

COPY

AFFIDAVIT

STATE OF NEW MEXICO)
)ss.
 COUNTY OF SANDOVAL)

Father Liam J. Hoare, being first duly sworn, states:

1. My name is Liam J. Hoare, s.P., and I attest that I am Servant General of the Servants of the Paraclete and Executive Director of the Programs of Therapy and Renewal operated by the Servants of the Paraclete in Jemez Springs, New Mexico; Albuquerque, New Mexico; St. Louis, Missouri; Dittmer, Missouri; Cherry Valley, California; and Gloucestershire, England. The Servants of the Paraclete is a religious order of priests and brothers whose principle work is spiritual and psychological renewal services to Roman Catholic priests throughout the world.

2. I was born in Dublin, Ireland, and, while employed as a junior executive with Shell Oil Company in London in 1963, I met Father Gerald Fitzgerald, the Founder of the Servants of the Paraclete. I became interested in the work that he was doing and requested to join in this work. I was accepted as a novice in the community, moved to a Servants of the Paraclete facility in Rome, and pursued theological studies at Pontifica Beda College in Rome from 1964 to 1968 when I was ordained as a priest of the Servants of the Paraclete. I served at several facilities of the Servants of the Paraclete at England, Scotland, Italy, and Missouri.

3. In 1974 to 1975 I studied alcoholism and drug abuse counseling at Willmar State Hospital in Willmar, Minnesota, and completed four quarters of Clinical Pastoral Education at Hazelden Foundation, which specializes in substance abuse counseling, in Hazelden, Minnesota. From 1975 to 1981 I was the Director and Religious Superior at the Servants of the Paraclete extended care facility for recovering alcoholic priests and brothers in St. Louis, Missouri. From 1983 to 1987 I attended the Wright Institute in Berkeley, California. By 1987 I completed requirements, sans dissertation, for the Ph.D. in Clinical Psychology at the Wright Institute.

4. In 1987 I was elected Superior General of the Servants of the Paraclete, a position which includes the offices of Executive Director and Chief Executive Officer of the Servants of the Paraclete Programs world wide. The term of office is six years. My office is based in Jemez Springs, New Mexico where, at that time, the Servants of the Paraclete operated two residential therapeutic programs for priests and religious, Foundation House and Villa Louis Martin. In 1987 I also assumed the responsibilities of Program Director for the Foundation House Program in Jemez Springs. In 1992 Foundation House and Villa Louis Martin merged into a unified residential program under the directorship of my colleague, Father Peter Lechner, s.P., Ph.D. In 1993, I was re-elected to a second six year term as Superior General, Executive Director, and Chief Executive Officer of the Servants of the Paraclete.

5. In March of 1989, Father Gordon MacRae enrolled in the Villa Louis Martin program in Jemez Springs, New Mexico following a guilty plea to a misdemeanor charge of attempting to solicit a minor in Keene, New Hampshire. Father MacRae was required to enter this program as a condition of probation in Cheshire County, New Hampshire. He completed the residential program in March of 1990. It was somewhat unusual at that time for an individual to be in residential therapy for a full year, however mid way through his program at Villa Louis Martin, in October, 1989, Gordon MacRae was diagnosed as having epilepsy, specifically referred to by neurologists as Complex Partial Seizure Disorder. The onset of symptoms appeared to be sometime in 1987 or 1988 but no prior diagnosis had been made. Gordon MacRae began a regimen of chemotherapy with the drugs, Carbamazapine and Pamelor. The adjustment to this, and his own willingness to remain in therapy, resulted in a program several months longer than the usual at that time.

6. The professional staff at Villa Louis Martin at that time consisted of the following individuals: Liam J. Hoare, s.P., M.A., C.A.C., Executive Director; Peter Lechner, Ph.D., Program Director; Jay Feierman, M.D., Psychiatrist; Jack Ellis, M.D., Psychiatrist; Robert Buser, M.D., Psychiatrist; Sarah Brennan, Ph.D., Licensed Clinical Psychologist; Robert Goodkind, Ph.D., Licensed Clinical Psychologist; Margaret Bridgford, Ph.D., Licensed

Clinical Psychologist; Cynthia Corbett, Ph.D., Psychodramatist; Marlene Green, R.N.;
Dorine Taylor, M.A., Cognitive Therapist; Nancy Rosborough, M.A., A.T.R., Registered Art
Therapist; Hemming Atterbom, Ph.D., Physiologist; Richard Papenfuss, Ph.D., Physiologist;
Rongsheng Wu, M.A., Physiologist; Paul Valley, s.P., M.S.W., Spiritual Director; Francis
Dorff, O.Praem., S.T.D., Spiritual Director; Richard Drabik, M.I.C., Spiritual Director;
Raymond Mann, O.F.M., Spiritual Director; and Neil Saller, T.O.R., J.C.L., Director of
Continuing Care.

7. Gordon MacRae made excellent progress in the Villa Louis Martin program, and the staff listed above felt that he addressed issues in individual and group therapy honestly, openly and by accepting the challenge that such intensive residential therapy presents. As with anyone in the residential programs of the Servants of the Paraclete who is in therapy as a requirement of legal probation, reports of this therapeutic progress were sent to the Probation Office in Keene, New Hampshire. Gordon MacRae maintained contacts and friendships with people in New Hampshire who sent him copies of New Hampshire newspaper articles which concerned him. Gordon would be dismayed, and our staff quite concerned, to learn that Keene, New Hampshire officials would apparently provide these confidential therapeutic reports to persons not legally designated and released to receive them, and would apparently abuse these reports by lifting segments of them entirely out of context and providing them to the media.

8. On January 25, 1990, Gordon MacRae traveled to New Hampshire to be present at a hearing to decide sentencing for the misdemeanor charge to which he entered a guilty plea in 1988, and to determine whether to suspend the remainder of his probation. One of our staff, Jack Ellis, M.D., accompanied Gordon at great expense to Gordon and to the Servants of the Paraclete. Dr. Ellis intended to testify as to Gordon's progress in the residential program. In the brief hearing, Dr. Ellis was not called on to present testimony. The Keene District Court ordered that sentencing and probation be continued until an April, 1990, hearing. Dr. Ellis and Gordon MacRae returned to New Mexico. Days later, our staff received a copy of a newspaper article quoting Keene, New Hampshire city officials as stating that officials from the Jemez Springs, New Mexico treatment center testified that

Gordon MacRae's progress was "slow", and that he was resistant in therapy. In fact, Dr. Ellis was not permitted to testify at all, and our staff would never have characterized Gordon MacRae as resistant and his treatment progress as "slow".

9. Gordon MacRae completed his program at Villa Louis Martin in March, 1990. His final report, which was not misquoted, or even quoted at all, in newspapers by Keene officials, stated that his progress in therapy is characterized as excellent, he has taken personal responsibility for past and future behavior, he has shown appreciation of and fidelity to ethical standards, he has evidenced insight, he is highly motivated, and he has a realistic plan to continue his progress.

10. It has been common practice for some residential care facilities, especially chemical dependency facilities and facilities which address addictive behaviors, to employ certain former patients of their programs who are academically and experientially qualified, and whose recovery is deemed to be commendable. Gordon MacRae was one such individual with whom we had some interest in inviting to contribute to our work. It was clear that Gordon was totally honest in his therapeutic process, that no stone was left unturned, and that his progress was excellent and his recovery work was commendable. Gordon also had substantial experience in administration. In April, 1990, Gordon was employed as an executive assistant in my office. His work was excellent, and his sensitivity to the needs of our unique work was equally evident. By the Fall of 1990 Gordon was a full time employee as my administrative assistant, a position which he held until June of 1991.

11. In June of 1991, the General Council of the Servants of the Paraclete passed a resolution to combine the two Jemez Springs programs, Foundation House and Villa Louis Martin, into a unified program called The Jemez Program. Peter Lechner, Ph.D., formerly Program Director of Villa Louis Martin, was appointed Program Director of the larger combined program. I relinquished my responsibilities as Program Director of Foundation House and concentrated on my roll as Executive Director of all of the Servants of the Paraclete facilities. In June of 1991, Dr. Lechner requested that Gordon MacRae transfer from his position as my administrative assistant to the new combined Jemez Program

assisting the staff there. Gordon's position involved program administration, research, and admissions. Detective McLaughlin of the Keene Police Department is quoted in New Mexico newspapers as saying that Gordon MacRae identified himself as "a counselor in a sex offender program for priests". This is clearly untrue, and Gordon has never identified himself or our programs in this way.

12. Between June, 1991, and May, 1993, Gordon MacRae proved himself to be an extremely valuable employee working well with staff and carrying out his responsibilities in a mature and unselfish manner. Beginning near the end of 1992, the Servants of the Paraclete became the subject of massive media attention throughout the United States over the fact that Father James Porter had once been a resident under our care. Though we did not operate as a treatment center but rather as a retreat center at the time Father Porter was here, we still became the subject of several lawsuits from the New England area as well as from New Mexico. The national press carried nearly daily articles about our work and the lawsuits, particularly in the New England area and New Mexico. The notorious publicity reached its peak around April/May of 1993 which is also when Gordon MacRae was arrested at his Rio Rancho, New Mexico home on the New Hampshire warrant.

13. Gordon MacRae was arrested on May 3, 1993 and incarcerated at the Sandoval County Jail until May 5, 1993 at which point he was released on a signature bond. Gordon is represented by Attorney Ron Koch of Albuquerque and other attorneys who have come forward requesting to assist him in this case. We on the Staff and Administration of the Servants of the Paraclete braced for the worst in terms of New Mexico press at the time of Gordon's arrest. There was none. It seemed that the New Mexico newspapers had taken no notice or had no interest in the fact that Gordon MacRae had been arrested on a New Hampshire warrant, incarcerated and released. Gordon clearly stated his innocence to us, and we believed him - and continue to believe him. It was decided that Gordon would remain in his position, but would have no participation in client services until this was resolved. We determined that Gordon's work in administration was invaluable and he would be able to continue in this area until he was exonerated, as we believed he would be. The fact that there had been no New Mexico press made this position easier. Still, the

nearly daily press over the Servants of the Paraclete role in the twenty-five year old Porter case continued both here in New Mexico and nationally, especially in New England where Father James Porter originated.

14. By the middle of May, 1993, it appeared that a lengthy document had been sent directly to the New Mexico press about the charges against Gordon MacRae detailing the ten year old allegations against him, and detailing out of context segments of the privileged psychiatric reports which we had sent to Keene officials and the Cheshire County Probation Office years earlier with signed and legally restricted release from Gordon MacRae. The statements of Keene officials in the New Mexico papers following this, which claimed that we were employing Gordon MacRae as a counselor in a sex offender treatment program, a characterization of our programs which we have never used, made it impossible for Gordon to continue working with us. Regretfully, we were forced to terminate his position with us and place him on administrative leave. The local headlines such as "Paraclete Priest Indicted for Rape" resulted in our being forced to lose a strong contributor to our work and a highly valued employee. In the days that followed, Gordon MacRae became despondent. Though he was no longer employed by us we invited him to live with the Servants of the Paraclete community until there could be some resolution to the legal charges.

On March 16, 1993, Gordon suffered an epileptic relapse, attempted suicide, and was hospitalized for a month here in New Mexico followed by two months in Connecticut. Gordon left a suicide note addressed to me in which he assured me of his innocence, but stated that he could not bare to see these fabricated charges causing pain to others. Keene officials continued to be quoted in the New Mexico newspapers throughout Gordon MacRae's hospitalization.

Respectfully Submitted,

Very Rev. Liam J. Hoare, s.P.

SUBSCRIBED AND SWORN to before me this 28th day of March, 1993, by Very Rev. Liam J. Hoare.

NOTARY PUBLIC

My Commission Expires:
