

AFFIDAVIT

STATE OF IOWA)
) ss:
COUNTY OF Polk)

The undersigned, Regina Student No. 74, first being duly sworn under oath, states as follows:

1. That I was a freshman at Regina High School during the school year of 1965 and 1966.
2. While a student at Regina High School, Father Soens was the priest and principal of Regina. I considered and respected him to be a trusted authority figure. My relationship with him as a student was based on trust and confidence in him as a spiritual, moral, temporal and secular authority figure.
3. During my freshman year, Father Soens approached me in the hallway and twisted my nipples, causing bruising. I believe that teachers and other adult authority figures in the school could have observed Father Soens' actions and should have known of his improper conduct. The students were aware of this and I believe the adults also knew of his actions.
4. While at school one day, I became ill and went to the office to inform the school secretary. While standing at the school secretary's desk telling her I was ill, Father Soens approached me from his office. I told Father Soens I was ill. Father Soens walked closer to me and stood within inches of me. I felt Father Soens' fingers rubbing my testicles on the outside of my pants. Father Soens then asked me if I felt better.

EXHIBIT 17

4. This incident occurred right in front of the school secretary's desk, in the direct line of vision of the school secretary.

Further, Affiant sayeth not.

Regina student no. seventy four
REGINA STUDENT NO. 74

Subscribed and sworn to before me
this 29 day of August, 2006.

Tammi Blackstone
Notary Public in and for
The State of Iowa

