh,
2 okay.
3 MR. FINNEGAN: On the Bates stamp, sorry.
4 MR. MAZZEO: Mike, which one in
5 particular?
6 MR. FINNEGAN: The last paragraph is what
7 I'd like to ask him about. Can I have him start reading
8 it?
9 MR. MAZZEO: Sure.
10 MR. FINNEGAN: Or do you want to give him
11 another copy?
12 MR. MAZZEO: Oh, okay.
13 BY MR. FINNEGAN:
14 Q. What I'm showing you here, Father, is Exhibit
15 117. And I'm going to direct you to read if you can the
16 bottom paragraph down here starting right there. And
17 again, I asked you something about this guy, but I don't
18 want to say his name out loud. So if we can do that and
19 before he was John Doe 4, so when we're talking about him
20 if we can just say John Doe 4 or John Doe, that will --
21 that will help. But read that -- read the last paragraph
22 there, and then I'll ask you some questions here. And
23 then that paragraph goes onto Page 38 at the top, and if
24 you can read that part, too, Father, that top paragraph,
25 and then that's the end of that paragraph.

Page 135

1 A. (Witness complies.)
2 Q. Are you done with that first paragraph,
3 Father?
4 A. Yeah. Can I make a comment about it?
5 MR. MAZZEO: Wait for a question.
6 BY MR. FINNEGAN:
7 Q. What -- what is -- what's your reaction to that,
8 to reading that?
9 A. Well, I don't recall -- I remember the Coffey
10 kid, but I don't recall him coming to me with this
11 problem. And I was not the pastor. I was associate
12 priest there.
13 Q. Do you remember his -- this -- this man's dad
14 coming to you about a problem with his son?
15 A. No, I don't remember that either. I can't
16 remember what Mr. Coffey looked like, and I don't
17 remember him coming to me. But if he went to the pastor,
18 it was not me, it would be somebody else. Might have
19 been Wagner.
20 Q. Any -- and so you -- you have no memory of
21 getting any type of -- it's correct to say that you have
22 no memory of getting any type of report that dealt
23 with -- with the --
24 A. Description here?
25 Q. Yeah.

Page 136

1 A. I don't recall that.
2 Q. Did -- did Father Wagner, did he ever have any
3 discussions with you?
4 A. About Feeney?
5 Q. About Feeney that he had gotten any reports
6 about Feeney?
7 A. No, he -- he didn't tell me about it. I suppose
8 he felt that that was a confidential thing. He had to
9 take that up with the chancellor here at Green Bay, the
10 bishop.
11 Q. And other than -- than the one name that you put
12 here on -- on Exhibit E, any other parents that --- that
13 came to you with concerns about Feeney's relationship
14 with their sons?
15 A. At the moment I can't recall of any.
16 MR. FINNEGAN: All right. I don't have
17 anything further, Pete.
18 EXAMINATION
19 BY MR. MAZZEO:
20 Q. All right. Father, I have a few questions for
21 you just to follow up. You testified earlier that you've
22 been a member of the Leo Benevolent Association for how
23 many years now?
24 A. From the day I was ordained. That's 52 I've
25 been a member of it. All the priests are members of the

Page 137

1 association. It's a benevolent fraternal organization to
2 look after the sick and old priests, you know. Started
3 before many of our states were states of the Union, 1878.
4 Q. Okay. And so --
5 A. And I was the treasurer, elected to the Board of
6 Directors by my fellow priests since 1969, and I was the
7 elected treasurer by the Board of Directors and --
8 Q. And that was the Board of Directors of the
9 LBA?
10 A. Of the LBA.
11 Q. All right. Would you just briefly describe the
12 relationship, if any, between the LBA and the Diocese of
13 Green Bay?
14 A. Well, we serve the people -- all the priests
15 serve the people of the Diocese of Green Bay, but it was
16 a separate corporation from the diocese.
17 Q. Did the Diocese of Green Bay have any control
18 over the LBA?
19 MR. FINNEGAN: Objection.
20 THE WITNESS: Well, with the appointment
21 of priests, with the assessment of funding for the LBA,
22 they had to assess parishes to fund for the individuals
23 in the association, their protection for disability and
24 their protection for retirement, and we had disability,
25 total, partial, permanent, temporary, all different kinds

35 (Pages 134 to 137)

Fr. Robert Vandenberg - 11/5/2010
John Doe 119 vs. Roman Catholic Bishop of Las Vegas, et al.

Page 138

1 of things. And every three years we tried to run an
2 actuarial study. In the first years, the entire LBA was
3 -- was managed out of the chancery office, and I don't
4 know when that happened, but there were officers elected
5 back in the 18 -- early 18 -- late 1800's.
6 BY MR. MAZZEO:
7 Q. All right. Father Bob, now you testified that
8 you -- you've been a member since you were -- you were
9 inardinated in 1952?
10 A. Yeah.
11 Q. And you still are currently a member of the
12 LBA?
13 A. And I was manager/treasurer for 40 years.
14 Q. Okay. So you're still a member, though, of the
15 LBA currently?
16 A. Yes.
17 Q. And -- and you're -- you're receiving benefits
18 from the LBA now that you're retired?
19 A. Yes.
20 Q. Okay. And then in 1969, you were elected by the
21 Board of Directors of the LBA?
22 A. First of all by the priests.
23 Q. By the priests, okay.
24 A. All the priests voted, then on the Board of
25 Directors I was elected treasurer because I was an odd

Page 139

1 duck, I had a degree in business administration from
2 Marquette, so the guys felt I could run the pension
3 program.
4 Q. And what, if any, involvement or -- to what
5 extent did the bishop have any say with your appointment
6 as treasurer to the LBA?
7 A. He had one vote.
8 Q. Okay. So he didn't -- it was his vote only?
9 A. The Board -- the Board voted, you know, and the
10 bishop had one vote.
11 Q. And he only had one vote by virtue of the fact
12 that he was a member of the Board?
13 A. Right.
14 Q. Okay. But otherwise, the bishop did not
15 otherwise appoint you --
16 A. No.
17 Q. -- in his capacity as bishop --
18 A. No.
19 Q. -- to serve on the LBA?
20 A. Right.
21 Q. Okay. All right. And before we had that lunch
22 break earlier, there was a discussion -- there was
23 actually a question that was asked by plaintiff's
24 counsel, Mr. Finnegan, when he asked you about any
25 conversations that you might have had with any children

Page 140

1 or the parents of children regarding sexual misconduct by
2 John Feeney. Do you recall that question?
3 A. Yeah.
4 Q. Okay. And you had responded at that -- based on
5 my recollection, you responded by saying that there was
6 -- aside from the list, the list of names that was shown
7 to you earlier, that you did have a discussion with the
8 father of one of the children that I believe was -- that
9 went to St. Therese Parish, is that correct?
10 A. Yeah.
11 Q. Okay. And I'm -- I was a little confused with
12 the testimony that you provided. Is it -- is it your
13 testimony that the discussion you had with that father,
14 whose name you disclosed on the sheet of paper identified
15 as Exhibit E, that there was no information disclosed to
16 you regarding sexual inappropriateness or misconduct by
17 Mr. -- by John Feeney?
18 A. Well, I didn't know what it was. He did not
19 specifically say that his son was actually touched or did
20 some action or Feeney tried to do some action with him.
21 He just said -- he -- he expressed to me the vehemence
22 that his son had against Feeney, and he was trying to
23 nudge me, I think, as a good friend that something was
24 going on. He didn't specifically say it.
25 Q. Okay. He didn't specifically say it, he didn't

Page 141

1 provide you any details with regard --
2 A. That's right.
3 Q. -- to any alleged misconduct or
4 inappropriateness between --
5 A. Yeah.
6 Q. -- John Feeney and his son, right?
7 A. Yeah.
8 MR. MAZZEO: Okay. I have no further
9 questions.
10 MR. FINNEGAN: Nothing.
11 (The deposition was concluded at approximately 2:23
12 p.m.)
13
14
15
16
17
18
19
20
21
22
23
24
25

Page 142

CERTIFICATE

I, Jeffrey J. Watzcak, a Notary Public, do hereby certify that the foregoing deposition was taken in the above-entitled action under the Rules of Civil Procedure on November 5, 2010.

That the witness was first duly sworn by me before the commencement of his deposition, that the testimony so given by said witness was reduced by me in stenotype and transcribed under my supervision; that the transcript is a true record, to the best of my ability, of the testimony given by the witness; and that the reading and signing of the deposition transcript was not waived by counsel for Father Robert Vandenberg.

I further certify that I am not a relative,
employee, attorney or counsel of any of the parties or
attorneys or financially interested in the event of this
action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this _____ day of _____, 2010.

Jeffrey J. Watczak
Notary Public
Minnesota and Wisconsin

A				
ability 142:10	acting 41:4	93:2 100:4	91:11,19,23 92:1	area 67:13 78:1
able 49:6,12,25	103:25 104:6	102:23 103:1,3,9	92:6 95:17,18	79:4
50:7,8 54:4 63:5	action 122:11,17	105:16 112:21	99:9 105:14	argue 38:1 55:18
63:13,21 65:7	140:20,20 142:4	132:5,10	114:1,4,25	57:16
82:14 86:20	142:17	alleged 8:7,10	116:18 120:15	argumentative
91:11 95:18	actions 100:17	86:15 95:14	121:4,11 123:8,9	67:15
98:3 110:23,25	active 11:10	103:5 112:21	123:10,17	arranged 98:8
abnormal 26:20	activity 50:19,22	113:18 114:2	132:17	ascertain 103:8
above-entitled 2:2	58:16 59:13,22	127:12 141:3	answered 14:17	aside 140:6
142:4	59:22 71:4,9,10	allowed 106:12,14	36:4 63:24	asked 14:17 21:2
abrasive 22:20	90:11 132:23	alluded 116:8	64:21 72:9 90:5	31:24 32:16
absolutely 54:4	actual 53:23 61:9	Alverno 92:21	92:23 132:16	36:4 39:5,6
absolution 60:21	62:3 99:10	amount 6:15 49:8	answering 45:6	41:19,19 44:22
72:13,19,25 73:6	actuarial 138:2	Anderson 2:9	66:21	46:14,15 61:18
absolve 79:20	addressed 126:24	121:10	answers 58:4	63:24,24 69:9
80:7	adequately 10:15	Angeles 40:13	92:11,13 127:11	72:8 90:4 92:22
abuse 75:25 85:5	administer 52:6	Ann 2:13	anticipate 8:3	96:10 102:12
99:17	61:8,11,19 87:11	anonymity 113:16	anybody 24:6	132:16 134:17
abused 63:4,8	administered	114:3,12 116:20	26:25 27:16	139:23,24
64:1,13 111:20	60:16 87:17	answer 6:1,18,19	29:21 36:17	asking 5:6 10:8,12
121:17	administering	10:4 21:11,14	42:19 47:17	31:17,23 34:7,7
abusing 73:25	52:5	32:11 33:1 36:5	75:21 84:13	34:24 42:22
74:7 100:13	administration	36:14 44:9,21,22	85:16 93:7,8	44:19 45:1 49:1
acceptance 29:18	77:2 139:1	45:11 46:11,16	117:19 120:6,12	50:6 51:8 52:12
accepted 22:23	admit 88:12,19	46:18 47:4 51:4	121:21	52:16,24 53:2,5
access 98:3	admitted 88:24	52:22 53:11,13	Anyplace 31:20	54:2,20 55:5,15
accidentally	admitting 53:15	54:4,23 55:20,21	Anytime 64:4	56:23 59:11
10:14	56:19	55:23,24 56:6,13	apparently 97:6	60:7 63:7,7 64:4
accommodate	adult 29:6,7 43:6	56:13,18,23 57:3	105:10	65:21 68:8,16
76:10 96:24	adults 43:5	57:22,23 58:7,18	APPEARANCES	69:15,21,25
account 98:4,11	affairs 11:11,13	58:20,25 59:16	2:8	70:21 74:25
accurate 6:10	affixed 142:19	60:4 62:7,8,15	appears 103:7	75:19 83:23,24
10:17	age 48:9 106:14	62:17 63:5,10	Appleton 16:16	120:12,13,23,23
accusations 3:12	agendi 41:4	64:7,7,19 65:7,9	16:18 17:7,12	121:1,20
44:17 94:7	ago 48:25 102:16	66:10,18 67:11	18:8 31:6 43:13	asks 69:5
132:5,10	agree 8:21 67:16	67:19 68:2,13,13	132:3	assert 47:3 56:22
accused 73:24	132:3	68:20 70:1,5	appoint 139:15	86:12
74:6,10,15 93:9	ahead 12:5 21:19	72:9 77:16 78:4	appointment	asserting 66:20
accustomed 29:11	47:4 68:20	79:25 80:2,12,15	137:20 139:5	80:17
acknowledging	alive 116:15	80:22 81:7,8,23	appropriately	assertion 54:24
125:14	allegations 46:6	82:1,6,18,19,22	7:19	assess 137:22
act 42:14 66:15	46:22 71:16	83:17 84:8,11,24	approximately	assessment
acted 108:24	72:17 78:7	85:12 86:20	2:5 11:22 18:14	137:21
	87:21 92:20	90:17 91:2,6,10	141:11	assigned 18:7

132:12,15 assigning 23:10 assignment 11:14 16:2 18:10,12,13 assignments 9:24 16:19 associate 18:16,18 135:11 associated 13:1 associates 2:9 42:13 association 11:6,7 11:11,13,16,18 11:25 13:1,5,11 14:1,4,5,11,15 14:19 127:18 130:1,11,13 136:22 137:1,23 assume 109:10 assumed 59:18,21 assumes 60:2 67:2 83:7 assuming 105:14 assumptions 107:3 athletic 20:22 25:12 athletics 31:15 attach 34:11 attached 17:4 attacking 114:21 attention 103:16 attorney 96:10,24 97:20 142:15 attorneys 13:24 142:16 attuned 10:15 authenticity 8:16 authored 126:3 authority 42:15 available 84:3 Avenue 61:13 aware 79:6 104:23 117:4	132:19 a.m 2:5 A555265 1:6 B back 20:13 27:13 60:6 85:3,16 96:12 97:11 101:11 112:1,16 122:22 130:1,10 130:12,19,23 138:5 background 29:17 bad 44:16 badger 6:3 56:4 68:1 121:21,21 ball 23:5 26:10 ballpark 86:21 bank 97:22,24 98:4,11 Barron 2:13 based 32:12,13,20 41:2 86:16 96:22 99:9 113:16 140:4 basement 19:8,16 basic 126:18 basis 14:23 19:12 20:21 27:18 31:13 51:2 59:4 62:24 66:11,18 basketball 27:11 Bates 134:3 Bay 1:11,18 2:4 11:4,25 13:21 14:3,9,21 40:11 73:24 74:6 84:22 136:9 137:13,15,17 bear 22:8 Bears 43:18 bedroom 19:24 20:8,9,11 26:23	27:1 bedrooms 18:23 18:25 19:19 beginning 127:9 behalf 2:11,14 97:7 102:23,23 103:4,8 behavior 104:8 believe 46:1 53:17 53:24 59:24 94:2 140:8 believes 53:14 bell 94:3,4 benchmarks 72:21 benefit 5:23 6:21 11:17 14:20 benefits 127:15 138:17 benevolent 11:6,7 11:13,16,25 12:11 13:1,10 14:1,10,15,19,23 127:4,15,17 128:1,5 130:1,11 130:13 136:22 137:1 bereft 28:11 Bernardine 94:22 best 6:22 142:10 better 23:15 118:1 120:19 big 6:23 22:10 28:19 74:22 77:10 78:2,25 117:20 birth 9:11 bishop 1:7 9:17 9:17,22,22 10:2 10:18 11:24 12:9,18,19 13:2 23:10 136:10 139:5,10,14,17 bishops 10:10	12:22 bit 42:5 60:7,8 117:4,6 118:20 blur 74:22 board 11:5 12:1,2 12:19,21 13:6,11 13:20,24 14:2 137:5,7,8 138:21 138:24 139:9,9 139:12 Bob 23:9 138:7 Bona 9:17,22 bond 96:1,4,5 97:15 98:12,25 99:12,14 100:20 101:8 bordering 67:13 67:14 bottom 34:4 121:22 128:22 129:25 131:2 134:16 bounds 70:8 boxing 43:22 boy 32:17 48:20 boys 26:5,16,18 26:23 27:1,8,19 27:22 28:6,21 29:8 30:6,17 39:6 43:14,17 45:17 breaches 79:22 break 6:24 7:2 38:11,14 51:19 53:15,18 54:10 70:17,19 102:4 123:20,23 139:22 breaking 114:20 breaks 56:20 briefly 137:11 brilliant 22:6 bring 73:16 broad 10:3	brothers 45:16 brought 42:5 86:6 130:6 built 61:23 bulletin 53:20 54:13,19 55:8 bumped 39:23 bunch 133:18 Buses 61:15 business 139:1 C California 97:9 call 15:1 79:9,9 97:3 called 17:1,3 96:17 118:5 122:8 calling 96:24 canon 58:3 62:13 64:19 67:8 69:12 79:23 80:11 87:15 91:1 Canuel 3:23,24 capacity 139:17 car 26:9 106:15 care 11:19 96:11 96:15 case 1:6 8:6 71:21 78:7 85:11 86:15 100:24 cases 76:3 Catholic 1:7,10 57:7 ce'd 126:3 128:22 131:2 celebrate 77:24 cell 86:10,11 cement 42:9 center 81:17 84:1 85:10 certificate 54:14 54:16 55:8
---	--	--	---	--

69:16 114:17 142:1 certify 142:3,14 chairs 12:18 chancellor 55:8 129:24 136:9 chancellor's 54:19 chancery 127:24 138:3 change 12:22 changed 17:13 changes 12:20,22 128:8 chapel 78:9,24 79:4 chaplain 79:16 charge 22:21 charitable 11:6 14:16 charity 14:11 charter 11:22 cheap 15:1 Chicago 43:18 child 34:7 41:19 60:13 63:4,9 64:1,13 69:17 89:8,15,17,21 90:3,12 106:13 109:23 114:24 119:23 children 24:14 31:3,17 39:1,13 42:21 43:6 44:3 44:18 48:1,2,13 54:15 102:22 103:10 139:25 140:1,8 choice 121:5 choose 15:18 92:4 92:5 chosen 62:24 Christian 45:16 church 17:4	Civil 142:4 clarification 35:23 66:14 clarify 35:7 CLARK 1:2 class 61:3 classes 25:2 61:14 classmates 111:1 classroom 31:19 clean 57:19 cleaned 38:25 39:14 cleaning 33:14 clear 5:12 34:10 45:4 97:25 116:17 123:8,8 clergy 13:21 14:2 14:6 43:9 64:25 65:1,3,12,21,24 66:1,11,14,14,16 66:20 68:12,17 83:10,11 cleric 36:13 51:6,7 60:13 Clinic 94:22 clogging 29:1 close 10:20 closeness 123:2 clothes 97:11 clothing 96:25 97:8 coach 31:14 45:23 113:10 coaches 31:14 Coffey 135:9,16 Coleman 17:17 collecting 121:15 collectively 125:22 Combined 40:2 come 22:15 52:14 53:10 55:17 60:11 66:1 99:19 101:10	105:19 107:18 114:15,19 130:15 comes 63:18 69:6 coming 27:12 42:24 62:2 106:9 135:10,14 135:17 commencement 142:7 commencing 2:5 comment 135:4 comments 38:3 committed 72:12 common 130:11 communicated 22:4 companions 77:11,14 complaint 41:23 78:7 95:15 103:6 104:8 127:12 complaints 25:7 25:10 108:5 complies 124:16 131:12 132:1 135:1 concern 7:12 28:9 30:20 40:15 104:4 concerned 26:4 26:11 29:22 30:2 42:6 101:2 concerning 105:16 132:11 concerns 107:15 108:16 115:24 119:10 136:13 concluded 141:11 confect 72:10 confess 60:23 61:12 confessed 53:16	53:16 72:12 confessing 72:24 73:5 confession 47:1 52:7,14,20,25 53:11,25 54:15 54:17 55:4,9,17 56:3,17,20,21 58:17 60:9,12,19 60:23,25 61:1,8 62:3,10 64:16 67:1 68:4,5,24 69:4,6,10,17 72:6,22,23 73:4 82:17 83:4,9 87:9,11 90:23 91:9,16 114:11 114:18 115:9 confessional 7:11 37:21 47:2 51:6 52:13,18 53:25 54:2,8,18 55:10 58:11,13 59:12 60:6,11 61:9,10 61:15,19,20,22 62:3,10 65:7,11 65:14,16,25 66:7 66:17 67:11 68:9,10 70:23 71:3,5,8,15,20 72:2 73:9,13 79:5 81:3,12 114:16,24 115:3 115:14 confessionals 81:13 confessions 7:10 51:11 61:5 78:15 83:5,25 84:3,21 85:21,23 confessor 51:3,22 52:2,3,4 53:9 57:25 62:20,23 63:19,22 91:13	confessors 78:13 78:22 confidence 36:21 66:2 confidential 37:11 37:12 68:10 113:17 136:8 confidentiality 36:21,23 37:18 63:18 confront 117:15 confused 140:11 connected 74:19 connection 17:24 39:15 97:12 connotation 24:19 consider 15:12 20:19 58:11 considered 32:4 60:19 consistent 7:8 constant 22:22 construction 20:1 consultor 11:5 contact 15:10 48:12 76:5 97:7 107:1 contain 102:17 contains 102:18 102:18 contents 55:5 Continue 12:8 continues 85:8 Continuing 98:5 contribute 98:25 control 137:17 cont'd 4:1 conversation 5:24 6:7,14 39:16,20 40:4 41:22 44:5 46:21 47:11,22 49:5,8 50:15,18 51:2,4 52:24 58:12 59:13
---	--	---	--	---

60:19 64:3 68:10 72:6,18 74:5 77:17 79:19 80:5,8,25 81:6,10 82:2,12 85:4 88:1,5,10 92:16,19 93:15 95:8,10,22 99:14 102:16,19 104:15,16,17 111:9 115:4,12 115:13 117:2 conversations 43:25 45:22 46:4,7 47:25 48:7 49:19 50:22 54:7 58:10,14,15 59:1 70:22 71:3,7,14 71:19 72:1,16 73:19,23 74:1 75:9 81:16,19,22 87:7 88:11,17,21 93:1 108:9,19 110:7,14,17,22 111:25 112:6,20 139:25 conviction 89:4 90:22 copied 130:1,13 copies 33:21 copy 34:16,16 101:16 129:8 134:11 corporation 1:8 11:20 128:4 137:16 correct 10:19 12:23 23:20 30:23 39:18 42:1 49:22 73:11 74:13 91:17 124:22 125:18 130:22	130:23 135:21 140:9 correctional 76:16 81:1,17 83:25 84:25 85:3,10 correctly 125:17 correspondence 96:3 127:19 cost 14:23,25 15:1 counsel 5:11 67:22,22 101:11 101:16 102:20 103:8 139:24 142:13,15 counseled 69:16 counseling 66:15 68:18,19 69:7 counselor 66:15 Counsel's 21:19 County 1:2 51:10 86:2,14 87:18 couple 5:10,22 89:5 90:22 92:3 104:21 131:5 course 9:1 39:11 39:13 42:12 84:19 court 1:1,21 5:16 5:22 6:3,9,20 37:16 54:22 55:23 121:7 Courthouse 87:8 87:12 88:2,11,18 88:22 cover 14:13 create 33:20 created 8:5,10 34:4 criminal 71:21 cross 124:25 crossed 130:21 crowd 79:18 Cubs 43:17	current 10:22 15:1 currently 138:11 138:15 custody 97:10 D D 125:4 dad 117:2,18 118:10,18 119:8 119:15 120:20 121:2 123:13 124:6 135:13 dads 30:1 48:6 Dainan 17:17 date 9:11 16:12 128:16 dated 127:12 dates 128:19 David 3:14 day 99:22 136:24 142:19 day-to-day 11:10 11:13 De 31:7 Deacon 2:17 dead 107:25 deaf 73:16,17 deal 28:19 dealing 128:3 130:14 dealt 71:15,20,21 72:2 128:6 135:22 DeBrune 38:24 39:5 decided 38:18 decision 42:16 decmed 44:9 Defendants 1:12 2:14 defense 96:10,24 defined 12:14,15 definitely 30:25	133:11 degree 139:1 deliberately 10:14 denied 88:24 Denver 92:17 deny 88:22 department 9:24 depends 42:24 Depo 1:22 DEPONENT 3:2 deposition 1:16 2:1 3:11 5:8 7:8 7:15 9:2 34:12 75:4,6,15,17,22 76:3 120:7 127:10 141:11 142:3,7,12 Dept 1:6 describe 137:11 Description 135:24 designated 78:12 82:16 details 141:1 determined 14:18 died 107:24 difference 29:5 43:4 65:11,20,24 66:17 68:16,21 68:24 different 17:22 25:16,17 39:23 41:10 42:25 55:1 65:4 66:6 80:16 92:3 118:19 119:9,11 137:25 dinner 42:7 diocesan 54:13 diocese 1:9,10 10:23 11:4 13:2 13:21 14:3,8,9 14:21 15:8 40:11 73:24	74:6,18 76:5 84:22 98:24 129:24 137:12 137:15,16,17 direct 103:15 113:18 114:1,3 133:14 134:15 directing 83:13,16 116:18 direction 51:6 directly 30:18 35:9 36:1,9 104:1 126:7 Directors 11:5 137:6,7,8 138:21 138:25 disability 14:14 137:23,24 disarmed 29:14 disarming 32:2 40:18,22 41:8 discern 35:11 41:21 43:8 50:1 50:7,8 51:1,13 63:14 72:5 73:2 106:20 110:23 110:25 discerned 106:20 disclosed 103:11 114:5,11 140:14 140:15 discretion 62:25 63:2 discuss 28:1,16 76:2 107:19 discussed 28:3,14 59:5 71:10 74:14,23 75:25 discussion 38:16 44:14 47:13 87:20 99:16 125:16 139:22 140:7,13 discussions 45:15
---	---	---	---	--

75:1,5 100:3 136:3 dislikes 15:19 disobeyed 10:1,10 10:18 dispute 126:20 128:16,17 130:18 disputing 130:22 distinction 38:23 distributed 78:13 DISTRICT 1:1 document 34:4 126:22,25 127:2 128:13 129:15 129:18,23 130:2 131:3,3,16 documents 7:24 8:4,9,13 126:16 127:11 128:15 Doe 1:4 101:18,20 102:10 103:16 103:19,25 104:3 104:6,11,17 105:2,4,19,23 106:1,2,5,6,8,9 106:13,14 107:12,16,18,21 107:23 108:2,3,6 108:10,13,17,20 108:25 109:5,8 109:14,20,22,25 110:3,5,8,9,13 110:15,17,18,18 111:2,4,11 134:19,20,20 doing 6:2 30:17 35:1 44:3,8 45:9 83:18 84:20 96:19 101:22 115:9 121:25 122:6 doors 27:6 downstairs 19:22	Doyle 96:10 Dr 8:9 93:23,24 94:2 draft 8:13 drafted 8:5 dramatize 21:23 drawing 67:25 68:3 drawn 70:11 drive 85:1 106:15 driving 26:9 37:22 106:14 dropped 116:2,4 117:3 118:10 drove 21:24 37:25 85:16 99:22 duck 139:1 duly 5:2 142:6 dumb 73:17 117:8 duties 15:24 <div style="text-align: center;">E</div> E 34:1,4 35:20 112:16 117:23 120:1 124:3,5,20 125:14 131:22 136:12 140:15 earlier 62:5 85:7 136:21 139:22 140:7 early 107:24 138:5 Ed 23:17,17 education 43:9 eight 54:15 either 34:7 40:12 49:3 66:24 92:9 106:21 124:8 133:7 135:15 elderly 11:19 elected 13:8 137:5 137:7 138:4,20 138:25 elevator 96:9,13	96:18 else's 83:4 employee 142:15 encompasses 47:1 encroaches 79:22 engage 31:1 engaged 48:12 88:22 90:11 entails 46:25 entire 81:6 85:21 138:2 entrusted 66:3 especially 47:11 67:10 establish 53:22 54:3 56:3 60:11 67:23 68:3 70:10 112:19 established 44:7 84:20 etcetera 31:14 48:4 eucharist 77:24 evening 27:11 99:25 event 142:16 everybody 25:21 25:22 44:25 78:16 evidence 60:2 67:3 83:8 exact 49:1 exactly 30:21 97:25 133:5 EXAMINATION 3:3 5:3 136:18 example 26:12 exchange 96:25 excluding 83:19 83:20,20 excuse 53:12 119:18 excused 51:4 exempt 51:16	exhibit 3:10 33:21 34:1,4,11 35:20 101:12,16 102:6 102:7,13,14 103:15 112:15 117:23 120:1 124:3,5,20 125:14 128:21 129:15,23 131:1 131:6 132:4 134:14 136:12 140:15 exists 113:17 expect 75:7 79:17 expected 36:23 49:2 expedition 103:7 experience 14:1 29:19 33:6 39:12 42:25 43:4 75:13 experienced 43:16 75:15,19 explain 19:4 60:15 61:17 63:16 exposed 48:9 expressed 140:21 extent 8:8,12 32:19 44:7,9 46:25 53:14,14 56:19 58:2,24 59:1 62:12 63:11 64:5,18 67:5 69:11 79:21 80:10 87:13 99:8 116:11 139:5 eye 117:11,13 <div style="text-align: center;">F</div> facilities 86:9,11 facility 11:2 17:8 66:25 81:2 95:5	fact 132:20 139:11 facts 60:2 67:2 83:7 fair 6:15 7:14 19:14 56:5 faith 57:6 fall 47:3 false 72:12 familiar 131:15 familiarity 39:14 families 112:5 family 31:22 38:19 108:8 115:17,22,23 fantastic 24:10,22 105:9 106:22 far 18:23 24:16 63:19 70:25 128:8,20 father 5:5 6:1,8 7:6,15,17,17 8:3 8:9,12 9:6,8,11 10:21 15:4 17:16,17,17,17 17:17 21:19 26:14,15 28:16 29:12 32:11,20 34:3,25 35:20 38:9,16 41:2 46:12 47:9 49:1 50:2 53:11,14,21 54:6,11,12 55:16 56:2,15 57:4,11 57:13,20,24 58:8 58:21,24 59:10 59:21 60:7,22,25 61:13,17 62:1,7 62:17,22 63:3,16 63:23 64:15 65:4,19 67:20,22 68:20 69:9 70:11,21 72:5 75:16,21 76:23
---	---	---	---	--

80:3,16,18,23	34:6 37:25 39:3	111:20 112:1	55:20 57:22	102:3,5,20
81:24 82:19	39:5,15 40:6,10	116:12 117:5,11	113:11 133:19	103:14 105:18
84:9 85:9 86:5	41:19,25 42:2,18	117:13,22	finish 21:13	107:7 112:22
86:14 87:4	43:12 44:1,17	118:11,24	Finnegan 2:9 3:4	113:1,5,9,12,15
88:10 90:17	46:5,21 48:1,12	119:10,20,22	5:4,6 7:13,25	113:19,22 114:6
91:8 101:10,11	49:10 50:3,9,19	121:17 123:14	8:17,19,24 9:3,5	114:8,13 116:22
101:18 102:6	50:22,25 52:7,19	124:12 125:16	10:6 12:12	116:25 118:13
103:2,15 104:24	53:6,15 55:4,15	129:8,12,19,24	13:14 15:3,22	120:11 121:14
105:19 107:2,8	58:11,12,16 59:2	132:7,11,22	16:6 19:12,14,15	122:10 123:6,22
108:14 109:3	59:13 61:8,20	136:4,5,6 140:2	21:10,13,18	123:24 124:4
110:25 111:2	62:2 63:3,8,22	140:17,20,22	22:13,24 24:5	125:5,20,25
112:11 117:23	63:25 64:12	141:6	26:13 32:14,21	126:4,9,13
117:24 120:1	66:24 69:9,25	Feeney's 19:24	32:25 33:16,25	127:13 129:22
121:12,15	70:23 71:4,8,15	26:5 45:17,24	34:2,13,15,22	130:7 131:9
122:12,16 124:5	71:20 72:2,17	48:10 51:22	35:14,17 36:4,16	132:13,17,25
124:20 126:14	73:20,24 74:6,10	56:16 57:25	37:8,23,25 38:5	133:9,21,24
126:16 128:12	74:14,19 76:2,8	59:24 62:10	38:10,15 44:20	134:3,6,10,13
129:10,16,23	76:10,13 77:4,7	64:16 76:4 82:6	45:6,9,14,21	135:6 136:16
131:1,5,13,20	77:13,18 79:20	83:6,9 90:22,23	46:3 47:8 49:7	137:19 139:24
132:6,11 134:14	80:6,7 81:1,11	91:16 98:12	50:5 53:8,10,21	141:10
134:24 135:3	81:17,21 82:9,10	100:16,17	54:9,12,21 55:11	first 5:7,12 15:5
136:2,20 138:7	82:12,17 83:19	107:16,19	56:8,12,14 57:2	15:10,11 16:1,10
140:8,13 142:13	83:20 84:23	108:17 110:8,14	57:14 58:6 59:7	18:10,12,13
fathers 30:1	85:5,19,20,24	112:7 115:24	59:9,20 60:3	54:14,17 55:9
father's 119:19	86:7,18 87:7,21	122:9,12 136:13	62:6,14 63:15	64:15 69:17
favor 121:25	88:2,10,18,21	fellow 13:8 14:12	64:10 65:2	74:4 99:22
fear 29:14	89:7,14,17 90:2	73:23 74:5,24	66:19 67:18	100:7 103:16
February 9:12	90:11 92:17,20	75:5 95:22	68:19,22 69:19	114:18 124:25
feeling 7:1 119:4	93:2,8,14,17,22	131:18 137:6	70:4,9,18,20	125:8 131:11,15
feelings 108:8	94:5,21 95:4,8	felt 21:3,8,15,22	71:25 72:15	131:22 135:2
124:12 133:4	95:14 96:1	39:1 89:18	74:20 76:22	138:2,22 142:6
Feeney 1:11 3:12	97:15 98:25	111:19 136:8	77:12 78:10,21	fishing 15:19
3:19,21,22 15:4	99:12,19 100:4	139:2	80:1,14,21 81:5	103:7 116:7
15:6,12 16:2,8	100:12,20 101:6	female 61:25	81:20 82:7,23	121:2
16:11,20,23 17:8	101:13 102:25	fibers 29:1	83:3,11,15,18,22	fit 40:17
17:12,21,25	103:23,24 104:2	figure 18:6	84:4,14 85:14	five 23:15 87:2,4
18:18,21 20:5,18	104:5,15,18,20	file 127:4,16	86:4,17 87:19,25	97:11
20:25 22:3,6,15	104:24 105:4,16	129:4	88:16 89:21,25	floor 19:5,6,20
23:1,24 24:8,14	105:21,24 106:2	files 127:23 128:1	90:8,16 91:4,20	20:5,11,16
24:19,24 25:14	106:6,9,12,21	128:6	92:2,13,15,25	floors 19:7,7,8,16
26:15,25 27:7,20	107:10 108:2,5	financially 142:16	93:21 94:13	focus 15:4
27:24 28:1,5	108:10,20,24	find 11:22 55:3	95:3,9,16 96:14	follow 136:21
29:22 30:3,5,17	109:21 110:1,4	116:24 119:15	97:2,13 98:9,19	followed 120:8
31:11,16 32:16	110:18 111:3,12	fine 8:19 33:23	99:11 101:1	follows 5:2

follow-up 113:6	140:23	106:11,20 108:7	68:20 79:14	67:16 113:15
follow-ups 119:14	friendly 20:21	115:6,13 116:8	84:13 85:20,23	118:9 121:9
football 25:3	51:2 59:4	117:14,16,23	89:1 96:9,12	122:25 140:23
forceful 25:18	friends 15:17,18	119:6 130:9	102:2 105:23	gotten 136:5
foregoing 142:3	15:19,20,20	generalizations	113:11 120:7	grade 25:2
forgive 84:19	20:19 21:25	119:7	121:5,7 125:10	grades 25:4
form 35:4 72:11	31:14 74:17	generally 13:12	125:21 126:2,15	Green 1:11,18 2:4
formal 31:19 69:3	110:25 121:9	15:16 48:23	126:17 127:2	11:4,24 13:21
formed 11:18	friendship 123:2	68:4,8,16 72:5	God 14:21,25	14:3,9,21 40:11
former 98:17	friend's 111:20	75:25 98:14	God's 29:12	73:24 74:6
forms 72:23	front 20:4,13	109:25	goes 61:3 133:23	84:22 136:9
foundation 8:15	frustrating 70:12	gentleman's	134:23	137:13,15,17
16:4 26:6 53:22	fulfilled 79:16	125:15	going 6:16 8:3,8	grew 39:12 57:7
57:18 60:1	full 9:6 26:10	George 109:7	8:11,13,14 10:15	ground 5:10,18
67:24 71:23	77:10	getting 22:11	21:16 26:10	5:22 6:23 7:3,6
foundational 54:3	fully 6:18	42:10 52:10	27:7 30:12 34:1	7:14 8:14
54:25	fund 137:22	94:19 118:5	37:2,3,9,15	grounds 8:11,15
founded 11:7	funded 14:19	126:19,20,22,25	43:13 46:17	98:6 100:21
four 19:22	funding 137:21	127:14 128:13	49:5 54:22	102:15 103:6,12
Fox 51:11 52:15	funds 11:16	128:24 135:21	55:12,20 56:22	113:8 116:21
76:16,19,24 77:4	furniture 61:10	135:22	57:7,16,18,20,21	120:4
77:7,14 79:8	61:12	gift 29:12	70:16 76:23	group 29:6 75:14
80:7 81:1,11	further 103:9	Gilbert 3:23,24	77:22 78:5	groups 126:7
83:6,25 84:16,25	113:3 136:17	girls 26:19 92:21	79:10 86:12,22	guess 5:17 12:3
85:1,3,10,19,22	141:8 142:14	93:2,9,11,14,17	93:22,24 94:22	13:4 17:5 38:18
89:3 90:21	future 122:8	give 23:13 32:21	95:4,12 101:17	45:11 49:2
91:16	f/k/a 1:9	37:1 60:21	102:1,13,14	50:12 58:4 99:9
Fr 1:11,16 2:1 3:2		65:15 72:18	103:2,6 104:19	107:5 130:3,4
3:23 5:1	G	74:18,21 84:15	104:24 105:3	guilty 100:24
frame 12:4,7	game 26:10 27:13	109:18 112:15	107:1 109:2	guts 24:10,21
15:14 45:18	43:17,18 48:22	120:10 134:10	113:18 114:3,4	105:9 106:22,23
59:16 60:1	games 20:22 23:6	given 13:13	116:13 118:21	guy 22:6 51:15
74:16 89:23	27:11 30:6	101:16 102:6,6	118:24 119:20	134:17
90:5,21,24 91:15	general 27:17,18	142:8,11	119:22,25	guys 42:24 52:15
94:24 103:1	41:24,25 42:23	gives 51:7	120:24 121:1,24	57:18 75:11
112:19	43:1 44:24	giving 41:10 48:4	122:1 123:4,9,12	101:22 113:24
fraternal 11:8	47:10 48:5,18,19	70:14 72:25	124:17,18,19,24	139:2
137:1	50:15 60:9	73:5 122:8	125:9 126:16,18	
free 42:14	74:24 75:7,19,25	go 5:10 6:7 7:22	133:9 134:15	H
Friday 1:17 2:4	76:1,1 78:25	12:5 21:19 23:6	140:24	H 9:8
friend 15:13	79:2 82:6 87:10	23:14 25:5 34:1	goings 130:6	half 18:1,4 21:1
20:22 100:9,11	88:7 93:15	37:6 42:9 43:21	golfing 15:20	hand 126:16
116:6,7 117:3	94:11 95:22	47:3 52:14 60:6	good 22:2 24:17	142:18
120:8 132:20	98:13 104:8	60:21 62:16	26:12 49:8	handle 14:11

57:12 125:23 handled 128:9 hands 22:2 43:9 43:10 handwrite 124:17 handwrote 124:21 125:14 happen 38:22 42:17 60:12 happened 54:1 63:6,7 95:21 96:8 138:4 happening 44:12 happens 60:17 harassment 67:15 hard 22:8 41:21 hauling 27:12 head 5:25 81:9 82:20 heads 5:24 hear 7:10 23:22 24:13,18,24 27:3 27:7 28:5 30:7 30:10,16 31:16 32:15 33:2 36:2 41:6,12,18 42:19 43:13,17 47:19 48:16 51:11 60:22 61:1,5 69:5,10 83:4,5 83:24 84:2 85:20,23 91:9 93:7,22 108:23 109:20,25 110:3 heard 24:22 25:13 27:16 28:8 29:13,16 30:8 31:21,22 32:1,18 38:20 39:3 41:22,24 42:1 43:15 49:19 56:16,20 62:9 64:16 65:15 66:25 78:2,16	83:9 90:23 91:16 93:14,16 109:1 118:11 hearing 50:9 hearsay 32:13 34:20 35:12,24 36:6,8 37:20 41:22 47:11 held 79:15 help 134:21 helpful 124:15 helps 73:2 hereunto 142:18 hesitate 7:1 hey 132:23 he'll 53:15 high 24:16 31:6,7 31:11 45:16,23 45:24 higher 42:10 historically 15:23 hit 42:11 hmm-mmm 6:7 hold 53:12 57:11 100:19 homily 23:13 hope 116:16 hopefully 35:4 hot 28:7 120:9,12 hotel 43:19 house 16:24 17:2 20:4 39:14 58:13 92:21 106:9 household 39:2 houses 27:8 How's 22:3 huh 12:6 18:11 58:5 hunting 15:19 — — idea 74:3 IDENTIFICAT...	3:10 identified 140:14 identity 35:2 II 1:6 impinge 54:25 implicate 84:7,12 115:18 118:4 120:6 122:7 implication 115:16 117:10 124:10 implications 118:17 implied 30:19 importance 25:20 Imposing 25:11 improper 69:23 improprieties 46:6,22 72:17 132:6,11,20 imprudent 32:5,7 44:2,9 inappropriate 89:19 90:2,13 103:25 104:6 108:3,24 inappropriaten... 102:24 140:16 141:4 incarcerated 51:1 51:9 53:6 54:7 incardinated 14:9 138:9 incidents 8:5,6,10 86:15 95:14 103:5 127:12 included 102:13 incorporated 11:20 INDEX 3:1 4:1 indicated 109:21 indicating 42:9 indirectly 104:1 individual 127:6	127:20 individually 61:4 125:22 individuals 27:15 105:15 137:22 inexpensive 15:2 informal 81:16,18 81:25 82:2 information 108:1 111:15 122:18,20 140:15 infringement 69:18,18 115:2 infringes 46:9 innocent 59:24 inside 54:2 insofar 25:19 32:11 78:6 institution 11:7 instruct 57:23 116:23 integrity 51:5 intention 34:11,15 intentionally 10:18 interconnected 27:5 interest 26:16,18 interested 27:21 142:16 International 1:22 interrupted 21:19 intimidating 56:1 introduced 5:5 investigate 123:1 investigated 122:25 investigation 107:9 118:6 invoke 56:24 involve 99:16 121:8	involved 24:15 31:11 36:24 41:9 42:20 44:23 47:24 48:1,2 51:10 97:8,18 involvement 24:14 25:14 26:5 45:17,24 112:7 139:4 involving 24:19 100:5 in-house 25:4 irrelevant 85:11 issue 54:16 55:8 issues 8:24 85:11 issuing 54:14 — J J 1:21 2:2 3:23 142:2,22 Jackson 2:10 jail 51:10 66:25 85:24 86:2,10,15 86:19 87:21 96:2,19 100:20 James 94:2 Jane 102:18 Jeff 2:9 121:10 Jefferson 1:17 2:3 Jeffrey 1:21 2:2 142:2,22 Joe 55:9 John 1:4,11 3:12 3:19,21,22 15:4 15:6,12 16:2,8 16:11,20,23 17:8 17:12,21,25 18:18,21 19:24 20:5,18,25 22:6 22:7,9 23:1,23 24:8,13,24 25:4 25:13 26:5,25 27:7,20,24 28:1
--	---	--	---	--

28:5 29:12,22	106:9,12,13,14	73:25 74:7,10	33:3,4,5,7 34:21	117:7,8,8,16
30:3,5,16 31:11	106:21 107:12	85:5 88:13,19,23	34:23,23 35:19	118:10,12,17,21
31:16,23 32:5,16	107:16,16,18,21	99:17 100:5,14	35:24 36:7,20,21	119:5,7 120:4
34:6 37:25 39:3	107:23 108:1,2,3	101:13 103:4	36:23 37:17,18	121:9 122:1,1,14
40:10 41:19,25	108:6,10,13,17	105:22 108:12	37:19,21,24	122:25 123:3,15
42:18 43:12,25	108:17,20,20,23	111:22,24	38:24 39:2,10,12	126:10 128:8
45:17,23 46:4,21	108:24 109:5,8	Kiefer 3:14	39:24,25 40:14	129:3,5 132:24
47:13,23 48:1,9	109:14,20,21,22	kind 25:6 27:17	40:19,21,24,25	133:3,3,5,5,8
48:11 50:9,18,22	109:25 110:1,3,4	30:21 31:7	41:4,11,17,22,24	137:2 138:4
51:22 52:7,14,19	110:5,7,8,9,13	34:20 41:21	42:3,4,6,11,15	139:9 140:18
53:6 54:7 55:4	110:15,17,18,18	44:24 51:4,16	42:17,23 43:1,8	knowing 36:22
55:15 56:16	111:2,3,3,11,12	104:8 106:10	43:8,10,21,23	knowledge 8:16
57:24 58:10,12	112:1 115:24	111:7 114:20,20	44:15,23,25	26:22,24 27:10
58:15 59:1,13	116:12 118:17	116:7,8 117:10	46:10,13,17 47:6	27:23 30:4
61:8,20 62:2,10	119:22 121:17	117:14,21,21	47:10,10,12,21	32:12,24 34:23
63:3,8,22,25	123:13 129:8,12	118:10 122:6	47:23,24 48:3,4	35:8 60:2 64:2,8
64:12,16 66:24	129:19,23	129:5 131:18	48:10,21 49:5,6	64:14 72:20
69:9,25 70:23	134:19,20,20	133:3	49:12,17 50:7,13	73:7,21 77:1
71:4,7,14,19	140:2,17 141:6	kindness 123:1	50:15 51:2,8,13	88:15,20 93:20
72:1,16 73:20	John's 32:2 97:9	kinds 48:8,8 59:5	51:25 52:1,3,5	98:10 99:1,10
74:6,10,14,19	joined 74:1	137:25	52:16 53:11,24	100:17,22
76:2,4,8,10,13	jot 73:18	kissing 93:9	53:24 54:20	103:13 132:10
77:4,7,13,17	Jr 3:23,24	knew 26:9 28:4	59:23 60:8,18	known 46:5
79:19 80:6,7		31:25 36:7 39:1	61:2,21,24,25,25	knows 67:23
81:1,10,17,21	K	44:25 106:19	62:8 66:7,9,18	Koszarek 3:24
82:4,8,12,17	keep 117:11,13	124:13	69:5 70:6,7,7	
83:5,9 85:4,19	127:21 133:12	know 6:1,16 7:16	74:22 77:16	L
85:20,23 86:7,18	keeping 41:3	10:5,7,8,16,20	78:4 79:25	L 124:23
86:21 87:7,21	Keewaunee	12:13,15 14:24	80:13,15 85:6	labeled 131:22
88:2,18,21 89:7	100:11	15:8,20 17:23,24	91:3,5,10,22,22	lack 8:15,15,16
89:14 90:1,11,22	Kelley 93:23,24	18:25 20:2,23,25	91:24 93:10	60:1,1 71:22
90:23 91:16	94:2	22:5,8,10,19,20	94:8,9,15,16,20	93:19 100:21
92:16,19 93:1,22	kept 127:4,6,20	22:20,21,22,22	94:20 95:19,20	103:12
94:5 95:4,14	kid 31:23,24	22:23 23:7,16	95:21,21 97:4,14	lacks 16:3 26:6
97:7,10,15 98:12	44:13 47:24	24:16 25:4,7,11	97:23 98:1,14,15	lady 33:14
99:19 100:4	110:5 111:12	25:17,18,20,24	98:24 99:1	Lake 51:11 52:15
101:13,18,20	114:18 118:11	26:1,2,10,11,15	100:7,18 101:3	76:16,19,24 77:4
102:10,17,25	118:21 119:12	26:18,19,21 27:4	101:20,20,21	77:7,14 79:8
103:16,19,23,24	133:4 135:10	27:5,6,12,14,24	102:13 104:7,21	80:7 81:1,11
103:25 104:3,5,6	kids 24:16,25 25:2	27:24 28:4,8,11	104:22 105:7,10	83:6,25 84:16,25
104:9,11,17	25:3 26:10	28:15,20 29:3,10	106:12,19,23,24	85:1,3,10,19,23
105:2,3,4,19,21	27:12 30:12	29:13,15 30:9,12	106:25 107:1,23	89:3 90:21
105:23,24 106:1	31:8 39:11	30:13,19,22,23	109:4 112:10	91:16
106:2,2,5,6,6,8,9	43:23 48:9	31:5,24 32:1	114:15 116:2,3	lakeshore 100:9

100:10	51:14 57:11	76:5 86:23,24	man's 135:13	81:15,24 82:22
large 78:8,11	70:6 107:12,12	look 60:20 109:3	marathon 6:24	82:25 83:2,7,13
79:17	level 25:2	126:14 131:10	marked 128:11	83:16,20,23
larger 77:18	liable 42:8	131:15 137:2	markers 72:22	84:11 85:6,25
Las 1:8 2:14	life 65:15	looked 28:12	Marquette 61:13	86:12 87:13,23
129:9,13	lights 23:6	135:16	111:1 139:2	88:14 89:20,22
late 106:9 138:5	likes 15:19	looking 22:2	married 39:10,13	90:4,15,24 91:18
law 5:16 55:1,2	line 19:10 78:5	103:15 122:22	39:17	91:25 92:11,22
58:3 62:13	85:8 86:13	126:24 129:9	Maryland 94:22	93:19 94:10,23
64:19 67:8	96:22 98:6	looks 97:17 129:7	mass 23:9 51:12	95:6,12 96:6,21
69:13 79:23	100:15	129:11 131:2,14	99:23,24	97:5 98:5,18
80:11 87:15	lines 67:24 68:3	Los 40:13	material 131:18	99:8 100:15,19
91:1	70:10	lot 5:23 6:14	matter 2:2 28:10	102:1,11 105:13
lay 7:3,15 42:16	list 101:12 102:10	25:17 26:18	72:11,11	107:2,5 112:18
57:18	102:13,15,17,17	31:8 75:24	Mazzeo 2:12 3:5	112:25 113:3,7
layout 18:23 19:4	102:22 103:10	77:20 118:12,14	7:7,17,21 8:2,18	113:11,14,16,21
19:11	105:15 109:13	133:6	8:23,25 9:4 10:3	113:25 114:7,10
laypeople 13:19	111:22 112:3,4	lots 25:2	12:4,7 13:13	116:17 118:2,7
13:23	140:6,6	loud 33:11 35:3	14:17 15:14	120:3 121:12
LBA 97:7 137:9	listed 112:5	101:23 102:9	16:3 19:9,13	122:3,23 123:20
137:10,12,18,21	listen 55:14,19	112:17 121:24	21:9,12,15,21	124:1 125:4,24
138:2,12,15,18	57:17 121:12,13	124:8,8,19	22:17 24:2 26:6	126:2,6,11 127:8
138:21 139:6,19	listened 44:14	134:18	32:8,10,19,23	129:20 130:3
league 25:1,3	Liston 43:22	Luke's 94:22 95:2	33:23 34:10,14	131:8 132:8,15
learned 23:5,7	little 15:5 25:1	lunch 123:21	34:18 35:6,13,15	133:19,23 134:1
left 20:25 49:10	48:5 55:9 60:7,8	139:21	35:21 36:8,11	134:4,9,12 135:5
84:25	113:3 117:4,6		37:6,10,14 38:2	136:19 138:6
legal 19:12 106:13	118:20,21,23		38:6,9,12 44:6	141:8
113:12 132:13	140:11		45:2,8,10,18,25	McEvoy 61:13,17
legally 12:3 68:2	live 16:23 99:19	mailman 130:5	46:25 49:2,23	mean 9:20 13:15
Lenny 22:1	lived 16:24 17:8	main 23:13,14	50:2 52:23 53:2	16:12 24:6
Leo 11:6,13,16,25	17:11,14 18:22	majority 14:2	53:5,9,12 54:5	27:10 31:19
12:11 13:1,7,10	20:18 119:6	making 27:14	54:11 56:7,10,18	47:9 50:9 60:17
14:1,10,15,19,23	living 17:20 19:1	42:9 44:17	57:13 58:1,23	64:2 86:5 92:6
127:4,15,17	40:11 47:14	male 61:25	59:6,8,15,25	113:23 116:4
128:1,5 130:1,11	58:13	man 66:8 117:2	62:5,11 63:10	126:10,12
130:13 136:22	location 115:7	managed 138:3	64:5,17,23 66:13	meaning 43:8
letter 3:13,15,16	locked 27:5	manager 11:10	67:2,5,8,12	100:10
3:18,19,21,22,24	locker 30:5	manager/treasu...	68:15 69:11	means 66:9 129:3
125:8 129:8	Locks 40:2	138:13	70:3,5,16 71:22	media 22:9
130:10,18,23	loggerheads	127:4	72:8 74:16	meet 86:7
letters 33:25	20:24	Manitowoc	76:20 77:9 78:4	meeting 15:6
130:12	long 22:1 48:25	100:10	78:20 79:21	meetings 12:18
let's 13:17 19:21	49:15,16,17 50:3	manner 72:23	80:9,17,20 81:4	Meger 3:13,15,17

3:18 member 12:1 136:22,25 138:8 138:11,14 139:12 members 136:25 Memo 3:12 memory 15:9 62:2 91:22 92:9 95:23,24 112:4 135:20,22 men 29:6 mentioned 17:20 75:14 mercy 51:11 76:10,12 79:12 Merkatoris 75:15 75:16,21 Merryfield 39:17 39:21 40:5,16 41:19 88:3 Mexico 95:1,5 Michael 2:9 middle 21:10 midst 11:19 Mike 5:6 134:4 Milborrow 17:16 military 28:18,25 29:6,19 33:6 42:25 43:4 Milwaukee 96:12 mind 21:17 92:7 116:6 124:17 minded 43:21 mine 7:12 20:13 117:3 minister 7:10 50:25 51:9 ministered 86:1,5 ministry 11:17 14:20 Minnesota 2:11 142:23 minutes 23:15	97:11 mirror 60:21 misbehavior 104:23 116:9 misconduct 88:23 102:24 105:16 112:21 140:1,16 141:3 misstates 22:17 49:23 mistake 22:7 88:12 modus 41:4 molested 89:7,15 molesting 74:10 74:15 114:21 mom 104:17 moment 102:2 136:15 moments 102:16 money 14:16 97:14,23 98:4,10 98:20 monitor 27:24 30:23 Monte 92:21 mother 29:20 31:23 33:9 34:6 35:9,25 43:1 104:2,3,11 105:2 106:1,5,8 mothers 29:21 48:6 move 21:6 32:10 105:13 107:12 moved 20:2 21:4 40:8 42:5,6 99:6 100:7 movement 82:13 moving 82:14 Msgr 3:13,15,17 3:18,24 <div style="text-align: center;">N</div>	naive 59:19 name 9:7,7,8,9 31:25 33:9,10,17 33:18 34:6,9,17 34:23 35:19,19 36:25 37:1,1,4 38:17,18 39:17 74:13 76:18 79:10 94:1 101:19 103:16 103:17 107:13 108:14 112:12 112:16,19 113:2 113:23 114:14 115:17,20 117:24 120:1,4 120:13,20,25 121:1 123:12,25 124:2,6,7,8,14 124:21,22,25 125:15,17 129:16 132:21 134:18 136:11 140:14 names 74:19,21 75:1,12 84:16 101:12,14,23 102:8,9,18,19,21 109:4,12,15 111:23 112:9,10 133:18 140:6 name's 128:12 nature 105:3 Navy 29:3 necessarily 33:17 102:21 need 6:17,24,25 7:2 38:1 46:17 54:22 61:12 66:13 68:2 needed 92:14 negative 24:13,19 24:19,25 25:13 104:14,20 107:9	108:7 negativities 25:20 negativity 25:21 neither 88:24 nephew 97:9,12 Nevada 1:2 2:14 129:19 never 10:17 25:19 27:16 28:3,14 29:16 50:18 52:2 71:10 73:10 75:19 91:16 97:16 109:1 new 45:13 94:25 95:5 Nicholas 99:7 night 27:9 99:23 100:3,8 101:6 106:9 nights 101:7 nine 17:16 18:15 nod 5:24,25 nods 81:9 82:20 nonresponsive 105:14 normal 5:23 6:6 6:14 15:1 26:16 26:20 normally 6:13 North 2:14 Notary 2:3 142:2 142:23 notes 73:8,18 Notice 3:11 November 1:17 2:4 142:5 nude 28:6,19,21 29:7,8,18,24 30:3,6 106:3,6 nudge 123:3 140:23 nudging 132:23 133:3	number 8:4 75:11 102:10 109:6,8 109:14,18 numbers 109:17 numerous 132:9 <div style="text-align: center;">O</div> oath 5:13 obedience 9:17,20 object 8:11,13 16:3 19:9 21:16 32:10 44:6 58:1 59:15 74:16 78:5 102:15 103:2,6 120:3 132:8 objecting 103:11 113:7 127:10 objection 7:23 8:1 8:2,14 10:3 12:4 12:7 15:14 16:3 19:10 21:9,18 22:17 24:2 26:6 32:19,22 38:2 45:18,25 49:23 56:11,19 59:25 59:25 62:5,11 64:5,17,17,23 67:2 69:11 70:3 71:22 72:8 77:9 78:20 79:21 80:9 81:4,4 83:7 85:7,8,25 86:13 87:13,23 88:14 89:20,22 90:4,15 90:24 91:18 92:22 93:19 94:10,23 95:6,13 96:6,21,22 97:5 98:5,18 99:8 100:15 102:12 105:13 112:23 112:24 113:13 113:16 122:3,23
---	---	---	---	---

126:10 132:13 137:19 objections 4:10 8:21 9:1 55:25 57:19 obligated 58:25 obligation 79:16 82:1 observed 43:15 obviously 67:22 91:9 occur 26:17 occurred 8:6,7,7 103:2 odd 23:16 138:25 offhand 117:21 office 127:6,17,20 138:3 142:19 officers 138:4 offices 19:3 official 45:23 off-the-record 102:16 oh 20:17 23:21 28:7 37:13 38:24 43:7 65:23 76:19 96:5,7 104:14 110:23 115:8 117:14 122:5 124:24 125:6 134:1,1,1,12 okay 5:21 6:5,12 6:22 7:24 8:2 15:21 34:14,18 36:11 51:13 56:25 58:23 60:21,23 64:25 65:16 70:14,14 71:1 72:10 74:24 76:21 79:24 80:20 83:2 105:17 113:14 117:22	120:8 124:10 134:2,12 137:4 138:14,20,23 139:8,14,21 140:4,11,25 141:8 old 54:15 137:2 older 39:12 once 32:16,18 33:2,2,3 76:14 87:5 ones 109:12,17 126:3,3,6 one's 116:23 open 27:6 62:10 openly 37:15 openness 29:18 operate 15:1 operated 14:22 opinion 22:14 40:24 41:2 98:13 opinions 25:16,17 106:25 opportunities 61:2 opportunity 123:11 opposed 99:9 123:5 132:22 option 121:23 ordained 9:13 15:7 136:24 order 10:1 51:5 52:18 60:24 61:11 ordination 9:16 organization 11:8 11:9 97:18 137:1 orientation 33:5 Original 3:11 ought 66:8,8 Outagamie 51:10	85:24 86:2,14,19 87:8,12,18,20 88:2,11,18,22 outline 23:13 outset 133:7 outside 5:5 15:24 44:25 58:11,12 58:16 59:10,11 59:12 70:23 71:2,4,8,15,20 72:2,7 73:4,12 81:11 85:18,22 87:8 112:3,3 out-of-town 43:14 overhear 36:1 overheard 35:10 overly 10:3 overnight 43:14 43:19 99:21 100:13 overtures 111:7 <hr/> <p style="text-align: center;">P</p> <hr/> P 3:12 PA 96:17 packed 97:9 page 3:10 131:15 131:21 132:4 133:19,22 134:23 pages 3:3 4:10 133:15 paper 33:20 37:11 114:5 120:16 127:6,21 140:14 paperwork 96:16 127:5 paragraph 131:22 134:6,16,21,23 134:24,25 135:2 parameter 47:3 70:25 parent 89:13 90:1 90:10 114:19,22	114:23 115:5,10 parents 43:10 48:11 107:18 108:8,10,20 110:8,14,18 111:25 112:6 114:3,12,14 136:12 140:1 parish 11:14 16:8 16:11,13 20:23 27:9 37:19 39:23,23 40:1,6 42:20 98:17 99:3,4 120:9 122:7 140:9 parishes 137:22 parishioner 60:13 parishioners 23:23 48:8 109:15 part 13:22 29:10 30:22 32:2 46:6 46:22 72:18 108:8 132:6 134:24 partial 137:25 particular 27:15 27:19 133:20 134:5 parties 142:15 pass 61:5 passed 23:20 pastor 21:2,6,6,8 21:15,21,24 22:7 23:17 42:8,12 76:25 135:11,17 pastors 14:22 22:11,12 PATRICK 1:11 Paul 2:11 3:24 Paul's 40:2 penance 61:11,16 61:19 77:25 78:1,12 87:17	penchant 40:17 pending 45:11 46:16 penis 31:24 32:17 32:17 34:7,8 39:6,7 penitent 47:1 56:21,24 58:2 59:2 60:25 61:23 62:12,24 62:25 63:2,11 64:6,18 67:6,14 68:6,17 69:12 72:13,24 73:5 79:22 80:10,18 82:25 87:14 90:25 92:8 116:19 pension 139:2 people 13:20 14:2 14:21,24,25 24:21,22 25:16 29:13 32:2 36:17 38:1 42:22 44:16 48:1,3 51:7 61:15 63:20 66:1,3 73:16 75:24 77:11,21 77:23 81:19,19 82:14 84:6,16,21 98:17 101:18 105:8 106:24 107:10 112:4 116:1,4 118:5,16 119:9 120:9 121:8,9,16,19 133:6 137:14,15 people's 101:15 perceive 59:11 perceived 58:17 Pere 31:7 permanent 137:25
--	--	---	--	--

<p>person 12:21 33:4 35:5 36:22 37:3 37:4 38:19 44:13 65:16,17 69:5,6 78:19 83:24 89:6 116:6,15 117:1 117:17 123:13 personal 8:15 32:12,23,23 35:7 40:24 44:12 47:13,16,22 60:2 68:25 74:19 93:19 99:10 100:21 103:12 106:25 personality 22:5 22:11,21 24:9 25:18 30:22 personally 23:2,3 23:4 24:3 36:13 44:18 47:6,23 personnel 9:23 person's 35:2 pertain 105:15 Pete 21:11 123:24 125:20 136:17 Peter 2:12 philosophy 40:20 48:10 phonetic 38:24 Physically 17:5 pick 97:4,21 116:2 picked 47:21 97:19 99:21 piece 33:20 61:10 pieces 92:3 pilot 29:3 place 7:3 52:25 60:10,18 76:25 79:1 112:20,21 Plaintiff 1:5 2:11 plaintiff's 102:20</p>	<p>103:8 139:23 play 11:25 25:5 playing 25:8 please 9:7 25:23 35:20 38:13 pleases 25:22 plus 9:25 51:21 point 9:25 20:20 23:13,14 26:3,4 26:14 31:17 45:5 46:5,20 51:21,23,24 53:6 56:15 57:23 89:6 90:9 96:20 100:12 105:21 pointwhen 41:12 police 133:12 pool 29:2 pools 28:7 population 79:2 portion 105:14 position 10:22 12:10,15 36:15 36:19 46:10 67:10 possible 51:18 133:18 possibly 89:10 100:13 111:13 post 96:1,4,5 97:15 posted 99:12,14 100:20 101:7 potential 33:18,19 practice 130:12 preach 23:9,15 Predecessors 1:10 prefer 34:19 67:11 presbyterate 13:9 present 2:16 77:6 preserve 51:5 president 12:2,17 12:19,21 13:3</p>	<p>presiding 13:2 pretty 14:13 40:8 49:10 98:21 preventing 66:21 priest 10:1,24 14:4 15:17 29:7 31:1 36:14,18 37:19 46:10 47:1 56:16,20,24 58:2 59:2 60:20 60:22,23 61:24 62:12,23 63:11 63:18 64:6,18 65:14 67:6,14 68:6,17 69:12 72:14,25 73:5 79:22 80:10,17 82:25 84:19 87:14 90:25 92:8 106:18 116:19 120:9 122:7 127:20 128:3 131:18 135:12 priesthood 9:14 57:24 90:10 priestly 11:17 15:24 priests 11:8,18 13:8,11 14:8,12 14:20,22 15:8,17 15:18 16:24 17:19,22 21:25 25:22 39:2 43:6 51:12,21 54:19 61:4 66:2 73:23 74:5,14,18,24 75:1,5 84:18,22 85:1 95:22 127:6,14,16 128:6 130:14 131:17 136:25 137:2,6,14,21 138:22,23,24</p>	<p>priest's 127:21 primarily 8:6 primary 7:12 principal 65:7 print 124:20 printed 124:21 125:17 prior 32:11 prison 66:25 76:7 76:11,18 79:3,17 84:3 85:21 prisoners 51:12 77:1 82:5 priv 64:25 privacy 61:23 101:15 private 28:7 78:15 78:18,19,22 98:13 privilege 47:2 53:23 54:24 56:21,23,24 58:2 58:25 59:3 62:12 63:12 64:6,19,24 65:1 65:3,12,12,21,25 65:25 66:1,12,14 66:15,16,21 67:6 67:14 68:12,17 68:18 69:12 70:2 79:23 80:10,18 81:25 82:25 83:10,11 87:14 90:25 91:10 92:8 113:17 114:6,8 116:20 118:7 Privileged 114:7 privy 98:2 131:17 probably 38:4 57:12 63:20 106:17 115:8 121:25 problem 22:9</p>	<p>23:16 29:19,20 55:21 70:14,15 75:24 122:9 135:11,14 problems 22:25 23:4,23 24:4,7 72:3 120:10 133:2 procedure 34:25 113:22 142:4 process 6:17 60:10,15 75:17 professional 36:15 43:22 46:9 63:17 65:6 66:2,3,8 67:10 68:25 69:8 professionally 51:16 58:19 120:6 program 139:3 promise 9:17,20 9:23 protect 7:11 35:1 35:5 37:3 52:18 113:17 120:25 protected 54:8 58:24 59:2 63:11 64:6,18,24 65:6 79:23 80:11 81:25 87:14 116:19 protection 114:9 137:23,24 provide 141:1 provided 140:12 prudence 28:10 28:11 42:23 prudent 29:9 30:25 31:4 Pruitt 2:13 psychologist 94:6 public 2:3 44:25 74:23 142:2,23</p>
--	--	--	---	---

publicly 103:11	81:16 82:1 84:8	131:21,24	102:2,8 114:5	regardless 35:14
purpose 43:11	88:25 90:7	133:14 134:15	120:19,19 124:7	35:18
pursuant 58:3	101:2 105:17	134:21,21,24	124:9 127:5,20	registered 25:19
62:12 64:19	114:4 121:13,22	reading 131:14	127:21 133:11	regular 52:2,3
67:8 69:12	122:16 123:10	134:7 135:8	133:14,17	57:25 62:19,24
87:14 91:1	123:17 131:8,21	142:11	142:10	63:19,21 64:2
102:19	131:25 133:15	ready 97:12	recreation 82:4	91:13
pushed 42:15	135:5 139:23	realize 61:22	rectories 11:1	regulations 12:10
pushes 50:24	140:2	104:10 105:11	rectory 17:1,3,11	42:13
pushing 42:8,12	questioned 120:7	really 22:2 49:4	18:22,24 19:5,11	Reilly 2:17
67:9 120:14	questioning 7:22	72:4 98:15,23	19:16,19 20:7,16	reiterate 127:9
put 33:18 34:4,16	19:11 68:1 78:5	104:13 133:16	26:23 27:1	relations 28:2
37:11 49:12	85:9 86:13	reasked 45:3,13	33:14 38:25	relationship
97:23 101:14	96:22 98:6	reason 21:4,5	red 23:6	24:17 27:18
104:7 111:18	100:16 122:8	35:1,2 101:22	reduced 142:8	47:17 63:17
120:9,12 124:2	questions 5:7 6:15	113:19 116:23	refer 101:17	69:8 105:20,24
127:20 132:21	7:24 8:4,12	recall 39:22 49:3	102:9	107:16,21 108:3
133:16 136:11	31:17 41:20	49:4 71:6,24	reference 117:16	108:17 109:22
putting 69:16	54:3,4,23,25	72:4 75:23 76:4	references 105:15	110:1,5,8,15
121:23 133:13	55:24 57:17,21	77:15 85:13	reflect 123:3	111:3,11 115:24
p.m 141:12	66:11,22 67:12	86:23 87:16,18	refuse 37:9 46:17	122:12 136:13
	69:21 70:22	87:24 88:9 89:9	54:23 55:20,21	137:12
	75:18,20 95:13	92:18 98:7,22	56:13 57:22	relationships 28:3
Q	101:21 102:11	100:6 104:13	121:4,11 123:9	44:18
qualified 64:11	103:2 113:6	108:7,11 116:1	refusing 36:25	relative 142:14
quarterback 25:5	119:14 121:20	129:20 130:5	46:11 57:3 58:7	relatives 109:10
25:8	126:12,18	135:9,10 136:1	58:20 62:17	released 96:7
question 5:19	127:10 132:9	136:15 140:2	65:9 66:10,18	100:20
6:16,18,20 7:18	134:22 136:20	receive 61:16 63:1	67:19 68:2	relevance 77:9
15:15 16:5 33:1	141:9	63:1	74:21 80:2,15,22	85:25 86:16
35:18,24 36:15	quite 12:20 28:11	received 95:14	81:8 82:19 84:8	88:14 89:23
38:7 44:21 45:3	42:5 99:4	receiving 130:2	84:15 91:5,23	90:5,25 94:23
45:4,7,11,12,13	121:16	138:17	115:20 120:15	96:6,22 98:6
46:11,14,16 50:6	quote 48:21 49:1	recognize 103:17	123:17	100:21 103:12
51:5,17 52:21		107:13 108:13	regard 21:12	120:4
53:8 55:12,19	R	109:5,13 112:2	34:11 59:8 85:9	relevancy 8:11
56:7,8,15,23	raise 54:21	131:11	86:14 95:13	19:13 112:24
57:4 58:7,20,25	raised 104:4	recollect 94:1	100:16 102:12	relevant 78:6
59:6,7 61:18	Ralph 75:15	recollection 60:5	102:16 103:3	remain 37:10,11
62:1 63:5,23,25	range 86:22	95:1 140:5	127:11 141:1	remained 13:15
64:20 65:9,19,20	reach 123:24	record 7:23 34:9	regarding 3:12	remark 117:21
67:19 68:7,14,16	reaction 106:21	35:3,21 37:7,15	19:11 108:5	118:10
69:22 70:4	107:9 135:7	38:13,16 56:11	132:6,9,10,10	remember 10:7,8
75:25 76:20	read 131:7,13,14	57:8,19 101:14	140:1,16	15:6,9,11 16:13
80:3,4,5,22				

17:14,20 18:3,5 18:7,23 19:24 21:20 29:25 30:4,15,16 32:15 33:8,9,11 40:4 40:10,12 46:2 71:13,18 74:4,9 74:12,13,25 75:12 82:2,3,8 82:10 88:1,5 89:24 92:24 93:12,13,16 95:2 98:22 108:9,21 108:22 109:14 109:15 110:12 110:22 112:9,10 112:12 126:19 126:20,22,25 127:3 128:12,20 128:24 129:9,12 130:2,6 131:3 135:9,13,15,16 135:17 removed 21:3 Reno-Las 1:9 129:25 reoffending 101:3 repeat 46:19 repetitive 67:13 report 24:6 29:21 30:1 36:9 117:15 118:18 121:2 133:12 135:22 reported 35:9 36:1,3,13 115:23 reporter 1:21 6:3 6:10 reporter's 5:23 6:21 37:16 reporting 36:2 reports 118:14 136:5 represent 121:19	request 99:22 requested 114:3 114:12 116:20 requesting 116:21 reside 10:25 respect 101:15 102:24 103:10 respond 7:19 38:7 54:6 responded 140:4 140:5 responsibility 68:25 responsible 77:1 responsive 122:11 restate 127:8 restated 45:3 retain 101:17 retired 10:24 138:18 retirement 14:14 137:24 retreat 21:24,25 92:21 93:3,9 retreats 17:9 29:13 41:9 44:15 48:4 Rev 3:14,15,15,16 3:17,18,18,19,20 3:21,21,22,23,24 3:24 reveal 65:17 66:3 revealed 97:16 106:17 reveals 65:15 Reverend 3:12 ride 23:5 right 7:20,21 8:23 8:25 9:4,15 10:22 12:24 18:15 22:4 29:15 34:22 37:16 38:23 53:13 55:14	56:22 57:5,17,20 57:23 65:10 67:7 70:2,24 84:17 99:14 101:23,25 109:9 112:2 115:15,16 120:18 123:15 123:19 124:24 125:9,11 132:17 133:6 134:16 136:16,20 137:11 138:7 139:13,20,21 141:2,6 ring 94:2,4 Rivers 100:10 road 2:13 96:12 Robert 1:16 2:1 3:2,15,16,18,20 3:21 5:1 9:8 142:13 role 11:24 ROMAN 1:7 room 19:1 77:10 77:18,22 78:2,9 78:11,14,16,19 78:25 79:1 rooms 27:4 30:6 78:22 rule 6:23 7:3,6 rules 5:11,18,22 7:14 12:10 13:5 142:4 rumors 42:19 132:5 run 61:6 138:1 139:2 _____ _____ _____ sacrament 52:6 60:9,16 61:3,8 61:11,16,19 63:2 72:7,11 73:3,4 78:12 87:9,17	sacramental 7:10 50:25 51:9 sacraments 52:5 77:2,24 86:6 Samborski 17:17 sat 13:24 saw 76:13,15 89:3 94:6 130:18,22 saying 21:21 31:23 35:10,17 51:15 54:6 68:12 91:24 92:7 140:5 says 22:3 101:18 101:19 scene 25:12 school 24:16 31:6 31:8,12 45:17,23 45:24 61:3 seal 7:11 51:5 52:11,18 53:15 53:18 54:8,8,18 55:10 56:20,21 65:6,14 66:6,17 67:10 68:4 69:15,18 114:20 115:2 142:19 second 19:20 20:5 20:11,16 50:2 53:12 79:15 116:22 125:1 secretary 129:19 secretary's 129:14 section 78:11 see 13:17 19:21 22:8 29:19 37:13 43:3,7,7 43:22 51:20 63:14 76:8,9 85:18,19,20,23 86:18,21,25 87:7 93:22 101:18 114:14 121:18 124:20 126:24	128:11,21 129:7 129:15,25 131:1 131:10 seeing 126:19 131:3 seen 22:1 130:12 seminary 92:17 send 129:19 sending 129:12 senior 10:24 sense 5:20 6:4,11 6:21 51:20 70:25 101:24 sensitive 14:24 25:23 sent 126:6 129:8 129:18 separate 11:20 17:2 33:20 78:1 79:4 126:7 127:16,24 128:4 128:6 137:16 serious 111:19 seriously 9:23 sermon 23:15 serve 137:14,15 139:19 served 11:8 16:2,7 16:10,19 50:25 51:8 63:20 services 11:3 set 61:3 126:18 142:18 seven 13:18 54:15 sex 43:9 75:24 sexual 22:15 28:1 28:3 31:17 46:6 46:22 47:16 48:12 50:19,22 58:16 59:13,22 71:4,8,10 72:17 85:5 88:23 99:17 102:24 104:10,23 105:3
--	---	---	---	---

105:10,16	signature 129:16	sound 111:18	17:11,21 18:8,16	stated 12:10 85:7
106:25 108:24	signing 142:12	sounds 53:3 99:4	18:18,22 19:16	103:5 127:9
109:22 110:1,4	sins 60:20 61:12	123:11	19:25 20:6,16,19	statement 53:20
111:3,8,11	72:12,24 73:5,16	source 108:23	20:25 22:25	91:17 130:24
112:21 124:11	79:20 80:7	109:20 110:4	23:18,24 24:7,12	132:4
132:6,11,20,23	84:19	South 1:17 2:3	25:15 26:4,5,15	statement's 10:19
133:1,2 140:1,16	sit 13:20 18:5	speaking 41:7	27:8,20,25 28:6	states 137:3,3
sexuality 22:10	74:12	special 27:14,14	28:21 31:10,18	station 96:18
29:15 32:3	situation 26:20	31:22	38:23 39:11	stay 101:6
40:18,22 41:8,20	43:5 53:25	specific 60:8	40:2 41:7,13,15	stayed 99:21
sexually 42:20	sizable 98:21	83:24 88:6	42:1,4,18,21	100:12
48:2 63:4,8 64:1	skin 22:11	95:23 105:1	43:12 44:1	staying 43:18
64:12 73:25	snapping 30:8,11	119:5,9 130:5	47:12,14,18	101:4
74:7,10,15 89:7	30:14,17 31:1	131:21	49:10,16,21	stenotype 142:8
89:14,18 90:2,12	socialized 15:24	specifically 41:23	50:10,16,17,21	stop 5:19
103:25 104:6	Sole 1:9	88:4 93:12	94:22 95:2 99:7	stopped 82:17
111:20 121:17	somebody 43:22	104:13,19	103:19,23,23	stream 115:8,9
share 15:18 75:24	57:16 95:10	108:11 109:24	104:5 109:15	street 1:17 2:3,10
shared 20:22	98:7 99:21	111:5,8 116:8	110:24 111:24	39:24
Sharon 38:24	129:3 135:18	117:18 140:19	112:6 114:23	strike 32:11 83:5
39:5,17,21 40:5	somebody's 29:20	140:24,25	115:23 132:2,16	105:13 119:19
40:16 41:18	43:1	specifics 106:16	140:9	strong 22:6
sheet 140:14	someplace 95:1	specify 49:6	stack 126:16	124:11 133:4
shipped 49:18	something's 73:3	speculate 107:6	stage 48:21	strutted 106:24
50:4	son 35:9 111:20	speculation 21:16	stamp 134:3	stuck 22:3
shook 22:2	115:25 116:10	26:7 60:1 97:5	stand 24:10,21	student 103:19
shopping 39:24	116:12 117:22	98:18 99:9	105:9 106:22,23	study 138:2
short 86:2	118:25 119:19	100:21 103:12	standing 7:23,25	stuff 20:23 22:15
show 101:15	122:13 123:4,13	122:4,23	8:2,14,21 19:10	27:12 30:24
131:5	124:11 125:16	speed 8:20	21:18 32:21	34:20 42:13
showed 104:21	132:22 135:14	speedily 40:8	85:7,8 86:13	47:22 71:2
showering 30:5	140:19,22 141:6	spell 9:7 31:24	95:12 96:12,21	82:15 116:2,4,7
106:6	Sonny 43:22	32:1,17,17 34:7	star 82:5,6	subsequent 86:15
showing 129:7	sons 30:2 112:7	34:8 39:6,7	start 6:18 16:13	successors 1:8,10
134:14	136:14	spelled 9:9	19:6 70:21	9:18
shown 128:16	son's 119:18,18	spiritual 51:6	126:11 134:7	suit 97:8
140:6	soon 49:10	spoiled 25:6	started 25:1,3	suitcase 96:25
shut 42:11	sorry 89:22	spoke 104:2	42:8 82:16	97:8
sic 109:11	104:18 112:11	sports 24:15	137:2	Suite 1:17 2:3,10
sick 11:19 137:2	133:25 134:3	43:21 59:5	starting 134:16	summer 28:7
side 20:13,14	sort 48:12 68:4	spot 37:22 38:1	state 9:6 10:17	Sunday 51:11
sidewalk 61:16	104:23 110:4	spring 8:8	11:20,23 21:16	76:10,12 79:2,9
sign 34:19	127:15	St 2:11 16:15,18	56:10,19 64:24	79:11,12,16
signal 42:7,16	sought 76:25	16:22 17:2,4,7	113:12	supervision 142:9

support 75:14	94:21 95:4	23:6	133:13 136:8	3:17,18
supportive 122:6	99:13 100:23	term 35:16 62:19	things 37:19	thought 24:9,22
suppose 17:24	119:18,19	terms 76:1	41:10 42:5 44:2	26:18,19 27:17
18:5 136:7	talked 47:21	testified 50:3	44:8,16 59:5	29:12 32:1
sure 16:7 46:20	48:18 68:11	112:23 124:13	69:3 74:23	41:16 44:2 90:2
66:23 70:18	72:23 74:9	132:9 136:21	80:16 88:7	90:12 94:25
74:22 100:10	75:22 77:7	138:7	138:1	99:2 105:8,9
102:3 123:22	102:7 109:12	testifies 5:2	think 7:16 8:20	106:21 119:3
128:9 129:5,6	125:15	testify 37:14,15	10:9 11:21	125:7,8,8
133:10,17 134:9	talking 37:4 38:20	49:3 52:24 83:8	12:18 13:17	thoughts 44:15
survivor 33:19	65:12 71:2	testimony 22:18	21:2,2,7 22:14	73:19
survivors 133:18	77:19 111:10	49:24 50:11	29:5,11,20 30:18	three 19:7 25:2
suspected 89:14	114:23 117:17	140:12,13 142:7	30:25 31:4,13,22	85:4,15,17 126:7
suspicious 98:13	119:15 120:21	142:11	32:6 33:3,25	138:1
103:22,24	123:14 124:6	Thanks 14:10	35:18 36:14,21	Thursdays 79:17
swam 28:19	134:19	that'd 124:15	36:22,24 37:23	tight 32:3
swim 28:21 29:4	talks 29:13 41:10	theology 48:10	40:7,7,8 41:21	time 6:6,25,25
swimming 28:6	tampering 54:17	therapist 94:6	42:4,22 43:3,10	7:19 8:5,10 9:16
29:2,7,7,18,24	tampers 55:9	Therese 16:15,18	43:15 44:12	11:22 12:4,7,25
30:2 106:2	taxation 14:24	16:22 17:2,4,7	45:6,19 46:9,13	13:10,13,25 15:5
sworn 5:2 142:6	teacher 45:23	17:11,21 18:8,16	46:14 47:12	15:11,14 16:1,10
system 29:2 96:17	team 25:5	18:19,22 19:17	50:24 51:8,18	16:20,22 18:21
	teenager 38:25	19:25 20:6,16,19	52:17,21 54:6,9	19:25 20:6,18
	tell 10:21 22:7	21:1 23:1,18,25	54:25 55:2 56:6	22:1 24:12,25
	23:11,12 26:25	24:7,13 25:15	57:5,6,15 58:18	25:14,22 27:20
	39:9 40:20,21	26:4,5,15 27:8	59:17,18 62:21	27:25 29:1
	48:11,15,17,23	27:20,25 28:6,22	63:20,24 64:7	31:10 32:4,16
	63:8,25 64:12	31:11,18 38:23	66:13 70:7	33:15 38:14
	73:22 75:16	39:11 41:7,15	79:15 81:23	40:1,6 41:25
	81:21,23 90:1	42:1,4,19,21	89:10 91:25	42:18 43:12
	94:5 104:11,19	43:13 44:1	92:1 95:7 96:10	44:1 45:18
	105:20 106:1,5,8	47:12,14,18	98:16,21 99:6,6	49:12,15,16,17
	109:5,8,9,13	49:11,16,21	99:7,23 107:24	50:3 52:19
	111:2,6 114:23	50:10,17,18,21	107:24 109:19	58:14 59:16
	117:18,18,19	103:19,24 104:5	111:10 112:23	60:1 61:7 62:9
	122:15 136:7	109:16 110:24	113:1 115:18	64:15 70:17,19
taken 2:1 5:8	telling 55:13 82:9	111:24 112:7	116:22 117:4,10	74:4,16 76:5,15
38:14 70:19	118:2 120:14	114:23 115:23	117:20 121:25	77:6,7,16 79:8
97:10 102:4	122:12	132:2,16 140:9	122:2 123:3	79:14 80:6 81:2
123:23 142:3	tells 36:17	thicker 42:10	124:1,18 126:7	82:16 85:18,22
takes 15:7 60:10	temporary 137:25	thing 6:8 22:10	130:21 131:17	86:3 89:3,13,17
talented 25:18	ten 86:25	29:10 44:12	131:19 140:23	89:22 90:5,21,21
talk 6:14 36:18	tend 6:14	82:3,8 114:21	thinking 112:12	90:24 91:15,15
38:11,19 48:19	tendency 21:5	117:20 131:14	Thomas 3:13,15	91:22 92:17
68:11 77:4,13				

94:10,24 102:4	treasurer 11:9,11	U	7:18 8:4,9,12	13:22
103:1,4,23 104:5	137:5,7 138:25	unnn-mmm 6:7	9:6,8 10:21	vote 139:7,8,10,11
111:19 112:19	139:6	undergoing 94:12	32:11 34:3 38:9	voted 138:24
119:2,3 122:8	treatment 94:8,12	94:16	53:14 54:6,11	139:9
123:23 126:15	94:16,19 95:13	underneath	70:21 103:3	vs 1:6
126:17 132:2	tried 14:25 127:21	124:18,21	107:2,8 142:13	V-A-N-D-E-N-...
times 5:23 17:7	138:1 140:20	125:17	Vandenberg's	9:10
21:4 52:4 76:7	trips 43:14	understand 5:13	32:20 85:9	W
76:12 79:7	trout 115:8,9	5:14,15,19,20	86:14	Wagner 23:17
86:18,23,25 87:2	truck 61:6	9:3 15:15 25:25	various 7:24	28:17 135:19
87:4,6 104:21	trucks 61:15	37:12 52:23	vault 129:4	136:2
Timothy 2:17	true 142:10	54:5 62:19	Vegas 1:8,9 2:14	wait 6:17,19 7:18
today 5:7,13,15	truly 92:8	65:19 68:7,15	129:9,13,25	45:2,2,12,13
23:9 74:12 75:4	try 34:25 37:2	69:20 70:12,13	vehemence	50:2 56:7,8
116:15	51:19,19 97:9	70:15 81:15	140:21	76:20 96:16
Todd 88:2	122:19	83:14 90:6 91:8	vehemently	131:8 135:5
told 30:14 33:10	trying 52:13	91:11 93:11	119:12 123:5	waiting 96:9,18
34:6 35:8 39:5	53:22 54:1,10	120:22	132:21	waived 142:12
40:16 63:3 89:6	55:3 56:2,4,4	understanding	Verbally 82:22	walking 61:13
89:13,17 90:11	57:1 61:17	5:12 53:17	versus 29:7 68:10	wall 42:10,15
93:13 95:24	67:23 68:1	102:21 119:2	73:4	wall's 42:10
104:3 105:8	70:10 121:21	123:25	vice 12:17 129:24	want 5:19 7:10,22
117:24 121:6	122:2 123:2	understood 41:16	victim 33:19	8:16 29:1 33:8
123:13	140:22	Union 137:3	113:18 114:2	33:10,18 34:8
top 128:12 129:1	turned 117:22	University 61:14	Video 1:16 2:1	35:22,23 38:10
134:23,24	118:11,16,22	111:1	VIDEOGRAP...	38:11 53:24
topic 23:11 35:22	119:10,12	upcoming 75:22	1:22	54:24 55:18,18
topics 23:10	twice 33:3 87:5	upfront 29:15	violate 70:2 91:10	55:19,22,24,25
total 137:25	two 11:21 18:1,4	44:25	violates 58:2	56:13 57:21
totally 117:8	19:6,8,16,22	upset 33:6 121:16	62:12 67:5	70:21 83:15,19
touch 25:3	21:1 51:12	upstairs 19:23	69:12 80:10	84:7,12 92:4,5,5
touched 140:19	52:15 77:11,13	96:17	violation 69:14	101:10,14,14,15
tough 37:18	80:16 84:5,15,21	uptight 40:18,22	virtue 139:11	102:7 103:15
towel 30:8,10,14	85:1 87:6 88:11	uptightness 29:14	visit 27:8 77:3	111:23 112:10
30:17 31:1	88:17 92:11,13	use 79:1 102:8	85:9	112:16,22,22,24
trail 127:7,22	100:10 102:19	113:22	visitation 87:10	113:6,9,10,23,24
trained 29:3	two-by-four	V	visited 81:14	115:18 118:4
training 29:11	42:11	vague 10:4 24:2	visiting 81:14	120:6,8,9 121:8
transcribed 142:9	type 11:3 66:15	45:25 87:23	86:11	122:5,7 123:10
transcript 6:10	107:8 108:2	valid 116:23	visits 27:14 86:14	123:20 124:1,7
34:12 102:14	114:20 115:24	Vandenberg 1:16	89:1	125:11,21,22,23
142:9,12	135:21,22	2:1 3:2,15,16,18	voluntarily 11:18	126:1,2,10 127:8
transferred 97:19	Typical 82:10	3:20,21 5:1,5	voluntary 31:13	133:16 134:10
travels 85:10			volunteers 13:18	

134:18	57:19 101:17	86:1 87:16,24	112:16,18 113:1	103:21 108:15
wanted 26:1	102:9 112:17	88:15 89:24	114:17 115:17	112:8,14 113:3
35:24 113:20	116:23 126:15	90:6 91:2,19	115:20 117:24	114:8 115:21
wants 62:25 63:1	we're 5:23 34:10	92:24 94:11,25	119:25 120:15	116:14 118:20
69:7	34:25 35:1,22	95:7 96:7,23	120:23,24 121:1	120:17 124:2,20
warn 54:19	42:14 57:7,16,20	97:6 98:7	123:11 124:5,14	125:11,19
warned 54:14	113:15 134:19	100:18,23	124:25 125:9	129:11,17 130:4
wasn't 26:20	we've 13:23,23	103:13 105:14	writing 123:25	131:4,23 135:4
27:23 28:19	123:14 128:8	107:4 113:10	129:1,9	135:25 138:10
29:9 30:22	WHEREOF	114:1,2,4 118:4	written 73:12,16	140:3,10 141:5,7
44:21 49:9 59:7	142:18	118:9 120:5	125:1 130:10	year 11:21 16:12
59:18,21 63:23	wide 27:6	122:5,24 124:16	wrong 51:15	16:12 18:1,3,3,7
63:23 86:24	widespread 132:5	129:21 130:4	wrongdoing	79:15
88:6 91:13	Wisconsin 1:18	131:12 132:1,8	88:19	years 10:1 11:9,10
104:7,25,25	2:4 11:21,23	132:19 135:1	wrote 30:21 73:17	11:12 13:23
119:5 133:4	55:1,2 61:13	137:20 142:6,8	124:25 125:9	15:7 17:13,16,23
watch 117:5,5	94:18 142:23	142:11,18	129:8	17:25 18:1,3,4,4
Watzak 1:21 2:2	wise 91:15,15	witness's 22:18		18:15 20:12
142:2,22	wish 122:22	49:24 100:16	X	21:1 39:1 40:3
water 120:9,12	witness 7:9,20	woman 34:24	Xavier 31:6,11	50:10,10 51:21
way 17:5 28:11	10:5 12:6,9	35:8,10,25 36:2	45:16,23	54:15 89:5
29:17 31:19	14:18 15:16	36:3,7 38:25	Y	90:22 136:23
32:2 39:11 41:4	16:5 21:23	word 9:9	yeah 7:5,17 8:19	138:1,2,13
41:4,7 52:17	22:19 24:3 26:8	words 22:3 36:13	13:4,15,17 16:15	Yep 16:17 128:25
72:5 76:1 85:3	32:9 34:19	44:16 51:1 70:1	18:25 20:17	129:14
92:9 104:1,7	35:11 36:6,10,12	72:13,19,25 73:6	21:18 23:3,19,21	young 29:12
108:24 111:18	37:13,17,24 38:4	work 33:21 78:17	24:6 25:9 28:7	38:24
114:6,7 115:19	38:8 44:11	112:17 129:11	28:24 29:9 32:7	youth 24:20 25:14
117:14	45:19 46:1 47:2	129:14	33:12,24 35:15	40:18,22 41:8,9
went 5:11 17:23	47:5 49:4,25	works 14:16	36:20 38:5 39:8	41:20 44:15
17:23 23:5 31:8	53:1,3,19 54:13	worried 100:13	39:19 41:14,16	45:24 46:7,23
40:14 45:10	55:7 56:25 58:4	worry 35:13,15	43:7,7 44:5	50:19,23 58:16
57:16 76:9,19,24	59:4,17 63:13	35:23	46:13 48:3	59:14 71:4,16
77:3 79:14 80:7	64:9,21,25 66:16	worships 79:2	50:12 58:9,22	72:3 74:15
83:25 84:5,6,16	67:4,7,9,15,16	wouldn't 31:4	60:17 62:18	I
84:21,23 85:15	68:21 69:14	39:22 49:6,12,25	64:9 66:20 67:4	1 34:5 101:19,20
85:18,20,22 87:6	70:6 71:24	50:7,8 62:4,8	68:23 69:1,14	103:16,19,25
94:6 127:5,19	72:10 74:17	63:5 65:7 82:14	73:14 74:24	104:6,24 105:4
135:17 140:9	76:21 77:10	84:7 86:20 91:9	76:19 79:13	105:19,23 106:2
weren't 24:11	78:8 79:24	95:18,18 110:23	80:19 83:1,10,18	106:6,13,14
27:5	80:12,19 81:9,18	110:24	83:22 84:23	125:14
West 2:13	82:3,20,24 83:1	write 33:17 34:5	90:19 91:13	1's 104:3,11,17
we'll 5:24 6:7,7	83:8,10,12 84:2	34:24 35:19	93:25 99:25	105:2 106:1,5,8
19:5 51:19	84:12 85:13	36:25 37:2	100:18 103:18	

106:9	19 4:10	44 4:11	81 4:13
10 4:10	1926 9:12	45 4:11	81a 3:24 131:1
100 2:10 4:14	1952 138:9	49 4:11	83 4:13
100,000 98:22	1958 9:14 18:9	5	85 4:13
102 4:14	1967 18:14	5 1:17 2:4 3:4	86 4:13
103 4:14	1969 137:6 138:20	142:5	87 4:13
105 4:14	1984 8:7,7	5/10/85 3:21	88 4:13
11 109:10,11	1985 8:8 130:2,10	5/16/85 3:22	89 4:13
113 4:15	130:19,23	50 9:25 51:21	89031 2:14
114 4:15	2	50,000 98:22	9
117 133:12 134:15	2 107:12,16,21	52 136:24	9/14/83 3:12
119 1:4	2's 107:18	55101 2:11	9/25/84 3:13
12 4:10	2:23 141:11	56 4:11	9:23 2:5
12/12/84 3:15,18	2010 1:17 2:4	58 4:11	90 4:13
12/13/84 3:16	142:5,20	59 4:11	91 4:13
12/20/84 3:19	205 1:17 2:3	6	92 4:13
120 4:15	21 4:10	60 3:12 131:6	93 4:13
1200 25:2	22 4:10	132:4	94 4:14
122 4:15	24 4:11	62 4:12	95 4:14
125 1:17 2:3	26 4:11	64 4:12	96 4:14
126 3:17	28 109:10	67 4:12	97 4:14
127 4:15	3	69 4:12	98 4:14
128 3:14,15	3 107:23 108:3,6	7	99 4:14
129 3:20,21,23	131:21 132:4	7 4:10	
131 3:12,24	3's 108:10	70 4:12	
132 4:15	32 4:11	71 4:12	
136 3:4,5	34 40:3 102:18	72 4:12	
137 4:15	133:23	74 4:12	
14 4:10 109:19,20	36 4:11	77 3:13 4:12	
109:22 110:1,13	366 2:10	128:21 129:1	
110:15	37 133:22	77a 3:15 128:11	
141 3:5	38 4:11 134:23	77b 3:16 126:24	
15 4:10 108:12	3890 2:13	77bb 3:18	
109:19 110:3,5,9	4	77c 3:19 129:7	
15's 110:8	4 82:5,6 108:13,17	77e 3:21 129:15	
16 4:10	108:25 134:19	129:16	
18 109:19 110:17	134:20	77f 3:22 129:23	
110:19 111:4,11	4th 9:12	78 4:12	
138:5,5	4's 108:20	79 4:12	
18's 110:18,25	4/7/86 3:24	8	
111:2	40 11:9 138:13	8 4:10 109:11	
1800's 138:5	41 133:25		
1878 11:7,18,21			
137:3			

ORIGINAL

1 NECC
2 J. R. CROCKETT, JR., ESQ.
3 Nevada Bar No. 000068
4 CROCKETT & MYERS
5 700 South Third Street
6 Las Vegas, NV 89101
7 702-382-6711
8 Fax: 702-384-8102

9 - and -

10 JEFFREY R. ANDERSON, ESQ.
11 JEFF ANDERSON & ASSOCIATES
12 366 Jackson Street, Suite 100
13 St. Paul, MN 55101
14 651-227-9990
15 Fax: 651-297-6543

16 *Attorney for Plaintiff John Doe 119*

17 DISTRICT COURT

18 CLARK COUNTY, NEVADA

19 JOHN DOE 119,

20 Plaintiff,

21 vs.

22 ROMAN CATHOLIC BISHOP OF LAS VEGAS
23 and His Successors, a Corporation Sole, f/k/a DIOCESE OF
24 RENO-LAS VEGAS and its Predecessors and Successors,
25 the CATHOLIC DIOCESE OF GREEN BAY, INC.,
26 and FR. JOHN PATRICK FEENEY,

27 Defendants.

Case No. A555265
Dept. No. II

COMMISSION TO TAKE VIDEOTAPE DEPOSITION OUTSIDE THE STATE OF NEVADA

28 TO: ANY NOTARY PUBLIC OF THE STATE OF WISCONSIN

.../

1 YOU ARE HEREBY COMMISSIONED AND FULLY AUTHORIZED to take the
2 videotaped deposition of: FATHER ROBERT VANDENBERG, in accordance with the
3 Rules of Civil Procedure of the State of Nevada, at the law firm of Peterson, Berk &
4 Cross, 125 South Jefferson Street, Suite 205, Green Bay, WI 54301, on the 5th day of
5 November, 2010, at the hour of 9:00 AM, and on succeeding days until concluded, or at
6 such other time and places as may be mutually agreed upon by counsel for the respective
7 parties hereto.

8 You shall put the witnesses on oath and their testimony shall be recorded by
9 someone acting under your direction, stenographically, and thereafter transcribed.
10 Objections to evidence presented shall be noted, and the evidence shall be taken subject to
11 the objections. When the testimony is fully transcribed, it shall be signed by the respective
12 witnesses after a full opportunity to make corrections or changes. You shall certify on the
13 deposition that the witness was duly sworn by you, and that the deposition is a deposition,
14 and place it in an envelope endorsed with the title of the action and marked "Deposition of
15 FATHER ROBERT VANDENBERG," and send it by registered mail to J.R.
16 CROCKETT, JR., CROCKETT & MYERS, 700 South Third Street, Las Vegas, Nevada,
17 89101.

18 DATED this ___ day of _____, 2010.

19
20 CLERK OF COURT, CLARK COUNTY

21
22
23 By KADIRA BECKOW
24 Deputy County Clerk
25
26
27
28

()

()

()



CATHOLIC DIOCESE OF GREEN BAY

BOX 66

GREEN BAY, WISCONSIN 54305

September 14, 1983

CONFIDENTIAL

ACCUSATIONS REGARDING REVEREND JOHN P. FEENEY

I. MORAL-SEXUAL

- a. Accusation of possible sexual assault (Wisconsin State Statutes, Fourth Degree) in the context of hearing the confession of a young girl.
 - Father Feeney was given a warning by Bishop Wycislo in a September 8, 1978, letter to be more prudent in the hearing of confessions, especially of young people.
- b. Accusation of exposure on the part of Father Feeney by an appliance repair and installation person. This young man, a non-Catholic, stated in writing that Father Feeney exposed himself while he (i.e., the appliance person) was installing an air conditioner in Father's bedroom.

A second accusation involves taking showers at the high school locker room and being in locker room while boys were taking showers.

 - Again, this after a warning by the Bishop and a request by Bishop Wycislo to restrict recreational activities which involve youth.
- c. A third incident of exposure in the presence of young boys in the case of a canoeing outing with seventh - eighth graders from the parish. The incident involved being dunked by Father Feeney and then joining them in clothing change.
 - This after being advised by Bishop to stay away from young people altogether.

II. FINANCIAL

- a. Accusation that personal phone calls were being charged to the parish, especially phone calls to travel agencies, airports, family members, and others of a personal nature.
- b. Accusation of attempting to bilk money from the parish in connection with the appearance of his singer brother, Joe Feeney. The advertising and band were charged to the parish, even though the advertising was for other appearances in Northeastern Wisconsin.

(Over)

DIOCESE OF GREEN BAY
0360

Ex. 60

Additionally, there was an attempt to present as double the cost of the back-up band for Joe Feeney's appearance. Actual cost was \$2500 for five appearances. There was an attempt to charge \$5000 (\$1000 apiece); double billing for advertising. Also, Suamico was billed.

- c. Accusation of double claim for missing money from the rectory: both from the parish insurance and personal insurance.

- d. Mass Stipends and Stole Fees

\$2800 worth of stipends for a member of the parish have not been accounted for. No Masses celebrated in parish; no notification of having sent Masses out; and no recording of stipends in parish Mass stipend book.

Charging \$10.00 for baptism. Diocesan established fee is \$2.00.

III. DISRUPTIVE CONDUCT DURING THE LITURGY

Standing on the front pew for preaching.

Harassing people regarding sitting in the back pews.

Pushing Missalettes in the faces of people.

Personal attacks and embarrassing various parishioners: during sermon, during reception of Communion.

IV. ABSENCES FROM THE PARISH

Not making arrangements for pastoral coverage. Neglecting duties as pastor in counseling, instructing people in preparation for sacraments and religious instruction. Not showing up for religious instructions on frequent occasions. Frequent absences from parish.

V. ACCUSATION OF ODIUM POPULI

- a. People have left parish and joined neighboring parishes.
- b. Children dropping out of Catholic school and attending public school.
- c. People are not attending Mass at the parish any longer.
- d. Attempts to intimidate people: threat of excommunication; other threats of a "religious nature".

(Continued)

- e.. Widespread accusations, allegations and rumors regarding sexual improprieties on the part of Father Feeney from previous parish assignments: St. Therese, Appleton; Freedom; Suamico; De Pere; Chilton, etc.
- f. Young people getting married in surrounding parishes, having children baptized in other parishes to avoid having Father Feeney baptize them.
- g. Rudeness to members of the parish.
- h. Refusal of trustees to serve because of inability to work with Father Feeney.
- i. Loss of respect among people of the parish.

VI. DISRUPTIVE CONDUCT AND INFLUENCE IN THE COMMUNITY

- a. Irresponsibility in attending to schedule for release time for students.
- b. Attempt to undermine the influence of school authorities.
- c. Trespassing in private lockers of students.
 - After incident, instruction has been put out that Father Feeney is not to be left alone in the public high school building.
- d. Repeated traffic violations: Shawano County, Kewaunee County, Outagamie County, Calumet County; harassing issuing officers.



CATHOLIC DIOCESE OF GREEN BAY

BOX 66

GREEN BAY, WISCONSIN 54305

CONFIDENTIAL

BRIEFING AND RESUME

Father Feeney has been at the Stockbridge parish for almost five years. During this time, there has been a continuous stream of calls from the parish in regard to his absences and his improper, erratic and disruptive behavior.

He was transferred from the pastorate of Freedom under the cloud of a charge of sexual assault involving two young boys. The District Attorney had already been approached and was pursuing the matter. The charges were dropped by the parents of the boys on assurance by the Diocese that Father Feeney was going to be removed and would be given counseling.

Father was transferred to the position of Administrator at Stockbridge with the warning that, if there was another repeat of such incidents, he would be removed.

In the recent past assignments, there have been accusations of improprieties of a sexual or quasi-sexual nature in each assignment. These have been the cause of scandal and widespread rumor.

Each time, there have been strong and vehement denials of any wrongdoing.

The accusations and the record of allegations date back years and include assignments at Chilton, Appleton, Freedom, Suamico, De Pere and, most recently, Stockbridge.

Attempts were made to have Father Feeney undergo counseling. He has been in either counseling or psychological testing with Father Martin Pable, Dr. Thomas Kelley and, most recently, with Father John Van Deuren.

These attempts were not successful since there has always been the strong denial and thus, no problem, as far as Father Feeney was concerned, to be worked out.

At this time, it would seem difficult for the Diocese to continue to transfer the problem or even to try to protect from any possible prosecution.



CATHOLIC DIOCESE OF GREEN BAY

BOX 66

GREEN BAY, WISCONSIN 54305

POSSIBLE ALTERNATIVES FOR RECOMMENDATIONS TO THE ORDINARY

1. Leave Father Feeney at his present assignment as Administrator of Stockbridge, and allow the people involved to attempt prosecution on the sexual misconduct issue.

There will probably be an attempt to solicit people for testimony from previous parishes. The resulting publicity in this case will be damaging both for Father Feeney and for the Diocese.

The investigative reporter from Channel 11 has already inquired what action will be taken on Father Feeney. He is willing to follow through and expose the Diocese's inaction should there be no action taken regarding Father Feeney.

2. Father Feeney could be given another temporary assignment in the Diocese in an area in which his reputation is not well known.
3. Father Feeney could be removed from assignment in the Diocese, given a leave of absence for reasons of health and sent by the Ordinary to a place such as the House of Affirmation or the treatment place in New Mexico.
4. Following a period of treatment, Father Feeney could find another diocese willing to accept him.
5. Father Feeney could be removed from assignment and retired early.
6. Father Feeney could request, on his own, to be released from assignment in the Diocese and attempt to find a position in another diocese willing to take him. The Ordinary would give a recommendation to another bishop to accept him for assignment. This would be done quietly without any damage to Father Feeney. Father will be responsible for finding a willing Ordinary and diocese.
7. Father Feeney could be placed in assignment with another priest who would serve as either a mentor or supervisor, to whom he would be accountable. Father Feeney would seek out one of the priests of the Diocese who would be willing to work with him.

SUGGESTION: Of the above possibilities, the first and second do not seem feasible.

DIOCESE OF GREEN BAY
0364

Chapter 1

THE PROCEDURE FOR THE REMOVAL OF PARISH PRIESTS

CANON 1740

When the ministry of any parish priest has for some reason become harmful or at least ineffective, even though this occurs without any serious fault on his part, he can be removed from the parish by the diocesan Bishop.

CANON 1741

The reasons for which a parish priest can lawfully be removed from his parish are principally:

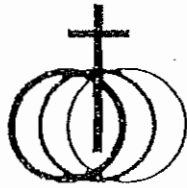
1. A manner of acting which causes grave harm or disturbance to ecclesiastical communion.
2. Ineptitude or permanent illness of mind or body, which makes the parish priest unequal to the task of fulfilling his duties satisfactorily.
3. The loss of the parish priest's good name among upright and serious-minded parishioners, or aversion to him, when it can be foreseen that these factors will not quickly come to an end.
4. Grave neglect or violation of parochial duties, which persists after a warning.
5. Bad administration of temporal goods with grave harm to the Church, when no other remedy can be found to eliminate this harm.

* Revised Code of Canon Law

0

1

2



DIOCESE OF GREEN BAY

1825 RIVERSIDE DR., P.O. BOX 1825 GREEN BAY, WI 54305-5825 — TEL 414-437-7531

September 25, 1984

Vault File

Msgr. Thomas Meger
Diocese of Reno - Las Vegas
Box 1211
Reno, NV 89504

Dear Monsignor Meger:

I thank you for your phone call of September 21, 1984, informing

me that Father Feeney, who is currently in Reno, Nevada, is planning to return to the Diocese of Green Bay. I am glad to hear that you are planning to have him return to the Diocese of Green Bay. I will be sure to let the appropriate personnel know of your plans.

If, at any time, the insurance coverage changes for Father Feeney, please inform us.

Thank you once again for your efforts in this matter.

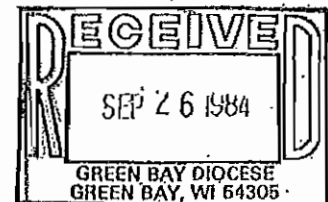
Sincerely in Christ,

David Kiefer

Rev. David Kiefer
Director
Office of Personnel

DK/ala

cc: Reverend John Feeney
Msgr. Roy Klister
Rev. Robert Vandenberg



DIOCESE OF GREEN BAY

Ex. 77

()

()

2



Diocese of Reno - Las Vegas
515 COURT STREET - P. O. BOX 1211
RENO, NEVADA 89504 - 1211

THE CHANCERY

(702) 329-9274

December 12, 1984

Reverend Robert Vandenberg
410 East Wallace
Combined Locks, Wisc. 54113

Dear Father Vandenberg:

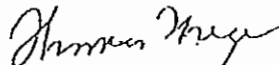
I spoke by phone with Father John Feeney this morning regarding the contribution that this Diocese will make to your retirement fund. He tells me that this goes into the LBA.

In March of next year, the Diocese will send to the Diocese of Green Bay a check in the amount of \$494.00, this total amount representing an on-going retirement contribution of \$449.00 and a long-term disability contribution of \$45.00. This is the amount that all parishes and agencies pay into the retirement and disability funds of our diocesan and religious personnel.

Would you please let me know if the contribution should be sent to you at the above address. If so, I will make sure that our Central Accounting Office is so informed.

With cordial good wishes for a very Merry Christmas, I am

Yours sincerely,


Rev. Msgr. Thomas Meger
Chancellor

/df
c. Father John Feeney

RCB 00347

77a
Ella
good

()

()

()



Diocese of Reno - Las Vegas
515 COURT STREET - P. O. BOX 1211
RENO, NEVADA 89504 - 1211

*Fa. John Feeney
file*

(702) 329-9274

THE CHANCERY

December 13, 1984

Reverend Robert Vandenberg
410 East Wallace
Combined Locks, Wisc: 54113

Dear Father Vandenberg:

I wrote you yesterday concerning the contribution of the Diocese to the retirement fund of the Diocese of Green Bay in reference to Father John Feeney. I presume you will receive that letter, although I discovered only after it had been mailed that the name of the town was misspelled. I am sending a corrected copy in the event that for some reason you did not receive the letter.

With good wishes, I am

Yours sincerely,

Thomas Meger

Rev. Msgr. Thomas Meger
Chancellor

/df
encl.

RCB 00348

77b

1

()

()



Diocese of Reno - Las Vegas

515 COURT STREET - P. O. BOX 1211

RENO, NEVADA 89504 - 1211

THE CHANCERY

(702) 329-9274

December 12, 1984

Reverend Robert Vandenberg
410 East Wallace
Combined Locks, Wisc. 54113

Dear Father Vandenberg:

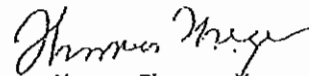
I spoke by phone with Father John Feeney this morning regarding the contribution that this Diocese will make to your retirement fund. He tells me that this goes into the LDA.

In March of next year, the Diocese will send to the Diocese of Green Bay a check in the amount of \$494.00, this total amount representing an on-going retirement contribution of \$449.00 and a long-term disability contribution of \$45.00. This is the amount that all parishes and agencies pay into the retirement and disability funds of our diocesan and religious personnel.

Would you please let me know if the contribution should be sent to you at the above address. If so, I will make sure that our Central Accounting Office is so informed.

With cordial good wishes for a very Merry Christmas, I am

Yours sincerely,


Rev. Msgr. Thomas Meger
Chancellor

/df
c. Father John Feeney

RCB 00347

77 BB

()

()

;

LEO

BENEVOLENT



ASSOCIATION

PRIESTS OF THE DIOCESE OF GREEN BAY

410 E. WALLACE
COMBINED LOCKS
WISCONSIN 54113

December 20, 1984

Rev. John Feeney
St. Francis de Sales Parish
1111 Michael Way
Las Vegas, Nevada 89108

Dear Father John:

Merry Christmas and Happy New Year!

Thank you for your letter of December 12th. I also received a letter from Msgr. Meger of the diocese of Reno-Las Vegas stating that a contribution of \$494. would be made in your name to the LBA in January 1985. Please clarify for me if this contribution is an annual contribution, or is this to be applied to your premium due to the LBA for 1984? It is to your income tax advantage of course, to have your employer contribute directly to the Leo Society.

The LBA bills quarterly for the \$1000. premium per year. Does the Reno-Las Vegas Diocese wish to be billed in this way, or do they prefer to make a once a year contribution of an amount established for the priests in that diocese with the responsibility for paying the balance falling on yourself? In other words, responsibility for the premium and a billing procedure should be clearly established for the future.

For the year 1984 John, you owe \$1000. Nothing has been put into the fund in your name. You are urged to pay this for 1984 to maintain your "paid up status." If the \$494. in January 1985 is for 1984, we will accept that as a payment for 1984. The balance, however, should be covered by your check and/or the signing of the promissory note.

A copy of this letter is being sent to Msgr. Meger, so that the two of you can agree on a payment plan for the future.

Incidentally, the Board of Directors voted for an increase of \$50. per month in the pension benefit beginning January 1st. I anticipate an increase in the premium after our actuarial study is completed in 1985. The benefit increase adds an annual cost of \$27,000., although we are doing well with our investments.

RCB 00349

77C
MJD

Rev. Feeney
December 20, 1984
Page 2

The presbyterate elected me to another four year term on the Board of Directors. As the Treasurer, pray that I don't end up like Judas.

With every best wish, I am

Fraternally,

Rev. Robert H. Vandenberg,
Treasurer

RHV/ms

P.S. We have renewed hopes for the Packers, going 7-1 in the last 8 games.

cc: Rev. Msgr. Thomas Meger ✓

()

()

)

LEO

BENEVOLENT

ASSOCIATION

PRIESTS OF THE DIOCESE OF GREEN BAY

410 E. WALLACE
COMBINED LOCKS
WISCONSIN 54113

May 10, 1985

Reverend John Feeney
St. Francis de Salle Church
1111 Michael Way
Las Vegas, Nevada 89108

Dear John:

We are in the process of a new actuarial study for the Leo Benevolent Association. Is it your intention to settle for vesting rights at age 70 for service in the Diocese of Green Bay, or do you intend to maintain full participation in the L.B.A.? To be eligible for pension and disability benefits a member must be a paid-up member in good standing. You are in arrears for \$1000.00 for 1984 and by June of 1985 you will owe an additional \$500.00. The interest rate for 1984 will be 9.6% determined by our rate of return for that year.

We request your immediate response as to your participation in the Leo, and hopefully your check so that our actuarial study can be made with accuracy.

It was good to see you a few weeks ago.

With every best wish, I am

Fraternally in Christ,

R. H. Vandenberg

Rev. Robert H. Vandenberg,
Treasurer, Leo Benevolent Association

RHV/ms

cc: Msgr. Thomas Meger ✓
Diocese of Reno - Las Vegas
Rev. David Kiefer

RCB 00352

He
mm

()

)

()



Diocese of Reno - Las Vegas

515 COURT STREET - P. O. BOX 1211

RENO, NEVADA 89504 - 1211

THE CHANCERY

(702) 329-9274

May 16, 1985

Reverend John Feeney
St. Francis de Sales Church
1111 Michael Way
Las Vegas, Nevada 89108

Dear Father Feeney:

We have received a copy of the letter sent to you by Father Robert H. Vandenberg, Treasurer of the Leo Benevolent Association, informing you that you are in arrears of \$1,000 for 1984 and by June, 1985 you will owe an additional \$500.00 as part of the association's retirement program for the Diocese of Green Bay. It is our policy that \$449.00 be paid for each year of service to your diocesan pension plan as well as an additional \$45.00 for long-term benefits for a total of \$494.00 per year paid into your LBA diocesan pension plan.

This money comes directly from the parish in which you are serving; therefore, I presume that Msgr. LaVoy has already paid the 1984-85 fiscal year Diocese of Reno-Las Vegas portion of the \$494.00 towards your pension and disability benefits and will again, at your request, do the same for the 1985-86 fiscal year beginning July 1, 1985. I would suggest that you check with Msgr. LaVoy to make sure that this has been done for the 1984-85 fiscal year, if not, it should be taken care of as soon as possible.

If there are any further questions on the matter of our own participation, please feel free to call our Financial Director, Mr. Phil Ries, who will be able to assist you and further answer any questions you may have.

With every best wish and God's blessing, I am

Yours sincerely,

Reverend Father Gilbert J. Canuel, Jr.
Vice Chancellor

/df

c. Leo Benevolent Association
Msgr. Elwood LaVoy

RCB 00353

Ex 77f

()

()

}

RCB 00355



Chancery Office

April 7, 1986

Rev. Gilbert J. Canuel, Jr.
Chancellor
Diocese of Reno
P.O. Box 1211
Reno, Nevada 89504-1211

Dear Father Canuel:

Thank you for your letter of March 25, 1986, and the enclosed check of \$494.00 as a contribution from the Diocese of Reno-Las Vegas toward the pension (\$449.00) and the long-term disability (\$45.00) of Father John Feeney, a priest of the Diocese of Green Bay now active in the Diocese of Reno-Las Vegas.

We are grateful for this contribution and even more grateful for the opportunity given Father John Feeney to continue active priestly ministry in your diocese.

May the Risen Lord increase your hope and your joy in this Easter season.

Sincerely in Christ,

Paul P. Koszarek

Rev. Msgr. Paul P. Koszarek
Vicar General - Moderator

PPK:lcs
cc: Rev. Robert Vandenberg, L.B.A.
2923

P.O. BOX 66
GREEN BAY, WI 54305-5066
414 425 4400

8/a