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### Proof of Claim form: Jane Doe M

Hall & Monagle, LLC

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## Proof of Claim form: Jane Doe M

### 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](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 Doe M

FILED  
at 11:25 o'clock A M

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW MEXICO

MAY 28 2019

In re:

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

Debtor.

Chapter 11

United States Bankruptcy Court  
Albuquerque, New Mexico

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: \_\_\_\_\_



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?

The priest who sexually abused me as a child was Fr. Ralph Pairon, acting as an agent empowered and protected by the Archdiocese of Santa Fe and St. Thomas the Apostle Parish.

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

The abuse happened when I was an altar server and Fr. Pairon was the priest at St. Thomas the Apostle Parish in Abiquiu, New Mexico.

- 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 sexual abuse always took place in Fr. Pairon's car, on the way back from trips to the local mission churches when I was assisting with altar service. I remember serving Masses at the missions at Youngsville, Gallina, Cañones, and Coyote, so there was abuse in the car between those missions and Abiquiu.

- 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.

The sexual abuse from Fr. Pairon occurred regularly between 1960 and 1962.

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.

Fr. Pairon started abusing me when I was age 11, and continued to abuse me on a regular basis until I was almost thirteen (or had just turned thirteen).

- e. What happened (describe what happened):

The abuse was always the same: Fr. Pairon would fondle and digitally penetrate my vagina while he was driving his car. He wouldn't say anything while he was doing it – we would just sit there in the car while drove with one hand and touched me and digitally penetrated me with the other.

I would simply freeze. I had no idea what to do as a child, other than sit there in shame and terror while he did whatever he wanted with me. The abuse would happen at the end of a long day of serving Masses in the missions, once the sun went down. It was always dark when Fr. Pairon abused me. This happened nearly every Sunday over a nearly two-year period – approximately 90-100 incidents.

- 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)?

I came forward to the Archdiocese of Santa Fe in the fall of 2017, in search of help. I spoke to Annette Klimka and started counseling with #10 in the fall of 2017. Since then I have told my husband, #3 in May 2018; my youngest son, #3, in the summer of 2018; my attorneys at the Hall & Monagle law firm (in September 2018); one of my sisters, #3 around November 2018; and my close friend, #3, also in November 2018. Around Christmas 2018, I disclosed the fact that I had been abused in confession to Fr. #10, one of the priests at St. #6, where I attend Mass.

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

I have always been Catholic. Despite the abuse, I remained Catholic. The abuse bent my faith, but it did not break my faith.

- 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.

No witnesses.

#### **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)?

In addition to the physical pain of the penetration – which was substantial – Fr. Pairon took my childhood away from me. The abuse crushed my sense of innocence, and with it my confidence and self-belief. I thought I was a bad person – that I had done something to tempt Fr. Pairon, something to make him do what he did to me. I am only now realizing - 60 years later – that I was a victim of Fr. Pairon’s perversion, and not the cause of it.

I have been married to my husband #3 for 46 years, but our marriage has been deeply impacted by the abuse that I suffered as a child. Our sexual and intimate life together was overlaid with fear and dissociation. It was difficult for me to accept his touch, even though I knew he loved me. It was difficult for me because of the associations of sexual touching with Fr. Pairon. There were many times where my difficulties with intimacy made my husband feel bad about himself, and this always made me feel like a terrible person. I kept this enormous secret from my husband for 45 years, and I lived in guilt as a result.

The abuse also left me questioning my faith for decades. I did not understand how God could have allowed such a terrible and hurtful thing to happen to me. There was a period of twenty years where I could not bring myself to go to confession. As a strong Catholic, this was very spiritually damaging to me. I finally took confession last Christmas, for the first time in twenty years, Fr. Brito said he hoped I could find it in my heart to forgive Fr. Pairon. I told him I didn’t know if I could do that, and I still don’t know if I can do that.

I was lucky in one way: my mother and father were very loving, supportive parents. But they were deeply involved in the life of the Church in Abiquiu, and I could never imagine telling them what Fr. Pairon was doing to me or had done to me. I never did tell them. I was afraid I would break their faith, and I couldn’t take that chance.

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

Since November 2017 I have been in counseling with #10  
No therapy or counseling regarding the abuse before November 2017.

**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: YES

a. Where and when you commenced the lawsuit:

Bernalillo County District Court 11/06/2018

b. The parties to the lawsuit:

Jane Doe M v. Archdiocese of Santa Fe, and St. Thomas the Apostle Parish

c. The case number if any:

#6 \_\_\_\_\_

d. The result of the lawsuit:

Automatically stayed as to Archdiocese; 3<sup>rd</sup> party pending

**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: 3/22/2019 A.

Signature: #1 \_\_\_\_\_

Print Name \_\_\_\_\_

Relationship to Sexual Abuse Claimant: \_\_\_\_\_