

Editor's Note:

Readers may find the descriptions in this deposition transcript offensive.

Page 1

1 IN THE UNITED STATES BANKRUPTCY COURT
 2 FOR THE DISTRICT OF OREGON
 3
 4 In re:)
 5 ROMAN CATHOLIC ARCHBISHOP OF) No. 04-37154-elpl1
 6 PORTLAND IN OREGON, AND)
 7 SUCCESSORS, A CORPORATION)
 8 SOLE, dba the ARCHDIOCESE OF)
 9 PORTLAND IN OREGON,)
 10 Debtor.)
 11
 12
 13
 14
 15 VIDEOTAPED DEPOSITION OF NORMAN KLETTKE
 16 Taken on behalf of the Defendants
 17 March 9, 2005
 18
 19
 20
 21
 22
 23
 24
 25

Page 3

1 --oOo--
 2 ALSO PRESENT: Ms. Paulette Furness;
 3 Fr. Michael Sprauer;
 4 Videographer Dane Peterson
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 2

1 BE IT REMEMBERED THAT, pursuant to the
 2 Oregon Rules of Civil Procedure, the deposition of
 3 NORMAN KLETTKE was taken by Aaron M. Thomas,
 4 Certified Shorthand Reporter and Registered
 5 Professional Reporter for Oregon, on March 9, 2005,
 6 commencing at the hour of 9:39 a.m., in the
 7 conference room of the law office of Schwabe
 8 Williamson & Wyatt in the City of Portland, County
 9 of Multnomah, State of Oregon.
 10
 11 APPEARANCES:
 12
 13 GATTI GATTI MAIER KRUEGER SAYER & ASSOCIATES
 14 Attorneys at Law
 15 By Mr. Daniel Gatti
 16 Counsel for Plaintiff
 17
 18 SCHWABE WILLIAMSON & WYATT
 19 Attorneys at Law
 20 By Ms. Margaret Hoffmann
 21 Counsel for Archdiocese Defendants
 22
 23 COONEY & CREW
 24 Attorneys at Law
 25 By Mr. Thomas Cooney, Sr.
 Counsel for Defendant Fr. Michael Sprauer
 26
 27 OREGON DEPARTMENT OF JUSTICE
 28 Attorneys at Law
 29 By Mr. William Tharp
 30 Counsel for State of Oregon Defendants
 31
 32

Page 4

1	EXAMINATION INDEX	
2	Page	
3	EXAMINATION BY MS. HOFFMANN	6
4	EXAMINATION BY MR. THARP	198
5	EXAMINATION BY MR. COONEY	275
6	EXAMINATION BY MR. GATTI	288
7	***	
8	EXHIBIT INDEX	
9	No. Item Page	
10	1 Itemized Statement of Earnings	71
11	for Norman Klettk	
12	2 Amended Complaint	86
13	9 Drawing	97
14	3 Juvenile Institution Face	190
15	Sheet for Lester Klettk	
16	4 MacLaren record for Norman	193
17	Klettk	
18	5 Complaint	220
19	6 Multnomah County Juvenile	227
20	Department records for Norman	
21	Klettk	
22	7 MacLaren School Reception	235
23	Committee Recommendations for	
24	Norman Klettk	
25	8 Initial Interview and	236

EXHIBIT
PAGE 1 OF 25

11:04:12 1 Have I summarized that accurately?
 11:04:14 2 A Yes.
 11:04:14 3 Q And in the course of your conversation
 11:04:16 4 with Norman, did you tell him that you had been
 11:04:18 5 sexually abused while you were at MacLaren?
 11:04:21 6 A He had read it in the newspaper, my name
 11:04:23 7 had came up in the newspaper. He actually brought
 11:04:27 8 it to my attention.
 11:04:28 9 Q Had you told your son about your
 11:04:30 10 allegations or your belief that you were sexually
 11:04:32 11 abused at MacLaren before he read it in the
 11:04:35 12 newspaper?
 11:04:36 13 A No.
 11:04:42 14 Q Why not?
 11:04:42 15 A I was ashamed, embarrassed. It's
 11:04:43 16 something I just blocked all through my adult life,
 11:04:47 17 and then when it came out through the newspaper, we
 11:04:50 18 just went crazy over it.
 11:04:52 19 Q Who did?
 11:04:53 20 A I did. I just couldn't handle it.
 11:04:55 21 Q Why not?
 11:04:55 22 A There was actually somebody else involved
 11:04:57 23 and not just me.
 11:04:58 24 Q Are you saying, Mr. Kletke, that before
 11:05:00 25 it came out in the newspaper, you didn't know there

11:05:56 1 at MacLaren?
 11:05:57 2 A That's correct.
 11:05:57 3 Q Okay. And sometime after you read that in
 11:05:59 4 the paper, is it fair to say that you decided to
 11:06:01 5 file a lawsuit?
 11:06:02 6 A That's correct.
 11:06:03 7 Q Had -- you had not contacted an attorney
 11:06:07 8 or made any plans to file your own lawsuit?
 11:06:10 9 A No.
 11:06:11 10 Q Until after you read in the paper that
 11:06:13 11 there were other people claiming to have been abused
 11:06:16 12 by Father Sprauer at MacLaren?
 11:06:18 13 A That's correct.
 11:06:19 14 Q So it was reading it in the newspaper that
 11:06:21 15 prompted you to go seek out an attorney?
 11:06:23 16 A That's correct.
 11:06:24 17 Q And how did you choose the attorney,
 11:06:27 18 Mr. Gatti?
 11:06:28 19 A His name was in the paper.
 11:06:32 20 Q Did you --
 11:06:32 21 A Representing the other plaintiffs.
 11:06:34 22 Q Did you have contact with any of those,
 11:06:36 23 plaintiffs that you read about in the paper before
 11:06:38 24 you contacted Mr. Gatti?
 11:06:39 25 A No.

11:05:03 1 was anyone else alleging to have been abused by
 11:05:06 2 Father Sprauer?
 11:05:07 3 A That's correct.
 11:05:07 4 Q When did you first learn that there were
 11:05:09 5 other people claiming that they were abused by
 11:05:11 6 Father Sprauer?
 11:05:12 7 A When I read it in the newspaper.
 11:05:13 8 Q And what is it that you read in the
 11:05:15 9 newspaper?
 11:05:15 10 A That all these people were abused in the
 11:05:18 11 MacLaren School for Boys system and they were coming
 11:05:21 12 forward.
 11:05:23 13 MR. GATTI: He's talking about the Grecco
 11:05:24 14 complaint.
 11:05:26 15 Q I think we're talking about two different
 11:05:28 16 things. Your son Norman read in the paper that you
 11:05:31 17 were claiming you were abused.
 11:05:33 18 Is that your testimony?
 11:05:34 19 A Yes. They actually spelled my name as
 11:05:37 20 "Normal," not "Norman," so that's where that -- no,
 11:05:41 21 I recall that. All of a sudden it said "Normal."
 11:05:44 22 Well, good clerical error.
 11:05:49 23 Q Okay. Let me go back.
 11:05:51 24 You read in the paper about other people
 11:05:53 25 claiming that they had been abused by Father Sprauer.

11:06:40 1 Q Did you know those other people --
 11:06:42 2 A No.
 11:06:42 3 Q -- when you read their names in the paper?
 11:06:45 4 A No.
 11:06:45 5 Q So you read the article in the paper and
 11:06:47 6 how soon after you read it did you contact a lawyer?
 11:06:50 7 A Within a matter of a week.
 11:06:52 8 Q Who did you talk to during that week?
 11:06:54 9 A Nobody.
 11:06:58 10 Q So you read an article in the newspaper
 11:07:00 11 about people bringing a lawsuit for sexual abuse at
 11:07:05 12 MacLaren, and within a week, you contacted
 11:07:09 13 Mr. Gatti?
 11:07:10 14 A That's correct.
 11:07:12 15 Q Did you contact any lawyer before you
 11:07:14 16 contacted Mr. Gatti?
 11:07:15 17 A No.
 11:07:15 18 Q Did you talk to anybody about what you had
 11:07:18 19 read in the newspaper before you contacted
 11:07:21 20 Mr. Gatti?
 11:07:22 21 A No.
 11:07:24 22 Q Did you make any attempt before you
 11:07:27 23 contacted Mr. Gatti to obtain information about your
 11:07:34 24 own allegations?
 11:07:36 25 A Other than contacting his office, no.

EXHIBIT
PAGE 2 OF 25

11:12:02 1 Q So your testimony today is that you were
 11:12:04 2 not in the care and custody of the State of Oregon
 11:12:07 3 at MacLaren for the years 1976 and 1977?
 11:12:11 4 A Not in MacLaren, however I probably during
 11:12:14 5 that time frame was in the custody of Multnomah
 11:12:16 6 County Juvenile, JDH.
 11:12:26 7 Q Okay.
 11:12:27 8 A At some point in time during those years.
 11:12:29 9 Q So I want to make sure that I understand
 11:12:30 10 your testimony today to the extent that it's
 11:12:34 11 different than the information that's in your
 11:12:36 12 complaint.
 11:12:36 13 Are you saying, Mr. Klettke, that during
 11:12:38 14 the years of 1976 through 1977, you were, in fact,
 11:12:42 15 in the custody of the State of Oregon?
 11:12:44 16 A The custody of Multnomah County.
 11:12:46 17 Q Okay.
 11:12:47 18 A At one or two occasions.
 11:12:50 19 Q Are you saying that you were not at
 11:12:53 20 MacLaren in the years 1976 through 1977?
 11:12:57 21 A Yes.
 11:13:01 22 Q The next sentence says, "Plaintiff Klettke
 11:13:04 23 was a resident at MacLaren when he was approximately
 11:13:07 24 13 years old."
 11:13:09 25 Is that a correct statement?

11:13:58 1 at MacLaren 1978, 1979 and 1980.
 11:14:03 2 Is that correct?
 11:14:04 3 A Correct.
 11:14:04 4 Q Okay. And are you -- is it your testimony
 11:14:07 5 today that in 1978 when you went to MacLaren, you
 11:14:10 6 were 14?
 11:14:12 7 A Yes.
 11:14:12 8 Q Okay. The next sentence in that paragraph
 11:14:15 9 says, "During his intermittent residency at
 11:14:20 10 MacLaren, Plaintiff Klettke was visited by defendant
 11:14:24 11 Sprauer who was allegedly visiting him for the
 11:14:27 12 purpose of spiritual counseling, connecting and
 11:14:29 13 guidance."
 11:14:31 14 Is that a correct statement?
 11:14:32 15 A That's correct.
 11:14:33 16 Q Okay. So if your testimony is that you
 11:14:35 17 were at MacLaren in 1978, 1979 and 1980, what you're
 11:14:42 18 alleging is that Father Sprauer visited you at
 11:14:45 19 MacLaren during 1978, 1979 and 1980?
 11:14:50 20 A 1978, 1979.
 11:14:52 21 Q Okay. And you're confident of that?
 11:14:54 22 A I'm confident.
 11:14:55 23 Q You're not going to change that?
 11:14:56 24 A No.
 11:14:57 25 Q Your testimony is Father Sprauer visited

11:13:10 1 A No.
 11:13:11 2 Q But that is information that you
 11:13:12 3 previously provided to be the basis of your
 11:13:14 4 complaint, correct?
 11:13:15 5 A That's correct.
 11:13:15 6 Q And now you're saying that you gave
 11:13:17 7 incorrect information, you were not 13 years old?
 11:13:20 8 A That's correct.
 11:13:20 9 Q How old were you when you were at
 11:13:21 10 MacLaren?
 11:13:25 11 A Fourteen. I turned fifteen in MacLaren.
 11:13:28 12 Q Okay. So your testimony today is that you
 11:13:31 13 were 14 when you went to MacLaren?
 11:13:33 14 A That's correct.
 11:13:33 15 Q And what is your testimony today, sir,
 11:13:36 16 about when you were at MacLaren?
 11:13:38 17 A Regarding?
 11:13:39 18 Q Pardon me?
 11:13:40 19 A Regarding?
 11:13:42 20 Q What is your testimony today as to the
 11:13:44 21 time frame that you were at MacLaren? As I
 11:13:46 22 understand it, you're saying that the information in
 11:13:50 23 the complaint is incorrect.
 11:13:54 24 A '78, '79 and '80.
 11:13:55 25 Q So your testimony today is that you were

11:15:00 1 you at MacLaren in 1978 and 1979?
 11:15:04 2 A Correct.
 11:15:04 3 Q And we can rely on that?
 11:15:07 4 A Correct.
 11:15:07 5 Q Okay. The next sentence says, "To the
 11:15:12 6 best of his recollection, Klettke was placed in the
 11:15:16 7 hole at D-1 in December of 1976 when, on two
 11:15:22 8 occasions, Defendant Sprauer sexually molested
 11:15:27 9 Klettke who after told no one."
 11:15:30 10 Is that a correct statement?
 11:15:31 11 A No, it's not.
 11:15:32 12 Q That is information that you provided
 11:15:34 13 initially for this complaint?
 11:15:41 14 A Correct.
 11:15:41 15 Q Okay. And today you're saying that the
 11:15:41 16 information you provided was incorrect?
 11:15:44 17 A It would have been the fall of '78.
 11:15:46 18 Q So you're saying that this sentence or
 11:15:49 19 that your allegation is that in the fall of '78, you
 11:15:54 20 were in D -1?
 11:15:57 21 A Yes.
 11:15:57 22 Q And you define D-1 as being the whole?
 11:16:01 23 A Yes.
 11:16:02 24 Q And that while you were in D-1 in 1978,
 11:16:06 25 you were sexually molested by Father Sprauer on two

EXHIBIT
PAGE 3 OF 25

Page 93

11:16:10 1 occasions?
 11:16:11 2 A Yes.
 11:16:11 3 Q That's your testimony?
 11:16:12 4 A Yes.
 11:16:13 5 Q Okay. And that's not going to change?
 11:16:15 6 A No.
 11:16:16 7 Q And we can rely on that?
 11:16:17 8 A Yes.
 11:16:19 9 Q So if I understand correctly, your lawsuit
 11:16:23 10 is based on the fact that you claim in the fall of
 11:16:26 11 1978, while a resident at MacLaren, you were placed
 11:16:31 12 in D-1, which is the hole, and you were sexually
 11:16:35 13 abused by Father Sprauer twice?
 11:16:37 14 A Yes.
 11:16:37 15 Q And that would be twice in the fall of
 11:16:42 16 1978?
 11:16:43 17 A Yes.
 11:16:43 18 Q And twice -- were you in D-1 two different
 11:16:47 19 times in the fall of 1978?
 11:16:48 20 A No.
 11:16:48 21 Q How long were you in D-1 in the fall of
 11:16:53 22 '78?
 11:16:54 23 A It's a reception-type thing when you first
 11:16:58 24 go in, you're put there and then you go through a
 11:17:02 25 reception program. I don't recall exactly how long

Page 95

11:16:06 1 A Immediately to D-1.
 11:18:08 2 Q So you went from the streets to D-1?
 11:18:10 3 A Correct.
 11:18:10 4 Q And how long were you in D-1 in 1978?
 11:18:13 5 A I would say -- I believe it was three to
 11:18:17 6 five days. It may have just been three days.
 11:18:21 7 Q Okay. And it was during those three or
 11:18:24 8 three to five days that you were in D-1 in the fall
 11:18:27 9 of 1978 that you claim you were abused by Father
 11:18:30 10 Sprauer?
 11:18:30 11 A Yes.
 11:18:31 12 Q Okay. I want you to tell me in your own
 11:18:33 13 words what you claim happened.
 11:18:37 14 A Well, they would bring in a counselor to
 11:18:40 15 see what my program was going to be and also
 11:18:44 16 spiritual counseling from Father Sprauer was there
 11:18:47 17 and there was also a Protestant pastor at the time,
 11:18:51 18 I guess, and they would come and visit and tell me a
 11:18:53 19 little bit more about the program I was incarcerated
 11:18:57 20 in and what was going to happen, when it was going
 11:19:00 21 to happen, to the best of my recollection, and they
 11:19:06 22 could visit whenever they wanted to.
 11:19:13 23 Q And what happened?
 11:19:16 24 A Father Sprauer -- I was seeking spiritual
 11:19:19 25 guidance and he physically abused me.

Page 94

11:17:06 1 I was in D-1.
 11:17:08 2 Q Is it your testimony, Mr. Klettker, that
 11:17:10 3 when you first arrived at MacLaren in '78, you were
 11:17:13 4 placed in D-1?
 11:17:15 5 A Yes.
 11:17:19 6 MR. GATTI: Margaret, the complaint is
 11:17:21 7 wrong with reference to where the abuse took place.
 11:17:24 8 MS. HOFFMANN: Wait a minute, Dan, stop,
 11:17:26 9 because he's giving me testimony.
 11:17:28 10 MR. GATTI: I understand.
 11:17:30 11 MS. HOFFMANN: He said it took place in
 11:17:36 12 D-1.
 11:17:37 13 MR. GATTI: No, he didn't say that. He
 11:17:39 14 said he was placed in D-1.
 11:17:41 15 Q Is it your testimony, Mr. Klettker, that
 11:17:43 16 you were abused in D-1?
 11:17:46 17 A Yes.
 11:17:46 18 MR. GATTI: Oh, I take it back, then,
 11:17:48 19 sorry.
 11:17:50 20 Q Is it your testimony, Mr. Klettker, that
 11:17:53 21 when you initially arrived at MacLaren in 1978, you
 11:17:58 22 were immediately placed in D-1?
 11:18:01 23 A Yes.
 11:18:02 24 Q And were you in reception first or did you
 11:18:04 25 go immediately to D-1?

Page 96

11:19:22 1 Q What did he do?
 11:19:23 2 A He touched me, hugged me, masturbated me.
 11:19:43 3 Q What else?
 11:19:45 4 A Just kept telling me things would get
 11:19:47 5 better.
 11:19:49 6 Q And physically, where did this hugging,
 11:19:52 7 touching, and masturbating take place?
 11:19:55 8 A In the holding cell.
 11:20:01 9 Q How many times did he hug you?
 11:20:04 10 A I don't recall.
 11:20:05 11 Q More than one?
 11:20:06 12 A Yes.
 11:20:07 13 Q More than ten?
 11:20:08 14 A No.
 11:20:09 15 Q More than two?
 11:20:11 16 A Yes.
 11:20:11 17 Q What's your best estimate, sir, as to how
 11:20:14 18 many times he hugged you?
 11:20:15 19 A Three to five.
 11:20:18 20 Q And what is your best estimate as to how
 11:20:21 21 many times he masturbated you?
 11:20:22 22 A Two.
 11:20:24 23 Q And what is your best estimate as to how
 11:20:27 24 many times he touched you?
 11:20:29 25 A Five.

EXHIBIT 1
PAGE 4 OF 25

11:20:31 1 Q Touched you where?
 11:20:32 2 A My penis.
 11:20:38 3 Q And when you say you were in the holding
 11:20:41 4 cell, can you describe that for me.
 11:20:45 5 A It was a cell block with individual cells.
 11:20:49 6 Q Okay. What I'd like to do is give you a
 11:20:51 7 piece of paper and a pencil and have you to the best
 11:20:54 8 of your recollection sketch out for me what D-1
 11:20:59 9 looked like, where you were and where the abuse took
 11:21:02 10 place.
 11:21:07 11 MR. GATTI: Off the record while he draws.
 11:21:10 12 MS. HOFFMANN: We can go off the record
 11:21:11 13 while he draws.
 15:33:26 14 (Exhibit No. 9 marked.)
 11:21:12 15 (Pause in deposition: 11:21 - 11:23 a.m.)
 11:23:49 16
 11:23:53 17 BY MS. HOFFMANN: (Continuing)
 11:23:54 18 Q Mr. Klettke, have you finished sketching
 11:23:57 19 what you referred to as D-1?
 11:23:59 20 A To the best of my knowledge.
 11:24:01 21 Q Can you label that D-1.
 11:24:03 22 A Sure.
 11:24:04 23 Q Now can you describe for me what it is
 11:24:06 24 you've drawn.
 11:24:14 25 A Well, there would be -- as you entered the

11:25:04 1 Q So are you saying that the holding cell is
 11:25:07 2 D-1?
 11:25:10 3 A Yes.
 11:25:10 4 Q Are you saying that the reception area is
 11:25:13 5 D-1?
 11:25:14 6 A No.
 11:25:15 7 Q You didn't go to the reception area, you
 11:25:18 8 came in off the street and went to D-1?
 11:25:21 9 A Yes, and then to reception.
 11:25:23 10 Q Okay. So whatever day you entered
 11:25:26 11 MacLaren, it was sometime in the fall of '78.
 11:25:29 12 Is that your testimony?
 11:25:31 13 A Correct.
 11:25:31 14 Q Do you remember the date?
 11:25:34 15 A It was sometime in October.
 11:25:36 16 Q Okay. So your testimony is you went to
 11:25:39 17 MacLaren in October of 1978?
 11:25:41 18 A Right.
 11:25:41 19 Q And when you came in off the street, the
 11:25:44 20 first place that you were housed was in D-1?
 11:25:47 21 A Correct.
 11:25:47 22 Q And you later went after you'd been in D-1
 11:25:51 23 three to five days, you went to a place that you
 11:25:53 24 called reception?
 11:25:54 25 A Correct.

11:24:14 1 building, it was a compound type, older building.
 11:24:14 2 As you would go in, I recall a security office where
 11:24:17 3 the staff would be.
 11:24:18 4 Q Now, you've just marked something on
 11:24:20 5 there.
 11:24:21 6 Tell us what you've marked.
 11:24:22 7 A I was just identifying this as like a
 11:24:24 8 security office as you go into D-1.
 11:24:28 9 Q If you put an X there, why don't you put a
 11:24:32 10 key down there that says, "X equals security
 11:24:35 11 office."
 11:24:36 12 A (Witness marks document).
 11:24:37 13 Q So you're saying when you come in off the
 11:24:41 14 street, you go through a security office?
 11:24:43 15 A Right.
 11:24:44 16 Q Okay.
 11:24:44 17 A Correct.
 11:24:45 18 Q And then what else are you depicting in
 11:24:48 19 that picture?
 11:24:49 20 A You would be taken to one of these cells,
 11:24:52 21 one of these cell blocks. It's hard for me to
 11:24:55 22 recall that, but it's just like a cell block with
 11:24:59 23 hallways and everybody had their own little cell.
 11:25:02 24 Q Okay.
 11:25:03 25 A Holding cell.

11:25:55 1 Q But as I understand your testimony, it's
 11:25:58 2 while you were in D-1 for that three to five days
 11:26:03 3 that you went through an orientation?
 11:26:07 4 A Reception was the orientation.
 11:26:09 5 Q Well, I thought you told me before that
 11:26:11 6 when you were in D-1, you were introduced to Father
 11:26:15 7 Sprauer --
 11:26:16 8 A That's correct.
 11:26:16 9 Q -- they told you what your program was
 11:26:18 10 going to be, you met a Protestant minister?
 11:26:21 11 A That's correct.
 11:26:22 12 Q So that all happened in the first three to
 11:26:24 13 five days while you were in D-1?
 11:26:26 14 A That's correct.
 11:26:27 15 Q What else happened in the first three to
 11:26:29 16 five days while you were in D-1? You met Father
 11:26:33 17 Sprauer, you met a Protestant minister and somebody
 11:26:37 18 told you what your program was going to be?
 11:26:39 19 A They told me where I was going to be
 11:26:41 20 placed.
 11:26:41 21 Q Who told you that?
 11:26:42 22 A The person in charge of the reception
 11:26:44 23 area.
 11:26:44 24 Q So did they -- did these people come into
 11:26:46 25 your cell --

EXHIBIT
PAGE 5 OF 25

11:33:52 1 through security, and they put you in a cell in D-1?
 11:33:55 2 A Correct.
 11:33:57 3 Q What's the first thing that happened or
 11:33:59 4 who's the first person that came and talked to you?
 11:34:05 5 A I believe it was medical staff, because I
 11:34:09 6 remember I had to go to medical one day for whatever
 11:34:14 7 check-up, blood, whatever.
 11:34:16 8 Q Did medical people come to D-1?
 11:34:19 9 A No, they took us -- security escorted us
 11:34:22 10 to the medical.
 11:34:25 11 Q When you say "us," who are you referring
 11:34:26 12 to?
 11:34:26 13 A Well, whoever was in D-1 that had to go to
 11:34:29 14 medical, they would send security to take us there.
 11:34:32 15 Q So did you go to medical with a group of
 11:34:34 16 other guys?
 11:34:41 17 A I believe I was by myself, but once you
 11:34:41 18 got to medical, there were other guys there.
 11:34:41 19 Q Okay. So you go in the front door --
 11:34:42 20 A I don't believe they escorted us as a
 11:34:45 21 group.
 11:34:45 22 Q So you go in the front door in MacLaren,
 11:34:49 23 you go through security, and they put you in a cell
 11:34:51 24 in D-1 by yourself?
 11:34:53 25 A Correct.

11:35:40 1 like?
 11:35:43 2 A He -- actually, at the time, looked like
 11:35:46 3 my Methodist minister at Tabor Heights, an older
 11:35:51 4 guy, bald, short hair, glasses.
 11:35:58 5 Q And when you met the Protestant minister,
 11:36:00 6 he came into your cell in D-1?
 11:36:03 7 A Correct.
 11:36:03 8 Q And then when he came into your cell, did
 11:36:06 9 he close the door behind him?
 11:36:07 10 A No, he didn't.
 11:36:09 11 Q He left the door open?
 11:36:11 12 A He wanted me to sign up for the church
 11:36:13 13 program.
 11:36:14 14 Q Right, but my question is: Did he
 11:36:16 15 physically come inside your cell?
 11:36:18 16 A Yes.
 11:36:18 17 Q But while he was in your cell, he left the
 11:36:21 18 door open?
 11:36:21 19 A I don't recall. I believe so.
 11:36:22 20 Q How did he get in the cell?
 11:36:24 21 A The guards would let him in.
 11:36:26 22 Q Okay. So he didn't have keys of his own
 11:36:28 23 to open and get in?
 11:36:30 24 A I don't believe so.
 11:36:31 25 Q So the guard had to open the door and let

11:34:53 1 Q The first thing you remember is some staff
 11:34:55 2 person came and escorted you to the medical portion
 11:34:56 3 of the facility?
 11:34:57 4 A I think that was the second day. I don't
 11:34:59 5 believe that was the first day.
 11:35:01 6 Q Okay.
 11:35:02 7 A I don't -- I don't recall.
 11:35:03 8 Q What do you believe happened the first
 11:35:04 9 day?
 11:35:05 10 A I believe it was more like a cooling down
 11:35:07 11 period, I ate, probably got to go out to recreation
 11:35:12 12 that night.
 11:35:14 13 Q When did you meet Father Sprauer?
 11:35:16 14 A It was the second or third day.
 11:35:18 15 Q Well, you were only there three days,
 11:35:21 16 right?
 11:35:22 17 A Yeah, it was the second or third.
 11:35:23 18 Q When did you meet the Protestant minister?
 11:35:25 19 A It would have been in the same time frame.
 11:35:27 20 Q Did you meet them together?
 11:35:28 21 A No.
 11:35:30 22 Q So whatever day you met Father Sprauer is
 11:35:32 23 the same day you met the Protestant?
 11:35:37 24 A I don't recall.
 11:35:38 25 Q What did the Protestant minister look

11:36:33 1 the Protestant minister in?
 11:36:35 2 A I believe.
 11:36:36 3 Q Did the guard stand there while the
 11:36:36 4 Protestant minister was in there?
 11:36:37 5 A No.
 11:36:37 6 Q Did he close the door behind so that it
 11:36:39 7 was locked?
 11:36:41 8 A Ajar.
 11:36:41 9 Q And what did the Protestant minister say,
 11:36:45 10 what was your conversation with him?
 11:36:46 11 A He was just trying to see what religion I
 11:36:49 12 was going to pursue when I'm incarcerated, if I
 11:36:52 13 needed any spiritual counseling, I could sign up for
 11:36:55 14 their weekly services.
 11:36:56 15 Q And what did you tell him?
 11:36:58 16 A I told him at that point, I was open to
 11:37:00 17 anything.
 11:37:01 18 Q So did you sign up for his --
 11:37:03 19 A I signed up for every program that was
 11:37:05 20 ever offered to me in MacLaren.
 11:37:07 21 Q Okay. Did you tell him you were
 11:37:09 22 Protestant?
 11:37:10 23 A Well, my church was Methodist, I was real
 11:37:13 24 open.
 11:37:13 25 Q Okay. How long was he in your cell?

EXHIBIT 1
PAGE 6 OF 25

11:37:17 1 A Fifteen, twenty minutes.
 11:37:19 2 Q How many times did he come to visit you in
 11:37:20 3 D-1?
 11:37:21 4 A Just once.
 11:37:22 5 Q Okay. And did you meet him before or
 11:37:25 6 after you met Father Sprauer?
 11:37:27 7 A Before.
 11:37:28 8 Q Okay. And then what do you recall about
 11:37:31 9 your first meeting with Father Sprauer?
 11:37:36 10 A Pretty much he was counseling me,
 11:37:40 11 spiritual guidance.
 11:37:42 12 Q Well, tell me, how did he get in your
 11:37:45 13 cell?
 11:37:45 14 A They would have let him in.
 11:37:47 15 Q So a guard came and opened your cell and
 11:37:50 16 let him in?
 11:37:51 17 A Right.
 11:37:52 18 Q And --
 11:37:53 19 A They weren't called guards, they were
 11:37:55 20 called staff.
 11:37:56 21 Q Okay. So a staff member came, opened your
 11:37:59 22 door and let Father Sprauer in?
 11:38:00 23 A Yes.
 11:38:01 24 Q What did Father Sprauer have with him, if
 11:38:05 25 anything?

11:39:03 1 A Wire rim.
 11:39:04 2 Q Wire rim?
 11:39:05 3 A They might have been plastic. I don't --
 11:39:09 4 that's a tough one.
 11:39:10 5 Q What color hair?
 11:39:12 6 A Dark brown, turning color.
 11:39:16 7 Q And when the staff let him in your cell,
 11:39:21 8 did the door -- was the door closed behind him?
 11:39:23 9 A Yes.
 11:39:23 10 Q And how long was he in your cell the first
 11:39:26 11 time?
 11:39:26 12 A A half hour, maybe 40 minutes.
 11:39:28 13 Q And what did you talk about?
 11:39:30 14 A Spiritual counseling.
 11:39:31 15 Q When you say that, what do you mean? What
 11:39:33 16 is spiritual counseling?
 11:39:34 17 A Guidance, what I've felt I've done wrong,
 11:39:37 18 what can make things better.
 11:39:39 19 Q Did he ask you if you thought you'd done
 11:39:43 20 wrong or --
 11:39:46 21 A Yes.
 11:39:46 22 Q What did you tell him?
 11:39:52 23 A I did do wrong.
 11:39:52 24 Q Did he ask you if you were Catholic?
 11:39:52 25 A Yes.

11:38:05 1 A A Bible, I believe a notepad.
 11:38:08 2 Q What did --
 11:38:09 3 A Probably part of my case file.
 11:38:11 4 Q You think he had your case file with him?
 11:38:13 5 A Probably part of it.
 11:38:14 6 Q Why do you say that?
 11:38:16 7 A Well, because it seems every time I was
 11:38:19 8 visited by anybody, somebody had a copy of something
 11:38:22 9 that says why I was there and how long I'm supposed
 11:38:25 10 to be there and so forth.
 11:38:27 11 Q Okay. When in relationship to your three-
 11:38:32 12 to five-day stay at D-1 did you meet Father Sprauer?
 11:38:36 13 A There was a second day.
 11:38:38 14 Q The same day that you met the Protestant
 11:38:41 15 minister?
 11:38:43 16 A It had to have been.
 11:38:44 17 Q What did Father Sprauer look like?
 11:38:49 18 A He was wearing his priest thing and he
 11:38:51 19 was -- he looked like a priest.
 11:38:53 20 Q Did he have any facial hair?
 11:38:57 21 A I don't recall at the time. I don't
 11:38:58 22 believe so.
 11:38:59 23 Q Glasses?
 11:38:59 24 A Glasses.
 11:39:01 25 Q What kind of glasses?

11:39:52 1 Q And what did you tell him?
 11:39:53 2 A I was open.
 11:39:55 3 Q But did you tell him you were Methodist?
 11:39:58 4 A I told him I had a Methodist church.
 11:40:00 5 Q Okay.
 11:40:01 6 A I had as a child attended Methodist
 11:40:04 7 church.
 11:40:04 8 Q Okay. When Father Sprauer was in your
 11:40:06 9 cell the first time that you met him, was he
 11:40:10 10 standing, sitting, and what were you doing?
 11:40:13 11 A Sitting, sitting.
 11:40:14 12 Q Okay. Where were you sitting?
 11:40:17 13 A On the bed bench. It was a cement bed
 11:40:21 14 with a mattress.
 11:40:22 15 Q Okay. So you were sitting on the bed and
 11:40:25 16 where was Father Sprauer?
 11:40:26 17 A He would have been sitting right next to
 11:40:28 18 me.
 11:40:28 19 Q Okay. Was he on your left or your right?
 11:40:31 20 A He was to my left towards the door.
 11:40:33 21 Q So he was sitting closest to the door?
 11:40:38 22 A Correct.
 11:40:38 23 Q Did -- are you claiming, Mr. Klettko, that
 11:40:41 24 something of a sexual nature happened the first time
 11:40:45 25 that Father Sprauer was in your cell when you were

EXHIBIT
PAGE 7 OF 25

11:40:47 1 at D-1 when you first went to MacLaren?
 11:40:52 2 A I am claiming that.
 11:40:55 3 Q Okay. What are you claiming happened?
 11:40:57 4 A I claim he got a little too friendly with
 11:41:00 5 me and started caressing me and saying things would
 11:41:03 6 get all better and he could do things for me that no
 11:41:06 7 one else could while I was there.
 11:41:10 8 Q What did he tell you he could do for you?
 11:41:13 9 A He could get me cigarettes, he could get
 11:41:16 10 me more rec time, he could get me -- I don't know,
 11:41:26 11 just I could help out in the auditorium and whatnot
 11:41:32 12 down the road, it would be an easier program.
 11:41:36 13 Q Did he tell you why he could do these
 11:41:39 14 things for you?
 11:41:42 15 A Because he was a priest.
 11:41:44 16 Q Did he tell you he was a priest at
 11:41:48 17 MacLaren?
 11:41:51 18 A I don't recall that he ever said that he
 11:41:52 19 was an actual priest at MacLaren. He was a priest.
 11:41:58 20 Now, whether he was part of MacLaren at the time, I
 11:42:02 21 do not recall. He was there as a priest, so I would
 11:42:08 22 assume at the time -- I would have assumed he was
 11:42:14 23 priest at MacLaren.
 11:42:15 24 Q He told you he could get you cigarettes?
 11:42:17 25 A Yes.

11:42:59 1 that he could do things for you?
 11:43:01 2 A No, not to that extent.
 11:43:02 3 Q Did he tell you that he could do anything
 11:43:05 4 for you?
 11:43:06 5 A He pretty much wanted me to sign a piece
 11:43:08 6 of paper so that I could go to the church, Saturday
 11:43:11 7 and Sunday, go do that with him on Sunday, be part
 11:43:15 8 of both programs, it wouldn't really matter, but
 11:43:17 9 the -- the Protestant minister never said, "I can
 11:43:22 10 make your program so much easier, I can do this for
 11:43:26 11 you, I can do that for you."
 11:43:28 12 Q Okay.
 11:43:29 13 A He was there probably just doing his job.
 11:43:31 14 Q So you said Father Sprauer told you that
 11:43:33 15 he could do these things for you and you've listed
 11:43:36 16 the things for me that Father Sprauer said he could
 11:43:39 17 do for you, right?
 11:43:40 18 A (Witness nods head.)
 11:43:41 19 Q Is that correct?
 11:43:41 20 A That's correct.
 11:43:41 21 Q And you said during that first visit, you
 11:43:44 22 thought he was too friendly.
 11:43:46 23 How so?
 11:43:47 24 A Arms around me, rubbed my neck, touched
 11:43:53 25 me.

11:42:18 1 Q He told you he could get you more rec
 11:42:20 2 time?
 11:42:20 3 A More canteen money.
 11:42:22 4 Q Wait, I want to go through the things and
 11:42:25 5 make sure I have a list.
 11:42:26 6 Did he tell you he could get you more
 11:42:28 7 cigarettes?
 11:42:28 8 A Yes.
 11:42:28 9 Q Did he tell you he could get you more
 11:42:30 10 recreation time?
 11:42:31 11 A Yes.
 11:42:32 12 Q Did he tell you that you could help out in
 11:42:34 13 the auditorium?
 11:42:35 14 A Or around campus.
 11:42:36 15 Q Okay. And he told you that he could help
 11:42:38 16 you get an easier program?
 11:42:40 17 A Yes.
 11:42:41 18 Q What else did he tell you that he could do
 11:42:43 19 for you?
 11:42:45 20 A Spiritually guide me, counsel me.
 11:42:50 21 Q Did he tell you how he could do these
 11:42:52 22 things?
 11:42:53 23 A Well, he was a priest. I put my trust
 11:42:55 24 into him.
 11:42:56 25 Q Well, did the Protestant minister tell you

11:43:55 1 Q Touched you where?
 11:43:56 2 A Leg, crotch.
 11:44:04 3 Q Was his hand on top of your clothing?
 11:44:06 4 A Yes.
 11:44:07 5 Q Okay. During the first visit, was his
 11:44:09 6 hand ever anywhere other than on top your clothing?
 11:44:14 7 A Yes.
 11:44:14 8 Q Where was his hand?
 11:44:16 9 A Down the front of my pants.
 11:44:17 10 Q So he -- during that first visit, he put
 11:44:22 11 his hand inside your street clothes, because that's
 11:44:25 12 what you had on, right?
 11:44:26 13 A Yes.
 11:44:27 14 Q And inside your underwear?
 11:44:29 15 A Yes.
 11:44:29 16 Q And when you came in off the street, what
 11:44:31 17 were you wearing?
 11:44:37 18 A Probably a loose jacket, a shirt,
 11:44:40 19 something like I'm wearing today, jeans and tennis
 11:44:43 20 shoes.
 11:44:44 21 Q Okay. Did you have an erection when he
 11:44:46 22 was touching your penis?
 11:44:48 23 A Yes.
 11:44:52 24 Q Did you ejaculate?
 11:44:54 25 A Yes.

EXHIBIT 1
PAGE 8 OF 25

11:44:54 1 Q That first time?
 11:44:55 2 A Yes.
 11:44:59 3 Q Did he -- did you pull your pants down or
 11:45:03 4 was his hand just inside your pants?
 11:45:05 5 A He helped pull them down.
 11:45:06 6 Q And when they were pulled down, where were
 11:45:08 7 they pulled down to?
 11:45:10 8 A My knees.
 11:45:10 9 Q Was that both your blue jeans and your
 11:45:12 10 underwear?
 11:45:14 11 A Yes.
 11:45:21 12 Q So you're sitting in D-1 your second day
 11:45:21 13 there and you have your blue jeans and your
 11:45:21 14 underwear pulled down to your knees?
 11:45:21 15 A Correct.
 11:45:21 16 Q So that your genitals are exposed?
 11:45:24 17 A Correct.
 11:45:24 18 Q And he masturbated you until you
 11:45:26 19 ejaculated?
 11:45:27 20 A Correct.
 11:45:28 21 Q Where did the sperm go when you
 11:45:30 22 ejaculated?
 11:45:32 23 A Probably a towel.
 11:45:33 24 Q Did he have a towel?
 11:45:35 25 A There was one in the cell.

11:46:35 1 words?
 11:46:36 2 A I believe so.
 11:46:36 3 Q He said, "Play with me?"
 11:46:40 4 A "Fondle me, molest" -- I don't know. I
 11:46:47 5 believe that's correct.
 11:46:48 6 Q So was it mutual, you were rubbing his
 11:46:48 7 penis while he was rubbing yours?
 11:46:49 8 A Yes.
 11:46:49 9 Q Did he also have his pants pulled down to
 11:46:52 10 his knees?
 11:46:55 11 A Kind of.
 11:46:55 12 Q I don't know what you mean when you say
 11:46:57 13 "kind of."
 11:46:59 14 A Well, unzipped, open.
 11:47:01 15 Q So he was sitting in your cell and he was
 11:47:04 16 sitting closest to your door, right?
 11:47:06 17 A Yes.
 11:47:06 18 Q And he had the top of his pants unzipped
 11:47:09 19 and his penis exposed?
 11:47:11 20 A Correct.
 11:47:12 21 Q And you masturbated him while he
 11:47:14 22 simultaneously masturbated you?
 11:47:19 23 A Correct.
 11:47:19 24 Q His pants were open, his penis was
 11:47:19 25 exposed, and your pants were pulled down to your

11:45:37 1 Q Okay.
 11:45:40 2 A Toilet paper, I don't recall.
 11:45:43 3 Q When he -- when Father Sprauer was in your
 11:45:46 4 cell on the second day that you were at Benson -- I
 11:45:50 5 mean, at MacLaren, did you touch his genitals?
 11:45:55 6 A Yes.
 11:46:00 7 MR. THARP: Are we still on the first day?
 11:46:03 8 MS. HOFFMANN: Yes. Well, he said it
 11:46:05 9 happened on the second day.
 11:46:06 10 MR. THARP: Oh, the second day.
 11:46:07 11 Q Is that right?
 11:46:07 12 A Yes.
 11:46:08 13 Q You're saying this is the first incident,
 11:46:10 14 but it occurred on the second day that you were at
 11:46:13 15 MacLaren?
 11:46:13 16 A Correct.
 11:46:13 17 Q Okay. Where did you touch him?
 11:46:20 18 A In the testicles and penis.
 11:46:21 19 Q On top of his clothes or underneath his
 11:46:25 20 clothes?
 11:46:26 21 A Both.
 11:46:26 22 Q And how did that come about?
 11:46:28 23 A He just said that things could be better,
 11:46:30 24 "Play with me, go along with me."
 11:46:33 25 Q Is that what he said? Were those his

11:47:19 1 knees so that your body from your waist down to your
 11:47:23 2 thigh was exposed?
 11:47:24 3 A Correct.
 11:47:25 4 Q How long did this take?
 11:47:28 5 A Twenty minutes, half hour.
 11:47:30 6 Q So for 20 to 30 minutes, he had his penis
 11:47:35 7 exposed and you had your penis exposed?
 11:47:38 8 A Yes.
 11:47:38 9 Q Is that correct?
 11:47:45 10 A Correct.
 11:47:45 11 Q And when -- did Father Sprauer ejaculate?
 11:47:48 12 A Yes.
 11:47:48 13 Q And where did his sperm go, where did the
 11:47:51 14 ejaculate go?
 11:47:52 15 A He either wiped it on toilet paper or on a
 11:47:57 16 towel.
 11:48:03 17 Q Had you ever engaged in this type of
 11:48:05 18 behavior before?
 11:48:06 19 A No.
 11:48:06 20 Q Had you masturbated yourself?
 11:48:11 21 A Yes.
 11:48:12 22 Q And had you ejaculated?
 11:48:13 23 A Yes.
 11:48:13 24 Q So you knew what masturbation was?
 11:48:16 25 A Yes.

EXHIBIT
PAGE 9 OF 25

12:01:34 1 whether you were abused more than once in D-1?
 12:01:37 2 A I cannot recall more than once in D-1.
 12:01:40 3 Q Okay. So to the extent that the
 12:01:43 4 complaint, paragraph 5, says that you were abused
 12:01:47 5 twice in D-1, that's false?
 12:01:49 6 MR. GATTI: It's a mistake.
 12:01:51 7 A It's a mistake.
 12:01:52 8 Q It's incorrect.
 12:01:53 9 Is that right?
 12:01:54 10 A It's not the entire truth.
 12:01:56 11 Q Okay. When was the second -- what other
 12:01:59 12 incidents of abuse do you remember, where did they
 12:02:03 13 happen and when did they happen?
 12:02:04 14 A In the auditorium. I would have had to
 12:02:09 15 have been on Thayer cottage at the time to have the
 12:02:15 16 privilege to go to auditorium.
 12:02:16 17 Q What were you doing in the auditorium?
 12:02:19 18 A Church.
 12:02:22 19 Q You were attending church in the
 12:02:24 20 auditorium?
 12:02:25 21 A That's how I know about the auditorium,
 12:02:28 22 and after different times at church, we would go
 12:02:32 23 back, certain of us, certain students.
 12:02:34 24 Q Okay. So tell me what happened in the
 12:02:41 25 auditorium after church or during church.

12:03:29 1 went to Thayer?
 12:03:30 2 A Correct.
 12:03:31 3 Q And as I understand it, you're not
 12:03:33 4 claiming you were abused by Father Sprauer while you
 12:03:35 5 were in reception?
 12:03:38 6 A Correct.
 12:03:39 7 Q All right. So now you're in Thayer.
 12:03:42 8 How long were you in Thayer before the
 12:03:43 9 second abuse occurred?
 12:03:45 10 A Within a couple of weeks.
 12:03:47 11 Q And where did --
 12:03:49 12 A Like we were at church and he was glad to
 12:03:52 13 see me.
 12:03:53 14 Q So your testimony --
 12:03:55 15 A Or should I just say mass.
 12:03:56 16 Q Your testimony, sir, is that you went to
 12:03:59 17 mass while you were in Thayer cottage, correct?
 12:04:01 18 A Correct.
 12:04:01 19 Q And Father Sprauer was the priest who said
 12:04:03 20 mass?
 12:04:04 21 A Yes.
 12:04:04 22 Q And you recognized Father Sprauer when he
 12:04:06 23 said mass, because he'd been to visit you in D-1
 12:04:10 24 when you first got there?
 12:04:11 25 A Yes.

12:02:41 1 A I don't recall if he had an office at the
 12:02:42 2 time there or if we were -- it was more like a
 12:02:47 3 storeroom or work room or something that when I was
 12:02:50 4 there cleaning and doing stuff, that he did the same
 12:02:54 5 thing he did to me in detention one.
 12:02:57 6 Q Was this -- what day of the week?
 12:03:00 7 A I don't recall. It would have been
 12:03:01 8 sometime when I was on Thayer cottage.
 12:03:04 9 Q Okay.
 12:03:05 10 A It wasn't during a church ceremony, no.
 12:03:07 11 Q That's what I was trying to determine.
 12:03:09 12 Was it in connection with a church
 12:03:10 13 ceremony?
 12:03:11 14 A No.
 12:03:11 15 Q Did you go to church when you were in
 12:03:14 16 Thayer cottage?
 12:03:15 17 A I went to both Protestant and Catholic.
 12:03:17 18 Q Each week?
 12:03:18 19 A Yes.
 12:03:18 20 Q Or did you rotate?
 12:03:20 21 A Both. Whatever I could do to get off
 12:03:22 22 cottage.
 12:03:23 23 Q Okay. How long were you in reception?
 12:03:25 24 A Two weeks.
 12:03:26 25 Q All right. And then after reception, you

12:04:11 1 Q Between the time that Father Sprauer came
 12:04:13 2 to visit you in D-1 --
 12:04:15 3 A He wasn't the only one doing the mass,
 12:04:17 4 there was someone else. If it was another priest, I
 12:04:21 5 don't recall, but there was other clergy during
 12:04:25 6 mass.
 12:04:25 7 Q So it would be more than one priest saying
 12:04:28 8 mass?
 12:04:28 9 A Yes, or part of mass.
 12:04:30 10 Q So there were two priests on the altar
 12:04:33 11 saying mass?
 12:04:35 12 A To the best of my recollection.
 12:04:39 13 Q Had you seen Father Sprauer between the
 12:04:42 14 time he visited you in D-1 and when the second
 12:04:46 15 incident of abuse took place?
 12:04:49 16 A I believe occasionally during reception
 12:04:51 17 when he would come to the cottage and visit, prayer
 12:04:58 18 group, you know, nothing out of the ordinary.
 12:05:01 19 Q So you did see him, physically saw him?
 12:05:05 20 A Physically.
 12:05:05 21 Q While you were in reception?
 12:05:07 22 A Physically.
 12:05:08 23 Q And you physically saw him during your
 12:05:11 24 initial stay at Thayer?
 12:05:12 25 A Correct.

EXHIBIT 1
PAGE 10 OF 25

12:05:12 1 Q And when you say you saw him, your
 12:05:14 2 testimony is he would be there doing prayer groups?
 12:05:19 3 A Yes.
 12:05:20 4 Q What else would he be doing when you saw
 12:05:22 5 him?
 12:05:22 6 A Counseling.
 12:05:24 7 Q When you say "counseling," what do you
 12:05:28 8 mean, counseling other inmates, other residents?
 12:05:32 9 A Other students, talking, counseling.
 12:05:33 10 Q Okay. But your next contact with Father
 12:05:36 11 Sprauer was when you claim he next abused you.
 12:05:40 12 Is that correct?
 12:05:40 13 A Correct.
 12:05:41 14 Q So you hadn't been involved --
 12:05:43 15 A Personal contact.
 12:05:44 16 Q -- personally counseling with him from the
 12:05:49 17 time you saw him in D-1 until the second abuse?
 12:05:54 18 A I'd say prayer meetings in reception and
 12:05:58 19 casual.
 12:05:58 20 Q But you'd seen him at mass?
 12:06:02 21 A Correct.
 12:06:02 22 Q Saying mass at MacLaren?
 12:06:04 23 A Correct.
 12:06:04 24 Q And this is while you were in Thayer?
 12:06:06 25 A Correct.

12:06:06 1 Q So tell me how it happened that Father
 12:06:09 2 Sprauer and you ended up together one-on-one.
 12:06:12 3 A I was assigned to help out in the
 12:06:14 4 auditorium and he was there.
 12:06:15 5 Q What were you doing, what was your work in
 12:06:18 6 the auditorium?
 12:06:18 7 A Cleaning.
 12:06:22 8 Q And what was Father Sprauer doing in the
 12:06:25 9 auditorium?
 12:06:26 10 A I guess you would say he was trying to
 12:06:28 11 supervise cleaning, or helping.
 12:06:32 12 Q So he was supervising you?
 12:06:33 13 A Or organizing.
 12:06:34 14 Q So was he supervising you?
 12:06:37 15 A Yes.
 12:06:38 16 Q Is that "yes"?
 12:06:38 17 A Yes. There was no staff.
 12:06:40 18 Q Okay. Were there other people cleaning in
 12:06:42 19 the auditorium?
 12:06:43 20 A Not at this particular time.
 12:06:44 21 Q Generally when you cleaned in the
 12:06:45 22 auditorium, were there other residents or inmates
 12:06:48 23 cleaning?
 12:06:49 24 A On some occasions.
 12:06:50 25 Q How long had you been cleaning in the

12:06:51 1 auditorium before this abuse took place?
 12:06:56 2 A This was one or two times. You know, it
 12:07:00 3 was one or two times.
 12:07:01 4 Q And was Father Sprauer the supervisor?
 12:07:03 5 Did he supervise over those people who cleaned the
 12:07:08 6 auditorium?
 12:07:09 7 A I believe depending upon what we were
 12:07:12 8 doing, more than one occasion cleaning, there would
 12:07:15 9 have been a staff member if Father Sprauer wasn't
 12:07:18 10 present.
 12:07:18 11 Q Okay. So you had seen him in the
 12:07:19 12 auditorium supervising?
 12:07:21 13 A Yeah.
 12:07:21 14 Q And then what happened on this occasion?
 12:07:23 15 A I was alone with him.
 12:07:24 16 Q And what happened?
 12:07:25 17 A He brought me into what you'd call a
 12:07:27 18 storage room, a supply room.
 12:07:30 19 Q What did it look like?
 12:07:32 20 A An oversized broom closet.
 12:07:34 21 Q What was in it?
 12:07:36 22 A Cleaning materials, supplies.
 12:07:43 23 Q Anything else?
 12:07:43 24 A I don't recall. Probably the mop buckets
 12:07:43 25 and the dust mops, vacuum cleaners.

12:07:44 1 Q Okay. Was there a table, a chair, a desk,
 12:07:49 2 anything like that in there?
 12:07:50 3 A There were a couple of chairs. It wasn't
 12:07:52 4 like a -- it was like a wooden chair -- chairs.
 12:07:55 5 Q And this room, this supply room, was off
 12:07:58 6 the auditorium?
 12:07:59 7 A It was part of the auditorium off the
 12:08:01 8 auditorium.
 12:08:02 9 Q Okay. And how did he get you into this
 12:08:04 10 room?
 12:08:05 11 A Followed me.
 12:08:07 12 Q Oh, you were going into this room for some
 12:08:10 13 supplies.
 12:08:11 14 Is that right?
 12:08:11 15 A Yes.
 12:08:12 16 Q Is that correct?
 12:08:12 17 A That's correct.
 12:08:13 18 Q And Father Sprauer, your testimony is he
 12:08:16 19 followed you into this room?
 12:08:18 20 A Correct.
 12:08:18 21 Q And what happened when you both got into
 12:08:20 22 this room?
 12:08:22 23 A He proceeded to do the same thing he did
 12:08:24 24 to me at detention 1.
 12:08:26 25 Q Well, what did he do or what did he say?

EXHIBIT
PAGE 11 OF 25

12:08:29 1 A He got me in the corner and cornered me,
 12:08:32 2 so to speak, asked me how things were going, how he
 12:08:35 3 could make things better, just proceeded to fondle
 12:08:40 4 me.
 12:08:41 5 Q Were you both standing up?
 12:08:43 6 A Initially.
 12:08:45 7 Q Okay. So literally he cornered you in a
 12:08:48 8 corner of the room?
 12:08:50 9 A Confronted me.
 12:08:51 10 Q Okay. And then did he -- I mean, what did
 12:08:56 11 he do, did he start fondling you?
 12:08:58 12 A Putting his arm around me.
 12:09:00 13 Q How did that turn into something sexual?
 12:09:03 14 A Kind of like he said, "I can make this
 12:09:07 15 better," and again, he did it again.
 12:09:09 16 Q He did what again, sir?
 12:09:11 17 A He molested me.
 12:09:12 18 Q Okay. But tell me in as much detail as
 12:09:15 19 you can what he did to you.
 12:09:17 20 A He undid my trousers, proceeded to fondle
 12:09:21 21 me, masturbate me.
 12:09:25 22 Q While you were standing up in the corner?
 12:09:26 23 A Sitting in a chair.
 12:09:26 24 Q How did you get from standing up in the
 12:09:26 25 corner to sitting down in the chair?

12:09:27 1 A I was back and forth in the room getting
 12:09:31 2 stuff, getting stuff.
 12:09:32 3 Q So at some point in time, you sat down in
 12:09:35 4 a chair?
 12:09:35 5 A Correct. I was intimidated to sit down.
 12:09:38 6 Q Was Father Sprauer standing or sitting?
 12:09:41 7 A Sitting next to me.
 12:09:43 8 Q So you went from standing to both of you
 12:09:45 9 sitting?
 12:09:45 10 A Correct, as he was guiding me spiritually,
 12:09:50 11 so to say, talking --
 12:09:52 12 Q How was he guiding you spiritually?
 12:09:54 13 A Talking to me, asking me how things were,
 12:09:57 14 how things were going.
 12:09:57 15 Q And then he sat you down in a chair and
 12:09:59 16 how did your pants get undone?
 12:10:01 17 A He undid them.
 12:10:02 18 Q Okay. And were they pulled down so that
 12:10:05 19 your penis and your stomach area was exposed?
 12:10:07 20 A Yes.
 12:10:07 21 Q And did he pull his pants down?
 12:10:10 22 A Yes.
 12:10:10 23 Q So while you're both sitting, you both
 12:10:13 24 have your pants down around your knees?
 12:10:15 25 A Correct.

12:10:15 1 Q And you're mutually masturbating each
 12:10:18 2 other.
 12:10:18 3 Is that your testimony?
 12:10:19 4 A That's my testimony.
 12:10:20 5 Q Okay. He used his hand to masturbate you?
 12:10:23 6 A Yes.
 12:10:23 7 Q And you used your hand to masturbate him?
 12:10:26 8 A Yes.
 12:10:26 9 Q And were you doing this simultaneously?
 12:10:28 10 A Yes.
 12:10:28 11 Q And did you both ejaculate?
 12:10:30 12 A Yes.
 12:10:30 13 Q And did you both ejaculate at the same
 12:10:32 14 time?
 12:10:32 15 A I don't recall.
 12:10:34 16 Q Okay. Was there any hugging, kissing
 12:10:37 17 involved?
 12:10:38 18 A Just friendly touching.
 12:10:41 19 Q Any oral sex?
 12:10:43 20 A He wanted me to and I wouldn't.
 12:10:45 21 Q How do you know he wanted you to?
 12:10:47 22 A He asked me.
 12:10:48 23 Q Any anal sex?
 12:10:49 24 A No.
 12:10:49 25 Q So when you say he asked you, he said,

12:10:52 1 "You know, will you put your mouth on my penis,"
 12:10:56 2 something along those lines?
 12:10:58 3 A Yes.
 12:10:58 4 Q How long were the two of you in this
 12:11:00 5 supply closet together?
 12:11:02 6 A Ten or twenty minutes.
 12:11:03 7 Q And did anybody come into the auditorium
 12:11:06 8 while you were there?
 12:11:07 9 A No.
 12:11:08 10 Q Was there a door on the supply closet?
 12:11:10 11 A Yes.
 12:11:10 12 Q Was it open or closed?
 12:11:12 13 A Open.
 12:11:12 14 Q So it was wide opened?
 12:11:14 15 A Yeah.
 12:11:14 16 Q So if somebody came in, they would have
 12:11:16 17 seen you?
 12:11:17 18 A I don't believe you could just walk into
 12:11:19 19 the auditorium. I believe like any other door at
 12:11:23 20 MacLaren, it's locked unless you're let in or out.
 12:11:27 21 Q Now, when in relationship to your transfer
 12:11:29 22 to Thayer did this occur?
 12:11:32 23 A Within the first couple of weeks.
 12:11:33 24 Q So I want to get a time frame.
 12:11:35 25 You were in --

EXHIBIT
 PAGE 12 OF 25

12:11:36 1 A I wasn't in Thayer all that long and I was
 12:11:40 2 transferred to Camp Tillamook. I don't -- if I look
 12:11:45 3 at the dates, it's within a couple of weeks.
 12:11:47 4 Q Well, help me out this way: When you
 12:11:50 5 first went to MacLaren, you were in D-1 for three
 12:11:52 6 days, right?
 12:11:54 7 A Right.
 12:11:54 8 Q And then you said you were in reception
 12:11:56 9 for three weeks?
 12:11:57 10 A Correct.
 12:11:59 11 Q And then how long were you in Thayer
 12:12:01 12 total?
 12:12:02 13 A It was months.
 12:12:02 14 Q Months?
 12:12:03 15 A It had to have been a couple months.
 12:12:05 16 Q Best estimate?
 12:12:06 17 A Yeah.
 12:12:07 18 Q Two months?
 12:12:08 19 A Yeah, when I was at Tillamook, I was -- it
 12:12:12 20 might have been -- it's just hard to say. You know,
 12:12:24 21 I looked at all the juvenile transcripts.
 12:12:24 22 Q Well, when in relationship to your
 12:12:24 23 transfer to Thayer did this occur, the beginning of
 12:12:28 24 Thayer?
 12:12:29 25 A The very beginning.

12:13:21 1 A Yeah, I believe that he walked me back to
 12:13:23 2 cottage after the incident.
 12:13:28 3 MS. HOFFMANN: Okay. Let's take a lunch
 12:13:29 4 break.
 12:13:30 5 What time do you want to come back?
 12:13:32 6 MR. GATTI: What time do you want?
 12:13:35 7 MS. HOFFMANN: 1:00, is that good for you?
 12:13:38 8 MR. GATTI: Yeah.
 12:13:43 9 (Lunch recess taken: 12:13 - 1:04 p.m.)
 13:04:28 10
 13:04:29 11 BY MS. HOFFMANN: (Continuing)
 13:04:29 12 Q Sir, are you ready to continue?
 13:04:31 13 A Yes.
 13:04:32 14 Q Just before the lunch break, you had
 13:04:33 15 finished telling us about the second allegation that
 13:04:37 16 you have regarding abuse by Father Sprauer, correct?
 13:04:40 17 A Correct.
 13:04:40 18 Q Is there anything that you want to add or
 13:04:42 19 change to that?
 13:04:43 20 A No.
 13:04:43 21 Q Okay. When was the next time that you
 13:04:45 22 claim were you abused by Father Sprauer?
 13:04:50 23 A It was probably within a week of that.
 13:04:55 24 Q When you say "within a week of that,"
 13:04:57 25 you're talking about -- you're at Thayer cottage?

12:12:31 1 Q The very beginning?
 12:12:33 2 MR. GATTI: Can we break here, Margaret?
 12:12:35 3 It's ten after 12:00 and I have a 12:15 call.
 12:12:40 4 MS. HOFFMANN: Sure.
 12:12:41 5 Can we just finish this incident and then
 12:12:43 6 we can have the rest to do when we get back?
 12:12:46 7 MR. GATTI: Sure.
 12:12:47 8 Q And you said you were in the auditorium
 12:12:49 9 because you were working cleaning the auditorium,
 12:12:51 10 correct?
 12:12:51 11 A Correct.
 12:12:52 12 Q And you had privileges at that point?
 12:12:53 13 A Correct.
 12:12:54 14 Q Okay. Have you told me everything that
 12:12:55 15 you remember about the second incident of abuse?
 12:13:00 16 A Yes.
 12:13:01 17 Q Okay. Where did you go or what did you do
 12:13:06 18 when -- after you and Father Sprauer both
 12:13:08 19 ejaculated?
 12:13:12 20 A I finished cleaning the auditorium and
 12:13:14 21 went back to cottage.
 12:13:15 22 Q What did he do?
 12:13:17 23 A Went about his business.
 12:13:19 24 Q Which was to supervise you in the
 12:13:20 25 auditorium?

13:05:00 1 A Yes.
 13:05:00 2 Q And the first incident was soon after you
 13:05:04 3 first arrived at Thayer?
 13:05:05 4 A Correct.
 13:05:06 5 Q And now it's a week later?
 13:05:08 6 A Within two weeks.
 13:05:09 7 Q Okay. What happened?
 13:05:10 8 A I was working in the auditorium again and
 13:05:11 9 the same thing happened.
 13:05:17 10 Q You were in the auditorium because that
 13:05:19 11 was part of the job you had at MacLaren?
 13:05:22 12 A Yes.
 13:05:23 13 Q What was Father Sprauer doing in the
 13:05:26 14 auditorium?
 13:05:27 15 A Supervising, helping.
 13:05:28 16 Q Was he supervising you?
 13:05:30 17 A Yes.
 13:05:32 18 Q Who else was in the auditorium?
 13:05:34 19 A Myself and Father Sprauer.
 13:05:36 20 Q Okay. Had you -- in the interim between
 13:05:39 21 the second and the third incidents of abuse, had you
 13:05:42 22 been working regularly in the auditorium?
 13:05:45 23 A That and in the kitchen and in the
 13:05:47 24 laundry.
 13:05:48 25 Q Okay. And had Father Sprauer been your

EXHIBIT
PAGE 13 OF 25

13:09:29 1 upon who the clergy was?
 13:09:32 2 A Both.
 13:09:32 3 Q So sometimes it was multiple --
 13:09:35 4 A Sometimes it would be a group of outside
 13:09:36 5 sources coming in to volunteer.
 13:09:38 6 Q Okay. How frequently was Father Sprauer
 13:09:41 7 part of this prayer group in the kitchen when you
 13:09:43 8 were at Thayer?
 13:09:47 9 A Frequently.
 13:09:48 10 Q Okay. And when did the prayer group in
 13:09:51 11 the kitchen take place, you said in the evenings?
 13:09:54 12 A Usually in the evenings.
 13:09:56 13 Q From when to when?
 13:10:00 14 A Seven to eight-ish. Anything
 13:10:03 15 extracurricular from the cottage from school was
 13:10:09 16 done in the evening.
 13:10:10 17 Q Okay. And this, you understood, was an
 13:10:10 18 extracurricular activity?
 13:10:11 19 A Yes.
 13:10:11 20 Q Meaning that it was voluntary on the part
 13:10:14 21 of the residents?
 13:10:17 22 A Yes.
 13:10:19 23 Q How many residents would go to this prayer
 13:10:19 24 group in the kitchen?
 13:10:20 25 A Ten to fifteen.

13:11:11 1 remember being there?
 13:11:12 2 A Names just don't come to mind.
 13:11:14 3 Q So as I understand it, for this third
 13:11:17 4 incident of abuse, you were working in the
 13:11:18 5 auditorium and Father Sprauer was there supervising
 13:11:21 6 you, correct?
 13:11:22 7 A Correct.
 13:11:23 8 Q What time of day was it?
 13:11:25 9 A It would have been afternoon.
 13:11:27 10 Q Okay. Do you know what day of the week?
 13:11:29 11 A No.
 13:11:31 12 Q And what happened?
 13:11:32 13 A The same thing as the first time in the
 13:11:35 14 closet.
 13:11:39 15 Q When you say "the same as the first time,"
 13:11:42 16 you mean the same as the second time, don't you?
 13:11:45 17 A Yeah, that's what I mean.
 13:11:46 18 Q Okay.
 13:11:47 19 A Sorry about that.
 13:11:48 20 Q Okay. How did you get into the closet?
 13:11:51 21 Was it the same type of thing, you went in cleaning?
 13:11:55 22 A Cleaning closet, supplies, mop bucket,
 13:11:59 23 broom.
 13:11:59 24 Q So you went into the cleaning closet to
 13:12:01 25 get supplies?

13:10:21 1 Q All from Thayer?
 13:10:23 2 A Yes.
 13:10:23 3 Q Do you know -- can you name anybody else
 13:10:25 4 that was there with you?
 13:10:27 5 A Students?
 13:10:29 6 Q Yeah, by name.
 13:10:30 7 Do you remember their names?
 13:10:32 8 A Thomas Tahah.
 13:10:34 9 Q Who?
 13:10:35 10 A Thomas Tahah.
 13:10:36 11 Q How do you spell that?
 13:10:38 12 A T-A-H-A-H, I guess.
 13:10:42 13 Q Anyone else?
 13:10:45 14 A Jim Tanan.
 13:10:47 15 MR. GATTI: How do you spell the last
 13:10:48 16 name?
 13:10:50 17 THE WITNESS: T-A-N-A-N, Tanan. I just
 13:10:56 18 remembered him. It's just hard to remember so far.
 13:11:01 19
 13:11:02 20 BY MS. HOFFMANN: (Continuing)
 13:11:02 21 Q Okay. But you definitely remember Tom
 13:11:04 22 Tahah and Jim Tanan going to this prayer group in
 13:11:09 23 the kitchen?
 13:11:09 24 A Yes.
 13:11:10 25 Q Okay. Anybody else that you definitely

13:12:03 1 A Yes.
 13:12:03 2 Q And why was Father Sprauer in there?
 13:12:05 3 A Trying to corner me.
 13:12:07 4 Q Okay. And what happened when you were
 13:12:08 5 both in the closet?
 13:12:13 6 A He was just spiritually consulting me
 13:12:15 7 again and being real friendly.
 13:12:19 8 Q And then what happened?
 13:12:21 9 A He molested me.
 13:12:23 10 Q How?
 13:12:24 11 A Fondled me, masturbated me.
 13:12:33 12 Q Are you saying, sir, that it was exactly
 13:12:35 13 the same type of activity that had occurred in the
 13:12:38 14 second incident?
 13:12:40 15 A Yes.
 13:12:42 16 Q There was mutual masturbation?
 13:12:44 17 A Yes.
 13:12:44 18 Q So you were masturbating Father Sprauer
 13:12:48 19 simultaneously while he was masturbating you?
 13:12:50 20 A Yes.
 13:12:50 21 Q And were you standing, sitting, lying,
 13:12:53 22 what was your relative respective positions?
 13:12:55 23 A Sitting.
 13:12:57 24 Q Had anything changed about this supply
 13:13:00 25 closet from the second time to the third time?

13:13:03 1 A No...

13:13:03 2 Q And there were -- you said there were

13:13:06 3 chairs in there?

13:13:06 4 A Uh-huh.

13:13:07 5 Q And is it your testimony, sir, that you

13:13:10 6 and Father Sprauer were sitting in the chairs?

13:13:13 7 A It wasn't a chair per definition, it was a

13:13:15 8 bench. I would say they were wooden chairs.

13:13:18 9 Q I'm sorry?

13:13:19 10 A Big, wooden chairs.

13:13:21 11 Q So they were wooden chairs?

13:13:24 12 A Courtroom-type chairs.

13:13:25 13 Q And you and Father Sprauer were sitting in

13:13:28 14 those chairs?

13:13:28 15 A Yes.

13:13:29 16 Q The door was open?

13:13:30 17 A Yes.

13:13:30 18 Q The same as before, it was wide open?

13:13:40 19 A Yes.

13:13:41 20 Q And is it your testimony, sir, that both

13:13:41 21 you and Father Sprauer had your pants pulled down

13:13:41 22 towards your knees?

13:13:41 23 A Yes.

13:13:41 24 Q So that you were both exposed from the

13:13:41 25 waist down to the knees?

13:14:29 1 him at the time of the second abuse?

13:14:33 2 A Yes.

13:14:34 3 Q What did he tell you when you were abused

13:14:38 4 the second time about what he could do for you at

13:14:40 5 MacLaren?

13:14:42 6 A He had already done some of the previous

13:14:45 7 things. He helped me get into the auditorium and do

13:14:49 8 some extracurricular stuff. He brought me

13:14:53 9 commissary, which -- snacks. I don't recall if he

13:14:59 10 brought me cigarettes or not. It seems I always had

13:15:07 11 plenty of cigarettes.

13:15:13 12 Q So are you saying, sir, that between the

13:15:15 13 time of the first abuse and the second abuse, he

13:15:18 14 had -- he had been helpful or responsible in getting

13:15:24 15 you the job cleaning the auditorium?

13:15:26 16 A Yes.

13:15:27 17 Q How do you know he was the one that was

13:15:29 18 responsible for getting you the job cleaning the

13:15:32 19 auditorium?

13:15:33 20 A I just assumed that he was the one

13:15:36 21 responsible for the auditorium. That was his doing.

13:15:38 22 Q Okay.

13:15:39 23 A I didn't think we got to just pick that

13:15:41 24 job, that chore.

13:15:43 25 Q Had you applied for that job?

13:13:41 1 A Yes.

13:13:41 2 Q And your penises were exposed?

13:13:41 3 A Yes.

13:13:42 4 Q And you mutually masturbated?

13:13:45 5 A (Witness nods head.)

13:13:45 6 Q Correct?

13:13:46 7 A Correct.

13:13:46 8 Q And you both ejaculated?

13:13:48 9 A Yes.

13:13:53 10 Q And what happened when you completed the

13:13:56 11 sexual act?

13:13:58 12 A I finished up my cleaning and went back to

13:14:01 13 cottage.

13:14:01 14 Q Okay. Now, you told me before,

13:14:03 15 Mr. Klettke, that the first time you met Father

13:14:07 16 Sprauer when you were in D-1 and there was sexual

13:14:11 17 activity, that he was assuring you or promising you

13:14:13 18 that he could do things for you while you were at

13:14:16 19 MacLaren, correct?

13:14:17 20 A Correct.

13:14:18 21 Q And in fact, you listed a whole group of

13:14:20 22 things that you said Father Sprauer said that he

13:14:22 23 could do for you while you were at MacLaren, right?

13:14:25 24 A That's correct.

13:14:26 25 Q Did you have similar conversations with

13:15:45 1 A I got it through Father Sprauer.

13:15:46 2 Q What did you understand that he did, what

13:15:48 3 connections did he have to get you that job?

13:15:52 4 A He was the Catholic priest, he was my

13:15:56 5 mentor, he was my counselor, somebody I respected.

13:16:01 6 Q When did he counsel you?

13:16:04 7 A Whenever we were -- well, mass is

13:16:06 8 counseling, the prayer groups is counseling.

13:16:10 9 Q So when you say --

13:16:11 10 A Spiritually.

13:16:12 11 Q When you say he was your counselor, you're

13:16:14 12 referring to the times that he said mass and the

13:16:16 13 times that he was involved in the prayer group?

13:16:19 14 A Yes.

13:16:20 15 Q Had you ever done any one-on-one

13:16:22 16 counseling with Father Sprauer from the time that

13:16:24 17 you got to MacLaren until the time of the second

13:16:27 18 incident of abuse?

13:16:29 19 A No.

13:16:30 20 Q Had you ever done any one-on-one

13:16:32 21 counseling with Father Sprauer from the time you got

13:16:34 22 to MacLaren until the time of the third incident of

13:16:37 23 abuse?

13:16:38 24 A I don't recall.

13:16:39 25 Q Okay. And you said he provided you with

EXHIBIT
PAGE 15 OF 25

13:16:43 1 cigarettes?
 13:16:44 2 A I don't recall. I always had cigarettes.
 13:16:46 3 Q Okay. During this time in the closet when
 13:16:53 4 there was the second incident of abuse in the
 13:16:55 5 auditorium, did he make representations to you that
 13:16:58 6 he could do things or continue to do things for you
 13:17:01 7 at MacLaren?
 13:17:02 8 A Yes.
 13:17:02 9 Q What did he tell you?
 13:17:04 10 A He told me he could still make things
 13:17:06 11 better for me, and he got me into this program, he
 13:17:10 12 continued having me all this free time. It was
 13:17:13 13 privileges no one else received.
 13:17:15 14 Q So you believed that you had privileges at
 13:17:18 15 MacLaren that no one else had?
 13:17:20 16 A Yes.
 13:17:21 17 Q And you believed or your testimony is you
 13:17:23 18 had privileges at MacLaren that no one else had?
 13:17:26 19 A Yes.
 13:17:27 20 Q And your testimony is that --
 13:17:28 21 A I had better privileges than anybody else,
 13:17:30 22 yeah.
 13:17:31 23 Q And your testimony is that you had those
 13:17:33 24 privileges because of something that Father Sprauer
 13:17:36 25 did to get you those privileges?

13:18:32 1 A Correct.
 13:18:32 2 Q But you could smoke in the hallways?
 13:18:35 3 A No, outside the building.
 13:18:37 4 Q All right. So during -- in between
 13:18:37 5 classes, you could walk outside the building and
 13:18:37 6 smoke?
 13:18:38 7 A Yes.
 13:18:38 8 Q How about in Thayer, could you smoke
 13:18:41 9 inside the cottage?
 13:18:42 10 A Yes.
 13:18:42 11 Q Was Thayer set up like a dormitory?
 13:18:45 12 A Yes.
 13:18:46 13 Q So you could smoke -- what, sit on your
 13:18:48 14 bed and smoke?
 13:18:49 15 A In the day room.
 13:18:50 16 Q In the day room.
 13:18:51 17 How about in reception, where could you
 13:18:53 18 smoke?
 13:18:54 19 A In the day room.
 13:19:02 20 Q Okay. And what, if anything, did Father
 13:19:02 21 Sprauer tell you during this third incident that he
 13:19:05 22 would do for you, or could do for you?
 13:19:09 23 A Just make it easier on me.
 13:19:11 24 Q Okay. At the time of this third incident,
 13:19:13 25 had you already made plans or been told that you

13:17:38 1 A Yes.
 13:17:39 2 Q Okay. Where could you smoke at MacLaren?
 13:17:47 3 A On cottage.
 13:17:49 4 Q In Thayer?
 13:17:50 5 A Yes.
 13:17:50 6 Q How about in reception?
 13:17:51 7 A Yes.
 13:17:52 8 Q So you could smoke in reception?
 13:17:54 9 A Yes.
 13:17:54 10 Q And you could smoke in Thayer cottage?
 13:18:01 11 A Yes, and at school, but not in class.
 13:18:03 12 Q I'm sorry?
 13:18:04 13 A At school, but not in class.
 13:18:06 14 Q So you could step outside your class and
 13:18:09 15 smoke?
 13:18:10 16 A On break. You would have break -- like a
 13:18:13 17 regular high school would have -- go from class to
 13:18:16 18 class, we did the same thing, and you had so much
 13:18:18 19 time to be somewhere.
 13:18:20 20 Q Okay.
 13:18:20 21 A The campus was pretty -- not like today.
 13:18:24 22 You could go there and smoke even as a juvenile, it
 13:18:26 23 was open.
 13:18:27 24 Q So when you say at school you could smoke,
 13:18:29 25 you couldn't smoke in your classrooms?

13:19:16 1 were going to be going to Camp Tillamook?
 13:19:23 2 A I was on a waiting list, a very long
 13:19:26 3 waiting list.
 13:19:26 4 Q Did Father Sprauer have anything to do
 13:19:28 5 with you going to Camp Tillamook?
 13:19:30 6 A I don't know.
 13:19:31 7 Q Did Father Sprauer have anything to do
 13:19:33 8 with you getting on the waiting list to go to
 13:19:37 9 Tillamook?
 13:19:37 10 A I don't know.
 13:19:37 11 Q Were you told that you were on the list to
 13:19:40 12 go to Tillamook when you first went to Thayer?
 13:19:44 13 A Yes.
 13:19:45 14 Q "Yes"?
 13:19:46 15 A Yes.
 13:19:46 16 Q Who were your counselors in Thayer, or who
 13:19:51 17 were the staff that were in Thayer?
 13:19:55 18 A I don't recall the names of the staff. I
 13:19:56 19 remember a Paul Meeks.
 13:20:01 20 Q What did Mr. Meeks do?
 13:20:04 21 A Assistant manager.
 13:20:05 22 Q Okay. Who else do you remember?
 13:20:09 23 A Mr. Heir, he was the manager.
 13:20:12 24 Q The manager of Thayer?
 13:20:14 25 A Yes.

EXHIBIT
PAGE 16 OF 25

13:24:11 1 Q And as a consequence, you were returned to
 13:24:13 2 MacLaren?
 13:24:13 3 A Pending the resolution of the hearing, I
 13:24:13 4 was -- the sciloscopes, I believe, and then I was
 13:24:17 5 convicted of stealing some apparel at Fred Meyers.
 13:24:21 6 Q Okay. So after you --
 13:24:23 7 A It was one or the other that reversed the
 13:24:26 8 judge's decision to send me back to MacLaren.
 13:24:29 9 Q Okay. You were arrested for stealing
 13:24:31 10 electronic equipment, correct?
 13:24:32 11 A Yes.
 13:24:33 12 Q And while you were waiting to find out
 13:24:35 13 what was going to happen, you got rearrested for
 13:24:38 14 stealing --
 13:24:39 15 A From Fred Meyers.
 13:24:47 16 Q -- from Fred Meyers, and as a result of
 13:24:47 17 that, you went back to MacLaren?
 13:24:47 18 A Yes.
 13:24:47 19 Q When did you go back to MacLaren?
 13:24:47 20 A I believe it was late '80.
 13:24:49 21 Q I'm sorry?
 13:24:50 22 A I think it was late '80, fall of '80.
 13:24:53 23 Q Did you see Father Sprauer when you went
 13:24:56 24 back to MacLaren in the late 1980s?
 13:24:59 25 A No.

13:25:41 1 A No, not the second time.
 13:25:43 2 Q Did you stay any place at MacLaren other
 13:25:46 3 than Hall cottage?
 13:25:53 4 A Well, I believe they would have put me
 13:25:55 5 back in detention, and then I would have went to
 13:25:59 6 cottage. At the time, Hall cottage turned to
 13:26:03 7 Thayer, Thayer turned to Hall. They switched
 13:26:07 8 cottages. Since I was part of Thayer, I went to
 13:26:10 9 Hall.
 13:26:11 10 Q But is it -- do I understand you to say
 13:26:13 11 that Hall and Thayer were the same cottages, they
 13:26:16 12 just had a different name?
 13:26:19 13 A No, different building.
 13:26:20 14 Q Okay.
 13:26:21 15 A But since I was committed the first time
 13:26:24 16 to Thayer, I was a new Hall student.
 13:26:27 17 Q Okay.
 13:26:28 18 A I guess they converted Thayer into some
 13:26:31 19 other program at my second incarceration.
 13:26:34 20 Q During your second stay at MacLaren, which
 13:26:36 21 as I understand your testimony began in late 1980,
 13:26:40 22 were you ever in D-1 or D-2?
 13:26:43 23 A Only when I was brought back.
 13:26:45 24 Q Okay. And which one were you in?
 13:26:48 25 A It would be D-1.

13:24:59 1 Q Did you ever see him again?
 13:25:00 2 A No.
 13:25:01 3 Q So after you left MacLaren and went to
 13:25:04 4 Camp Tillamook, you never again saw Father Sprauer?
 13:25:07 5 A Not until today.
 13:25:08 6 Q You never again even laid eyes on him?
 13:25:12 7 A No.
 13:25:13 8 Q When you returned to MacLaren -- are you
 13:25:15 9 okay?
 13:25:15 10 A Yes.
 13:25:16 11 Q When you returned to MacLaren in the late
 13:25:18 12 1980s, how long were you there?
 13:25:21 13 A I believe it was six months.
 13:25:23 14 Q I shouldn't have said late 1980s. In late
 13:25:27 15 1980.
 13:25:28 16 A I understood.
 13:25:29 17 Q You returned to MacLaren --
 13:25:32 18 A I believe it was six months, until I
 13:25:33 19 turned 18.
 13:25:34 20 Q Okay. Where were you housed the second
 13:25:36 21 time?
 13:25:37 22 A Hall cottage.
 13:25:38 23 Q The whole time?
 13:25:39 24 A Yes.
 13:25:40 25 Q Did you go to a camp?

13:26:50 1 Q For how long?
 13:26:51 2 A One to three days.
 13:26:55 3 Q And am I correct, sir, you are not
 13:26:58 4 alleging any abuse during your second stay at
 13:27:02 5 MacLaren, which began in late 1980?
 13:27:07 6 A Correct.
 13:27:11 7 Q Now, with respect to the three incidents
 13:27:14 8 of abuse that you've testified to today, who did you
 13:27:19 9 tell about those incidents?
 13:27:23 10 A Nobody.
 13:27:27 11 Q Did you -- at the time, did you tell
 13:27:30 12 anybody at MacLaren?
 13:27:31 13 A No.
 13:27:32 14 Q Did you tell any counselor?
 13:27:33 15 A No.
 13:27:34 16 Q Did you tell any other member of the
 13:27:36 17 clergy?
 13:27:37 18 A No.
 13:27:38 19 Q Did you tell the Protestant clergyman?
 13:27:42 20 A No.
 13:27:43 21 Q Did you tell anyone who -- at the
 13:27:46 22 Archdiocese about the abuse?
 13:27:48 23 A No.
 13:27:48 24 Q Have you ever told anyone at the
 13:27:49 25 Archdiocese about the abuse?

EXHIBIT
PAGE 17 OF 25

13:32:33 1 Q Were you ever abused when you were at
 13:32:36 2 Donald E. Long?
 13:32:38 3 A No.
 13:32:40 4 Q Were you ever physically abused when were
 13:32:42 5 you there?
 13:32:43 6 A No.
 13:32:44 7 Q Were you ever sexually abused there?
 13:32:45 8 A No.
 13:32:46 9 Q Did you ever interact with any clergy when
 13:32:50 10 you were at Donald E. Long?
 13:32:52 11 A None.
 13:32:53 12 Q Was it while you were at Donald E. Long
 13:32:56 13 that you heard these rumors about MacLaren?
 13:32:59 14 A Probably.
 13:32:59 15 Q Had you been at any other juvenile or
 13:33:02 16 criminal facilities prior to MacLaren other than
 13:33:06 17 Donald E. Long for two weeks and then in and out a
 13:33:10 18 couple times?
 13:33:11 19 A No.
 13:33:12 20 Q After MacLaren, were you ever arrested
 13:33:14 21 again?
 13:33:14 22 A Yes.
 13:33:14 23 Q When?
 13:33:15 24 A '93, my drunk driving tickets, failure to
 13:33:19 25 pay child support.

13:34:50 1 A Not that I recall.
 13:34:51 2 Q Okay.
 13:34:54 3 A Actually, there was. The first time I did
 13:35:00 4 probation -- probation violation, I was sentenced
 13:35:03 5 and I did I believe 30 days the first time I ever
 13:35:06 6 went to adult jail. I'll get the date -- '90, '91,
 13:35:11 7 I did 30 days at the Inverness Jail.
 13:35:15 8 Q What was that for?
 13:35:17 9 A Probation violation, child support,
 13:35:21 10 support enforcement.
 13:35:22 11 Q Why didn't you tell anybody at MacLaren
 13:35:24 12 about the sex that was going on between you and
 13:35:29 13 Father Sprauer?
 13:35:31 14 A I was ashamed, scared, humiliated and I
 13:35:42 15 just blocked it out.
 13:35:46 16 Q Well, while you were at MacLaren, you
 13:35:48 17 never forgot that it had happened?
 13:35:51 18 A I just -- I blocked it out.
 13:35:53 19 Q Okay. What were you scared of?
 13:35:57 20 A The humiliation, maybe being exposed.
 13:36:02 21 Q Exposed -- what do you mean, exposed to
 13:36:04 22 what?
 13:36:04 23 A Having it come out and other people would
 13:36:06 24 find out.
 13:36:15 25 Q After the first incident, why -- did you

13:33:21 1 Q Did you do jail time?
 13:33:23 2 A I did 90 days work release.
 13:33:32 3 Q Any other jail time that you've done?
 13:33:34 4 A Arrested and I spent two weeks -- 60 days
 13:33:40 5 in Clackamas County jail.
 13:33:42 6 Q For what?
 13:33:43 7 A DUII.
 13:33:44 8 Q Okay. So 1993, you were arrested and you
 13:33:51 9 did 90 days work release, right?
 13:33:55 10 A Actually, that was -- yes, I believe that
 13:33:59 11 was the right date.
 13:34:01 12 Q And when did you spend 60 days in
 13:34:03 13 Clackamas?
 13:34:10 14 A '93, '94.
 13:34:13 15 Q What other jail time have you done?
 13:34:17 16 A Just county, booked and released.
 13:34:21 17 Q For what?
 13:34:22 18 A I did -- child support, probation for
 13:34:30 19 DUII'ing.
 13:34:31 20 Q For what?
 13:34:32 21 A DUII.
 13:34:35 22 At the beginning of this year, I did two
 13:34:37 23 weeks in the county for probation violation for
 13:34:40 24 child support.
 13:34:49 25 Q Anything else?

13:36:23 1 protest the second time?
 13:36:25 2 A No.
 13:36:26 3 Q Why not?
 13:36:27 4 A I just -- I -- I don't have an answer for
 13:36:32 5 you.
 13:36:33 6 Q How about the third time, did you protest?
 13:36:40 7 A (Witness shakes head.)
 13:36:40 8 Q Is that "No"?
 13:36:40 9 A That's "No."
 13:36:40 10 Q Did you ever tell anybody, "Look, I don't
 13:36:41 11 want to be supervised by Father Sprauer. I think
 13:36:44 12 there's something a little odd about him"?
 13:36:47 13 A No.
 13:36:48 14 Q Did you ever go to one of the guys in
 13:36:49 15 charge of Thayer and say, "You know what, I think
 13:36:53 16 there's something a little odd about Father Sprauer.
 13:36:56 17 I don't want him to be supervising me"?
 13:37:00 18 A No.
 13:37:00 19 Q You'd had contact when you first got there
 13:37:03 20 from the Protestant clergyman, right?
 13:37:05 21 A Yes.
 13:37:06 22 Q Did you ever go to the Protestant
 13:37:09 23 clergyman and say, "Hey, I don't want to be around
 13:37:13 24 that Catholic guy"?
 13:37:14 25 A No.

EXHIBIT
PAGE 18 OF 25

13:37:16 1 Q Well, I take it you did not enjoy the
 13:37:19 2 sexual experience that you're claiming occurred
 13:37:20 3 between you and Father Sprauer.
 13:37:22 4 A No.
 13:37:22 5 Q You didn't enjoy it the first time, right?
 13:37:26 6 A No.
 13:37:26 7 Q You didn't enjoy it the second time?
 13:37:29 8 A No.
 13:37:29 9 Q You didn't enjoy it the third time?
 13:37:33 10 A No. I was put in the position.
 13:37:34 11 Q What position?
 13:37:35 12 A The position to be molested.
 13:37:37 13 Q How about when you left MacLaren and went
 13:37:38 14 to Camp Tillamook, did you ever tell anybody there?
 13:37:41 15 A No.
 13:37:42 16 Q How about when you were paroled home?
 13:37:44 17 A I was -- no. I was very busy in Camp
 13:37:47 18 Tillamook.
 13:37:49 19 MR. GATTI: She didn't ask you how busy
 13:37:52 20 you were. She asked you if you told anybody.
 13:37:54 21 A No.
 13:37:55 22 Q When you got paroled home when you were
 13:37:58 23 finished with MacLaren, did you tell anybody what
 13:38:01 24 had happened between you and Father Sprauer?
 13:38:05 25 A No.

13:38:39 1 Q So you went to both the Catholic services
 13:38:41 2 and the Protestant services?
 13:38:43 3 A Correct.
 13:38:44 4 Q Who was the Protestant clergyman when you
 13:38:46 5 went back in 1980?
 13:38:50 6 A I don't recall.
 13:39:00 7 Q I take it you're claiming that this
 13:39:03 8 alleged abuse by Father Sprauer has somehow injured
 13:39:06 9 or damaged you.
 13:39:07 10 A That's correct.
 13:39:07 11 Q How do you think your life would have been
 13:39:14 12 different if this alleged abuse wouldn't have
 13 13 occurred?
 13:39:18 14 A If I wouldn't have blocked it out, I
 13:39:21 15 probably would have received some serious
 13:39:23 16 counseling. I probably would have saved my marriage
 13:39:27 17 by not blocking it out and had marriage counseling.
 13:39:33 18 I probably -- I most certainly wouldn't be the drunk
 13:39:37 19 I am today. I wouldn't be ashamed anymore.
 13:39:52 20 That's --
 13:39:54 21 Q Anything else?
 13:39:55 22 A (Witness shakes head.)
 13:39:56 23 Q Am I correct, sir, that you then blame
 13:39:58 24 your alcoholism on this alleged abuse?
 13:40:02 25 A That's a fact.

13:38:05 1 Q How about when you went back to MacLaren
 13:38:07 2 in the '80s?
 13:38:08 3 A No.
 13:38:09 4 Q When you went back in the '80s, did you
 13:38:11 5 inquire as to whether Sprauer was still there?
 13:38:14 6 A No.
 13:38:15 7 Q Did you look to be abused in there?
 13:38:16 8 A No.
 13:38:17 9 Q Who was the clergy was there in 1980?
 13:38:19 10 A I don't recall.
 13:38:20 11 Q Did you go to mass when you were there in
 13:38:22 12 1980?
 13:38:23 13 A Yes.
 13:38:23 14 Q So you went to the Catholic mass?
 13:38:25 15 A Yes.
 13:38:25 16 Q And there was a Catholic priest?
 13:38:30 17 A Yes.
 13:38:30 18 Q You just don't know who it is?
 13:38:31 19 A Correct.
 13:38:31 20 Q Were you supervised by any Catholic priest
 13:38:31 21 when you went back in 1980?
 13:38:31 22 A No.
 13:38:33 23 Q Did you go -- why did you go to Catholic
 13:38:35 24 services in 1980?
 13:38:37 25 A I went to both.

13:40:04 1 Q Your belief and testimony is that if you
 13:40:07 2 had not been abused by Father Sprauer, you never
 13:40:09 3 would have had problems with booze?
 13:40:15 4 A Yes.
 13:40:15 5 Q And you blame the failure of your marriage
 13:40:18 6 on this alleged abuse?
 13:40:19 7 A I blame the failure of my marriage on
 13:40:22 8 alcoholism.
 13:40:23 9 Q And you blame the alcoholism on the abuse?
 13:40:25 10 A That's correct.
 13:40:25 11 Q Okay. Now, your brother is an alcoholic,
 13:40:29 12 right?
 13:40:30 13 A Seems to be.
 13:40:31 14 Q Was he sexually abused?
 13:40:33 15 A Pretty recently.
 13:40:35 16 No.
 13:40:36 17 Q And you have other siblings who have
 13:40:38 18 battled booze, right?
 13:40:40 19 A My sister.
 13:40:41 20 Q Was she sexually abused?
 13:40:43 21 A Not to my knowledge.
 13:40:44 22 Q So why -- help me with your thought
 13:40:48 23 process, why do you think that your alcoholism is
 13:40:51 24 more related to the abuse than perhaps a genetic
 13:40:55 25 family tree?

EXHIBIT
PAGE 19 OF 25

13:40:59 1 A Because nobody in my family history has
 13:41:02 2 been an alcoholic per se.
 13:41:05 3 Q I thought you told me your brother was an
 13:41:08 4 alcoholic.
 13:41:09 5 A My brother has just recently become an
 13:41:12 6 alcoholic.
 13:41:13 7 Q What's the cause of his alcoholism?
 13:41:16 8 A Marital problems.
 13:41:17 9 Q And you believe the cause of his
 13:41:19 10 alcoholism is because recently he's had some marital
 13:41:23 11 problems?
 13:41:23 12 A Yes.
 13:41:23 13 Q And what's the reason for your sister's
 13:41:25 14 marital problems?
 13:41:27 15 A When we were kids, she had a -- well, she
 13:41:28 16 married her high school sweetheart. They would just
 13:41:28 17 go out and party on the weekends. They would work
 13:41:31 18 together at the same restaurant, and after work,
 13:41:34 19 they would go out and be kids, and I can remember
 13:41:38 20 that.
 13:41:38 21 Q So you're saying her alcoholism is just --
 13:41:41 22 A I'm not saying she's an alcoholic or was
 13:41:45 23 ever.
 13:41:47 24 Q She's a pretty heavy drinker?
 13:41:49 25 A She used to drink in high school.

13:43:11 1 Do you see that?
 13:43:13 2 A Correct.
 13:43:13 3 Q And it has your name, "Lester Klettke,"
 13:43:18 4 correct?
 13:43:18 5 A Yes.
 13:43:18 6 Q I'll represent to you that it comes from
 13:43:20 7 the MacLaren documents. It says, "Date admitted,
 13:43:24 8 10-19-78."
 13:43:26 9 Is that correct?
 13:43:27 10 A Correct.
 13:43:27 11 Q And is that the date that you were
 13:43:29 12 admitted to MacLaren the first time?
 13:43:31 13 A Yes.
 13:43:32 14 Q And it has your height down as five feet
 13:43:35 15 eight inches and your weight as 126.
 13:43:41 16 Is that what you weighed and what your
 13:43:43 17 height was when you were admitted to MacLaren --
 13:43:44 18 A Yes.
 13:43:44 19 Q -- in October of 1978?
 13:43:44 20 A Yes.
 13:43:45 21 Q And it says your complexion is fair.
 13:43:47 22 Is that a correct statement as of the time
 13:43:49 23 that you were admitted to MacLaren?
 13:43:51 24 A Yes.
 13:43:51 25 Q And under religion, it has a "P."

13:41:51 1 Q Okay. When you were married, you said
 13:41:52 2 your wife drank pretty heavily?
 13:42:01 3 A That's correct.
 13:42:01 4 Q Was she ever sexually abused?
 13:42:01 5 A No.
 13:42:01 6 Q What do you think -- what's the cause of
 13:42:01 7 her alcoholism?
 13:42:01 8 A Geez, she had a lot of fun. I drank so
 13:42:09 9 she drank. Our mutual friends drank.
 13:42:11 10 Q So you would agree that sometimes
 13:42:13 11 alcoholism or heavy drinking is just a natural
 13:42:16 12 process of your environment, it doesn't have to be
 13:42:20 13 caused by something?
 13:42:21 14 A I would agree or she would agree?
 13:42:23 15 Q I'm asking you if you would agree.
 13:42:25 16 A It could be.
 13:42:56 17 (Exhibit No. 3 marked.)
 13:42:57 18 Q I'm showing you what the court reporter
 13:42:58 19 has marked as Exhb. 3. It's a document that at the
 13:43:01 20 bottom right-hand corner says, "Confidential
 13:43:04 21 Protective Order, SL 000002."
 13:43:08 22 Do you see that document?
 13:43:09 23 A That's correct.
 13:43:10 24 Q At the top of the page, it says, "Juvenile
 13:43:10 25 Institution Face Sheet."

13:43:54 1 Do you see that?
 13:43:55 2 A Protestant.
 13:43:56 3 Q And is that information that you provided
 13:43:57 4 them or somebody provided them when you went to
 13:43:59 5 MacLaren?
 13:44:00 6 A Correct.
 13:44:00 7 Q And in fact, you were a Methodist when you
 13:44:03 8 went to MacLaren?
 13:44:04 9 A It says -- "I was raised in the Methodist
 13:44:09 10 church."
 13:44:10 11 Q It says "Place and date of birth, Texas."
 13:44:13 12 Is that where you were born?
 13:44:15 13 A Correct.
 13:44:16 14 Q So that's a correct statement.
 13:44:17 15 It says, "Age: 14"?
 13:44:21 16 A Correct.
 13:44:21 17 Q And it has your birthdate as 11-12-62.
 13:44:21 18 Is that correct?
 13:44:21 19 A Correct.
 13:44:21 20 Q And it says you were there -- "Reason for
 13:44:23 21 commitment: Theft and attempted theft (two, theft in
 13:44:27 22 the second degree, ORS 164.045."
 13:44:30 23 Is that correct?
 13:44:30 24 A Correct.
 13:44:31 25 Q Okay. And there's a picture on this

EXHIBIT 1
PAGE 20 OF 25

15:05:15 1 "The present court attitude is that he is lazy, kind
 15:05:19 2 of a smart Alec and a con artist and he will tell
 15:05:25 3 you what he thinks you want to hear."
 15:05:28 4 Do you agree with that comment, that
 15:05:30 5 that's how you were then?
 15:05:32 6 A Huh-uh. No.
 15:05:35 7 Q When he says "At the present court
 15:05:38 8 attitude," do you know what he's talking about?
 15:05:40 9 A My interview with him specifically?
 15:05:44 10 Q Well, it says "Court."
 15:05:46 11 That wasn't the attitude of the judge that
 15:05:48 12 sentenced you that you were aware of?
 15:05:50 13 A No.
 15:05:52 14 Q In subparagraph B, it says, "The majority
 15:05:56 15 of this young man's law violations have been toward
 15:06:00 16 the family, so the police haven't really been all
 15:06:03 17 that involved and neither has the greater share of
 15:06:07 18 his involvement been adjudicated."
 15:06:11 19 Is that a correct statement?
 15:06:12 20 A Partially.
 15:06:13 21 Q What's inaccurate about it?
 15:06:14 22 A Well, I would -- not necessarily legal
 15:06:19 23 things, more school activities, staying out late,
 15:06:23 24 partying --
 15:06:24 25 Q Curfew?

15:07:50 1 Q When did you first begin to harbor a
 15:07:54 2 dislike for Mr. Thompson?
 15:07:56 3 A The first time I met him.
 15:07:57 4 Q And what did he do to cause you to dislike
 15:08:00 5 him?
 15:08:01 6 A He wanted me to go through these programs
 15:08:03 7 that I didn't want to go through and he had an
 15:08:06 8 attitude about it.
 15:08:08 9 Q How old was he?
 15:08:09 10 A How old is Virgil Thompson?
 15:08:12 11 Q Then. Do you know? I mean, just
 15:08:16 12 ballpark, in his 20s?
 15:08:21 13 A Forties.
 15:08:21 14 Q Forties, okay.
 15:08:26 15 Have you seen Mr. Thompson since you've
 15:08:28 16 left MacLaren, since you left MacLaren in 1981?
 15:08:33 17 A No.
 15:08:40 18 Q Did you think that Mr. Thompson disliked
 15:08:43 19 you?
 15:08:44 20 A Yes.
 15:08:45 21 Q Would you admit that he oftentimes,
 15:08:48 22 though, wrote glowing commendations for you, I mean,
 15:08:55 23 he said that you were doing a good job and things of
 15:08:59 24 that kind?
 15:09:00 25 A I wouldn't say glowing.

15:06:25 1 A Curfew, partying with friends.
 15:06:28 2 Q Drinking beer?
 15:06:29 3 A Occasionally.
 15:06:30 4 Q Yeah.
 15:06:34 5 Do you remember perpetrating any crimes,
 15:06:37 6 thefts, vandalism on your family?
 15:06:40 7 A No.
 15:06:51 8 Q In subparagraph 3 under "Recommendations,"
 15:06:54 9 it says, "This young man will be a con artist. He
 15:06:59 10 will try to con us. He will look at us to see if we
 15:07:03 11 really mean what we say."
 15:07:05 12 Do you think that's a correct
 15:07:08 13 representation of what you were like back then?
 15:07:11 14 A No. That was Virgil Thompson's opinion.
 15:07:15 15 Q Okay. And I take it during this
 15:07:16 16 interview, you obviously never said anything about
 15:07:22 17 Father Sprauer's abuse.
 15:07:23 18 A No.
 15:07:24 19 Q And at least a portion of the abuse that
 15:07:27 20 occurred prior to this.
 15:07:29 21 Is that correct?
 15:07:29 22 A Correct.
 15:07:41 23 Q When did your -- I take it you disliked
 15:07:44 24 Virgil Thompson. I think you testified to that.
 15:07:49 25 A Correct.

15:09:01 1 Q Good?
 15:09:02 2 A What I'm supposed to be doing.
 15:09:21 3 Q Eventually you were -- you transferred, I
 15:09:23 4 believe, from Thayer to Camp Tillamook?
 15:09:27 5 A Correct.
 15:09:27 6 Q Did you want to go to Camp Tillamook?
 15:09:29 7 A Yes.
 15:09:30 8 Q What was Camp Tillamook like when you got
 15:09:32 9 there?
 15:09:33 10 A Work and school.
 15:09:35 11 Q Was it outdoors?
 15:09:36 12 A Out in the --
 15:09:38 13 Q I mean --
 15:09:39 14 A In the forests.
 15:09:41 15 Q Forests.
 15:09:42 16 A Campgrounds.
 15:09:46 17 Q Did you think --
 15:09:48 18 A A lot of freedom.
 15:09:49 19 Q Actually, customarily, not always, but
 15:09:52 20 customarily, the individuals that were sent to Camp
 15:09:54 21 Florence were people that earned their -- earned the
 15:09:58 22 right to go to Camp Florence?
 15:10:00 23 A That's correct.
 15:10:01 24 Q It was sort of a privilege?
 15:10:02 25 A That's correct.

1
 EXHIBIT
 PAGE 21 OF 25

15:41:35 1 A Correct.
 15:41:36 2 Q And in fact, you specifically requested
 15:41:38 3 that he be changed as your parole officer?
 15:41:41 4 A Correct.
 15:41:43 5 Q And also at this time, which I think is
 15:41:47 6 the reason why I placed the date that occurred prior
 15:41:50 7 to July, you also threatened a lawsuit because a
 15:41:54 8 staff member had hit you in the testicles.
 15:41:57 9 A That's correct.
 15:41:58 10 Q Or assaulted you.
 15:41:59 11 A That's correct.
 15:41:59 12 Q And what were the circumstances
 15:42:01 13 surrounding your being hit in the testicles?
 15:42:04 14 A We were at the gym and we were
 15:42:06 15 roughhousing, playing basketball, and I got in his
 15:42:12 16 way and got smacked.
 15:42:13 17 Q Was it intentional?
 15:42:15 18 A No. No.
 15:42:15 19 Q Okay. And in fact --
 15:42:18 20 A And they just laughed about it.
 15:42:20 21 Q They laughed about it, but the fact of the
 15:42:23 22 matter was it hurt you?
 15:42:24 23 A Yes, seriously.
 15:42:25 24 Q And you threatened a lawsuit?
 15:42:27 25 A Yes.

15:43:55 1 A Through Virgil Thompson.
 15:43:58 2 Q What do you mean through her -- through
 15:44:01 3 him?
 15:44:01 4 A His recommendation.
 15:44:03 5 Q Well, didn't she make that on her own?
 15:44:06 6 A Through his recommendation.
 15:44:24 7 Q Okay. And you eventually terminated?
 15:44:35 8 A Yes.
 15:44:46 9 Q Do you remember any of these individuals,
 15:44:50 10 do you remember an Adrian Daniel, a counselor?
 15:44:54 11 A Yes.
 15:44:55 12 Q Do you remember how you got along with
 15:44:58 13 Adrian Daniel?
 15:45:00 14 A Well.
 15:45:00 15 Q Okay. Do you remember Gary Lawhead?
 15:45:02 16 A No.
 15:45:03 17 Q Do you remember Ben Holt?
 15:45:06 18 A Yes.
 15:45:07 19 Q How did you get along with Mr. Holt?
 15:45:09 20 A I think I met him once.
 15:45:11 21 Q Okay. He was the superintendent?
 15:45:15 22 A Yeah, a little Hawaiian guy.
 15:45:24 23 Q Did you ever -- as I understand it, you,
 15:45:30 24 for the most part, attribute your alcoholism to the
 15:45:34 25 abuse -- to the abuse by Father Sprauer.

15:42:28 1 Q And in fact, I believe you went and saw
 15:42:33 2 Dr. Edwards, you actually went to a doctor about
 15:42:37 3 that condition?
 15:42:37 4 A Yes.
 15:42:38 5 Q Okay. And again, would you agree with me
 15:42:46 6 that these letters that you write and these appeals
 15:42:50 7 you write, that you weren't a timid person, when you
 15:42:54 8 were damaged or harmed, you stood up for yourself,
 15:42:58 9 correct?
 15:42:58 10 A (Witness nods head.)
 15:42:59 11 Q You disagreed with Virgil Thompson?
 15:43:01 12 A I disagreed with Virgil Thompson.
 15:43:04 13 Q And you also threatened a lawsuit?
 15:43:06 14 A Correct.
 15:43:24 15 Q Do you remember that one of the
 15:43:25 16 problems -- I'm asking you whether or not you recall
 15:43:32 17 this -- that one of the problems that you had with
 15:43:34 18 being paroled was Judge Nachtigal's letter saying
 15:43:42 19 that you had to be -- not be released until you were
 15:43:46 20 18, do you remember that?
 15:43:47 21 A Yes.
 15:43:47 22 Q And that was from the judge?
 15:43:49 23 A Yes.
 15:43:49 24 Q That wasn't Virgil Thompson, that wasn't
 15:43:52 25 anybody else, that was the judge herself?

15:45:39 1 Is that correct?
 15:45:41 2 A That's correct.
 15:45:44 3 Q Has there been any therapist or mental
 15:45:46 4 health professional that has made the diagnosis to
 15:45:49 5 support that opinion of yours?
 15:45:52 6 A No.
 15:45:55 7 Q On numerous occasions, you appeared in
 15:45:57 8 front of Judge Marcus.
 15:46:00 9 A Yes.
 15:46:01 10 Q As an adult, I'm talking about.
 15:46:03 11 A Yes.
 15:46:04 12 Q Some of those -- if I remember correctly,
 15:46:06 13 some of them had to do with the failure to pay
 15:46:09 14 support?
 15:46:10 15 A Correct.
 15:46:15 16 Q During any time you ever appeared in adult
 15:46:18 17 court, in the circuit court, did you ever consider
 15:46:23 18 raising the abuse as -- in mitigation of any of your
 15:46:28 19 charges that were pending by the court?
 15:46:31 20 A No.
 15:46:33 21 Q And why not?
 15:46:36 22 A I totally blocked it out, put it behind
 15:46:38 23 me.
 15:46:39 24 Q When you say "Blocked it out," are you
 15:46:42 25 saying that you never thought about it again?

EXHIBIT
PAGE 22 OF 25

Page 269

15:46:45 1 A Pretty much. Being so shamed and thrown
 15:46:50 2 into a closet, you know -- you know, what I know now
 15:46:55 3 and didn't know then, or should have known then, it
 15:46:58 4 would have been different.
 15:47:00 5 Q So when you read about the abuse that has
 15:47:09 6 occurred in other parts of the country, for example,
 15:47:11 7 in Boston, that didn't refresh your recollection at
 15:47:14 8 all?
 15:47:14 9 A No.
 15:47:44 10 Q And as I understand it, what caused you --
 15:47:47 11 what precipitated you making the causal connection
 15:47:50 12 was when you read the article about the Grecco
 15:47:54 13 litigation?
 15:47:56 14 A Correct.
 15:47:56 15 Q And when you read that, what newspaper did
 15:47:59 16 you read it in?
 15:48:00 17 A The Oregonian.
 15:48:01 18 Q Okay. In that -- do you remember what
 15:48:08 19 date that was?
 15:48:08 20 A No.
 15:48:10 21 Q Do you know approximately what date that
 15:48:12 22 was?
 15:48:13 23 A It was almost two years ago.
 15:48:16 24 Q Was it -- do you remember when you read
 15:48:17 25 the article, was it in association with the actual

Page 271

15:49:56 1 they were there. The problems were there.
 15:50:26 2 Q Through your counsel, your attorney,
 15:50:28 3 you've produced certain documents having to do with
 15:50:30 4 Woodland Park emergency room.
 15:50:33 5 Do you remember being admitted to
 15:50:36 6 Woodland -- or admitting yourself to Woodland Park?
 15:50:40 7 A Yes.
 15:50:41 8 Q I think the most recent had to do with
 15:50:43 9 chest pains?
 15:50:44 10 A Yes.
 15:50:53 11 Q Had you ever -- since you went to Woodland
 15:50:54 12 Park, had you gone back and had any follow up
 15:50:58 13 associated with what caused those chest pains that
 15:51:01 14 particular day?
 15:51:02 15 A It was a cracked rib -- or sprained,
 15:51:05 16 excuse me.
 15:51:17 17 Q Do you remember in November of 2002, going
 15:51:25 18 to the emergency room there at Woodland Park having
 15:51:27 19 to do with seizures?
 15:51:29 20 A That's correct.
 15:51:31 21 Q Where you had an abrasion on the top of
 15:51:34 22 your head?
 15:51:34 23 A Yes.
 15:51:37 24 Q The doctor, from what I can tell, from the
 15:51:43 25 best that he came up with was it was possible

Page 270

15:48:21 1 filing of the complaint by the Grecco plaintiffs?
 15:48:24 2 A I don't believe so. I read about it -- I
 15:48:27 3 don't recall.
 15:48:28 4 Q Okay. So that I understand this blocking
 15:49:00 5 out, then from a conscious standpoint of what you're
 15:49:06 6 thinking about, you actually were -- you were no
 15:49:13 7 different than someone that hadn't been abused?
 15:49:18 8 A I was abused.
 15:49:19 9 Q No, my point is, prior to you reading the
 15:49:22 10 newspaper article, you never thought about the
 15:49:24 11 abuse, so you never dwelled on it up until that
 15:49:27 12 point in time.
 15:49:28 13 Is that fair to say?
 15:49:30 14 A That's correct.
 15:49:30 15 Q So it didn't cause you any anxiety up
 15:49:33 16 until that point time?
 15:49:34 17 A There was always anxiety.
 15:49:36 18 Q No, but there was never anxiety that you
 15:49:39 19 related to the abuse.
 15:49:40 20 Is that fair to say?
 15:49:42 21 A That's fair to say.
 15:49:43 22 Q So there are no emotional problems that
 15:49:45 23 you were aware about prior to reading the newspaper
 15:49:49 24 article that you associated with the abuse?
 15:49:53 25 A Whether I realized or was aware of them,

Page 272

15:51:48 1 alcohol withdrawal?
 15:51:56 2 A Possible.
 15:51:56 3 Q And then also on May 6th of 2001 -- I'm
 15:52:01 4 sorry, I took those out of sequence. I went to the
 15:52:05 5 most recent -- it says, "This patient is a
 15:52:08 6 37-year-old gentleman who was apparently walking to
 15:52:11 7 a store and he became very shaky, shivering all
 15:52:15 8 over to the point where he was unable to control
 15:52:21 9 it."
 15:52:21 10 Do you remember that?
 15:52:22 11 A I had a seizure.
 15:52:23 12 Q Do you know, has anyone ever been able to
 15:52:26 13 indicate what type of seizure that was?
 15:52:26 14 A Epileptic.
 15:52:26 15 Q Do you have epilepsy?
 15:52:26 16 A No. It's in relationship to epilepsy,
 15:52:30 17 epileptic seizures.
 15:52:32 18 Q Did anyone indicate to you what caused
 15:52:34 19 that seizure?
 15:52:36 20 A No.
 15:52:36 21 Q It said, "He considers himself a drunk.
 15:52:41 22 He drinks at least a six-pack of beer every day and
 15:52:44 23 apparently he had a fairly significant alcohol
 15:52:44 24 consumption last night. He said he stopped drinking
 15:52:47 25 about 3 a.m."

EXHIBIT 1
PAGE 23 OF 25

Page 285

16:06:09 1 seen in the last ten years.
 16:06:10 2 A Ten years. Well, other than emergency
 16:06:12 3 room doctors that they've brought up and my surgeon.
 16:06:15 4 Q Which surgeon?
 16:06:16 5 A Julio.
 16:06:18 6 Q What hospitals have you ever been in?
 16:06:21 7 A Woodland Park, Portland Adventist.
 16:06:24 8 Q What for at Adventist?
 16:06:29 9 A I fell and had to have stitches in my
 16:06:34 10 head. I guess you'd say I tripped.
 16:06:39 11 Q Did alcohol have anything to do with that?
 16:06:41 12 A No.
 16:06:42 13 Q When you were flying with your friend, you
 16:06:43 14 said you went to Eastern Oregon.
 16:06:46 15 Why were you going to Eastern Oregon and
 16:06:48 16 where would you go?
 16:06:49 17 A Baker City. He has family and friends
 16:06:51 18 there. Prineville Reservoir, my entire family
 16:06:55 19 catches there a month out of the summer.
 16:06:57 20 Q And that was with Bob Hall?
 16:06:59 21 A Yes.
 16:07:00 22 Q Is he still around?
 16:07:01 23 A Yes. In Beaverton.
 16:07:02 24 Q And is he the one that sold the plane, so
 16:07:06 25 you can't fly anymore?

Page 287

16:08:12 1 haven't discussed how her insurance is going to pay
 16:08:15 2 for it and I have not represented -- or contacted
 16:08:18 3 any legal counsel.
 16:08:19 4 Q Okay.
 16:08:21 5 A Pending further medical stuff, outcome.
 16:08:26 6 Q Have you given a statement to anybody -- I
 16:08:28 7 don't want you to tell me what the statement says
 16:08:30 8 until you identify if you've given one, who you've
 16:08:34 9 given it to, a written statement or a recorded
 16:08:37 10 statement?
 16:08:42 11 A Have I given one?
 16:08:43 12 Q Yes.
 16:08:44 13 A I imagine I've given Mr. Gatti --
 16:08:49 14 Q A written statement? Don't tell me what's
 16:08:51 15 in it, I just want to know if you've given a written
 16:08:55 16 statement to Mr. Gatti.
 16:08:57 17 A Verbal.
 16:08:57 18 Q Okay. And you told him as best you can
 16:09:00 19 recall what occurred?
 16:09:01 20 A Correct.
 16:09:01 21 Q Have you had any memory problems?
 16:09:05 22 A No.
 16:09:09 23 Q You say you don't wish to drive anymore.
 16:09:11 24 Why is that?
 16:09:12 25 A Because I drink and I can't afford it.

Page 286

16:07:08 1 A I can still fly, but, yes, he did sell his
 16:07:11 2 plane.
 16:07:11 3 Q You still have your license?
 16:07:13 4 A Student license.
 16:07:14 5 Q You don't have your guns anymore.
 16:07:16 6 What happened to them?
 16:07:17 7 A I sold them.
 16:07:19 8 Q It was a voluntary thing, not required?
 16:07:21 9 A Yes.
 16:07:24 10 Q When you got divorced, did you have a
 16:07:26 11 lawyer help you?
 16:07:27 12 A Yes.
 16:07:27 13 Q Who was that?
 16:07:28 14 A Who was that one -- Thomas Thorpe.
 16:07:35 15 Q Tom Thorpe?
 16:07:36 16 A Yes.
 16:07:37 17 Q Did your wife have a lawyer?
 16:07:39 18 A Yes.
 16:07:40 19 Q Who was her lawyer?
 16:07:45 20 A Andy Ragland.
 16:07:46 21 Q And was the divorce in Multnomah County?
 16:07:49 22 A Yes.
 16:07:57 23 Q Do you have a claim pending against the --
 16:08:03 24 or arising out of the roof accident?
 16:08:06 25 A Not legally pending, but it's there. We

Page 288

16:09:16 1 MR. COONEY: That's all I have.
 16:09:18 2 Thank you.
 16:09:26 3 MS. HOFFMANN: Did you finish?
 16:09:28 4 MR. THARP: Yes.
 16:09:29 5 MR. GATTI: Are you done?
 16:09:30 6
 16:09:31 7 EXAMINATION BY MR. GATTI:
 16:09:31 8 Q Just for clarification, it was either
 16:09:33 9 Ms. Hoffmann or Mr. Tharp, you indicated that you
 16:09:39 10 wanted to now have counseling for what you realize
 16:09:42 11 your damages were as a result of the abuse.
 16:09:44 12 Do you remember those questions?
 16:09:45 13 A Yes.
 16:09:46 14 Q What is it you attribute in terms of
 16:09:51 15 damages to the abuse now that you didn't know then?
 16:09:58 16 A Self-esteem, pride, shame, sadness, just
 16:10:10 17 depression, alcoholism, insecurity. That's pretty
 16:10:22 18 much --
 16:10:28 19 Q You'd like treatment for that?
 16:10:30 20 A Yes.
 16:10:31 21 Q Do you think it would help?
 16:10:32 22 A Yes.
 16:10:34 23 MR. GATTI: That's all I have.
 16:10:39 24 (Deposition adjourned at 4:10 p.m.)
 25

EXHIBIT PAGE 24 OF 25