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EXHIBIT A

AFFIDAVIT

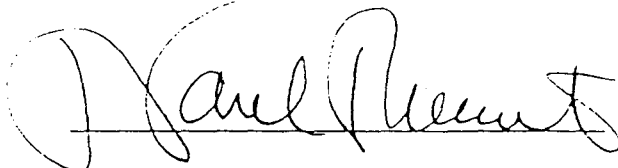
**M-016**, Sr., being first duly sworn upon his oath deposes and says that:

1. I, **M-016**, Sr. of Bridgeport, Connecticut, am over the age of eighteen years.
  2. I believe in the obligations of an oath.
  3. This statement is based on my own personal knowledge.
  4. I am the father of **M-015**, Jr. and **M-014**.
  5. I am Catholic and was a parishioner at St. John Nepomucene.
  6. I know the Rev. Raymond Pcolka who was a Catholic priest and was in charge of my sons as altar boys at St. John's.
  7. During approx. 1979 -- 1982 I was told by my sons that they were sexually abused by Father Pcolka which abuse started when **M-014** was fondled by Father Pcolka as he was being robed as an altar boy.
  8. At the time my sons revealed this to me Father Pcolka as assigned to Holy Name Parish in Stratford. I told the pastor whom I believe was Father Patoniak and gave him my name so that he would know it was not an anonymous call.
- I said, "You better watch out for Father Pcolka, this is what he did to my children. He abused them." I told him that I was going to go to the police about this. Father Patoniak said, "Do you know what you are saying, it's your children's word against an outstanding priest in

this parish," and he kept in effect threatening me that the story wasn't so. I then started to tell him over the phone the graphic details that M-014 had said to me and, at this point, he hung up. I called back immediately and the housekeeper answered and said if I called again I would be turned over to the police."

M-016

Subscribed and sworn to before me this 11 day of Oct, 1996.



Commissioner of the Superior Court

STATE OF CONNECTICUT

SUPERIOR COURT

NO. CV 93 0302072 S  
GEORGE ROSADO, ET AL  
VS.  
BRIDGEPORT ROMAN CATHOLIC  
DIOCESAN CORPORATION, ET AL

JUDICIAL DISTRICT OF  
BRIDGEPORT/FAIRFIELD  
AT BRIDGEPORT

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STATE OF CONNECTICUT  
NO. CV 94 0316399S  
M-014  
VS.  
BRIDGEPORT ROMAN CATHOLIC  
DIOCESAN CORPORATION, ET AL

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SUPERIOR COURT  
JUDICIAL DISTRICT OF  
BRIDGEPORT/FAIRFIELD  
AT BRIDGEPORT

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STATE OF CONNECTICUT  
NO. CV 94-0316393 S  
M-015, JR.  
VS.  
BRIDGEPORT ROMAN CATHOLIC  
DIOCESAN CORPORATION, ET AL

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SUPERIOR COURT  
JUDICIAL DISTRICT OF  
BRIDGEPORT/FAIRFIELD  
AT BRIDGEPORT

JULY 27, 1998

DEPOSITION OF: M-016, SR.

APPEARANCES:

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NIZIANKIEWICZ & MILLER REPORTING SERVICES

1 didn't know -- his behavior became bizarre back in the  
2 '70s.

3 Q I understand. But basically you first  
4 learned about this from your wife; is that correct?

5 A That's correct.

6 Q That is when I refer to this sexual  
7 molestation activity of Father Pcolka?

8 A That's correct.

9 Q And you understood that she had first  
10 learned it from your son M-014 ?

11 A That's correct.

12 Q While your son M-014 had been in this  
13 rehabilitation program at Fairfield Hills?

14 A I am not sure when she learned of the  
15 situation. All I know is that she told me of it and it  
16 was after that period.

17 Q Now, up to this point in time, or up to that  
18 point in time, Mr. M-016, when your wife told you what  
19 she had learned from your son M-014 about Father Raymond  
20 Pcolka having sexually molested one or more of your sons,  
21 did you ever have any reason to suspect or believe Father  
22 Pcolka to have sexually molested any child?

23 A No.

24 Q And after your wife shared this information  
25 with you about Father Pcolka, what did you do next with

1 respect to that information?

2 A I sat on it for a couple of weeks and then  
3 I questioned M-014 myself.

4 Q And what did your son M-014 tell you about  
5 it when you questioned him directly?

6 A He told me that Father Pcolka tied him down  
7 to a bed, put shaving cream all over his ass and fucked  
8 him.

9 Q And did you get any more details than that  
10 from your son?

11 A He was getting a little more explicit, and I  
12 stopped the situation right at that point because at that  
13 point I was infuriated.

14 Q I understand. Did you discuss this  
15 subject with any of your other sons?

16 A Then I asked M-015 if he could confirm the  
17 story that I got from M-014. I got M-015 on the side and  
18 I questioned him as if this was true or whether this was  
19 not the truth, and M-015 had completely backed up  
20 everything that M-014 said.

21 Q Did you discuss it with any of your other  
22 sons?

23 A No. I didn't feel there was any need to.

24 Q All right. Once you got this information  
25 from your sons, after you first got it from your wife, did

1 you discuss this subject of Father Pcolka's molestation  
2 activity with any other person?

3 A My father.

4 Q And did you discuss it with anyone else  
5 besides your father?

6 A And then after I discussed it with my father  
7 I called the rectory where Father Pcolka was at the time.

8 Q And this was the church rectory where he  
9 was living?

10 A Yes.

11 Q And which church rectory was that?

12 A Holy Name up in Stratford.

13 Q And with whom did you speak when you called  
14 Holy Name?

15 A Well, first I spoke to the -- whoever was  
16 working in the house. There was the woman who answers the  
17 phone, and then I spoke with the pastor of the church.

18 Q And who was that?

19 A I am not sure what his name is.

20 Q Was it Father Petoniak?

21 A Yes, Father Petoniak. That's right.

22 Q And had you dealt with Father Petoniak on  
23 other occasions?

24 A I have met Father Petoniak. My father was  
25 trustee of the church, and he drove the nuns everywhere

1 they went. My family was really into the Catholic church.  
2 At that time, we still believed in what we were taught. We  
3 had no idea it was a scam.

4 Q I understand that you're upset and you're  
5 concerned.

6 A Yes.

7 Q But the critical thing was that Father  
8 Petoniak was more than simply a voice on the other end of  
9 the telephone. You had met the man personally?

10 A Oh, yeah, he knew who I was. The kids were  
11 in the Catholic Slovak. They were in gymnastics, and we  
12 just prior to this had had a big thing where the children  
13 all get together and do the gymnastics and so forth.

14 Q So when you called the Holy Name Parish  
15 Church rectory, you spoke to a woman you say?

16 A Yes.

17 Q And you got her to bring Father Petoniak --

18 A I asked for Father Petoniak and he came on  
19 the phone next.

20 Q Now, did you tell the woman why you were  
21 calling, or did you simply ask for Father Petoniak?

22 A No, I simply asked for Father Petoniak.

23 Q And when you got Father Petoniak on the  
24 phone, what did you say to him dealing with Father Pcolka?

25 A Well, I tried to be tactful at first, and



1 when I started to tell him that we had a problem, that  
2 Father Pcolka was molesting children and that he molested  
3 my two, it got out of sorts. He didn't want to hear it.

4 Q For the record, and again, I know, Mr.  
5 M-016, this is difficult, but could you just, so we will  
6 have a complete record of this, would you be good enough to  
7 tell us what you recall you said to Father Petoniak in this  
8 particular telephone conversation and what Father Petoniak  
9 said to you?

10 A After I started to tell him -- after I said  
11 that the priest had molested the children, he said it was  
12 outrageous and didn't want to hear anything more about it.  
13 And I said, well, listen, you are going to have to hear  
14 more about it because this is what has happened, and I  
15 intended to go further. He said, well, where the hell do  
16 you think you are going to go with this? Do you think the  
17 cops are going to believe you or the Catholic church? And  
18 at that point there he hung up on me. So I called back and  
19 I got the housekeeper again. The housekeeper says if I  
20 call there again they are going to have me arrested, and  
21 she hung up on me.

22 At that point, is when I went to my father,  
23 as a matter of fact. I spoke to my father after I did that  
24 because that's when I got -- I thought my father being a  
25 trustee, I felt as though he might have some pull.

AFFIDAVIT

STATE OF CONNECTICUT :

ss. Oxford

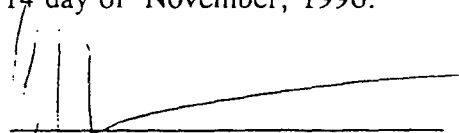
COUNTY OF FAIRFIELD :

**M-014**, being first duly sworn upon his oath, deposes and says that:

1. I am over the age of 18 years.
2. I believe in the obligations of an oath.
3. This affidavit is made on my own personal knowledge.
4. In approximately 1971 - 1973, I was a parishioner and altar boy at the St. John Nepomucene Church in Bridgeport, CT. At that time, Father Raymond Pcolka was stationed at that church and was in charge of the altar boys.
5. During that period of time, I was repeatedly sexually abused by Father Pcolka.
6. Subsequent to that period of abuse, sometime in the early 1980's, I wrote letters to the following places in order to report the fact that I was sexually abused by Father Raymond Pcolka when I was a child:
  - a) Bridgeport Catholic Diocese on Jewett Street in Bridgeport, addressed to either Bishop Curtis or Monsignor Cusack;
  - b) Greater Archbishop Counsel in Washington, D.C.
  - c) Father Tomasko at St. John Nepomucene Church.
7. I never received a response to any of my letters.
8. Sometime in 1986, I also wrote to the Pope in Vatican City, Italy regarding the fact that I was sexually abused by a Bridgeport Roman Catholic priest. I did not receive any response to this letter.

**M-014**

Subscribed and sworn to before me this 14 day of November, 1996.

  
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Commissioner of Superior Court