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Q. Now, we've heard testimony and received
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   reports from people that, in the hallways and whatnot,
    Lawrence Soens used to pinch young men on their chests.
    Did that ever happen to you?
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        A. Other than the incident in his office?
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        Q. Yes.
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        A. In the hallway, no.
        Q. Did you ever see him do that to anyone?
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        A. All the time.
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        Q. All the time --
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        A. I say "all the time."
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 Please elaborate for me.

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        A. It was very common to see him nipple-
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19 pinching. That's what it's called. Pinching a guy's
    nipple. You would see it quite often in the halfways in
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    front of other people, as well. It was almost common.
   It was common.
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1 2 When he would do this to kids out in the 3 hall, were any adults -- teachers, nuns, other staff -out there to see that happening? A. I can recall there being other adult teachers in the area of where he was. I cannot imagine them not seeing that because it was so obvious. He didn't hide that. He would just do it right in the hallway. The teachers would be walking past and other students would be walking past, and he would be standing there with his arm around a guy, pinching his nipple. 12 Q. As you sit here today, can you say that you 24

know other adults actually saw him doing this twisting

1 of the nipple?

A. Absolutely. Absolutely. 100 percent,

without a doubt.

Q. Why do you say that?

A. You couldn't miss it. It was so obvious. If 5

we saw it, the students, the others had to see it, other

teachers. I don't know if all of them saw it, but there

had to be other teachers that saw this and knew about

it. Had to be.

EXHIBIT 💍

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19 tell me what you 20 remember happening. A. No. As I recall, I came to the front area, 21 and the secretary told me Mr. Soens wanted to see me. 22 So I remember walking in his office and the door being 23 24 open. He was sitting behind the desk. And I don't remember if he asked me to close the door or if I closed 25

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Q. Tell me what happened from there.

A. Well, we started to discuss the letter that I wrote. He pretty much read the letter back and was asking me questions about why I felt that way, and I was giving him answers as to why I felt that way. And the conversation had probably gone on for maybe five minutes, you know. They seem longer than they are.

And towards the end of our discussion, at one point he got up and came around. I can see him sitting right there just like you are. He got up, walked around and went behind me. He was still talking. I wasn't watching him. And then I remember him coming up behind me. I can't believe I'm doing this. I remember him coming up behind me and putting his hands on my shoulders. I'm sorry.

Q. That's okay. If you need to take a minute, 20 let's do that.

A. Putting his hands on my shoulders, and he is 21 22 talking to me. And he starts to run his hands down my 23 chest, and he is playing with my nipples, specifically 24 with my nipples, playing with them, molesting them, 25 massaging them. And it seemed like a very long time.

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1 It was probably no more than 30 seconds that he was doing this. And all the time he is doing this (indicating), he is talking to me. 3 And I'm not understanding anything he is 5 saying because of this right here (indicating). And it's almost like I went totally blank when he started doing that, because this is so strange that I don't recall thinking anything at the time. And when he was done, he talked a little bit 10 more and came back around and sat down behind the desk and said a few more things. And then this was the

extent of it. And I got up and walked out.