

COPY

THE STATE OF NEW HAMPSHIRE

CHESHIRE, SS.
DOCKET NO. 91-C-149SUPERIOR COURT
JUNE TERM, 1992"JOHN DOE," A MINOR, BY
HIS MOTHER AND NEXT FRIEND

VS

GORDON MacRAE AND THE ROMAN CATHOLIC
BISHOP OF MANCHESTER, INC.

INTERROGATORIES PROPOUNDED BY THE PLAINTIFF,
"JOHN DOE," A MINOR, BY HIS MOTHER AND NEXT FRIEND,
TO BE ANSWERED UNDER OATH BY THE DEFENDANT,
THE ROMAN CATHOLIC BISHOP OF MANCHESTER, INC.

The following constitute interrogatories propounded by the Plaintiff, "John Doe," a minor, by his mother and next friend, to be answered by the Defendant, the Roman Catholic Bishop of Manchester, Inc., under oath, pursuant to and within the time prescribed by New Hampshire Superior Court Rule 36. All answers must be full and complete and contain all facts and evidence which substantiate the answer as it is given and which would be presented to the Court. When a question calls for the possibility of either an affirmative or a negative answer, do not limit your answer to a simple negative or affirmative, explain in detail. State the facts and reasons behind your answer fully and completely. If there are any documents which substantiate any answer, or any explanation to any answer, please specifically refer to them and attach copies to these interrogatories, whether or not they are requested.

These interrogatories shall be deemed continuing so as to

require supplemental answers if the Plaintiff or his attorney obtains further information between the time answers are served and the time of a hearing on the merits regarding this matter.

1. Please state the name, address and corporate title of each natural person who has answered any of these interrogatories and specify which interrogatories each such person has answered.

Msgr. Francis J. Christian, Chancellor of the Diocese of Manchester.

Questions 1, 2, 3, 4, 6, 7, 8, 9, 10, 14, 15, 16.

Msgr. John P. Quinn, Director of Catholic Charities.

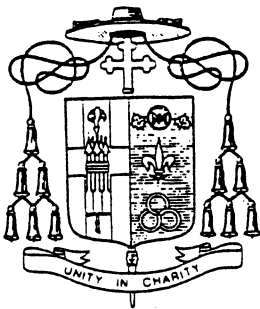
Questions 5, 11, 12, 13.

2. Please describe in detail Gordon MacRae's employment history with the Roman Catholic Bishop of Manchester, Inc., stating:

- A. The date he first became employed with the Church.
- B. The title and address of each position he held with the Roman Catholic Bishop of Manchester, Inc.
- C. His duties in each such position.
- D. The dates between which he held each position.
- E. The reasons the Roman Catholic Bishop of Manchester, Inc., moved him from one position to the next.

Please attach hereto copies of any documents which support your answer.

- a. June 5th, 1982 -- Date of Ordination to the Catholic Priesthood.
- b. Associate Pastor, Our Lady of the Miraculous Medal Parish, Hampton, July 10, 1982 to June 15, 1983.
Associate Pastor, St. Bernard Parish, Keene, June 15, 1983 to July 1, 1987.
- c. In each of these priestly assignments he served as an Associate Pastor, e.g., under the supervision of the Pastors of those parishes he was to preach the Gospel and celebrate the sacraments of the Church with the parishioners.
- d. cf b.
- e. Gordon MacRae was transferred from Hampton to Keene as part of a normal series of priestly transfers in which the Bishop attempts to place priests in parishes that require their specific talents.



ODORE JOSEPH

By the Grace of God and the Apostolic See

BISHOP OF MANCHESTER

+

To all who shall examine this letter
Greetings in Our Lord!

We hereby affirm and certify that our beloved son

Gordon James MacRae

of the Diocese of Manchester having been examined,
approved and found worthy, in an ordination ceremony held in

St. John the Evangelist Church, Hudson, N.H.

on the fifth day of June 1982, according to the
rite of the Holy Roman Church, with all rules being observed,
was promoted in our Lord to the order of

Priesthood

Given at Manchester, New Hampshire in the Episcopal

Offices under our sign and seal and with the assistance of our

Chancellor on the eighth day of June 1982

Francis J. Chustea
By order of the Most Reverend Bishop
Chancellor

+ *Odore J. Gordon*
Bishop of Manchester

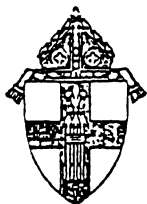
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MOST REVEREND ODORÉ J. GENDRON D.D.
Bishop

MOST REVEREND ROBERT E. MULVEE, J.C.D.
Auxiliary Bishop



OF THE BISHOP

DIOCESE OF MANCHESTER

May 27, 1982

Rev. Gordon L. MacRae
St. Francis Xavier Church
State Street
Groveton, N.H. 03582

Dear Father MacRae:

Subsequent to our recent conversation, and upon the recommendation of the Diocesan Personnel Board, this letter will serve to confirm your appointment as Associate Pastor of Our Lady of the Miraculous Medal Parish, Hampton, effective July 10th, 1982.

For every priest, his first assignment is truly special, and I pray that you will find much happiness and fruitfulness as you minister to the good people of Hampton. I know that you will cooperate effectively with Father Gerard Boucher, the Pastor, and his pastoral staff in caring for the needs of his people.

Assuring you of my prayerful good wishes for the months and years ahead, I am

Cordially in Christ,

Bishop of Manchester

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③
May 27, 1983

Rev. Gordon J. MacRae
Our Lady of The Miraculous
Medal Rectory
289 Lafayette Road
Hampton, New Hampshire 03842

Dear Father MacRae:

Subsequent to our recent conversation and upon the recommendation of the Diocesan Personnel Board, this letter will confirm your assignment as Associate Pastor of Saint Bernard's Parish in Keene, effective June 15th, 1983.

I have every confidence that you will work happily and effectively with Father Gabriel Houle, the Pastor, and Father Wilfrid Bombardier, the other Associate Pastor, in caring for the needs of the good people of Keene.

In closing, let me thank you for your dedication during these last difficult months in Hampton, and assure you of my prayers for the success of your work in Keene in the months ahead.

With every good wish, I am

Cordially in Christ,

Bishop of Manchester

3. If Gordon MacRae took any leaves of absence from his employment with the Roman Catholic Bishop of Manchester, Inc., please state the effective dates of each such leave of absence. Please attach hereto copies of any documents which support your answer.

Gordon MacRae requested and received from the Bishop a leave of absence from the priestly ministry on July 1st, 1987.

FR MCRae
(3)

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June 15, 1987

Rev. Gordon J. MacRae
St. Bernard Rectory
173 Main Street
Keene, NH 03431

Dear Father MacRae:

Subsequent to our recent conversation and your letter of June 11th, this letter will grant your request for a temporary leave of absence from priestly ministry in the Diocese of Manchester, effective July 1st, 1987.

It is understood that this period is initially for a period of one year. It is my hope during this period of time that you will continue to see Dr. Ouellet and that also you might seek out a spiritual director with whom you can continue to discuss and, hopefully, deepen your commitment to priestly ministry.

I look forward to meeting with you in December of this year and ask you to make an appointment for this purpose at an appropriate time. We would then meet again some time in the late Spring to discuss your situation and possible return to ministry, or an extension of your leave.

You understand that with the exception of specific instances for which I would grant you faculties at your request, you would not have the faculties to function as a priest during the period of this year.

Please be assured, Gordon, of my prayers for you in the months ahead. I pray especially that the Lord will enable you to see more clearly the vocation to which He is calling you, and if that be His will, to allow you to return to priestly ministry at the appropriate time, renewed and rededicated to the work that you have done so very effectively. If I can be of further assistance to you, please do not hesitate to contact me.

With every good wish, I am

Cordially in Christ,

Bishop of Manchester

4. Please describe with specificity what services, if any, Gordon MacRae performed for the Roman Catholic Bishop of Manchester, Inc., during each leave of absence specified in the preceding interrogatory. Please attach hereto copies of any documents which support your answer.

During his leave of absence Father MacRae was given permission to celebrate Sunday Mass and the Sacrament of Reconciliation for the Catholic patients at Spofford Hall Hospital. That permission was given to him August 18th, 1987, upon his request and the request of Reverend Leonard F. Zecchini, the Episcopalian minister who was the Director of Pastoral Care at Spofford Hall.

August 18, 1987

Rev. Gordon J. MacRae
52 Summit Road #12
Keene, NH 03431

Dear Father MacRae:

In response to your letter of July 28, 1987, and after having carefully considered all the pastoral reasons you advance, I am pleased to grant you the necessary faculties to offer the Sunday Liturgy and to celebrate the Sacraments for the Catholic patients at Spofford Hall Hospital. I do so because of the manifest spiritual needs which you have so clearly described, as existing among the patients at the hospital. I am also confident that, as you have indicated in your letter, you will in this capacity continue to be sensitive to the need to avoid public confusion about your present leave of absence from the Diocese and about your ministry as a priest in these rather particular circumstances. I know you will take the necessary precautions in this regard.

Reverend Leonard Zecchini, Director of Pastoral Care, has also written me about this request, and I have this date sent him a letter indicating that I have granted you this permission. He, too, has very well described the unusual circumstances of the hospital and the ongoing need the Catholic patients have for regular spiritual care in their total recovery process.

I am pleased, Gordon, that you will be able to exercise your priesthood in this limited fashion at Spofford Hall. I know that, in addition to your other talents and responsibilities, your priestly ministry in this regard will be of great assistance to the patients at the hospital. As we have previously discussed, I ask that you continue to keep me apprised of your situation.

With every good wish, I am

Cordially in Christ,

Bishop of Manchester

5. Please describe in detail each and every incident of sexual misconduct alleged against Gordon MacRae of which the Roman Catholic Bishop of Manchester, Inc., has knowledge and the date upon which it first received information pertaining to each such allegation. Please attach hereto copies of any documents which support your answer.

On November 23, 1983, Msgr. John Q. Quinn received notification from Judith Patterson of Catholic Social Services, Salem, that Gordon MacRae had kissed a young man during the past summer. He was also notified of this same incident by Dr. Henry Guertin-Ouellette on that same date. He notified Msgr. Francis J. Christian, the Chancellor of the Diocese of Manchester, of this information, and informed him that he was reporting the incident to the appropriate authorities of the State of New Hampshire.

Msgr. Francis J. Christian, was notified on July 14th, 1988, by authorities of Spofford Hall that charges of solicitation had been brought against Gordon MacRae by the young man in treatment at that facility. Gordon MacRae was at that time on leave of absence from the Diocese of Manchester and working as an alcohol counselor. The authorities of Spofford Hall indicated to him that they had already notified the appropriate authorities in the State of New Hampshire. As a result of these charges and pending their outcome Gordon MacRae, who had been given permission during his formal leave of absence from priestly ministries to celebrate Mass and the other sacraments only at Spofford Hall, was suspended from all priestly ministry.

6. Please describe with specificity each warning you gave to any employees of the Roman Catholic Bishop of Manchester, Inc., employed in the City of Keene, New Hampshire, any parishioners of the parish in Keene, New Hampshire, or any other persons relating to Gordon MacRae and his prior history of sexual misconduct and the date each such warning was given. Please attach hereto copies of any documents which support your answer.

None

7. Please describe in detail Gordon MacRae's responsibilities while posted in the Hampton, New Hampshire, parish. Please attach hereto copies of any documents which support your answer.

cf Question #2.c.

8. Please describe in detail Gordon MacRae's responsibilities while posted at St. Bernard's Church in Keene, New Hampshire. Please attach hereto copies of any documents which support your answer.

8. cf Question #2.c.

9. If the Church required Gordon MacRae to receive any counseling, instruction, training or therapy as a result of his sexual misconduct, please state:

A. The nature of such counseling, instruction, training or therapy.

B. Where such counseling, instruction, training or therapy was received

C. The dates such counseling, instruction, training or therapy was required of Gordon MacRae.

Please attach hereto copies of all documents which support your answer.

When the alleged incident was reported to the Diocese, the Diocese was informed by Gordon MacRae, and corroborated with Dr. Henry Guertin-Ouellette, that Gordon MacRae had been in counseling with the doctor since November of 1982. The Diocese instructed Gordon MacRae to continue therapy with Dr. Guertin-Ouellette.

In November of 1988, after his court hearing and his guilty plea to the misdemeanor complaint of endangering the welfare of a person under the age of 18, the Court required him to have an extensive psychological evaluation. This was done in December of 1988, at the House of Affirmation in Whitinsville, MA. The Court then required a second independent evaluation, which was done in January of 1989, by the Straffort Guidance Center in Dover, N.H. That evaluation recommended to the Court that Gordon MacRae enter a residential treatment program at Villa Louis Martin in Jemez Springs, New Mexico. Gordon MacRae entered that program in mid March of 1989, and was in treatment there until May of 1990.

10. Please state the name and address of each person employed by the Roman Catholic Bishop of Manchester, Inc., who is charged with supervising Gordon MacRae in order to ensure or prevent sexual misconduct by Gordon MacRae in the future.

Because Gordon MacRae is no longer employed by the Roman Catholic Bishop of Manchester, such a function would be inappropriate.

11. Please state the name and position of each and every employee of the Roman Catholic Bishop of Manchester, Inc., who discussed Gordon MacRae's sexual misconduct in Hampton, New Hampshire, with the victim or any member of his family.

Judith Patterson of the Catholic Social Services Office in Salem was the only individual to have direct contact with the alleged victim or members of his family.

12. Please state the date of each such communication between employees of the Roman Catholic Bishop of Manchester, Inc., and the victim of Gordon MacRae's sexual misconduct in Hampton, New Hampshire. Please attach hereto copies of all documents which support your answer. In doing so, it is unnecessary for you to disclose the name of the victim which may be blacked out.

The alleged victim was a counseling client of Judith Patterson from September 20, 1983 through April 10, 1985. Because of the confidentiality of the counselor/patient relationship this information cannot be made available.

13. Please state the name and position of each and every employee of the Roman Catholic Bishop of Manchester, Inc., who had conversations with employees of the Division for Children and Youth Services with reference to Gordon MacRae's sexual misconduct in Hampton, New Hampshire, and the date of each such communication. Please attach hereto copies of all documents which support your answer. In doing so it is unnecessary for you to disclose the name of the victim which may be blacked out.

Monsignor John P. Quinn. November 21, 1982 and November 23, 1983.

14. Please attach hereto all internal memos of the Roman Catholic Bishop of Manchester, Inc., concerning Gordon MacRae's sexual misconduct. In doing so it is unnecessary for you to disclose the name of the victim which may be blacked out.

Attached

15. Please state the name and address of every person you intend to call as a witness in the trial of this matter.

Objection. Improper question. We will disclose our witnesses to you pursuant to the Rules of Court.

16. Please state the name and address of each expert witness you have retained in preparation for this matter and attach hereto copies of any reports such expert witnesses have made.

We have not selected our experts. We shall be happy to disclose this information when we do.

Respectfully submitted,

"John Doe," a minor by his
mother & next friend
By His Attorneys
GREEN, McMAHON AND HEED
28 Middle Street
Keene, New Hampshire 03431
(603) 352-3523

Dated: _____

Peter W. Heed, Esquire

I hereby certify that an original plus two (2) copies of
the foregoing Interrogatories were mailed this date to Gregory
W. Swope, Esquire, of Sheehan Phinney Bass + Green, P.A.,
Counsel for the Defendants.

Peter W. Heed, Esquire

* * * * *

The Roman Catholic Bishop of
Manchester, Inc.

Dated: 7/20/92

BY: Mrg. Francis T. Christian
Mrg. John P. Quinn
Its

STATE OF NEW HAMPSHIRE
HILLSBORO, SS.

Personally appeared the above-named Mrg. Francis J. Christian and
Mrg. John P. Quinn,
of the Roman Catholic Bishop of Manchester, Inc., a New
Hampshire Corporation, on behalf of the corporation, who upon
oath declared that the statements in the foregoing Inter-
rogatories by him subscribed are true to the best of his
knowledge and belief.

Dated: 7/20/92

Franceen M. Morasse
Justice of the Peace/Notary Public

Franceen M. Morasse, Notary Public
My Commission Expires On May 24, 1994