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5-28-2019

### Proof of Claim form: Jane Doe U-B-TEX

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## Proof of Claim form: Jane Doe U-B-TEX

### 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 4/4/19

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW MEXICO

FILED  
at 11:18 o'clock ~~A~~ M

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-tll

**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 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?

Father Walter Cassidy sexually abused me. The Archdiocese of Santa Fe and Our Lady of Guadalupe parish in Albuquerque employed and empowered Fr. Cassidy to sexually abuse me.

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

Fr. Cassidy was our family priest. He was a common visitor to our house, he came for dinner regularly. My mother adored him. He ran church programs, was the bus driver, and he had total power over me. He was God on Earth when I was a little girl.

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.

On the Catechism bus in our North Valley neighborhood around the Parish, and in the basement of the Parish rectory, at Our Lady of Guadalupe Parish at Griegos and San Ysidro, in Albuquerque, NM.

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.

1965-1966, second grade through fourth grade. About half a dozen or more times.

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.

Second through fourth grades, when I was seven to nine years old.

e. What happened (describe what happened):

We (girls) thought we were special to be allowed to drive the bus. He picked one of us each day to sit on his lap, while he drove. Finally, Father arranged for me to be the last one

dropped off, by choosing his route. To drive the bus, both my hands were on the wheel, and he made sure, 'don't take your hands off the wheel or we'll crash', and he put his hands and fingers in my vagina, and would play with my breasts. It made me cry. He pinned me down in his lap with one arm. He would also corner me in the basement of the rectory and do the same thing, putting me on his lap. He told me not to tell anyone, that God wanted this to be secret. I either had to walk, or be chosen to drive the bus, and even though I tried to get away at the Church, if he saw me, he'd say, 'come here'. And push his fingers past my panties, under my dress, into me. He didn't say much, except to not tell anyone. It was routine.

- 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 told my mom in about fourth grade and she told me to stay away from him, and keep my brothers with me whenever I was at the church. I told my daughters when they were young kids, #3 (now 45) and #3 (now 33), to try to protect them from men like that. I'm telling my lawyers now.

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

Born and raised Catholic. I quit going when I got married at age 16, and Fr. Cassidy was the pastor for my wedding. I hated him and had no choice because he was our parish priest. It practically ruined my wedding standing there next to him and my husband, but there was no choice, except to disappoint many relatives on both sides, and insist on going to a Courthouse.

- 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 particular witnesses, but everyone knew he was a perv, and we avoided him as we all got older. "We" being all the girls.

**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)?

What Fr. Cassidy did hurt me physically. It made me feel dirty and embarrassed. He was very mean to me as well. He also made me unable to trust men at an early age. Too early. I suffered confusion about sexuality and what was permissible and what was not, sexually. I have had trouble with intimacy which has impacted my relationships with men, but at the same time I was very promiscuous, until I was about 40. That demonstrates the kind of fundamental confusion arising from abuse by the man of God. No one talked about the sexual abuse but everyone seemed to know it was going on, is how it felt to me, and seems to me looking back. All the girls took turns at the bus driving seat, when told to do so. I used sleeping pills to sleep for many years, and was an alcoholic for about 25 years, but I stopped drinking about ten years after my divorce. Also, on another topic, the sexual abuse caused a loss of religious belief, which was a blow to me. I've still not got it back. The peace of religion I will never have, I know, but I remember it as innocent and blissful. Another thing is that I have been over protective of my children to a fault, suffering anxiety about them being abused, which heaped more reasons on to not sleep and to drink and to fall into mindless patterns of promiscuous, meaningless routine one-night stands. Always to feel as dirty as the Priest told me I was and made me feel.

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

No.

**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.)

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

Name of Case: #1 \_\_\_\_\_

Date filed: #6 \_\_\_\_\_

Chapter:  7  11  12  13 Name

#6

4. State whether you have previously commenced any lawsuit seeking damages for the identified sexual abuse. If yes, please state: None

a. Where and when you commenced the lawsuit:

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b. The parties to the lawsuit:

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c. The case number if any:

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d. The result of the lawsuit:

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