

**IN THE IOWA DISTRICT COURT IN AND FOR SCOTT COUNTY**

<b>MICHAEL GOULD,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Law No. 104526</b>
	)	
<b>vs.</b>	)	
	)	
<b>BISHOP LAWRENCE D. SOENS,</b>	)	<b>AFFIDAVIT</b>
<b>IOWA CITY REGINA HIGH SCHOOL,</b>	)	
<b>REGINA INNER PARISH CATHOLIC</b>	)	
<b>EDUCATION CENTER, f/k/a IOWA</b>	)	
<b>CITY CATHOLIC HIGH SCHOOL, INC.,</b>	)	
<b>AND THE DIOCESE OF DAVENPORT,</b>	)	
	)	
<b>Defendants.</b>	)	

<b>STATE OF _____</b>	)	
	)	<b>ss:</b>
<b>COUNTY OF _____</b>	)	

I, Michael Gould, DOB: 7/1/49, first being sworn under oath, states as follows:

1. Bishop Lawrence D. Soens served as the priest and principal at Regina High School while I was a student between 1963 and 1967. I was a baptized member of the Roman Catholic Church within the Davenport Diocese and attended catechism and weekly mass within the Diocese of Davenport. Bishop Lawrence D. Soens was an ordained Roman Catholic priest, representative and authority figure of the Diocese of Davenport and Regina High School and was my educational and spiritual advisor during this time period. He was a person of great influence and persuasion as a holy man and authority figure in my life. I developed great admiration, trust, dependence, reverence and respect for the Roman Catholic Church, its agents, the Diocese of Davenport, its Bishops, the priests of the Diocese and Regina High School.

EXHIBIT 1

2. That beginning in 1963 and continuing until the year I graduated, Bishop Soens would have me come into his office, stand in front of his chair and he would begin rubbing my nipples with the back of his index finger. He would begin to pinch the nipple between his index finger and his thumb and stroke and pinch either nipple while continuing to talk. He would then begin to stroke, with the back of his index finger, the outside of my zipper directly over my genitalia. As a result, he would rub my penis on the outside of my slacks. He would then unzip my slacks, reach inside and continue rubbing my penis on the outside of my underwear in the same manner. Sometimes he held my penis and pinched it or stroked it as if he were milking a cow. At other times, he would rub with the back of his hand on the inside and he would turn his hand over and rub my testicles, sometimes over my underwear and sometimes with actual skin contact.

3. I believe he intended to sexually arouse me, but I attempted to prevent this by biting the inside of my lip so hard that it bled. At times, while he was doing this, I would basically disappear by letting my mind and head go away while continuing to bite my lip.

4. I was raised from early childhood to be Catholic and to follow whatever the nuns and priests said and did. I did not want to be sent home from school or thrown out, be ex-communicated or go to hell. I was taught as a result of my Catholic upbringing and education, to shut my mouth and suck it up.

5. Bishop Soens' conduct to myself was so open and obvious that nuns and teachers must have known about it. This includes a common action of his which was pinching and twisting boys' nipples in the school.

6. I told my father about it when it was occurring, but he didn't believe me, so I assumed it was something that was okay and reported it to no one else.

7. I was confused, and based on my Roman Catholic upbringing, I could not determine whether the actions were right or wrong.

8. Although I have remembered these incidents since they have happened, I have used psychological mechanisms in coping to tuck it away and convince myself that nothing could be done about it.

9. That Regina High School, now known as Regina Inner Parish Catholic Education Center, either knew, or should have known, that Bishop Soens needed to be closely supervised in his contact with boys under the age of 18. I was a member of the Davenport Diocese and relied upon, trusted, depended, and was counseled in educational, spiritual, emotional and psychological matters by representatives of the Davenport Diocese and Regina High School at the time of the sexual misconduct and abuse. I looked to the representatives of Regina High School and the Davenport Diocese and placed confidence in them and depended upon them for my education and spiritual and emotional guidance.

10. I believe that I have had a mental illness since I suffered the sexual abuse and misconduct by Bishop Soens. I have been diagnosed with having psychological illness for the mental difficulties I have as a result of the sexual misconduct by Bishop Soens. I was disabled mentally from being able to vindicate my legal rights against Bishop Soens, Regina High School and the Diocese of Davenport.

11. The concealment by Regina High School about the sexual misconduct by Bishop Soens prevented me from attempting to vindicate any legal rights against Regina High School until I filed my lawsuit.

12. Bishop Soens, as a priest and my principal, sought and gained my trust, admiration, confidence and obedience and conditioned me to comply with his direction and to look at him as an authority on all matters spiritual, moral, ethical and temporal.

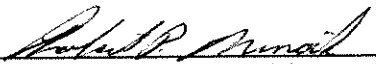
13. I was taught by representatives of the Davenport Diocese and did not consider myself to be the equal of Bishop Soens. I depended upon him as a source for my spiritual, moral, ethical and educational guidance.

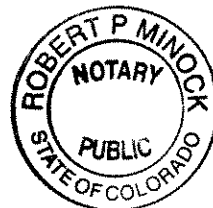
14. As a result of the sexual abuse and molestation by Bishop Soens, while principal of Regina High School, I believe I suffered from mental illness and developed various psychological coping mechanisms and symptoms of psychological distress. I admit that I am not an expert and do not completely understand how, and to what extent, my shame, guilt, self blame, anxiety, repression and depression has affected me. However, I know that I was unable to discover the nature and extent of the sexual misconduct and the abuse and the causal relationship between the extent of the sexual misconduct and abuse and my injuries until, at the earliest, 2005. I am still not fully aware of the nature and extent of the abuse and sexual misconduct and the nature and extent of the damage I have suffered and it is my understanding that I am still suffering from a mental illness that dates from the time of the abuse.

Further, Affiant sayeth not.

  
MICHAEL GOULD

Subscribed and sworn to before me  
this 1<sup>ST</sup> day of SEPTEMBER, 2006.

  
Notary Public in and for  
The State of COLORADO



My Commission Expires  
05/15/2010