

1 in time that you spoke to Dr. McEchron, you had
2 already had a meeting with Monsignor Schmidt in
3 which he had told you that Father Leu was going
4 to resign his position. Correct?

5 A. Yes. It wasn't a formal meeting or
6 anything. It was on Saturday. I said, Pinky, did
7 you get everything done, or, Did you get down to
8 meet Father Leu? And he said, Yes, and he was
9 going to resign the parish. And I remember
10 thinking, Well, we didn't have to do anything that
11 weekend with what was going on; we could wait until
12 the Bishop got back.

13 Q. So I understand -- I just want to try to
14 set the time line here. You meet with Monsignor
15 Schmidt and he gives you his report. You then
16 discuss it with the Bishop, and it's decided that
17 psychological evaluation needs to take place.
18 Correct?

19 A. That's right.

20 Q. You then have a discussion with Father
21 Leu about that. Correct?

22 A. Right.

23 Q. And then you at that point
24 Dr. McEchron. Is that correct?

25 A. I'm not sure who I called -- whether I

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1 talked to McEchron before I talked to Leu, or not.
2 I'm not sure which -- I think that I talked to
3 Father Leu, my best memory; said, This is what we
4 are going to do; told him who I was going to call,
5 make sure that person was agreeable to him. Then I
6 called McEchron so that he knew that the two of
7 them needed to get together.

8 Q. But, at a minimum, you had spoken with
9 the Bishop about what the next step was. Correct?

10 A. That's correct. Yes.

11 Q. And is it your testimony that throughout
12 the time that you first heard the allegation come
13 up, which would have been on a Tuesday before
14 Thanksgiving -- is that correct?

15 A. Uh-huh (affirmative response).

16 Q. From that point in time to the point in
17 time that you picked up the phone and spoke to
18 Dr. McEchron, that at no time prior to that period
19 of time you had considered this prior rumor about a
20 priest having spanked children?

21 A. Not that I remember.

22 Q. But that all of a sudden when
23 Dr. McEchron brings up this fact, that when you
24 tell him that it's your belief that Father Leu
25 had been involved with some type of spanking of

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1 children in the past?

2 A. That's correct.

3 Q. Did you tell him -- Dr. McEchron --
4 that part of the reason that you had gone to
5 Dr. McEchron for an evaluation was the fact that
6 this was not the first instance of misconduct that
7 had been alleged, but that this was, in fact, a
8 second report?

9 A. No.

10 Q. You didn't tell him that that was part of
11 the motivation of the Diocese?

12 A. No.

13 Q. I want to understand it. Did you tell
14 him that this was a rumor or did you tell him that
15 this was a fact? What exactly did you tell
16 Dr. McEchron about this prior incident?

17 A. To the best of my memory -- it was just a
18 telephone conversation; I have nothing else to go
19 back on -- I told him Father Leu had been accused
20 of sexual misconduct. I didn't know what
21 details were, but I wanted to set up an appointment
22 between the two of them for an evaluation where
23 we would go from there. Someone talked about
24 that.

25 Then he said, Is there anything in the

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1 background that you can give to help me in this?
2 That's when the -- background, and that's when that
3 came into my mind, and that's what I related to
4 him. I thought this was something, a rumor, or
5 whatever. I thought that Father Leu had been
6 involved in that and this might be something that
7 he wanted to ask him about. That's my best
8 recollection of that conversation.

9 Q. Do you have a recollection of when you
10 first heard that rumor in terms of time, something
11 along that line? It doesn't have to be exact.
12 Some time period.

13 A. 1985, '86. I don't know.

14 Q. How long had that rumor gone on, by
15 the way? Was it a short-lived rumor, or was it
16 something that continued up until 1988?

17 A. Short-lived. It wasn't something that
18 was in conversation every month. It was a story,
19 and it popped up and then it was gone, I guess.

20 Q. Didn't it strike you as part of your
21 responsibility, or at least the Diocese's responsi-
22 bility, to determine whether or not that rumor was
23 in fact, true or not?

24 MR. MILLER: Objecti

25 Argumentative.

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1 Q. (CONTINUING) Go ahead and answer it.

2 THE WITNESS: Is it all right?

3 MR. MILLER: Go ahead.

4 A. The rumor was that parents were concerned
5 that that was going on. I thought, as long as
6 parents were aware of all of that, the Diocese did
7 not have to do anything further with that.

8 Q. What about in this particular case? The
9 parents may have become aware of this. Is it your
10 testimony that the Diocese has no responsibility in
11 this instance, either?

12 MR. MILLER: Objection.

13 Argumentative.

14 A. There is a distinction between a rumor
15 going around about what parents might know
16 something or object to something and a specific
17 allegation that was made. Yes, I think in this
18 instance with the Kaspers, we had a great deal of
19 obligation to respond to that, and I think we did.

20 Q. I'm not quite sure why there was such
21 an obligation in the instance of the disciplining
22 of children by spanking them.

23 MR. MILLER: Same objection. It's
24 argumentative.

25 A. It was simply a rumor, that parents were

1 upset that he was doing this with their children.
2 There was never any allegation made and it was only
3 a rumor.

4 Q. But who was doing it with the children?

5 A. This other priest.

6 Q. You never tried to figure out what the
7 basis for this rumor was?

8 A. I didn't, no.

9 Q. Are you aware of anybody that investi-
10 gated that?

11 A. No.

12 Q. Do you know a Father Greg Miller?

13 A. Yes.

14 Q. Who is he in terms of where would he be
15 located?

16 A. At the present time, Father Miller is
17 pastor at St. Alphonses Church in Mount Pleasant,
18 Iowa.

19 Q. Have you ever had any conversation with
20 him about Father Leu?

21 A. Not that I remember.

22 Q. Did Father Miller ever indicate to you
23 that he felt that Father Leu was homosexual?

24 A. Not that I remember.

25 Q. Had you ever heard that rumor about

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1 Father Leu?

2 A. No.

3 Q. Had you ever entertained the idea that
4 Father Leu was homosexual?

5 A. No.

6 Q. Now, after you referred Father Leu to
7 McEchron and after you had contacted Dr. McEchron,
8 a meeting of some kind was scheduled between Father
9 Leu and Dr. McEchron.

10 A. That's correct.

11 Q. Did you have any further contact with
12 Dr. McEchron after had you had that phone conver-
13 sation in which you set up the meeting?

14 A. I had a phone conversation with him
15 that Father Leu was being reported to the proper
16 authorities. I'm not sure whether that was social
17 service or just how that is handled. But I learned
18 that from that phone conversation, tried to find
19 out something was going on, and Dr. McEchron said
20 that he couldn't tell me. So more than that, that
21 was the end of it right there, except that I knew
22 the reporting had gone on or was going on to happen.

23 Q. Did you call Dr. McEchron, did he call
24 you?

25 A. I don't remember.

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1 Q. But is it fair to say that the phone
2 conversation was limited to this statement by him
3 that he had had to report Father Leu to some
4 authority and that he was not able to provide you
5 with any information?

6 A. Yes. It may have been more extensive
7 than that. And I was very surprised that reporting
8 had to take place. I think we had some conversa-
9 tion about that. I never learned, aside from the
10 fact of the reporting, of any of his conversations
11 with Father Leu.

12 Q. Did you at any point in time tell the
13 doctor that story you told me about that Father Leu
14 may have been involved with prior disciplining of
15 children by spanking them on the butt, that that
16 was a mistake? Did you ever tell the doctor that?

17 A. No, not that I remember.

18 Q. As far as you know, did anyone let
19 Dr. McEchron know that the information that you had
20 provided to him at that first phone conversation
21 may not have been wholly accurate?

22 A. No, because I was the only one that
23 that, and I didn't do it, so I presume the
24 else did, either.

25 Q. In other words, you didn't say to someone

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1 else, Hey, why don't you let Dr. McEchron know that
2 the story I told was --

3 A. No.

4 Q. Did you have any conversations with
5 anybody about what you had related to Dr. McEchron
6 regarding the possible prior incident?

7 A. I have since then, yes.

8 Q. But you said since then. I want to know,
9 at or about the time you hung up the phone with
10 Dr. McEchron, did you do anything?

11 A. No.

12 Q. You said no, right?

13 A. That's right.

14 Q. You said later on you've had conver-
15 sations with people about that. With whom have
16 you had conversations?

17 A. Probably four or five months ago,
18 Monsignor Parizek is the only one I really
19 remember.

20 Q. I'm sorry. I'm not as familiar with this
21 litigation as other people. Who is he?

22 A. Just a -- he is a vicar --
23 for the Diocese. He lives at the
24 We have lunch together frequently.

25 Q. What brought up that topic?

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1 A. Specifically, I don't remember, except
2 that I remember being concerned at that time, you
3 know, that I had given misinformation to McEchron.

4 Q. With whom else have you spoken?

5 A. With the Bishop, I guess, just in
6 conversations and general way about it. I don't
7 remember anybody else.

8 Q. And when did you have conversations with
9 the Bishop about that incident?

10 A. Probably a couple months ago.

11 Q. Would that have been the first time you
12 had spoken to the Bishop about that incident?

13 A. I don't remember. I could have spoken
14 about it earlier than that. I just don't remember.

15 Q. Did you or anybody that you are aware of
16 make any investigation into whether or not Father
17 Leu had made any improper contact with children at
18 Our Lady of Victory or Holy Family?

19 A. I don't know. We didn't have any cause
20 to make any investigation prior to this incident.
21 What transpired since then would be whatever social
22 services or the police do. I
23 any of that was done or not. Prior to this
24 incident, we didn't have any reason to. Since
25 then, we've tried to not interfere with the legal

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1 processes that have gone on. So we haven't done
2 anything since then, either, so --

3 Q. Is it your testimony that after you got
4 off the phone with Dr. McEchron, that you didn't go
5 back to the Bishop and say, Hey, by the way, I told
6 them -- excuse me -- I told Dr. McEchron that there
7 was this rumor going around and maybe Father Leu
8 had something to do with it?

9 A. I don't have any memory of doing that.
10 There could have been a conversation that we had
11 a week or two later. I certainly didn't go back
12 and report to him the contents of our phone
13 conversation.

14 Q. Besides Monsignor Parizek and the Bishop,
15 is there anybody else that you've had conversations
16 with about the fact that you had spoken with
17 Dr. McEchron regarding the possible prior incident?

18 A. No.

19 Q. Have you reviewed any documentation in
20 preparation for today?

21 A. I saw the depositions for A.M. -- that Bishop
22 O'Keefe gave and Father Schmidt -- or, Monsignor
23 Schmidt and Father Linnenbrink, summary of
24 what the Diocese -- or, whatever that paper was.

25 MR. MILLER: Answers to

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1 interrogatories.

2 A. (CONTINUING) Answers to interroga-
3 tories. I saw those last week.

4 Q. Is there any of the testimony of Father
5 Linnenbrink that you disagree with?

6 A. The only thing that struck me is that he
7 says that I was at a meeting at the Ironmen with
8 the four of them. I don't remember that. I can
9 visualize the motel because we've had meetings
10 there frequently, and I've tried to picture the
11 four of us meeting together there, and I don't.

12 Q. Was there anything in particular about
13 the conversation or the meeting that he discussed
14 in his deposition that you have no recollection of?

15 A. I didn't notice anything in reading that
16 that I strongly disagreed with, except the meeting
17 at the Ironmen Inn.

18 Q. What about Monsignor Schmidt's
19 testimony? Is there anything in his that you
20 disagree with?

21 A. Not that I remember. Nothing struck me
22 as --

23 Q. What about the Bishop's?

24 A. There was nothing in there that I
25 remember objecting to or saying, No, that's not

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1 true. I didn't read it with a fine -- you know,
2 every fine point in mind that I might argue with,
3 that I disagree with. No. I didn't spot anything
4 that I had a disagreement with there.

5 Q. Did you review Father Leu's testimony?

6 A. Yes, I did.

7 Q. Is there anything in there that you
8 disagree with, if you recall?

9 A. A lot of that was stuff that I had
10 heard the first time, so it wasn't a matter of
11 disagreeing with. In terms of what he had done,
12 that is the first information I had of even what
13 had gone on. I don't remember anything that I
14 strongly disagreed with or thought that was in
15 error.

16 Q. Do you recall any telephone conversation
17 with Dr. McEchron in which Dr. McEchron had
18 contacted you about this allegation of a prior
19 incident at the request of Father Leu, because
20 Father Leu believed that it was not accurate? Do
21 you have any recollection of that telephone
22 conversation taking place?

23 A. No, I don't.

24 Q. Now, in terms of your contact with the
25 Kasper family, might I understand that you had

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1 limited, if any, contact with them prior to Father
2 Leu resigning?

3 A. I had no contact with them prior to that
4 time.

5 Q. And what contact did you have with the
6 parents, Kathy and Arden, after Father Leu
7 resigned?

8 A. After he resigned, I called the Kaspers
9 and I talked to Kathy, and we talked about
10 counseling. And I believe that she said that she
11 was already in counseling with Lutheran Social
12 Services, or was going to be; she had that contact,
13 anyway. And I told her that the Diocese would pay
14 for counseling services. Since she already had
15 somebody lined up, then, I said, we are prepared
16 to help her in that regard. She said it wasn't
17 necessary, and it went from there. I said, That's
18 fine. We will take care of that.

19 Q. I'm a little confused. What was
20 necessary?

21 A. That I line -- help her to line somebody
22 up, or whatever. She said that, no, she was
23 already in that.

24 Q. But in terms of paying for the
25 counseling, that was something that the Diocese was

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1 going to do.

2 A. That's correct.

3 Q. Now, what about any discussion regarding
4 attorneys' fees and payment of those?

5 A. No.

6 Q. Did you have any discussion with them?

7 A. No.

8 Q. Now, was that the only conversation you
9 had with Kathy? Or, for the most part, the conver-
10 sations you had with her was about obtaining
11 counseling and paying for it?

12 A. I don't remember any further points in
13 that conversation. Father Leu had resigned. This
14 had -- my recollection, was in that following week
15 after Thanksgiving. I may be off on my time in
16 that regard. But it seems to me that is when
17 that -- there really wasn't much else to talk about
18 at that point.

19 Q. Was there anything said by Kathy or by
20 Arden that you have specific recollection of?

21 A. I didn't talk to Arden at that time.
22 met with them again sometime after Christmas.

23 Q. In terms of Kathy, do you have any
24 recollection of what she may have said to you about
25 either the incident itself or anything else that

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1 you think is relevant?

2 A. I don't have a strong memory of that
3 conversation except for counseling. We may have
4 talked about getting counseling for Father Leu, and
5 I may have told her that that was in process.

6 Q. Did you have any contact with Arden after
7 Christmas, you said?

8 A. I had a call from Arden and Kathy, that
9 they were very concerned about what was going on
10 and they wanted to meet with me. I said, Fine, I
11 would be happy to do that.

12 Q. What was their concern?

13 A. At the meeting -- I invited them. They
14 came to Davenport. They said they would be happy
15 to do that. I met with them. Their concerns were
16 Father Leu's future and some -- what they had
17 expected was going to happen. We reviewed that.
18 We talked about family counseling in general terms
19 and just affirming whatever was going on there.

20 They asked about Father Leu's counseling,
21 and I told them that that had been arranged.
22 I don't think it had taken place at that point.
23 I told them that we were working with Mr. McEchron,
24 so that was in the plan -- or, planning stages.

25 I talked about Father Leu's future. I

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1 think at that point they had an expectation that he
2 would just be fired from the priesthood and be
3 gone. When they asked that he be removed from the
4 parish, I thought particularly Arden thought he
5 would just be fired and he was gone and that kind
6 of thing.

7 We talked about some of the processes
8 and some of the facts of that and what we were
9 doing, that certainly he would not be assigned
10 where children might be involved until all was
11 resolved. We talked about firing a priest and
12 the limitations of that and what went on in that
13 particular situation.

14 If I remember right, we talked for maybe
15 45 minutes or an hour, and that was it. They
16 seemed to be happy when they left, and we worked
17 through that. I'm not sure that Arden was ecstatic
18 with the future of Father Leu. I thought at that
19 point he thought he should be treated more harshly
20 immediately. But I thought that I left on an
21 amicable basis. I told them that I would keep them
22 informed in the future of what was happening.

23 Q. Did you have any discussions with either
24 of them later on after that?

25 A. I don't ever remember talking to Arden

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1 again. I don't remember any conversations with
2 Kathy, either. I think I may have dropped them a
3 note or two simply about what was happening. I'm
4 not sure if I had a phone conversation with
5 Mrs. Kasper about counseling, or not. I may have.

6 Q. Whatever you did have, it doesn't stick
7 in your mind right now.

8 A. No.

9 Q. Now, you indicated to them at some point
10 that there are some facts that they need to know
11 about being able to fire priests. Is there some
12 difficulty with that that we should know, or is
13 it just simply the fact that you had to wait to
14 determine whether or not the allegations were, in
15 fact, true?

16 A. Well, in firing a priest, in the sense
17 of suspending a priest, there isn't any problem in
18 doing that. Of having a priest not be a priest
19 anymore, there is problems with that.

20 Q. What are the problems?

21 A. Well, theologically, once a priest is
22 a priest, they are always a priest. What that
23 stops. The activity of that priest and his future
24 status, there are different stages of that.
25 Generally, if a priest is dispensed from his

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1 obligations -- that's in terms of marriage or
2 something like that -- that takes on a particular
3 status for him personally and different relation-
4 ship to the Church in that he is not active anymore
5 and then agrees to that. Suspension is something
6 where the priest is told that he can't operate
7 anymore.

8 Q. What's the severest form of punishment or
9 sanction that the Church can -- or, the Diocese can
10 give out to a priest?

11 MR. MILLER: Excuse me. It's vague
12 and indefinite. It's also compound. Do you want
13 to know what the Church can do or what the Diocese
14 can do?

15 MR. DIAZ: The Diocese.

16 A. In the practical area, it would be to
17 suspend a priest.

18 Q. What more can be done to Father Leu than
19 has already been done?

20 A. He could be forcefully laicized so he
21 would have no standing whatsoever. For example, we
22 talked about him being able to say mass privately.
23 He can't publicly function in any way. If we were
24 to force laicization on him, he wouldn't be able to
25 offer mass even privately.

1 Q. How does one offer mass privately?

2 A. You do it by yourself.

3 Q. Nobody else present.

4 A. That's correct.

5 Q. I term that praying.

6 A. The mass is a prayer.

7 Q. I appreciate that. But not in the
8 confines of what an individual may do. You
9 are saying that he can actually go through the
10 ceremony, but he cannot have anybody else present?

11 A. That's correct.

12 Q. Do you have any knowledge about this
13 issue of the attorneys' fees and the payment by
14 the Diocese of it?

15 A. No, I do not.

16 Q. For example, you don't know why they went
17 to a particular law firm or anything like that?

18 A. I have no idea.

19 Q. Did the Diocese, in fact, pay, as far as
20 you know, for the attorneys' fees incurred by Arden
21 and Kathy Kasper?

22 A. Not that I remember, no.

23 Q. Was there ever any promise or agree-
24 ment made with the Kaspers that that would, in
25 fact, be done?

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1 A. Not to my knowledge.

2 Q. Now, apparently, it's my understanding
3 that either or both of the Kaspers lost some wages
4 in the process of going through this counseling and
5 the aftermath of what had occurred. Are you aware
6 of that fact, or not?

7 A. I am not aware of that as a fact. Arden
8 may have mentioned that during our meeting in
9 whatever it was, January, or early 1989. I don't
10 remember more about that.

11 Q. Was there any promise made to the Kaspers
12 that they would have any of their lost wages
13 reimbursed to them by the Diocese as a result of
14 what had occurred?

15 A. Not that I know of or that I remember.

16 Q. Did you have any discussions with any of
17 the attorneys for Father Leu during the criminal
18 process?

19 A. Not that I remember.

20 Q. Did you provide a statement to anybody
21 else -- strike that.

22 Did you provide any statements to anybody
23 the police, county attorney's office or anybody
24 else involved in the criminal process, including,
25 by the way, the Department of Health and Human

1 Services, the DHS?

2 A. Not that I remember.

3 Q. Have you had any contact with any other
4 counselors that provided services to the Kasper
5 family?

6 A. No.

7 Q. Did they --

8 A. Excuse me.

9 To the Kasper family?

10 Q. Yes.

11 A. I paid the bills, of course. When the
12 counselor that was with Lutheran Social Services
13 went on her own, or with Adams & Baumbach, I was
14 concerned that there would be an increase in the
15 fees, and I said that that was all right at that
16 time. She called me at a further time when -- I
17 believe the Kaspers have a young daughter. That
18 the daughter was having problems because of the
19 divorce. It didn't have anything to do with this
20 action as such. Counselor called me and asked if
21 we would pay the fees for that, and I said yes.
22 Again, that was, I believe, to be a short-term
23 thing. It wasn't going to go on forever. ever.

24 Q. Did you see any reports of any kind, any
25 documents, other than bills, that was submitted by

1 the counselors?

2 A. No. I didn't think I had a right to
3 that, and I never asked for them.

4 Q. I want to go back to just one area that
5 I have some interest in, and that is the psycho-
6 logical evaluations that are done of seminarians or
7 prospective seminarians. Is that done for all of
8 them or only for some of them?

9 A. It's done for all of them.

10 Q. That's policy here at the Diocese?

11 A. It is now.

12 Q. When did that policy go into effect?

13 A. I'm uncertain. Up to maybe ten years
14 ago, or something like that.

15 Q. You say it's done now. I guess I'm
16 confused. As you were trying to distinguish maybe
17 what may have been done 15, 20, 25 years ago?

18 A. Right.

19 Q. But for the last ten years, that's what's
20 done of prospective seminarians?

21 A. That's correct.

22 Q. What's the reasoning behind

23 A. Primary reason would be to help them in
24 their studies, relationships with other people as
25 they are going through school, in case a person

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1 might be so outgoing that they won't get their
2 studies done and just to be aware of those
3 particular things, or a person tends to be a
4 little bit withdrawn, they should be encouraged to
5 participate in more group activities, and that kind
6 of thing. That's generally the results and purpose
7 of that interview or psychological evaluation. It
8 might turn up somebody that was just extremely
9 unfit for the life of a priest and might
10 particularly call awareness to observe that person
11 under those circumstances.

12 Q. Would you say that it's done for the
13 best interest of the Diocese as opposed to the
14 individual, or is it for both?

15 A. It's for both.

16 Q. And that's why it's mandated that
17 everyone have it done as just opposed to making
18 it optional for the individual.

19 A. That's correct.

20 Q. And has Dr. McEchron been doing those
21 evaluations for the ten years or for some shorter
22 period of time?

23 A. I think he has been doing it for all of
24 that period of time.

25 Q. Other than in the instance in this

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1 particular case, are you aware of any other
2 psychological evaluations that have been given of
3 priests, not prospective seminarians?

4 A. Where the Diocese -- not that the Diocese
5 has required. Well, in one instance, yes. A
6 person was having -- one of the priests was having
7 mental problems, and we asked him to get an
8 evaluation in that regard.

9 Q. Without mentioning the priest's name,
10 what kind of mental problems was he having?

11 A. I believe that he is manic-depressive.
12 He was certainly having problems with depression.

13 Q. In relationship to Dr. McEchron, what
14 does he charge for the evaluations that he does for
15 you on a routine basis, the ones that are done for
16 the seminarians?

17 A. It's about \$200, but I might be off one
18 way or the other on that.

19 Q. Do you know what he charged you for
20 Dr. Leu -- for Father Leu? Excuse me.

21 A. No, I don't.

22 MR. DIAZ: Let me take one minute
23 here.

24 We will take a short break. I will
25 be right back.

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(A five-minute recess was taken.)

Q. (BY MR. DIAZ) A few more questions, then we are done.

A. Sure.

Q. You indicated that at some point Mrs. Kasper had contacted you about their youngest child. Is it Annie, I believe is her name?

A. I have no idea.

Q. The youngest child is a girl.

A. The counselor contacted me; Mrs. Kasper didn't.

Q. So the counselor that was dealing with the child contacted you, looking to see whether or not you would be willing to pay for the counseling session regarding that particular child. Is that correct?

A. Yes. It was Kathy and the child, as I understand it, went to counseling together. I think that was two or three or four sessions, maybe.

Q. And the counselor related to you that while it was not a direct result of this incident, it was an indirect result of the stress upon the family? Is that correct?

A. She said it was because of the divorce,

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1 pending divorce, or whatever. Kathy and Arden were
2 separated at that time, and the young girl was
3 having some problems with that. The counselor
4 said, It doesn't pertain to what's gone on before,
5 but that Kathy would like to get some counseling
6 for this. Because she had been coming through this
7 already, would we be willing to help, and I said
8 yes.

9 Q. The records that you've provided -- we've
10 got quite a handful. It looks like we've counted
11 approximately 25 pages worth of records relating to
12 billing that was done by either Lutheran Social
13 Services or the counseling service of Adams &
14 Baumbach Associates. Is that correct?

15 A. That's right.

16 Q. Are these what were provided to you for
17 the counseling of different members, including
18 Kathy and Arden and arguably even the child, as
19 well? Are these the bills that you paid relative
20 to that counseling that you agreed that you would
21 provide?

22 A. That's correct.

23 MR. DIAZ: Why don't we mark this as
24 an exhibit. We have already numbered the page at
25 the bottom of it. You can just check to make sure

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1 that they are done.

2 MR. MILLER: Why don't we call it
3 Morrissey 1.

4 Q. (BY MR. DIAZ) Do you remember receiving
5 any letters from Mrs. Kasper at all?

6 A. If I did, they were in -- I presume, in
7 the file, or I've discarded them. No, I really
8 don't.

9 MR. DIAZ: Fair enough. Thank you.
10 That's all.

11 (Morrissey Deposition Exhibit 1 was
12 mark'd for identification.)

13 (The deposition was concluded at
14 4:15 p.m. on January 13, 1992.)
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1 STATE OF IOWA)
2) ss.
3 SCOTT COUNTY)

4 I, Alanna G. Jeffery, a Certified
5 Shorthand Reporter and Notary Public in and for the
6 State of Iowa, do hereby certify that the facts as
7 stated in the caption hereto are true; that the
8 witness named on the face sheet was by me sworn to
9 testify to the truth and nothing but the truth
concerning the matters in controversy in this
cause; that said witness was thereupon examined on
oath and the examination reduced to writing under
my supervision, consisting of the foregoing pages,
and the computer-aided transcript is a true record
of the testimony given by said witness and all
objections made.

10 I further certify that I am neither
11 attorney or counsel for, nor related to or employed
12 by, any of the parties to the action in which this
13 deposition is taken; and, further, that I am not a
relative or employee of any attorney or counsel
employed by the parties hereto or financially
interested in the action.

14 In witness whereof I have hereunto
15 set my hand this 26th day of January, 1992.

16
17 Alanna G. Jeffery, CSR
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20 Bettendorf, Iowa 52722
21 (319) 355-3338

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