

23 Q. What did he do to you?
 24 A. Well, it started out with he would -- he
 25 would come up to me. I thought he was being friendly,

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1 but he would put his arm, maybe, on my shoulder and
 2 maybe rub my back and put his arm around me, then pretty
 3 soon he got to fondle me here (indicating), then he
 4 would pinch and twist.
 5 Q. When you say fondle here, you were rubbing
 6 your chest?
 7 A. Yes, right.
 8 Q. And then he would pinch your nipple?
 9 A. Yes, and twist.
 10 Q. Where did this happen?
 11 A. At Regina in the hall, anywhere I would see
 12 him, actually, at Regina.
 13 Q. And --
 14 A. It got to be a typical thing, when you would
 15 see him coming, you would -- I would try to either get
 16 away or cover up.
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 22 Q. It says in here that he would get you into
 23 his office and put his hands on your penis and pinch the
 24 end of your penis. Is that correct?
 25 A. Yes.

1 Q. When he did that, did he do that over your
 2 clothes or did he make hand contact with the penis?
 3 A. No, with the clothes.
 4 Q. Over the clothes?
 5 A. Yes. He would -- what he would do is, he
 6 would get up -- I don't know. He would be in a chair
 7 across from you, and he would come up and he would be
 8 talking to you, and he would put his hands on your knee,
 9 and the hands would run up -- first of all, he would
 10 grab ahold and twist the inside of your thigh. It was
 11 pretty painful. He was real good at doing that. Then
 12 all of a sudden he would grab ahold or pinch. I just
 13 remember his pinching, then getting -- I backed away.
 14 Q. You would back away when he would pinch the
 15 penis?
 16 A. Yes.
 17 Q. Did that cause you pain, as well?
 18 A. Oh, God, yes.
 19 Q. What was his stated reason for doing that?
 20 A. I don't know. I never asked him.
 21 Q. Why were you in the office in the first
 22 place?
 23 A. The only thing I can guess I was there for
 24 was, he was trying to get me to go to the seminary.

EXHIBIT 3

4 A. Well, I know most of my schoolmates that I
5 went to school with had experience with him. I don't
6 know specifically which ones had the penis done. I know
7 everybody has had the nipples done. Which ones, I
8 can't -- I can't recall.

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17 Q. Do you have any information in the way of
18 facts that would tell us that the Diocese of Davenport
19 has known since the '60s that Lawrence Soens was abusing
20 children at Regina High School?

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25 A. I don't know how they could not know.

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1 Q. How would they know it?

2 A. This was a common -- it was just common
3 knowledge with everybody in the school what was going
4 on, especially with the fondling the nipples stuff.