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Proof of Claim form: Jane Doe DD-B

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Proof of Claim form: Jane Doe DD-B

Content Notice

This item is part of the Archdiocese of Santa Fe Institutional Abuse Collection, and it may contain descriptions of physical, emotional, sexual, and religious abuse, including abuse of minors. Other potentially sensitive topics within the collection include mental health conditions, substance abuse, and other forms of violence.

Resources are available if you or someone you know needs support for any reason.

For the National Sexual Assault Hotline, call 800-656-HOPE (4673) or go to <https://hotline.rainn.org/online>

For the 988 Suicide and Crisis Lifeline, call or text 988, or go to <https://chat.988lifeline.org/>

For the Substance Abuse and Mental Health Services Administration Helpline, call 1-800-662-4357

For crisis treatment in New Mexico: <https://www.nmhealth.org/contact/crisis/>

Survivors Network of those Abused by Priests resources: https://www.snapnetwork.org/resources_for_survivors

To report abuse:

- <https://archdiosf.org/report-abuse>
- <https://www.reportbishopabuse.org/>

To report child abuse:

- <https://www.childhelphotline.org/>

Keywords

child sexual abuse, church abuse, New Mexico, Archdiocese of Santa Fe

Disciplines

Catholic Studies | Ethics in Religion | Religion Law | United States History

Jane D DD-B
May 20, 2019

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW MEXICO

In re:

ROMAN CATHOLIC CHURCH OF THE
ARCHDIOCESE OF SANTA FE, a New Mexico
corporation sole,

Debtor.

Chapter 11
Case No. 18-13027-t11

CORRECTED SEXUAL ABUSE PROOF OF CLAIM

This form has been corrected solely with respect to the address for hand delivery.

IMPORTANT:
THIS FORM MUST BE RECEIVED NO LATER THAN
June 17, 2019 AT 5:00 P.M. (PREVAILING MOUNTAIN TIME)

Carefully read Notice and Instructions that are included with this **CONFIDENTIAL PROOF OF CLAIM** and complete all applicable questions. Send together with one copy to: Clerk of the United States Bankruptcy Court, District of New Mexico at the following address: Office of the Clerk of Court-ATTN SEALED DOCUMENTS, U.S. Bankruptcy Court, District of New Mexico, Pete V. Domenici U.S. Courthouse, 333 Lomas Blvd. NW, Suite 360 Albuquerque, NM 87102. If you prefer to hand deliver the completed Confidential Proof of Claim form to the Clerk, the physical address for hand delivery is Clerk of the United States Bankruptcy Court, District of New Mexico, 333 Lomas Blvd. NW, Suite 360 Albuquerque, NM.

If you mail or deliver the Confidential Proof of Claim form it must be received by the Clerk no later than 5:00 p.m. (prevailing Mountain Time) on June 17, 2019.

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.

AND YOU MAY ALSO OBTAIN INFORMATION FROM THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS BY CALLING TOLL FREE AT 888-570-6217.

FAILURE TO COMPLETE AND RETURN THIS FORM MAY RESULT IN YOUR INABILITY TO VOTE ON A PLAN OF REORGANIZATION AND RECEIVE A DISTRIBUTION FROM THE ROMAN CATHOLIC CHURCH OF THE ARCHDIOCESE OF SANTA FE, COMMONLY KNOWN AS THE ARCHDIOCESE OF SANTA FE (THE "ARCHDIOCESE").

UNLESS YOU INDICATE OTHERWISE IN PART 1 BELOW, YOUR IDENTITY WILL BE KEPT STRICTLY CONFIDENTIAL, UNDER SEAL, AND OUTSIDE THE PUBLIC RECORD OF THE BANKRUPTCY COURT. HOWEVER, THIS PROOF OF CLAIM AND THE INFORMATION IN THIS PROOF OF CLAIM WILL BE PROVIDED

PURSUANT TO COURT-APPROVED CONFIDENTIALITY GUIDELINES TO THE ARCHDIOCESE, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS AND TO SUCH OTHER PERSONS AS THE BANKRUPTCY COURT DETERMINES NEED THE INFORMATION IN ORDER TO EVALUATE THE CLAIM.

THIS PROOF OF CLAIM IS FOR SEXUAL ABUSE CLAIMANTS ONLY.

For the purposes of this Proof of Claim, a **Sexual Abuse Claim** is defined as any Claim (as defined in section 101(5) of the Bankruptcy Code) against the Archdiocese resulting or arising in whole or in part, directly or indirectly from any actual or alleged sexual conduct or misconduct, sexual abuse or molestation, indecent assault and/or battery, rape, pedophilia, ephebophilia, or sexually-related physical, psychological, or emotional harm, or contacts, or interactions of a sexual nature between a child and an adult, or a nonconsenting adult and another adult, sexual assault, sexual battery, sexual psychological or emotional abuse, humiliation, or intimidation, or any other sexual misconduct, and seeking monetary damages or any other relief, under any theory of liability, including vicarious liability, any negligence-based theory, contribution, indemnity, or any other theory based on any acts or failures to act by the Archdiocese or any other person or entity for whose acts or failures to act the Archdiocese is or was allegedly responsible.

For Purposes of this Proof of Claim, a **Sexual Abuse Claimant** is defined as the person asserting a Sexual Abuse Claim against the Archdiocese, or if a minor, then his parent or legal guardian.

TO BE VALID, THIS PROOF OF CLAIM MUST BE SIGNED BY YOU OR YOUR ATTORNEY. IF THE SEXUAL ABUSE CLAIMANT IS DECEASED OR INCAPACITATED, THE FORM MAY BE SIGNED BY THE SEXUAL ABUSE CLAIMANT'S REPRESENTATIVE, EXECUTOR OF THE ESTATE OR THE ATTORNEY FOR THE ESTATE. IF THE SEXUAL ABUSE CLAIMANT IS A MINOR, THE FORM MAY BE SIGNED BY THE SEXUAL ABUSE CLAIMANT'S PARENT OR LEGAL GUARDIAN, OR THE SEXUAL ABUSE CLAIMANT'S ATTORNEY.

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

PART 1: CONFIDENTIALITY

THIS SEXUAL ABUSE PROOF OF CLAIM (ALONG WITH ANY ACCOMPANYING EXHIBITS AND ATTACHMENTS) WILL BE MAINTAINED AS CONFIDENTIAL PURSUANT TO COURT-APPROVED GUIDELINES UNLESS YOU EXPRESSLY REQUEST THAT IT BE PUBLICLY AVAILABLE BY CHECKING THE BOX AND SIGNING BELOW. ONLY THE SEXUAL ABUSE CLAIMANT MAY WAIVE CONFIDENTIALITY IN THIS PART 1.

- I do not want this Proof of Claim (along with any accompanying exhibits and attachments) to be kept confidential. Please verify this election by signing directly below.

Signature: _____

Print Name: _____

PART 2: IDENTIFYING INFORMATION

A. Sexual Abuse Claimant

First Name _____ #1 Middle Initial _____ Last Name _____ Jr/St/III

Mailing Address (If party is incapacitated, is a minor or is deceased, please provide the address of the individual submitting the claim. If you are in jail or prison, your current address).
#2 _____

City _____ #2 State/Prov. _____ Zip Code (Postal Code) _____ Country(if other than U.S.A.) _____

Telephone No(s):
Home: _____ Work: _____ Cell: #2 _____

Email address: #2 _____

Social Security Number: #4 _____

If you are in jail or prison, your identification number: _____

May we leave voicemails for you regarding your claim? Yes No (please contact my attorneys)

May we send confidential information to your email: Yes No (please contact my attorneys)

Birth Date: #2 _____ Male Female
Month Day Year

Any other name, or names, by which the Sexual Abuse Claimant has been known:

#1 _____

B. Sexual Abuse Claimant's Attorney (if any):

Hall & Monagle, LLC
Law Firm Name

Brad D. Hall
Attorney's First Name Middle Initial Last Name

320 Gold Ave SW #1218
Street Address

Albuquerque, NM 87102
City State/ Prov. Zip Code (Postal Code) Country
(if other than U.S.A.)

(505) 255-6300 (505) 255-6323 brad@hallmonagle.com
Telephone No. Fax No. E-mail address

PART 3: NATURE OF COMPLAINT

(Attach additional separate sheets if necessary)

NOTE: IF YOU HAVE PREVIOUSLY FILED A LAWSUIT AGAINST THE ARCHDIOCESE IN STATE OR FEDERAL COURT, YOU MAY ATTACH THE COMPLAINT. IF YOU DID NOT FILE A LAWSUIT, OR IF THE COMPLAINT DOES NOT CONTAIN ALL OF THE INFORMATION REQUESTED BELOW, YOU MUST PROVIDE THE INFORMATION BELOW.

- a. Who committed the acts of sexual abuse or other wrongful conduct?

When I was a little girl, I was sexually abused by Fr. Arthur Perrault who was employed, empowered and protected by the Archdiocese of Santa Fe, Our Lady of Assumption Parish and the Servants of the Paraclete.

- b. What is the position, title or relationship to you (if known) of the abuser or individual who committed these acts?

Fr. Perrault was our family priest, and was my confessor including in face to face situations, which he preferred. He also was generally thought of as a teacher, even though I did not have him for any classes. He worked closely with my dad who read liturgies at masses, and hung out with Perrault.

- c. Where did the sexual abuse or other wrongful conduct take place? Please be specific and complete all relevant information that you know, including the City and State, name of the School (if applicable) and/or the name of any other location.

The first incident took place at our Lady of Assumption Parish in Albuquerque, New Mexico, on Lomas. I was sent to Fr. Perrault to confess as part of my grade school curriculum about once a month. He had a small room for confessions that was open and we were face to face. It also took place on a two trips to the East Mountains, either the Sandias or Manzanos, and on the second trip, there were other men present.

- d. When did the sexual abuse or other wrongful conduct take place?

1. If the sexual abuse or other wrongful conduct took place over a period of time (months or years), please state when it started, when it stopped, and how many times it occurred.

I was abused three times over about 9 months, from late 1974 to 1975.

2. Please also state your age(s) and your grade(s) in school (if applicable) at the time the abuse or other wrongful conduct took place.

I was 8 years old in the late Fall of 74, and turned 9 in December, 1974. I was in third grade. So I was 8 when taught to do oral sex at confession, and nine and a half by the time I was vaginally raped.

e. What happened (describe what happened):

In a face-to-face confessional setting, Perrault made me fondle him, lick him and provide oral sex until he ejaculated. He cupped my head with his hand and used force to make me do it once he got my mouth over the tip of his penis, and he didn't stop while I gagged and he came. I then threw up on the floor, which made him angry, and even red-faced. He made me clean it up with paper towels from the bathroom. I was petrified because he knew my dad. My dad often helped Fr. Perrault read liturgies at mass, and my dad was strict and could be very mean and physically abusive sometimes, and I knew I was supposed to do whatever a priest said, and please him. I did not please Perrault, and thought I'd be in trouble.

In the following spring, Fr. Perrault took me to the east mountains in his car. He must have told my parents because I don't recall any discussion of it. We were at a campground. He made me do oral sex again. Just like the first time I gagged a lot. I did not vomit though. Afterward he lectured me and shamed me for what I had done to him, a priest, a man of god. He told me I was evil to have sucked on him and licked him and swallowed. He said "who would ever want you?" I was stuck between going to hell for not doing what the priest says, and going to hell because I was forced to receive the priest's penis in my mouth, which he was saying proved I was evil and hell bound. His words made me cry. Of course, now I know that at age 9 I didn't even know what sex was, or what he was talking about, and that then, all I knew is that I was super defective for not pleasing him, for not doing something right.

The third time happened a couple months later, in the summer time of 1975. Fr. Perrault took me to the east mountains again, at another campground, or it could have been the same one. He had me sip wine, repeatedly, on the way there, and today I think he drugged me, but I'm not positive. This time there were four other men there, kind of standing around the table. Perrault told me as we got out of the car that I better not fail again. I ended up on the picnic table, and those men watched while Fr. Perrault vaginally raped me on the table, from the end of the table. It was done as if it were some sort of religious service or mass. He intoned like a priest during the rape, and they responded in unison. It was like prayer. The others watching might have been other priests, but I don't know. After this rape, I never saw Fr. Perrault again, and it wasn't long until I started to use drugs and alcohol to forever bury the memory and the pain and the certainty of my inadequacy.

f. Did you tell anyone about the sexual abuse or other wrongful conduct and, if so, who did you tell and when (this would include parents; relatives; friends; the Archdiocese; attorneys; counselors; and law enforcement authorities)?

When I was 24, after a dozen or so years of drugs and booze, I started having occasional flashbacks and intrusive memories of the abuse, and I became totally anorexic. I went to a therapist in Albuquerque because of the anorexia. I don't remember her name other than Judy. In 1998, I had more therapy in #6 with a woman named #10 when I was a #6 based in #6. When I returned to Albuquerque I spent 10 days in a residential treatment center called #6. I probably did disclose the priest abuse to some of these therapists along the way. I have been in therapy in Santa

For a long time. I have only told a series of therapists over the years, and then finally told my attorneys in 2019. I was willing to tell the FBI and a criminal jury earlier in 2019 in the Perrault trial, but they wanted abuse witnesses whose abuse was after a certain date in the 80's.

- g. Identify any church or religious organization you have belonged to or have been affiliated with.

I was born a Catholic without a choice, and I feel like I barely escaped alive.

- h. State whether there were any witnesses to the abuse. If there were any witnesses, please list their name(s) and any contact information you have.

Four unknown men were present when Fr. Perrault vaginally raped me at a campground on a table in the east mountains. They are the only witnesses that I know of. There were no witnesses to the oral rapes.

PART 4: IMPACT OF COMPLAINT

(Attach additional separate sheets if necessary)

(If you are uncertain how to respond to this Part 4, you may leave this Part 4 blank, but you will be required to complete this Part 4 within thirty (30) days after a written request is made for the information requested in this Part 4)

1. What injuries (including physical, mental and/or emotional) have occurred to you because of the act or acts of sexual abuse or other wrongful conduct that resulted in the claim (for example, the effect on your education, employment, personal relationships, health, and any physical injuries)?

As for physical injuries, I gagged and vomited because of the first oral rape. I gagged and couldn't breathe for the second oral rape. I was bleeding from my vagina after the third rape in the mountains that the other men watched. I was the youngest of 7 kids, and my mom didn't notice that I came home bleeding between my legs. I doubt if she was even at home when Perrault dropped me off, not long after sunset, because of all the busy schedules of all her kids, but I don't remember for sure. I just know it was not an issue.

At the time, I was in the Church Choir on many Sundays, playing the tambourine and the triangle. I remember Fr. Perrault looking at me while we performed hymns, and I had to please him and everyone with singing, and dinging the triangle, and worried about that. At our Catholic school that was a 1-8 school, as grade school blended into middle school, I quickly got in with the kids who drank and used drugs. I refused to go to confession with any priest. Fr. Perrault had disappeared, on to his next assignment I guess. My grades got worse and worse, until I was expelled from St. Pius High School for poor performance and suspicion of using drugs. Poor performance meant about a 1.8 GPA, I think. Suspicion of using drugs meant that my reputation was that I'd do anything with anyone to get high, and I preferred downers to speedy type drugs. My eating disorder began in High School and got more serious over the years, requiring therapy by age 24.

And my drug addictions and alcoholism were my daily life. I also became promiscuous, and totally addicted to meaningless sex, which was a good way to get drinks and drugs, all through my teens, twenties and early thirties. I am unable to connect emotionally with anyone, and still to this day. I live alone. When I was 32 I was impregnated in #6 from a one night stand, while working as a #6. I came back to New Mexico to get an abortion, and not long after, I totally collapsed into depression, and suicidal ideation. I couldn't get up off the floor. My sister took me to the #6 treatment facility in Albuquerque in my mid-30's. My drinking and drug use basically ended then, but I still to this day go to Narcotics Anonymous twice a week, at age 53. So for twenty years I've gone to NA meetings. It remains a guard. Today, I wish I had children, but I realize that the mental and emotional problems stemming from the sexual abuse as a child by Fr. Perrault made that a completely unrealistic option for me. Too late now.

The sexual abuse trauma and his evil words to me formed me into a person that always had a very hard time saying "no" to any man about anything. Being traumatized as a child unable to please the priest, left me with a never ending need to try and please. Therapy helps me understand this, but it does not alleviate or make it go away. I have suffered deep depression and anxiety for decades, including suicidal ideation, and even attempted an overdose as recently as two years ago. Fr. Perrault has affected every day of my life, like he hijacked my very soul. I believe his prosecution, and this case, are gifts to the community. His prosecution helped me come forward in 2018 to my attorneys, and helped me keep on. I've been living in Santa Fe for years and working as a massage therapist, so I loved the Federal trial being in Santa Fe. I hope that this large public Bankruptcy case helps expose the cover-up of the sex abuse in the Catholic Church, and all the victims get sufficient reparations and some peace out this process. When I hear people on the streets say very casually that the victims had their bottoms patted by a priest who maybe put his arm around a child's shoulders, and now wants money, I shake my head. The people should know that these men were raping children and pretending it was religious, and no amount of money will make it all go away as if it never happened.

2. Have you sought counseling or other treatment for your injuries? If so, with whom and when?

I am currently seeing psychologist #10

I have been in counseling for many years in regard to various problems, and I'm still seeing how they stemmed from the abuse, as described above.

PART 5: ADDITIONAL INFORMATION

1. Prior Claims: Have you filed any claims in any other bankruptcy case relating to the sexual abuse described in this claim.

Yes No (If "Yes," you are required to attach a copy of any completed claim form.)

If "Yes," which case(s):

2. Settlements: Regardless of whether a complaint was ever filed against any party because of the sexual abuse or other wrongful conduct, have you settled any claim relating to the sexual abuse or other wrongful conduct described in this claim?

Yes No (If "Yes," please describe, including parties to the settlement. You are required to attach a copy of any settlement agreement.)

3. Bankruptcy. Have you ever filed bankruptcy? Yes No (If "Yes," please provide the following information:

Name of Case: _____ Court: _____

Date filed: _____ Case No. _____

Chapter: 7 11 12 13 Name of Trustee: _____

4. State whether you have previously commenced any lawsuit seeking damages for the identified sexual abuse. If yes, please state: NO

a. Where and when you commenced the lawsuit:

b. The parties to the lawsuit:

c. The case number if any:

d. The result of the lawsuit:

Sign and print your name. If you are signing the claim on behalf of another person or an estate, print your title.

Under penalty of perjury, I declare the foregoing statements to be true and correct.

Date: 5-13-19

Signature: _____

#1

Print Name _____

Relationship to Sexual Abuse Claimant: self