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0001  
1 CONFIDENTIAL PER COURT ORDER  
2 STATE OF CONNECTICUT : SUPERIOR COURT  
3 JUDICIAL DISTRICT OF FAIRFIELD  
4 AT BRIDGEPORT  
5  
6 -----X  
7 RICHARD ROSADO,  
8 Plaintiff,  
9 -versus- No. CV-95-0320239S  
10 BRIDGEPORT ROMAN CATHOLIC  
11 DIOCESAN CORP., ET AL.,  
12 Defendants.  
13 -----X  
14 GEORGE ROSADO, JR.,  
15 Plaintiff,  
16 -versus- No. CV-93-0302072S  
17 BRIDGEPORT ROMAN CATHOLIC  
18 DIOCESAN CORP., ET AL.,  
19 Defendants.  
20 -----X  
21  
22 DEPOSITION OF BISHOP WALTER CURTIS  
23 July 31, 1995  
24  
25

0002  
1 Deposition of BISHOP WALTER  
2 CURTIS, taken pursuant to Notice and  
3 Section 243 et seq. of the Connecticut  
4 Practice Book, at St. Joseph's Medical  
5 Center, 128 Strawberry Hill Avenue,  
6 Stamford, Connecticut, before James  
7 Martone, a Notary Public in and for the  
8 State of Connecticut, on July 31, 1995, at  
9 10:12 a.m.  
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0003  
1 A P P E A R A N C E S:  
2 For the Plaintiffs:  
3 TREMONT & SHELTON, P.C.  
4 64 Lyon Terrace  
5 Bridgeport, Connecticut 06604  
6 By: PAUL E. TREMONT, ESQ.  
7 DOUGLAS MAHONEY, ESQ.  
8  
9 For the Defendant Bridgeport Roman  
10 Catholic Diocesan Corp. and Bishop  
11 Walter Curtis:  
12  
13 HALLORAN & SAGE  
14 225 Asylum Street  
15 Hartford, Connecticut 06103  
16 By: JOSEPH T. SWEENEY, ESQ.  
17 - and -  
18 DANAHY, TEDFORD, LAGNESE & NEAL, P.C.  
19 21 Oak Street  
20 Hartford, Connecticut 06106  
21 By: ROBERT C. DANAHY, ESQ.  
22  
23 For the Defendant Raymond Pcolka:  
24 TIERNEY, ZULLO, FLAHERTY & MURPHY,  
25 P.C.  
134 East Avenue  
Norwalk, Connecticut 06851  
By: FRANK W. MURPHY, ESQ.

21 A L S O P R E S E N T:  
22 Craig Tomlin, Videographer  
23 Monsignor Laurence Bronkiewicz  
24 Santi J. Neuberger, M.D.  
25

0004  
1 EXHIBIT INDEX  
2 PLAINTIFFS' DESCRIPTION PAGE

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5 3 Undated Letter 40  
6 4 Letter dated June 30, 1983 69

7 NOTE: Exhibits retained by counsel.

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0005  
1 MR. SWEENEY: I think the record  
2 can and should reflect that we are assembled  
3 here today at St. Joseph's Hospital in Stamford  
4 for a deposition to be taken of the  
5 out-of-the-court testimony of Bishop Walter  
6 Curtis, who is seated to my left, for the two  
7 lawsuits entitled George L. Rosado and others  
8 versus the Bridgeport Roman Catholic Diocesan  
9 Corporation, and Richard Rosado versus the same  
10 defendants.

11 I'm Attorney Joseph Sweeney. I  
12 represent Bishop Curtis and the Diocese of  
13 Bridgeport. To my immediate right is Monsignor  
14 Laurence Bronkiewicz, the Vicar for Clergy of  
15 the Diocese of Bridgeport, and to his right,  
16 Attorney Robert Danaher, who is co-counsel with  
17 me.

18 I think we can and should at this  
19 stage, if we may, Mr. Tremont, confirm the fact  
20 that we're operating this deposition under the  
21 terms of a protective order issued by Judge  
22 Bruce Levin on December 8, 1994, and in  
23 accordance with my discussion with your partner,  
24 Attorney Cindy Robinson, it has been agreed that  
25 the terms of that protective order will apply to

0006  
1 this deposition, both insofar as it relates to  
2 the George Rosado case, and the Richard Rosado  
3 case.

4 I think the record can further  
5 reflect the fact that we have -- in accordance  
6 with an order entered by Judge Bruce Levin on  
7 October 3, 1994, we have seated in the room  
8 Dr. Santi Neuberger, who is Bishop Curtis's  
9 personal physician, who is to be here to deal  
10 with any medical issues which may develop during  
11 this deposition.

12 I'd be prepared to, if it's  
13 agreeable with you, Mr. Tremont, and with  
14 Attorney Frank Murphy, who represents the other  
15 defendant, Father Pcolka, I'd be prepared to  
16 stipulate as to the adequacy of the notice of  
17 this deposition, as to the adequacy of our  
18 reporter's qualifications, both as a court  
19 stenographer and as a notary, and to reserve  
20 objections to questions until the time of trial,  
21 except objections as to matters of form, which  
22 might be cured by a timely objection and  
23 rephrasing.

24 I think that those are three  
25 stipulations I would suggest we enter, and I

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- (1) defer to anything that you and Mr. Murphy may
- (2) wish to add to that.
- (3) MR. TREMONT: I have no objection
- (4) to that. Can we swear the witness in?
- (5) MR. SWEENEY: Shall we just ask
- (6) Mr. Murphy, is he agreeable to those
- (7) stipulations?
- (8) MR. MURPHY: I agree to those
- (9) stipulations.
- (10) MR. TREMONT: Swear the witness
- (11) in, please.
- (12) BISHOP WALTER CURTIS,
- (13) called as a witness, having been first duly
- (14) sworn by James Martone, a Notary Public in
- (15) and for the State of Connecticut, was
- (16) examined and testified as follows:
- (17) DIRECT EXAMINATION
- (18) BY MR. TREMONT:
- (19) Q. Would you give us your full name?
- (20) A. Walter William Curtis.
- (21) Q. And where do you reside.
- (22) A. The Queen of the Clergy home in
- (23) Stamford, Connecticut.
- (24) Q. And at the present time, are you
- (25) retired as bishop of Bridgeport?

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- (1) A. I am, yes.
- (2) Q. All right. Would you be good enough to
- (3) tell me when you became bishop of Bridgeport?
- (4) A. Shouldn't be too hard to remember, but
- (5) I --
- (6) Q. Well, you try the best you can to
- (7) remember, and if you -- what I'm asking you, and
- (8) you can give me an approximation, if you will.
- (9) It's not necessary to give me an exact date.
- (10) A. Nineteen hundred and I think
- (11) thirty-four.
- (12) Q. Prior to being bishop of Bridgeport,
- (13) what was your title or function in the Roman
- (14) Catholic Church?
- (15) A. I was a professor at the seminary in
- (16) Newark, New Jersey.
- (17) Q. All right. And you ultimately became
- (18) bishop of Bridgeport?
- (19) A. Yes.
- (20) Q. All right. All right. And do you
- (21) recall when it was that you retired as bishop of
- (22) Bridgeport?
- (23) A. Well, that was when I was 75, and that
- (24) would -- '88. In '88.
- (25) Q. 1988, and how old are you now, Bishop?

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- (1) A. 82.
- (2) Q. 82, so that would have been seven years
- (3) ago that you retired?
- (4) A. Yes.
- (5) Q. Okay. And during the course of your
- (6) tenure as bishop of Bridgeport, did the Diocese
- (7) of Bridgeport have any kind of policy regarding
- (8) celibacy of its clergy?
- (9) A. Well, I had a practical policy that if
- (10) any accusation was made otherwise, I would refer
- (11) it to our director for personnel, at the time,
- (12) Monsignor Andrew Cusack, and he would then
- (13) handle it for me.
- (14) Q. All right. So Monsignor Cusack at that
- (15) particular time was with the diocese. Do you
- (16) remember when you retired as bishop, was
- (17) Monsignor Cusack still with the diocese or had
- (18) he gone to New Jersey?
- (19) A. He had gone to New Jersey, yes.
- (20) Q. And who took over those duties when
- (21) Monsignor Cusack left?
- (22) A. I guess Father Bronkiewicz.
- (23) Q. So Father Bronkiewicz took over those
- (24) particular duties at that time?
- (25) A. Yes.

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- (1) Q. Let me ask you, Bishop, I'm talking
- (2) generally, when you received complaints
- (3) regarding a violation of the vow of celibacy
- (4) from your clergy, how would those complaints
- (5) come to you?
- (6) A. I guess they would come from somebody
- (7) making the complaint.
- (8) Q. All right, and would that be directly
- (9) to -- would you accept those complaints yourself
- (10) directly, or would they be filtered through
- (11) someone else?
- (12) A. Well, they could have gone both ways.
- (13) Q. All right. And once that complaint
- (14) came to you, you indicated that you would have
- (15) Monsignor Cusack, while he was there --
- (16) A. Yes.
- (17) Q. It was his duty to investigate it?
- (18) A. Yes. He was -- he had a doctorate in
- (19) psychology, and he made it a point always to
- (20) immediately contact the person involved and
- (21) check out the facts.
- (22) Q. All right. And then after he checked
- (23) the facts out, what would happen then?
- (24) A. Well, he'd make his report to me,
- (25) and --

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- (1) Q. All right.
- (2) A. As to what -- he would suggest what I
- (3) should or should not do.
- (4) Q. All right, and how would he make the
- (5) report to you?
- (6) A. Verbally.
- (7) Q. All right. Was anything kept in
- (8) writing?
- (9) A. I don't recall.
- (10) Q. Well, you are aware, are you not,
- (11) Bishop Curtis, that under the canon law, any
- (12) investigation, whether it's open or closed and
- (13) regardless of how it works out for a violation
- (14) of canon law, the investigation itself, that all
- (15) the proceeds must be kept in the secret
- (16) archives. Are you aware of that?
- (17) MR. SWEENEY: Well, I'm going to
- (18) just for the record state that I know Attorney
- (19) Tremont has read from some book, I think in this
- (20) proceeding there's been testimony to the
- (21) contrary, but I just want that to be reflected
- (22) on the record.
- (23) MR. TREMONT: I thought the only
- (24) objections were as to matters of form, and
- (25) seeing that we have reserved our objections

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- (1) until the time of trial, I would see no need for
- (2) stating an objection unless it's as to a matter
- (3) of form.
- (4) Q. But could you answer that for me,
- (5) please?
- (6) A. Well, I think, as you would say it,
- (7) it's much too broad. Not everything goes into
- (8) the secret archives.
- (9) Q. All right. Some things do go into the
- (10) secret archives?
- (11) A. If the bishop so wishes, yes.
- (12) Q. Right, and it was up to you, as the
- (13) bishop, to determine what went into the secret
- (14) archives?
- (15) A. Yes.
- (16) Q. And isn't it a fair statement that in
- (17) making that determination, even though you had
- (18) extraordinary powers as a bishop, you were
- (19) required to follow canon law?
- (20) A. Yes.
- (21) Q. And would you agree with me, Bishop
- (22) Curtis, that if there was a complaint about one
- (23) of your priests, priests within the diocese
- (24) under your jurisdiction, sexually abusing
- (25) children, that the investigation of that

- (1) A. I don't know what the difference is.
- (2) Q. Well, perhaps I should use the word
- (3) "rebuke" or "admonishment." Do you know what
- (4) I'm talking about, Bishop, in regard to that?
- (5) Let me read you Canon 1339 of the Code of Canon
- (6) Law. "An ordinary can admonish personally or
- (7) through another person one who is in proximate
- (8) occasion of committing an offense or upon whom
- (9) after an investigation has been made, there has
- (10) fallen a serious suspicion of having committed
- (11) an offense."
- (12) Did you ever have occasion to
- (13) make such a rebuke, either directly or through
- (14) Monsignor Cusack, rebuke or admonishment, to a
- (15) priest in your diocese for a violation of the
- (16) code of celibacy?
- (17) A. I think what you are reading is a
- (18) formal -- a formal juridical procedure, and I
- (19) didn't.
- (20) Q. You've never -- never issued a formal
- (21) juridical procedure?
- (22) A. No.
- (23) Q. Well, I'm asking you not about a formal
- (24) juridical procedure. I'm asking you whether you
- (25) admonished or rebuked an individual as a result

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- (1) of an informal investigation, as opposed to a
- (2) formal juridical procedure?
- (3) A. No.
- (4) Q. You never did?
- (5) A. No.
- (6) Q. All right. So despite the fact that
- (7) you did indicate that there were violations, you
- (8) never acted to rebuke any of the individuals who
- (9) might have been involved?
- (10) MR. SWEENEY: Well, objection as
- (11) to the form of the question. Mr. Tremont, I
- (12) think that he said that there may have been one
- (13) such occasion. Your question, I think,
- (14) misstates the testimony to the effect that there
- (15) were multiple occasions.
- (16) MR. TREMONT: I don't know how
- (17) many there were. I didn't ask him how many
- (18) there were.
- (19) MR. SWEENEY: Well, I think your
- (20) question as phrased is objectionable.
- (21) Q. All right. You never rebuked any
- (22) individual for a violation of the vow of
- (23) chastity, while you were bishop, either directly
- (24) or through your vicar?
- (25) A. Well, through the vicar, because of the

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- (1) vicar, I didn't have to.
- (2) Q. What do you mean by that?
- (3) A. Well, the priests understood that
- (4) Monsignor Cusack was sort of a representative of
- (5) myself, so if he rebuked them, that was -- the
- (6) priest would see that as coming from me.
- (7) Q. But you authorized Monsignor Cusack
- (8) then to rebuke such a priest?
- (9) A. If he thought it -- he was a -- he was
- (10) a professional in this area, and I trusted his
- (11) judgment.
- (12) Q. Yes, but he certainly -- you'd
- (13) certainly discuss it with him, as you said?
- (14) A. Yes, we would discuss it, yes.
- (15) Q. And if he were to rebuke him, he would
- (16) tell you before he did that --
- (17) A. Yes.
- (18) Q. -- to get your approval, even though
- (19) you trusted him implicitly; is that correct?
- (20) A. Yes.
- (21) Q. All right. And could you tell me
- (22) whether you ever had any persons come to you and
- (23) complain that any of your priests, the priests
- (24) in your diocese, were sexually abusing children,
- (25) while you were bishop?

- (1) A. I don't remember.
- (2) Q. You don't remember?
- (3) A. No.
- (4) Q. You don't recall at any time during
- (5) your bishopric, whether a claim was made that
- (6) one of your priests were sexually abusing
- (7) children in the parish?
- (8) MR. SWEENEY: I think he's
- (9) already answered the question.
- (10) MR. TREMONT: Well, I'm asking
- (11) him again.
- (12) MR. SWEENEY: I'll object, it's
- (13) been asked and answered.
- (14) MR. TREMONT: Well, I claim it.
- (15) A. Well, if it did happen, I would do the
- (16) same thing. I'd ask Monsignor Cusack to
- (17) investigate and take care of things.
- (18) Q. All right, and then when he reported
- (19) back to you --
- (20) A. Yes.
- (21) Q. -- what --
- (22) A. He would let me know what he was doing
- (23) all the time.
- (24) Q. He'd let you know what he was doing.
- (25) What steps did you take as bishop to see to it

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- (1) that children were not abused in your parishes
- (2) or in your rectories by priests? Would you take
- (3) any kind of steps in that regard?
- (4) A. I would not have thought to take any
- (5) steps, as this was going on, we presumed it was
- (6) not going on.
- (7) Q. In other words, while you were bishop,
- (8) you had the knowledge that some priests --
- (9) obviously not all priests or majority of
- (10) priests -- but that some priests were having
- (11) sexual relations with children in the parish?
- (12) A. Not anymore than I said before.
- (13) Q. Well, you attended meetings, did you
- (14) not, of the National Council of Catholic
- (15) Bishops?
- (16) A. I did, yes.
- (17) Q. And how often would they -- would those
- (18) meetings be held during a year?
- (19) A. They were annual meetings.
- (20) Q. Annual meetings. And during those
- (21) meetings, was there not, Bishop Curtis,
- (22) discussion regarding a problem of pedophilia
- (23) among the Catholic clergy?
- (24) A. There was at one meeting. It was at
- (25) one meeting because of the publicity that

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- (1) attended cases.
- (2) Q. And you were not aware at that time
- (3) that such pedophilia existed within the church?
- (4) A. I was aware of it, yes.
- (5) Q. All right. And being aware of it, did
- (6) you do anything to assure that it either didn't
- (7) happen in Bridgeport, or you could keep it, if
- (8) it did happen, to a minimum, that you'd be able
- (9) to ferret it out and investigate it?
- (10) A. Well, I would -- I did on occasion
- (11) bring in an outside speaker to talk to the
- (12) clergy and to discuss the question of clerical
- (13) celibacy.
- (14) Q. Okay, and do you recall who the
- (15) speakers were, or any of them?
- (16) A. I think Father Benedict Groeshel was
- (17) one.
- (18) Q. Father Benedict --
- (19) A. Groeshel.
- (20) MR. SWEENEY: I think it's
- (21) G-r-o-e-s-h-e-l.
- (22) Q. There was more than one, that you
- (23) recall?
- (24) A. There was more than one. The name
- (25) escapes me.

(1) Q. All right. Now, did the rectories --  
 (2) the rectories of the various parishes, rectory  
 (3) at Holy Name, at St. James, at St. Thomas's, any  
 (4) of the rectories, who owns the rectories?  
 (5) A. The parish owns it.  
 (6) Q. All right, and you say the parish owns  
 (7) it. Is that in the name of the diocese?  
 (8) A. No. No. We are not a corporation  
 (9) sole. We are a corporation aggregate.  
 (10) Q. Who controls that rectory?  
 (11) A. The pastor.  
 (12) Q. And who controls the pastor? Who does  
 (13) the pastor answer to?  
 (14) A. Well, he answers to, ultimately, the  
 (15) bishop, to the vicar general.  
 (16) Q. All right. And then through him, to  
 (17) the bishop?  
 (18) A. Yes.  
 (19) Q. All right. Did you have any rules  
 (20) regarding the bringing of children in the  
 (21) bedrooms, the private bedrooms of priests, in a  
 (22) rectory, in the Diocese of Bridgeport?  
 (23) A. I don't recall. I don't recall any.  
 (24) Q. So you had no rules which would prevent  
 (25) a priest from having a child spend the evening,

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(1) for instance, in that priest's bedroom?  
 (2) MR. SWEENEY: Objection. I  
 (3) think, Mr. Tremont, your present question  
 (4) restates his prior testimony.  
 (5) MR. TREMONT: No.  
 (6) MR. SWEENEY: He doesn't recall,  
 (7) he said. You twisted it around to say it didn't  
 (8) happen.  
 (9) MR. TREMONT: That's not -- I  
 (10) claim it. This is cross-examination. I claim  
 (11) it.  
 (12) MR. SWEENEY: I know, but I take  
 (13) the position this question is improper as a  
 (14) matter of form.  
 (15) MR. TREMONT: Well, it isn't. I  
 (16) claim it.  
 (17) Q. Would you answer that question,  
 (18) please?  
 (19) MR. SWEENEY: Do you understand  
 (20) the question, Bishop?  
 (21) A. Would you repeat the question?  
 (22) Q. All right. Did you have any rule that  
 (23) prevented or precluded one of your priests from  
 (24) having a child stay overnight in his bedroom,  
 (25) private bedroom?

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(1) A. No.  
 (2) Q. All right. Did you have any rule which  
 (3) prevented, in the rectory, a priest from having  
 (4) a girl under the age of 18 stay in his bedroom  
 (5) all night?  
 (6) A. I have difficulty answering because,  
 (7) you know, it seems to presume that I'm supposed  
 (8) to have rules on everything that a priest could  
 (9) or couldn't do. It's not the way -- that's not  
 (10) the way we operate. A priest is independent,  
 (11) and has his own responsibilities and knows  
 (12) what's right and wrong. So I don't have to make  
 (13) a rule for everything he does.  
 (14) Q. You had no rules then -- the answer is,  
 (15) you're telling me, that you did have no rules  
 (16) which prevented or precluded a priest from  
 (17) having a child or a girl under the age of 18 in  
 (18) his bedroom, in the rectory?  
 (19) A. No. No.  
 (20) Q. All right. And let me ask you, did you  
 (21) indicate to anyone during the course of your  
 (22) bishopric, that a pastor or a monsignor, someone  
 (23) should report to the chancellor, if a priest  
 (24) had children in his bedroom?  
 (25) A. No.

(1) MR. SWEENEY: We've been going  
 (2) about 45 minutes and I think the air-conditioner  
 (3) was turned off for noise purposes.  
 (4) MR. TREMONT: It was? Why don't  
 (5) we keep it on.  
 (6) MR. SWEENEY: Yes.  
 (7) MR. TREMONT: I don't really  
 (8) care. Why don't we move the microphone over a  
 (9) little closer.  
 (10) MR. SWEENEY: Let's turn it on,  
 (11) and also -- keep it down low, but have it on,  
 (12) and then if we can adjust the microphone to  
 (13) compensate for it.  
 (14) MR. TREMONT: It was too hot. I  
 (15) was wondering why. We can put it higher then.  
 (16) MR. SWEENEY: I think -- let's  
 (17) try it where we have it now.  
 (18) Q. All right. Let me show you this letter  
 (19) which we can mark as Plaintiffs' Exhibit 1 for  
 (20) identification.  
 (21) (Plaintiffs' Exhibit 1 marked  
 (22) for identification.)  
 (23) Q. Bishop, would you please take a look at  
 (24) this letter. Read that letter, if you would,  
 (25) please.

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(1) MR. SWEENEY: Pardon me,  
 (2) Dr. Neuberger, with comment on this, Bishop  
 (3) Curtis has had a stroke which impairs his  
 (4) ability to read. Could it be read aloud to  
 (5) him?  
 (6) MR. TREMONT: Absolutely.  
 (7) Q. Let me read this letter to you,  
 (8) Plaintiffs' Exhibit 1 for identification. It's  
 (9) on the letterhead of the Diocese of Bridgeport,  
 (10) Ministry for Clergy and Religious. It is dated  
 (11) July 7th, 1983. It is signed by Monsignor  
 (12) Andrew T. Cusack, Vicar for Clergy and  
 (13) Religious. It indicates a copy went to you, and  
 (14) a copy to Attorney James J. O'Connell. Did you  
 (15) know Attorney O'Connell?  
 (16) A. Yes. He was our diocese attorney.  
 (17) Q. For how long a period was he the  
 (18) diocese attorney?  
 (19) A. Well, he was the attorney when I  
 (20) arrived, and so just how long, I don't know.  
 (21) Q. And was it through most of your tenure  
 (22) that Coles & O'Connell were attorneys for the  
 (23) diocese?  
 (24) A. That's right.  
 (25) Q. And the letter goes on to say, "I have

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(1) received your letter of June 30th, 1983. From  
 (2) the very beginning of our contact, I assured you  
 (3) that the entire matter concerning Father Raymond  
 (4) Pcolka, as given to me by you, would be  
 (5) professionally communicated and treated.  
 (6) Since your letter of June 30th  
 (7) seems to indicate some doubt that, in fact, this  
 (8) has been done, I ask that you do direct all  
 (9) necessary and future communications in this  
 (10) regard to our diocesan lawyer. He is Attorney  
 (11) James O'Connell." And he gives his address.  
 (12) "This procedure gives me further  
 (13) assurance that this matter continues to be  
 (14) handled by us in a professional way. Thanking  
 (15) you for your kind consideration of this mutual  
 (16) concern and with every best wish, I am,  
 (17) sincerely yours, Monsignor Cusack."  
 (18) Do you recall that letter,  
 (19) Bishop?  
 (20) A. No.  
 (21) Q. All right. The letter obviously refers  
 (22) to Father Pcolka, correct, from my reading of  
 (23) it?  
 (24) A. I'm trying to remember where it said  
 (25) that.

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- (1) Q. All right. It says, "From the very  
(2) beginning of our contact, I assured you that the  
(3) entire matter concerning Father Raymond Pcolka,  
(4) as given to me by you, would be professionally  
communicated and treated." All right?  
I'm asking you whether that  
(7) letter refreshes your recollection that  
(8) Father -- about a sexual abuse charge made  
(9) against Father Pcolka?  
(10) A. Doesn't refresh my memory, but I accept  
(11) what the letter says.  
(12) Q. Okay. You don't recall then talking to  
(13) Father Cusack about Father Pcolka?  
(14) A. Not specifically, no.  
(15) Q. You don't generally remember it?  
(16) A. No.  
(17) Q. You don't remember a claim being made  
(18) against him, at least in 1983, that he was  
(19) abusing children in the parish?  
(20) A. No.  
(21) Q. Would that have been a significant  
(22) matter, if that discussion -- if you had that  
(23) discussion?  
(24) A. Yes, it would be.  
(25) Q. All right. And you don't recall

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- (1) whether that was investigated or what happened?  
(2) You recall nothing about it; is that correct?  
(3) A. Yes.  
(4) Q. All right. Are you now aware of the  
(5) fact that there is a lawsuit pending against you  
(6) and the Diocese of Bridgeport, regarding claims  
(7) of sexual abuse by over 12 children concerning  
(8) Father Pcolka?  
(9) A. Is that what this is all about, this  
(10) meeting?  
(11) Q. Yes.  
(12) A. Yes.  
(13) Q. Are you aware of that?  
(14) A. I am now, yes.  
(15) Q. Well, did someone read to you, Bishop,  
(16) the lawsuits which were filed claiming that  
(17) during your tenure as bishop, that from 1973  
(18) through the mid-1980s, that Father Pcolka had  
(19) committed sexual offenses against altar boys at  
(20) St. James Church in Stratford, Holy Name Church  
(21) in Stratford, and at St. Johns Nepomucene Church  
(22) in Bridgeport?  
(23) A. I don't remember it.  
(24) Q. You don't remember it?  
(25) A. No.

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- (1) Q. All right, and you're telling us that  
(2) you don't remember now any investigation or  
(3) claims of sexual abuse regarding Father Pcolka?  
(4) A. No.  
(5) Q. There is a letter, Bishop, that is  
(6) addressed to you from a Mr. and Mrs. M-029  
(7) [REDACTED]. And this particular letter is attached  
(8) to another letter from Father Toomey to Father  
(9) Scanlon. Do you know who Father John J. Toomey  
(10) was?  
(11) A. Yes. He was our vicar general. He --  
(12) Q. Okay. And -- all right, he was your  
(13) vicar general, and do you remember Father  
(14) Scanlon?  
(15) A. Father Scanlon --  
(16) Q. Bernard Scanlon, St. Ambrose, do you  
(17) remember him?  
(18) A. Yes. Yes.  
(19) Q. All right. Now, I'm going to read this  
(20) letter to you.  
(21) MR. TREMONT: Want me to mark  
(22) them for identification?  
(23) MR. SWEENEY: I think it would be  
(24) appropriate.  
(25) MR. TREMONT: Let's mark the June

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- (1) 18th letter as Plaintiffs' Exhibit 2.  
(2) (Plaintiffs' Exhibit 2 marked  
(3) for identification.)  
(4) MR. MURPHY: What year is that?  
(5) MR. TREMONT: 1976. And the  
(6) M-029 letter as Plaintiffs' Exhibit 3.  
(7) (Plaintiffs' Exhibit 3 marked  
(8) for identification.)  
(9) MR. TREMONT: There's no date on  
(10) that letter. It appears that it was attached to  
(11) the July 7th -- the June 18th, 1976, letter.  
(12) Q. Now, I'm going to read you part -- I'm  
(13) going to read you this letter and ask you some  
(14) questions about it and I'll read it in part.  
(15) MR. SWEENEY: Pardon me, because  
(16) we marked it as an exhibit, may I see it before  
(17) you proceed?  
(18) MR. TREMONT: Yes. You gave it  
(19) to me.  
(20) MR. SWEENEY: I probably did.  
(21) MR. TREMONT: Yeah.  
(22) MR. SWEENEY: May I have the  
(23) other letter that's also been marked?  
(24) MR. TREMONT: I'll start on this  
(25) one.

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- (1) Q. Now, this letter to the vicar general,  
(2) John Toomey, addressed to Father Scanlon at  
(3) St. Ambrose starts off this way. "Dear Father  
(4) Scanlon, enclosed is the photostat of a letter I  
(5) took out of Bishop Curtis's mail written by  
(6) Mr. and Mrs. M-029 [REDACTED]. It is a complaint of some  
(7) sort against Father Raymond Pcolka."  
(8) Now, I'd like to ask you, while  
(9) you were bishop, did you go through all of your  
(10) mail; if a letter was addressed to you, would  
(11) you read it?  
(12) A. No.  
(13) Q. So could it be that letters could be  
(14) sent to you, complaints could be sent to you by  
(15) persons in the diocese or anywhere, and you  
(16) might -- they never -- may never have gotten to  
(17) your desk?  
(18) A. That's possible, yes.  
(19) Q. All right, and how would that -- how  
(20) did that work in regard to the mail? What was  
(21) your procedure?  
(22) A. I had a lady secretary who would sort  
(23) the mail and give it to me.  
(24) Q. But you're indicating that you might  
(25) not read every letter that was addressed to you?

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- (1) A. I can assure you I didn't.  
(2) Q. You didn't, all right. And I'm not  
(3) talking about advertisements or things of that  
(4) nature. Who would determine what you should see  
(5) and what you shouldn't see?  
(6) A. Well, my secretary.  
(7) Q. All right, and what was the secretary's  
(8) name? Did you have more than one over the  
(9) course of the years?  
(10) A. Just the one.  
(11) Q. And who was that?  
(12) A. Margaret Gruce.  
(13) Q. Margaret Gruce? What instructions had  
(14) you given her in regard to what mail you  
(15) should -- in other words, you personally should  
(16) see and what you did not have to see? What kind  
(17) of a guideline did you use?  
(18) A. There was no real -- no guideline.  
(19) Q. All right.  
(20) A. Kind of a -- just --  
(21) Q. I'm sorry, you said it was kind of a --  
(22) A. Of just a modus operandi.  
(23) Q. Okay. Here is a letter, Plaintiffs'  
(24) Exhibit 3, which is addressed directly to you  
(25) and relates to Father Pcolka and relates, it

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- (1) appears from the letter -- and I'll read you the
- (2) letter -- but it appears from the letter that it
- (3) relates to Father Pcolka's activities with a
- (4) woman who apparently is married to the son of
- (5) the persons writing the letter, so there's some
- (6) sort of a complaint regarding a female and
- (7) Father Pcolka.
- (8) Now, do I understand that such
- (9) complaints that might have been brought against
- (10) your priest by parishioners, you might not have
- (11) even seen, even though the letter was directed
- (12) to you? Somebody would take it out of the mail?
- (13) A. That's quite possible, yes.
- (14) Q. All right. And so you might never
- (15) know -- for example, in this case you might
- (16) never know about that letter, Bishop?
- (17) A. That's right.
- (18) Q. All right. But didn't you demand that
- (19) whenever there was a complaint made against one
- (20) of your priests regarding a situation which
- (21) might involve a violation of the vow of
- (22) chastity, that it should be brought to your
- (23) attention?
- (24) MR. SWEENEY: Well, objection.
- (25) Counsel, as to matter of form. You're implying

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- (1) that this letter you have in your hand suggests
- (2) a violation of the vow of chastity and maybe you
- (3) ought to put it on the record. I don't think
- (4) that's true.
- (5) MR. TREMONT: Well, I'm asking a
- (6) question. I can ask a question.
- (7) MR. SWEENEY: All right.
- (8) A. Well, now if something came in that
- (9) might affect -- might seem to affect a priest,
- (10) Marge could just as well give it to Monsignor
- (11) Cusack.
- (12) Q. In other words, "Let's not bother the
- (13) bishop with this. You check it out first?"
- (14) A. Yes.
- (15) Q. So that you may never have seen those
- (16) things?
- (17) A. Yes.
- (18) Q. And you would only have seen them then
- (19) if Monsignor Cusack -- or apparently, in this
- (20) case it was Father Toomey -- if he brought it to
- (21) your attention?
- (22) A. Yes.
- (23) Q. Did there ever come a time while you
- (24) were bishop, that you advised your diocesan
- (25) administrative staff, whether it was the vicar

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- (1) general or the vicar for clergy or whomever it
- (2) might be, that they must report to you -- they
- (3) must report to you any claim or complaint
- (4) regarding sexual misconduct by a priest in your
- (5) diocese?
- (6) A. No.
- (7) Q. All right. Now, what was -- assume,
- (8) Bishop, that it was determined while you were
- (9) bishop that a priest did have a pedophilic
- (10) experience, with another -- with a child, what
- (11) would you do? What was the diocese policy in
- (12) that regard?
- (13) A. Well, through Monsignor Cusack, to find
- (14) out for sure if it was pedophilia or not,
- (15) because not every -- not every sexual misconduct
- (16) with a child is pedophilia. My policy was to
- (17) find out from Monsignor Cusack, who was a
- (18) trained professional, what the situation really
- (19) was, and Monsignor Cusack would either himself
- (20) provide the guidance needed professionally, or
- (21) secure professional guidance.
- (22) Q. So he would do it himself, or get
- (23) somebody from outside of the diocese, if you
- (24) will, to do it?
- (25) A. Yes.

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- (1) Q. All right, and then what would happen
- (2) with that priest? I mean by that, would he
- (3) continue on, for instance, as a priest in the
- (4) diocese?
- (5) A. Well, the policy was he was innocent
- (6) until proven guilty. If he was innocent, he
- (7) could continue.
- (8) Q. And if it was determined that he did do
- (9) something -- he did have some sexual encounter,
- (10) put it that way, with a child, what would happen
- (11) to the priest?
- (12) A. Well, he could be sent to Hartford to
- (13) the --
- (14) Q. Institute of the Living?
- (15) A. Yes.
- (16) Q. Was there any other place that was used
- (17) while you were bishop?
- (18) A. Yes. There was a place in Baltimore.
- (19) Q. In Maryland?
- (20) A. Maryland, yes.
- (21) Q. All right, and after he was sent there,
- (22) what would happen when he came back?
- (23) A. When he came back, he would be
- (24) reassigned.
- (25) Q. All right, and you say "reassigned."

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- (1) Would he be assigned to a different parish?
- (2) A. Quite likely, yes.
- (3) Q. All right, and what was the purpose of
- (4) that, Bishop, the reassigning to a different
- (5) parish?
- (6) A. Well, I presume it was to allow him to
- (7) have a fresh start.
- (8) Q. All right, when he was assigned to a
- (9) different parish, would the -- would anyone be
- (10) advised of the problem which he had previously
- (11) had?
- (12) A. No.
- (13) Q. All right. Now, was there any time --
- (14) was it your policy at any time to suggest that
- (15) the priest be transferred to a different
- (16) diocese?
- (17) A. No.
- (18) Q. Were there any priests -- and I'm not
- (19) asking for names. Were there any priests during
- (20) the time that you were bishop that were
- (21) transferred to a different diocese because they
- (22) were found to be guilty, if you will, of
- (23) pedophilic conduct in the Diocese of
- (24) Bridgeport?
- (25) A. Yes.

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- (1) Q. All right. Under those circumstances,
- (2) would you convey to the ordinary of the new
- (3) diocese, the complaints that had been made or
- (4) the findings that you made in regard to that
- (5) priest? When I say "you," I mean you or
- (6) Monsignor -- somebody under your authority.
- (7) A. I don't recall, no.
- (8) Q. Okay. So you don't recall whether that
- (9) would have been done or not, is that -- you say
- (10) you don't remember? It may have, it may not
- (11) have?
- (12) A. I presume that Monsignor Cusack would
- (13) have gotten in touch with his counterpart in the
- (14) area.
- (15) Q. All right, so that you wouldn't do it
- (16) yourself?
- (17) A. No.
- (18) Q. So it would be -- it wouldn't be on the
- (19) level, you're telling me, of bishop to bishop,
- (20) it would be vicar to vicar, whomever it might
- (21) be?
- (22) A. Yes.
- (23) Q. Who was in authority, all right.
- (24) MR. TREMONT: You want to take a
- (25) break?

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- (1) MR. SWEENEY: Dr. Neuberger
- (2) suggested it.
- (3) MR. TREMONT: Sure.
- (4) (Recess: 11:16 to 11:31 a.m.)
- (5) BY MR. TREMONT:
- (6) Q. Bishop, you had indicated to me that
- (7) before becoming bishop, you had taught at a
- (8) seminary in New Jersey?
- (9) A. That's right.
- (10) Q. And what seminary was that?
- (11) A. Immaculate Conception Seminary,
- (12) Darlington, New Jersey.
- (13) Q. What did you teach?
- (14) A. Moral theology.
- (15) Q. Moral theology. When you came to the
- (16) Bridgeport diocese, was there a seminary which
- (17) was used by the individuals who were studying
- (18) the priesthood for the diocese?
- (19) A. We used several seminaries. One was
- (20) St. John's in Brighton, Massachusetts. Another
- (21) was St. Mary's in Baltimore. And --
- (22) Q. St. Bernard's? In Rochester?
- (23) A. Well, St. Bernard's had been used. It
- (24) wasn't used when I was here.
- (25) Q. All right. And as bishop, did you --

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- (1) and also as being a former seminary professor,
- (2) did you review the curriculum of the seminary?
- (3) A. No.
- (4) Q. You never did?
- (5) A. No. They would send us each year a
- (6) copy of their curriculum, but I saw no need to
- (7) review it because there were trained people in
- (8) charge.
- (9) Q. All right, so that you never reviewed
- (10) what was taught at the seminary in regard to the
- (11) individuals who ultimately became priests in
- (12) your diocese?
- (13) A. No.
- (14) Q. Okay. Now, you had indicated before
- (15) that -- I think in answer to one of my
- (16) questions, that not every sexual contact with a
- (17) child is pedophilia.
- (18) A. Yeah.
- (19) Q. What do you mean by that, Bishop?
- (20) A. Well, that's my understanding.
- (21) Q. Yes, but I mean what is -- what do you
- (22) mean by that?
- (23) A. Pedophilia is a specific kind of crime,
- (24) I guess, and unless you -- unless the person is
- (25) I think of some age, I'm not sure what, it isn't

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- (1) pedophilia.
- (2) Q. In other words, it's your belief that
- (3) if an individual has sexual relations with a
- (4) child, that the child -- if the child is over a
- (5) certain age, it's not pedophilia; is that what
- (6) you mean?
- (7) A. If he's under a certain age.
- (8) Q. It is not or it is?
- (9) A. It is not.
- (10) Q. So that if an individual had some sort
- (11) of a sexual relation or contact with a child
- (12) under a certain age, it wouldn't be considered
- (13) pedophilia?
- (14) A. Right. That's my understanding.
- (15) Q. That is what you were led to believe
- (16) from your reading on the subject or discussions
- (17) with Father Cusack?
- (18) A. Yes. Yes.
- (19) Q. All right, and you are aware of the
- (20) fact that there is a specific canon, canon law,
- (21) which makes it canonically illegal to have sex
- (22) with a child, are you not?
- (23) A. I'm not aware of the specific thing,
- (24) no.
- (25) Q. I'm referring, Bishop, to Canon 1395.

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- (1) "If a cleric has otherwise committed an offense
- (2) against the sixth commandment of the decalogue
- (3) with force or threats or publicly or with a
- (4) minor below the age of 16, the cleric is to be
- (5) punished with just penalties, including
- (6) dismissal."
- (7) Were you aware of the fact that
- (8) having sexual relations with a minor under the
- (9) age of 16 was a violation of canon law?
- (10) A. Yes.
- (11) Q. And was there any time that it was
- (12) brought to your attention that a priest in your
- (13) diocese had had sexual relations with a minor
- (14) under the age of 16?
- (15) A. Right now I don't remember.
- (16) Q. All right. Let me ask you, you say you
- (17) don't remember whether that was brought to your
- (18) attention, all right. You indicated to us that
- (19) you -- that the diocese had used the Institute
- (20) of the Living --
- (21) A. Yes.
- (22) Q. -- for its priests, and a place in
- (23) Baltimore -- or Maryland you said.
- (24) A. Maryland, yes.
- (25) Q. Is it St. Luke's, do you recall, is

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- (1) that -- does that refresh your recollection or
- (2) not? It may not.
- (3) A. I don't recall now.
- (4) Q. All right, but it was someplace in
- (5) Maryland?
- (6) A. Yes.
- (7) Q. And when you came to the diocese, when
- (8) you first came as bishop, do you recall which
- (9) place was being used?
- (10) A. No.
- (11) Q. Okay. And was there any reason to use
- (12) one place rather than another, St. Luke's as
- (13) opposed to the Institute of the Living?
- (14) A. No. Would have been Monsignor Cusack's
- (15) judgment as to what to do.
- (16) Q. All right. He would make that
- (17) decision?
- (18) A. Yes.
- (19) Q. And as far as paying for the medical
- (20) expense of either St. Luke's or the Institute,
- (21) who would pay for that, Bishop?
- (22) A. The diocese would.
- (23) Q. All right, and would the diocese
- (24) receive the medical and psychiatric reports
- (25) regarding the priest?

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- (1) A. Yes.
- (2) Q. All right, and they would be directed
- (3) to you?
- (4) A. Monsignor Cusack.
- (5) Q. To Monsignor Cusack. And did he review
- (6) any of those reports with you?
- (7) A. Yes.
- (8) Q. All right, and could you tell me what
- (9) would happen with those medical reports? Where
- (10) would they go after they were received?
- (11) A. They would go into the priest's file.
- (12) Q. When you say "the priest's file," are
- (13) you talking about a file which is made up by the
- (14) diocese with the name of the priest on it?
- (15) A. Yes.
- (16) Q. A specific record?
- (17) A. Yes.
- (18) Q. All right. You had mentioned before
- (19) that there were times that you would take a
- (20) complaint in regard to a priest and take it out
- (21) of the file. I think you said because it was
- (22) old, or --
- (23) A. Out of the secret file.
- (24) Q. Out of the secret file, okay, and where
- (25) would you put that when you took it out?

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- (1) A. I would destroy it.
- (2) Q. You'd destroy it.
- (3) A. Yeah.
- (4) Q. And what was -- give me an example of
- (5) what would be the reason you would do that.
- (6) A. Well, it would be -- it would be an
- (7) antiquated issue, happened so long before, there
- (8) was no point in preserving it any longer.
- (9) Q. In other words, you would have a
- (10) complaint against the priest, for instance, is
- (11) that what we're talking about? Is it a
- (12) complaint or would it be the result of an
- (13) investigation?
- (14) A. If I had occasion to go into that file,
- (15) I might then see things there that I wasn't
- (16) really looking for, but they were there, and if
- (17) it seemed to me to be too antiquated to bother
- (18) keeping, I'll just take them out and destroy
- (19) them.
- (20) Q. When you say too antiquated to keep any
- (21) longer, what do you mean by that?
- (22) A. Well, it might refer to a priest who
- (23) had died. Might have been something in the file
- (24) about a priest who had already died.
- (25) Q. In other words, it would be a dead

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- (1) priest?
- (2) A. Yes.
- (3) Q. Let me ask you, do you keep -- did you
- (4) keep the files of priests after they died?
- (5) A. I don't recall.
- (6) Q. Okay. Would you destroy -- in other
- (7) words, would it be -- would there be a situation
- (8) where the complaint was antiquated, it was an
- (9) old complaint, and since that time you had no
- (10) further complaints about the priest so you would
- (11) throw them out, the old complaints?
- (12) A. That happened.
- (13) Q. All right, and who would decide to do
- (14) that?
- (15) A. I would make the decision.
- (16) Q. You'd make the decision. Would you do
- (17) that on your own, Bishop, or would Monsignor
- (18) Cusack suggest, for instance, that you do that?
- (19) A. I'd do it on my own.
- (20) Q. All right. Where did you keep the
- (21) secret archives, when you were bishop?
- (22) A. Well, they were in our -- they were in
- (23) a safe area. It was in a safe area.
- (24) Q. And was that over at the diocese
- (25) offices?

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- (1) A. Yes.
- (2) Q. Which were on Jewett Avenue?
- (3) A. Yes.
- (4) Q. If I recall, you were living at the
- (5) rectory at St. Augustine's Cathedral, were you
- (6) not, when you were bishop, towards the end?
- (7) A. Yes.
- (8) Q. You originally lived in the big house
- (9) that Bishop Sheehan had bought on Villa Avenue?
- (10) A. That's right.
- (11) Q. And then you moved over to the
- (12) rectory --
- (13) A. Yes.
- (14) Q. -- and sold the house. But these
- (15) records would have been over on Jewett Avenue?
- (16) A. Yes.
- (17) Q. Who had access to those records,
- (18) besides yourself?
- (19) A. It was a double key arrangement. The
- (20) vicar general would keep one key and I would
- (21) keep the other.
- (22) Q. All right, so the two keys were
- (23) required --
- (24) A. Yes.
- (25) Q. -- to open up these things? And,

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- (1) generally, what were in the secret archives?
- (2) What did they contain? What did you choose to
- (3) put in there when you were bishop?
- (4) A. I don't think I should say.
- (5) MR. SWEENEY: Well, the issue is
- (6) the type of document.
- (7) Q. Yeah. I'm not asking you --
- (8) MR. SWEENEY: He's not going to
- (9) ask you any specific stuff, but, for example,
- (10) like the deed to the cathedral. Can you just
- (11) tell him like real estate deeds, this kind of
- (12) thing.
- (13) Q. Yes. What kind of documents would go
- (14) in there?
- (15) MR. SWEENEY: If you recall?
- (16) A. Well, there would have been documents
- (17) relating to diocese activity that -- we had an
- (18) annual appeal for funds, and the report on that,
- (19) the file report on that would be --
- (20) Q. In the secret archives?
- (21) A. -- kept in the secret archives.
- (22) Q. All right. What other kind of
- (23) information?
- (24) A. At the moment, I don't remember.
- (25) Q. Well, you are aware of the fact,

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- (1) Bishop, that the secret archive is a requirement
- (2) of canon law, that each diocese must have a
- (3) secret archive?
- (4) A. Yes.
- (5) Q. All right, and I want to read you from
- (6) Canon 489, "There is also to be a secret archive
- (7) in the diocesan curia, or at least a safe or
- (8) file in the ordinary archive, completely closed
- (9) and locked which cannot be removed from the
- (10) place, and in which documents to be kept secret
- (11) are to be protected most securely. Every year
- (12) documents of criminal cases are to be destroyed
- (13) in matters of morals, in which the criminal has
- (14) died or in which 10 years have passed since the
- (15) condemnatory sentence."
- (16) Did you have -- while you were
- (17) bishop, were there any judicial proceedings
- (18) which resulted in criminal charges being proven
- (19) against one of your priests? Any kind?
- (20) A. No.
- (21) Q. None, all right. So it's fair to say,
- (22) then, while you were bishop, there were no
- (23) criminal records that you put in the archives?
- (24) A. That's right.
- (25) Q. All right. And the -- what other kinds

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- (1) of things did you have in there besides the
- (2) financial -- some financial records?
- (3) A. Well, communications from the Holy See.
- (4) Q. So that if you received anything from
- (5) the Holy -- not anything, but some things from
- (6) the Holy See, you might decide to put those in
- (7) there?
- (8) A. Yes.
- (9) Q. Were there in the secret archives, any
- (10) records regarding your priests?
- (11) A. I don't recall now what was in there.
- (12) Q. All right, but would there be -- for
- (13) example, if we -- if there was a complaint
- (14) against one of your priests, would that have
- (15) been put in the secret archives as well as in
- (16) the personnel file or in one place rather than
- (17) the other?
- (18) A. Likely the secret archive rather than
- (19) the general.
- (20) Q. Than the general one. And when you
- (21) indicated to us before that you had seen, you
- (22) said, some documents which you thought were
- (23) antiquated and you were able to remove,
- (24) regarding priests, those were from the secret
- (25) archives?

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- (1) Q. Would they ever be put in the secret
- (2) archives?
- (3) A. They might be, yes.
- (4) Q. All right. Would a copy of that letter
- (5) ever be sent to Rome?
- (6) A. No.
- (7) Q. All right. Would a copy of that letter
- (8) or file ever be sent to Washington, DC?
- (9) A. No.
- (10) (Discussion off the record.)
- (11) Q. Now, could you tell me how -- could you
- (12) tell me how many -- do you remember how many
- (13) priests -- approximately how many priests were
- (14) in the diocese, you know, during the time you
- (15) were bishop? Roughly?
- (16) MR. SWEENEY: Pardon me, Counsel,
- (17) just a matter of form. You mean at any one
- (18) point in time?
- (19) MR. TREMONT: Yes, basically.
- (20) Q. Just a general number. I know it
- (21) changed from year to year, but just a general
- (22) number.
- (23) A. I don't remember.
- (24) Q. You don't remember.
- (25) A. No.

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- (1) Q. Okay. Did you make it a point, let's
- (2) say, to know each priest personally? Did you
- (3) try to meet with each priest at some time during
- (4) a year?
- (5) A. It was not a policy, but factually it
- (6) would work out that way.
- (7) Q. All right, and if a priest had a
- (8) problem, a personal problem, to whom would he go
- (9) with that problem?
- (10) A. Well, he could go to Monsignor Cusack
- (11) or he could come directly to me.
- (12) Q. All right, and was your door always
- (13) open, Bishop?
- (14) A. Yes, it was, yes.
- (15) Q. All right. Now, let me ask you, as far
- (16) as complaints regarding a priest having sexual
- (17) involvement with a teenager, we made a
- (18) distinction I think that a -- I believe that a
- (19) pedophile would be an individual who would have
- (20) sex with a child under the age of puberty, all
- (21) right. As far as a person having sex with a
- (22) teenager, 14, 15, 16 years old, would that be a
- (23) matter of concern in regard to the diocese?
- (24) A. Yes.
- (25) Q. All right. How would those persons be

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- (1) handled?
- (2) A. Well, if -- there had to be a
- (3) complaint, first of all, since the presumption
- (4) is it didn't happen unless you have a complaint
- (5) with some testimony to it.
- (6) Q. And if there was the complaint, then
- (7) how would that be handled?
- (8) A. Then it would go to Monsignor Cusack's
- (9) hands.
- (10) Q. Now, when these persons came back, that
- (11) you told us about, from the Institute of the
- (12) Living or from St. Luke's in Maryland -- from
- (13) Maryland -- you didn't know the name of the
- (14) place -- you said that they would be reassigned
- (15) to another parish, correct?
- (16) A. Yes.
- (17) Q. All right. And would they be
- (18) reassigned to the duties of a priest?
- (19) A. Yes.
- (20) Q. All right. And you were aware, were
- (21) you not, at that point, that being -- continuing
- (22) to be a parish priest, that they would, for
- (23) example, come in contact with altar boys?
- (24) A. Yes.
- (25) Q. All right. Did you not consider that

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- (1) that was a danger?
- (2) A. No. No.
- (3) Q. Why not?
- (4) A. Well, after -- if they have gone
- (5) through treatment, you know, and the treatment
- (6) house in question would have indicated that it
- (7) was safe for them to return to priestly duties.
- (8) Q. So you're saying then that you relied
- (9) upon the fact that the Institute of the Living
- (10) or the place in Maryland would indicate that
- (11) they would be safe for priestly duties?
- (12) A. Yes.
- (13) Q. Okay. Now, did you, through Monsignor
- (14) Cusack or whomever, see to it that these persons
- (15) who came back and were reassigned to different
- (16) parishes were closely monitored after their
- (17) treatment?
- (18) A. I believe, but I'm not sure that each
- (19) place had a policy of having them come back to
- (20) the -- you know, for a recheck every month or
- (21) so.
- (22) Q. All right. Let's assume that that was
- (23) the policy, that they went back to the
- (24) Institute -- for example, went back to Hartford
- (25) and had a recheck. Did you in the diocese have

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- (1) a policy that you, yourself, your
- (2) administrators, would monitor that particular
- (3) priest and his activities at the new parish?
- (4) A. No.
- (5) Q. All right. And I believe that you
- (6) indicated to me that you would keep secret the
- (7) accusations against that priest and the report,
- (8) the psychiatric reports that you might receive
- (9) from the Institute; is that correct?
- (10) A. Yes.
- (11) Q. You wouldn't let the pastors or
- (12) somebody else know that this priest was sent up,
- (13) this would be a private affair --
- (14) A. Yes.
- (15) Q. -- between yourself and the Monsignor,
- (16) and whoever had need to know; is that a fair
- (17) statement?
- (18) A. Yes. Yes.
- (19) Q. All right. Now, when there were more
- (20) than one complaint, when after such complaints,
- (21) Bishop, there were subsequent complaints about
- (22) the priest for more than one time after the
- (23) treatment, what was your policy in regard to
- (24) those priests?
- (25) A. I had no policy.

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- (1) Q. Well, would there be a time that you
- (2) would -- would you just -- would you transfer
- (3) them again to another parish, if there were a
- (4) problem?
- (5) A. No. We would try to, you know, again,
- (6) put them in touch with somebody who was
- (7) competent to guide them.
- (8) Q. All right.
- (9) A. Monsignor Cusack again would steer me
- (10) on this. But we didn't transfer just for change
- (11) of scenery.
- (12) Q. All right. In other words, you would
- (13) give them the treatment first?
- (14) A. Yes.
- (15) Q. All right. Now, you indicated that
- (16) there was a time -- there did come a time when a
- (17) priest would be transferred out of the diocese?
- (18) A. Yes.
- (19) Q. All right. Who made that
- (20) determination?
- (21) A. Well, it would be made by myself -- I
- (22) guess by the priest himself, first of all. By
- (23) the priest himself, and then by the diocese.
- (24) Q. All right. Now, do you recall how --
- (25) the number of priests that were transferred out

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- (1) the Recollection Day --
- (2) A. Right.
- (3) Q. -- that you would use that particular
- (4) speaker. Now, was there any requirement in the
- (5) diocese when you were bishop, that if a pastor
- (6) or a -- yeah, if a pastor saw something unusual
- (7) happening with one of the priests in his parish
- (8) or rectory, that he report that to you or your
- (9) emissary, whether it was the vicar general or
- (10) Monsignor Cusack?
- (11) A. There was no rule, no.
- (12) Q. There was no rule. Did that happen?
- (13) Did you get complaints from pastors about
- (14) illicit activities of priests or curates,
- (15) whether it was alcohol or sex or what have you?
- (16) A. No. They would -- any such complaint
- (17) would go either to the vicar general or to
- (18) Monsignor Cusack.
- (19) Q. All right. And then would that be
- (20) discussed with you or would it be handled by
- (21) them?
- (22) A. If they thought it wise, yes, or
- (23) necessary.
- (24) Q. Okay. So if they thought it was grave
- (25) enough or if there was enough substance, I

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- (1) assume they would come to you?
- (2) A. Yes.
- (3) Q. And your policy, as I understand it,
- (4) would be to tell, let's say, Monsignor Cusack;
- (5) you'd rely on his advice?
- (6) A. Yes. Yes.
- (7) Q. And whatever he particularly thought,
- (8) you'd go along with generally?
- (9) A. Right.
- (10) Q. Okay. Now, the -- you indicated to us
- (11) that Coles, O'Connell & Dolan were your
- (12) attorneys while you were bishop?
- (13) A. Yes.
- (14) Q. And as far as any claims of sexual
- (15) abuse are concerned, the diocese had insurance,
- (16) did it not, to cover that?
- (17) A. It had I think the ordinary insurance
- (18) coverage.
- (19) Q. Yes. You had ordinary insurance
- (20) coverage for that.
- (21) A. Yes.
- (22) Q. Now, I note that in the letter which I
- (23) read to you -- and I'll just read it again. And
- (24) perhaps what I should do, Bishop, is read you
- (25) another letter to Monsignor Cusack with a copy

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- (1) to you. Let me find it. I'll have Douglas look
- (2) for it.
- (3) I note in the letter, Plaintiffs'
- (4) Exhibit 1 for identification, Bishop, that
- (5) was -- that I read to you before, and I will
- (6) just reread part of it to refresh your
- (7) recollection,, it was addressed to an individual
- (8) from Monsignor Cusack and says, "I received your
- (9) letter of June 30th, 1983. From the very
- (10) beginning of our contact, I assured you that the
- (11) entire matter concerning Father Raymond Pcolka,
- (12) as given to me by you, would be professionally
- (13) communicated and treated. Since your letter of
- (14) June 30th seems to indicate some doubt that this
- (15) has been done, I ask that you direct all
- (16) communications to our diocesan lawyer, Attorney
- (17) James O'Connell." Okay?
- (18) And, Bishop, there is a letter of
- (19) June 30th, 1983, which is marked as Plaintiffs'
- (20) Exhibit 4 --
- (21) (Plaintiffs' Exhibit 4 marked
- (22) for identification.)
- (23) Q. -- for identification, which is
- (24) addressed to Monsignor Cusack, a copy is sent to
- (25) you, at least you're shown as a copy on it,

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- (1) signed by a J. Landro. States, "I'll ask some
- (2) of the questions now and expect a letter in
- (3) reply. The first is, did the priest in question
- (4) admit to molesting me when I was a youngster?
- (5) The second and more important is can you assure
- (6) me he will not be in a position to do this again
- (7) to another young person?"
- (8) Do you ever remember receiving a
- (9) copy of such letter?
- (10) A. No.
- (11) Q. All right. Is it possible that even
- (12) though the letter indicates that a copy was sent
- (13) to you, as well as Monsignor Cusack, to whom it
- (14) is directed, that that might not have gotten to
- (15) your desk?
- (16) A. It might not have been sent even.
- (17) Q. No, but I'm saying if it were sent, is
- (18) it possible that somebody wouldn't have shown
- (19) you that letter?
- (20) A. No. It would have gone to Monsignor
- (21) Cusack.
- (22) Q. All right, so you might not have seen
- (23) it?
- (24) A. If it were sent out by letter.
- (25) Q. And why -- and I'm asking you, as the

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- (1) bishop at that time, a letter -- there's a
- (2) letter claiming sexual abuse against Father
- (3) Pcolka, why would Monsignor Cusack suggest to
- (4) the writer of that letter that they contact
- (5) Attorney James O'Connell? What was that about,
- (6) that policy?
- (7) A. I would have to presume it would be
- (8) precautionary in case there was a suit entered
- (9) into against the diocese.
- (10) Q. Would -- as far as suits against the
- (11) diocese at that time, would you advise your
- (12) insurance carrier if there was such a claim?
- (13) A. I don't know.
- (14) Q. Well, who would be in charge of that?
- (15) A. Monsignor Devine was our manager of all
- (16) finances.
- (17) Q. So it would be the financial manager
- (18) that would handle that?
- (19) A. Yes.
- (20) Q. And let me ask you, did you have a
- (21) policy in regard to settling claims that were
- (22) made against the diocese for sexual abuse? Did
- (23) you have any policy in that regard?
- (24) A. No.
- (25) Q. Did you report -- you don't know

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- (1) whether you reported those claims to your
- (2) insurance company?
- (3) A. No, I don't.
- (4) Q. All right. What were -- what was the
- (5) position of Attorney O'Connell? What I mean by
- (6) that, what was he supposed to do in these cases?
- (7) A. He would give what legal guidance was
- (8) necessary, as he saw it.
- (9) Q. All right. Do you recall, as you sit
- (10) here today, how many cases -- how many claims of
- (11) sexual abuse that the diocese settled while --
- (12) I'm not saying whether they were valid or not,
- (13) but that the diocese settled while you were
- (14) bishop?
- (15) A. I can't recall any.
- (16) Q. You recall none, all right. The -- if
- (17) a claim was made of sexual abuse, such as the
- (18) letters which I showed you, Bishop, where would
- (19) those letters be kept?
- (20) A. If they were -- if a priest was named,
- (21) they would be kept in the priest's file, his
- (22) individual file.
- (23) Q. So they would be in his individual
- (24) file?
- (25) A. Yes.

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(1) BISHOP WALTER CURTIS,  
(2) called as a witness, having been previously  
(3) duly sworn, was examined and testified as  
(4) follows:  
(5) MR. TREMONT: This is just a  
(6) continuation of the depositions which were taken  
(7) of Bishop Curtis on July 31st of 1995 and August  
(8) 8th of 1996, and these depositions are - this  
(9) continuation -  
(10) MR. SWEENEY: Before you go too  
(11) far, can we give the video man a chance to get  
(12) his equipment going?  
(13) Are you ready, sir?  
(14) THE VIDEOGRAPHER: I usually  
(15) start with a read on, sir.  
(16) (Discussion off the record.)  
(17) THE VIDEOGRAPHER: We are now on  
(18) record. This is the continuation of testimony  
(19) by Bishop Walter Curtis, which was suspended on  
(20) August 8th, 1996, at 11:55 a.m., in the case of  
(21) George L. Rosado, Jr., et al. plaintiff, versus  
(22) Bridgeport Roman Catholic Diocesan Corporation,  
(23) et al., defendant, case No. CV 930302072S, and  
(24) Brian Freibott, et al., plaintiff, versus  
(25) Bridgeport Roman Catholic Diocesan Corporation,

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(1) et al., defendant, case No. CV940316574S.  
(2) Would everyone please introduce  
(3) themselves for the record?  
(4) MR. TREMONT: T. Paul Tremont,  
(5) representing the plaintiffs.  
(6) MS. ROBINSON: Cindy L. Robinson  
(7) representing plaintiffs.  
(8) MR. LYONS: Attorney Henry Lyons  
(9) representing James Krug and Jamie Bellaville in  
(10) companion cases.  
(11) MS. COUGHLIN: Barbara Coughlin  
(12) representing defendant, Father Raymond Pcolka,  
(13) P-c-o-l-k-a.  
(14) MR. CONWAY: Matthew Conway,  
(15) representing the defendants, Bishop Walter  
(16) Curtis, Bishop Edward Egan and Bridgeport Roman  
(17) Catholic Diocesan Corporation.  
(18) MR. SWEENEY: Joseph T. Sweeney  
(19) of Halloran & Sage, also representing the  
(20) defendant, Bridgeport Roman Catholic Diocesan  
(21) Corporation and the defendants, Bishop Walter  
(22) Curtis, Bishop Edward Egan and Monsignor Andrew  
(23) Cusak, and also the record should reflect seated  
(24) at the table is Monsignor Laurence Bronkiewicz  
(25) as the representative of the Bridgeport

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(1) diocese.  
(2) MR. TREMONT: And there's also  
(3) present in the room -  
(4) MR. SWEENEY: Dr. Frank Federico,  
(5) the director of medicine here at St. Joseph's  
(6) Manor, is also present.  
(7) MR. TREMONT: All right. We'll  
(8) continue on with this deposition in accordance  
(9) with the prior agreements and rules which are  
(10) all on record.  
(11) CONTINUED DIRECT EXAMINATION  
(12) BY MR. TREMONT:  
(13) Q. Good morning, Bishop.  
(14) A. Good morning.  
(15) Q. Bishop, let me ask you a few questions,  
(16) if I may, about some of the priests that were  
(17) under your jurisdiction when you were Bishop of  
(18) Bridgeport. Did you know a Father Andrew  
(19) Farkas?  
(20) A. Yes.  
(21) Q. And do you recall how long Father  
(22) Farkas was a priest in the diocese?  
(23) A. No, I don't know.  
(24) Q. Do you recall what church Father Farkas  
(25) was assigned to?

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(1) A. He was at, I think, Holy Cross Church.  
(2) Q. All right. And where was that parish  
(3) at the time you first met Father Farkas?  
(4) A. In Bridgeport.  
(5) Q. In Bridgeport. And to your knowledge,  
(6) does the parish still exist in Bridgeport?  
(7) A. No.  
(8) Q. What happened to the parish?  
(9) A. It was transferred to Fairfield.  
(10) Q. To Fairfield. And is that a national  
(11) parish?  
(12) A. Yes. It was a Slovak parish.  
(13) Q. Do you recall having complaints in the  
(14) early 1960s from parishioners regarding the  
(15) violation of the vow of chastity by Father  
(16) Farkas?  
(17) A. No.  
(18) Q. No such recollection?  
(19) A. No.  
(20) Q. All right. Did you ever have any  
(21) complaints regarding the violation of chastity  
(22) by Father Farkas?  
(23) A. No.  
(24) Q. All right. Now, what about Father Fred  
(25) Constantino, do you recall Father Constantino?

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(1) A. Yes.  
(2) Q. Could you tell me as far as Father  
(3) Constantino is concerned, where was he - what  
(4) was his parish?  
(5) A. He was a pastor of - in Bridgeport, of  
(6) Holy Rosary, I believe.  
(7) Q. All right. Had you ever had any  
(8) complaints regarding sexual conduct involving  
(9) children from persons regarding Father  
(10) Constantino?  
(11) A. No.  
(12) Q. All right. Did you ever have any  
(13) complaints regarding the violation of the vow of  
(14) chastity against Father Constantino?  
(15) A. No.  
(16) Q. All right. Now, do you know the  
(17) Reverend Laurence Brett?  
(18) A. Yes.  
(19) Q. How did you know Father Brett?  
(20) A. I ordained him as a priest, I believe.  
(21) Q. You ordained him?  
(22) A. Yes.  
(23) Q. Do you recall what parish Father Brett  
(24) was assigned to?  
(25) A. He was, I think, a chaplain at Sacred

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(1) Heart University.  
(2) Q. And do you recall any complaints of  
(3) sexual abuse being brought against Father Brett?  
(4) A. Yes.  
(5) Q. You do? All right. And could you tell  
(6) me what complaint of sexual abuse was there  
(7) against Father Brett?  
(8) A. It involved, I think, a student of  
(9) Sacred Heart University, was not a child.  
(10) Q. Could you elaborate, please?  
(11) MR. SWEENEY: Do you want the  
(12) bishop to explain the nature of the misconduct?  
(13) Q. I don't - Did you say it was a  
(14) student at Sacred Heart University?  
(15) A. Not a student.  
(16) Q. He was not a student?  
(17) A. It was a student involved in the  
(18) misconduct, yes?  
(19) Q. All right. And what was the nature of  
(20) the misconduct?  
(21) A. It was sexual.  
(22) Q. Was it a male student?  
(23) A. Yes.  
(24) Q. All right. So he was engaged in sexual  
(25) activity with a male student?

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- (1) A. Right.
- (2) Q. And that was at Sacred Heart
- (3) University?
- (4) A. Yes.
- (5) Q. And how was that brought to your
- (6) attention, Bishop?
- (7) A. I don't remember.
- (8) Q. And, Bishop, was that -- I will
- (9) withdraw that.
- (10) Do you recall more than one
- (11) complaint of sexual abuse in regard to Father
- (12) Brett?
- (13) A. No.
- (14) Q. Just this one complaint?
- (15) A. One.
- (16) Q. And do you recall when this occurred?
- (17) A. No, I don't.
- (18) Q. Isn't it a fact that it occurred in the
- (19) early 1960s?
- (20) A. I don't remember.
- (21) Q. If I asked you this, Bishop, that
- (22) according to the Catholic Directory of the
- (23) Diocese prepared by the Diocese of Bridgeport,
- (24) Father Brett was at Cecilia -- St. Cecelia
- (25) Church in Stamford from 1963 through 1964, and

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- (1) from 1965 on, he was on a leave of absence
- (2) outside of the diocese, wouldn't that mean that
- (3) these activities would have had occurred while
- (4) he was with the diocese before 1965?
- (5) A. I don't follow you on that.
- (6) Q. Well, if Father Brett was on a leave of
- (7) absence from the diocese after 1965, would not
- (8) these incidents have occurred prior to 1965
- (9) while he was active with the diocese?
- (10) A. Yes.
- (11) Q. All right. You don't remember from
- (12) whom you got that complaint?
- (13) A. No.
- (14) Q. Did you know a F-004 [REDACTED]?
- (15) A. Yes.
- (16) Q. All right. Who is Mrs. F-004 [REDACTED]?
- (17) A. I don't know.
- (18) Q. You don't know. Do you remember
- (19) meeting with F-004 and M-004 [REDACTED], who were
- (20) the parents of the young man who was sexually
- (21) involved with Father Brett?
- (22) A. No.
- (23) Q. You don't recall meeting with them?
- (24) A. No.
- (25) Q. All right. Let me ask you, do you deny

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- (1) meeting with them or you don't remember?
- (2) A. I don't remember, because my policy was
- (3) to ask Monsignor Cusak to handle complaints that
- (4) came in against priests, and he may have met
- (5) with them.
- (6) Q. All right, but the -- when you first
- (7) started with the diocese as bishop of the
- (8) diocese, Father Cusak wasn't the Vicar of
- (9) Clergy, was he?
- (10) A. No.
- (11) Q. All right. And as a matter of fact,
- (12) you had somebody else in that position, did you
- (13) not?
- (14) MR. SWEENEY: Counsel, just to
- (15) clarify your question, do you mean someone else
- (16) in the position of Vicar of Clergy or someone
- (17) else who handled --
- (18) MR. TREMONT: Vicar of Clergy.
- (19) MR. SWEENEY: Those kind of
- (20) complaints.
- (21) Q. Is that correct, Bishop?
- (22) MR. SWEENEY: Do you understand
- (23) that question, Bishop?
- (24) A. Well, I know I have relied on Monsignor
- (25) Toomey, Vicar General at the time.

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- (1) Q. All right. Is it possible if this
- (2) incident occurred during the time that Monsignor
- (3) Toomey was Vicar of the Clergy, Monsignor Toomey
- (4) was involved in this -- in investigating this
- (5) incident along with you?
- (6) MR. SWEENEY: All right, Counsel.
- (7) One correction. The Bishop's answer was that he
- (8) was Vicar General, not --
- (9) MR. TREMONT: Vicar General, all
- (10) right.
- (11) We have to reread that question
- (12) back, please, with the change that Mr. Sweeney
- (13) made.
- (14) (Question read.)
- (15) MR. SWEENEY: This is in
- (16) reference to investigating the complaint against
- (17) Father Brett; is that correct?
- (18) MR. TREMONT: The complaint he
- (19) remembers against Father Brett.
- (20) Well, I'll withdraw the question.
- (21) Let me repeat the question.
- (22) Q. Would Monsignor Toomey then, could he
- (23) have been involved in investigating the
- (24) complaint against Father Brett if indeed the
- (25) complaint was filed before Monsignor Cusak was

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- (1) on the job?
- (2) A. Yes.
- (3) Q. All right. Now, do you recall being
- (4) told that this young man, Mr. Frechette,
- (5) committed suicide?
- (6) A. No.
- (7) Q. You don't remember that?
- (8) A. No.
- (9) Q. Do you remember meeting at least two
- (10) times with these parents in regard to this
- (11) incident?
- (12) A. No.
- (13) Q. Do you remember getting information
- (14) from the apostolic delegates office in
- (15) Washington, D.C., regarding the complaint of
- (16) sexual abuse by Father Laurence Brett?
- (17) A. No.
- (18) Q. You don't remember that.
- (19) A. No.
- (20) Q. Do you remember -- do you have -- I'll
- (21) withdraw that.
- (22) Do you remember seeing
- (23) correspondence regarding the complaint of Father
- (24) Brett?
- (25) A. I don't remember it, no.

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- (1) Q. All right. Now, do you remember a
- (2) complaint by a young man named Frank Montinelli
- (3) regarding Father Brett?
- (4) A. No.
- (5) Q. Tell us what you did after you received
- (6) the complaint regarding Father Brett.
- (7) A. I think I asked Monsignor Toomey to
- (8) interview him and report to me about it.
- (9) Q. And what did he report to you?
- (10) A. I don't remember.
- (11) Q. You remember the complaint; is that
- (12) correct?
- (13) A. Yes.
- (14) Q. And you don't remember what you did
- (15) about the complaint, what happened?
- (16) A. No.
- (17) Q. You don't remember what happened to
- (18) Father Brett?
- (19) A. Well, Father Brett was -- No, I don't
- (20) remember now.
- (21) Q. Was he sent down to New Mexico at the
- (22) time? Do you recall?
- (23) A. I don't recall.
- (24) Q. Do you recall whether he was sent to
- (25) any psychological or psychiatric institution for

- (1) examination?
- (2) A. No.
- (3) Q. Was he removed from his position in the
- (4) diocese?
- (5) A. Yes. He was no longer chaplain at
- (6) Sacred Heart University.
- (7) Q. What did you do with him? What did you
- (8) do with him, Bishop?
- (9) MR. SWEENEY: If you recall.
- (10) A. I don't recall now.
- (11) Q. Did you then set up a policy regarding
- (12) sexual abuse between priests of your diocese and
- (13) students as a result of that incident?
- (14) A. No.
- (15) Q. Now, do you know the Reverend Joseph
- (16) Moore?
- (17) A. Yes.
- (18) Q. And how do you know Father Moore?
- (19) A. I don't remember.
- (20) Q. All right. Was he a priest in your
- (21) diocese?
- (22) A. Yes.
- (23) Q. All right. Do you remember any
- (24) complaints of sexual abuse in regard to Father
- (25) Moore?

- (1) A. I don't remember.
- (2) Q. Do you remember Father Moore being
- (3) accused of sexually abusing children, boys,
- (4) while he was at the Assumption Parish in
- (5) Westport?
- (6) A. No.
- (7) Q. You don't remember the parents of two
- (8) boys contacting you, Bishop, in regard to the
- (9) sexual abuse by Joseph Moore?
- (10) A. No.
- (11) Q. You don't recall advising these parents
- (12) that they would meet with Father Cusak in regard
- (13) to the sexual abuse which occurred while Father
- (14) Moore was at the Church of the Assumption in
- (15) Westport?
- (16) A. No.
- (17) Q. Is there any reason, Bishop, why you
- (18) remember the Brett case but you don't remember
- (19) any of the other claims of sexual abuse or
- (20) reports that I am asking you about; any reason
- (21) why the Brett case is especially in your memory?
- (22) A. Well, Sacred Heart University was new,
- (23) and this was -- it was against the character of
- (24) the university. It was a black mark, so to
- (25) speak.

- (1) Q. And that's why that stands in your
- (2) mind?
- (3) A. Yes.
- (4) Q. All right. Do you remember a
- (5) Mr. M-003, speaking to you
- (6) regarding the sexual abuse of his son by Father
- (7) Moore who was at the Assumption Parish?
- (8) A. No.
- (9) Q. Do you remember a Mr. Shaughnessy
- (10) speaking to you about the sexual abuse of -- by
- (11) Father Moore while he was at his parish?
- (12) A. No.
- (13) Q. All right. Do you know what happened
- (14) to Father Moore? Do you have any idea of
- (15) what -- where he is?
- (16) A. No.
- (17) Q. Let me ask you, Father Moore apparently
- (18) is -- has been on duty outside of the diocese
- (19) since 1984. Do you have any idea of where he
- (20) might be? Do you have any idea where he might
- (21) be?
- (22) A. I believe he became involved in
- (23) charismatic work and went to the Archdiocese in
- (24) Newark.
- (25) Q. How do you -- I'll withdraw that.

- (1) Are you aware of the fact that he
- (2) was at Steubenville College while he apparently
- (3) is listed as on duty outside of your diocese?
- (4) A. No.
- (5) Q. If he went to the Archdiocese of
- (6) Newark, Bishop, would he have been transferred
- (7) to that Archdiocese? How would that have
- (8) worked?
- (9) A. Well, Steubenville was a center for
- (10) charismatic programs, and I don't remember
- (11) whether he went there for that purpose or was --
- (12) or was permitted by Newark to do that, I don't
- (13) know.
- (14) Q. Would he have been transferred -- would
- (15) he have transferred to Newark, or would he still
- (16) have been a member of the Bridgeport diocese?
- (17) A. He would still be a member of the
- (18) diocese, yes.
- (19) Q. Do you recall discussing with Father
- (20) Cusiak, Monsignor Cusiak --
- (21) MR. SWEENEY: Monsignor Cusak.
- (22) Q. Cusak, the claims of sexual abuse that
- (23) were brought against Father Moore? Do you
- (24) remember discussing it with him?
- (25) A. I don't remember, but if these

- (1) complaints came after Monsignor Cusak was Vicar
- (2) for Religious, I would have turned the case over
- (3) to him and asked him to follow through on it.
- (4) Q. You would remember, though, would you
- (5) not, the -- if a priest is -- I will withdraw
- (6) that.
- (7) Under the canon law, Bishop, you
- (8) are responsible to see that your priests -- as
- (9) ordinaries, that your priests remain chaste; is
- (10) that correct, they follow the vow of chastity?
- (11) A. Yes.
- (12) Q. And that is your requirement as the
- (13) ordinary?
- (14) A. Yes.
- (15) Q. All right. Now, if, indeed, there were
- (16) these complaints that priests were sexually
- (17) involved with children or with parishioners,
- (18) that -- it would be your responsibility, would
- (19) it not, to investigate that, that claim, and be
- (20) satisfied that that either was or was not true;
- (21) it's your ultimate responsibility, isn't it?
- (22) A. Yes.
- (23) Q. All right. And wouldn't you remember
- (24) these instances, if you and Monsignor Cusak
- (25) spoke, regarding the -- a charge as serious as

- (1) sexually abusing children, I mean, wouldn't that
- (2) be something that you would talk about and
- (3) something you would be interested in, that you
- (4) just wouldn't push aside?
- (5) A. If I gave it to Monsignor Cusak to take
- (6) care of, then I would be content that I had done
- (7) all that was needed for my part.
- (8) Q. You wouldn't be interested in what
- (9) Monsignor Cusak found or what he concluded or --
- (10) you just --
- (11) MR. SWEENEY: Pardon me, Counsel,
- (12) he is not saying that. All he is saying is he
- (13) refers it to him.
- (14) Q. Well, that's what -- After you
- (15) referred it, you would continue on the case,
- (16) wouldn't you, or would you just put it aside and
- (17) say "Well, he took care of it"? What would you
- (18) do?
- (19) MR. SWEENEY: Counsel, is the
- (20) point of your question, would he receive a
- (21) report back? Is that --
- (22) MR. TREMONT: No.
- (23) Q. Bishop, you would bring it to Father --
- (24) you would ask Father Cusak to take care of it?
- (25) A. Yes.