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Proof of Claim form: John Doe 115B

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.childhelpline.org/>

Keywords

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

Disciplines

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

JD 115B

FILED
at 11:22 o'clock 1 M

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW MEXICO

MAY 28 2019

United States Bankruptcy Court
Albuquerque, New Mexico

In re:

Chapter 11

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

Case No. 18-13027-t11

Debtor.

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

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

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

Telephone No(s):
Home: _____ #2 Work: _____ #2 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 X Male Female
Month Day Year

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

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

(505) 255-6300 (505) 255-6323 (if other than U.S.A.)
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?

Father Finbar (Barry) Coyle OFM (Deceased) committed the acts of sexual abuse while the wrongful conduct of the catholic organizations that employed Finbar caused him to have access to me and other children as a pedophile.

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

Father Finbar held the position of Vocation Director at Saint Francis Cathedral in Santa Fe New Mexico employed as a priest by the Archdiocese of Santa Fe.

- 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.

Pecos, NM during a boy scout trip, Fr. Coyle's office located behind St. Francis Cathedral's offices, in his car, on road trips to speak to potential seminarians: Acoma, Isleta, Jemez, Nambe, Shiprock, Pojoaque, San Felipe. San Ildefonso, Santa Clara, Santo Domingo and Zuni. Fr. Coyle loved pigs and each time he saw one he would stop and I had to get out of the car with him to go pet the pig. Each time we would stop he would try to kiss me or hold my hands behind my back and fondle me. I would try to push him away, but he would then raise my hands behind my back until I was in pain. If I would start to cry he would either be profoundly apologetic or would be verbally abusive: "Stop your fucking crying, I didn't hurt you."

On an overnight road trip to Lafayette, Louisiana to visit Lonnie Butte (who joined the seminary a year after I joined) Fr. Coyle, my twin #3 and myself drove to Lafayette, LA and he got a motel room with two queen size beds.

Our home at #2

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 by Father Finbar, by my count, 127 or more times from August 1966 to 1969. Boy Scouts camping trip in Pecos, NM: (1 time), his office 1966-69: I would say conservatively that the abuse occurred twice a month if not more during 1966-1967 (48 times) & 1967-1968 (48 times) & 8 months in 1968-69 (16 times) = 112 incidents, Pueblos: (12 times), Lafayette: (1 time), Garcia St. (1 time) = 127 or more incidents.

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.

My age at the time of the abuse was 11 years old to 13 years old, from 6th to 8th grade.

e. What happened (describe what happened):

My twin and I were in the Boy Scouts and in the 6th grade and Fr. Barry Coyle was the Troop Leader. He and two or three other men took a group of us to Pecos for a weekend camping trip. We pitched our tents; built a camp fire and then we were told a story about a monster that lived across the Pecos River, which ran through the campgrounds. The monster would kidnap campers and they would never be found. We were told during this circle to not look around and to never to be alone. There was a lot of commotion in the wooded area and if you looked around you were yelled at to keep your eyes on the fire. At intervals we were told to shut our eyes. Someone came up behind me and tapped me on the shoulder. I was instructed to stand up and follow the verbal directions without making a sound. As I turned around I saw someone in a dark hoodie. I was blindfolded and the man put his hand over my mouth. I was led away and taken to the river (I could hear the water) where my shoes and socks were removed and I was led into the freezing cold water. My hands were held and the male voice told me to open my mouth. I was fed warm spicy "worms" (spaghetti) and I was instructed to swallow them. I remember almost choking on them and spitting them out because they were so spicy. I started crying and shaking because I was cold and afraid. Fr. Coyle took off the blindfold and hugged me very tight. He then led me back to the tent and watched as I undressed from wet jeans and my Boy Scout shirt and got into my pajamas and into the sleeping bag. He knelt down next to me and unzipped part of the sleeping bag, put his hand into my pajamas and underwear and fondled my penis. I pushed his hand away and told him to stop touching me. He stopped, but told me: "Never tell anyone about what happened or

you will be in big trouble. Ok? Scouts honor?" I replied: "OK, Scouts honor." I was too afraid to tell anyone or to ask anyone what I should do.

During the sixth, seventh, and part of the eighth, grades #3 and I were porters at the Cathedral office. I believe that we worked from 5pm to 8:30pm. We answered the phone, greeted people who came to see the priests and worked on our homework. We were paid for this work and it was a welcomed break from an alcoholic father whose moods were often unpredictable and a mother who was depressed and exhausted. At some point while working as a porter Fr. Coyle suggested that I either come early to his office because he thought I needed "to talk about my feelings." He called me "his turtle" and told me that he "was going to bring me out of my shell." So I believe during the sixth grade and the seventh grade I had weekly meetings with him. They started out casual asking me how I was doing but as they continued he would focus on asking me: "What are you feeling turtle #1 ?" If I could not answer the question or ask him what he meant he would start to yell at me often repeating the same question. If I tried to leave he would get up and from behind his desk and come over and hug me because he often made me cry. He would come around from his desk and apologize for making me cry and give me a hug. The hugs were at first just "tight" hugs, but then he started to fondle my penis and if I tried to resist he would hold my arms behind my back with one hand and continue to fondle me. The first time this occurred he made me "swear that I would never tell anyone about this or I would really be in trouble!" He also told me that if I "didn't meet with him I would also be in big trouble". He was unpredictable, the fondling, masturbation, and kissing me on the mouth did not occur every time we met, but it was at least twice a month for two years (1966-1968). I also came to realize that he would become angry if I shut down or did not meet with him. I told him one time I didn't want to meet with him anymore and he picked up the heavy glass ashtray and threw it at me.

I believe during the part of the summer of 1967 Fr. Coyle asked my parents if I could go with him on road trips to the local Native American reservations to talk to potential seminarians. My Mom needed one of us to stay home and help her with her day care center. #3 had no interest in going with Coyle, and I welcomed it because I could get away from ironing shirts, doing laundry and weeding the large garden. We went to the aforementioned pueblos and he wouldn't do anything in the car, but if we saw a pig we had to get out of the car. If I refused he would come over to the passenger side and demand that I get out. He would go try to pet the pig and then would come over and give me a hug and started to hold my hands behind my back and would fondle my penis and masturbate me, kiss me on the lips and then he started masturbating while alternately masturbating me. I didn't know it at the time, but I started having periods of disassociation where I "went somewhere." He did this on many trips to the pueblos. (12-day trips).

During the summer of 1968 Tony and I accompanied Fr. Coyle to Lafayette, Louisiana to meet Lonnie Butte and his two younger brothers. His parents fixed a traditional crawdad feast. We were 13 year old and Lonnie was 12. Lonnie was drinking beer and Fr. Coyle allowed us to drink beer as well. We consumed a lot of beer! When we returned to the motel room we were both

throwing up because we were so intoxicated. Coyle was too, but he continued to drink out of a flask that he took from his suitcase. I had suspected that he was an alcoholic because I could often smell alcohol on his breath. He gave us cold washcloths, wiped the vomit off of our clothing and when we got into the queen size bed next to the wall, I was the one facing the wall. I think #3 probably passed out and Coyle came over with a flask in one hand and his pajama bottoms in the other. He was not wearing a top, he came over and got in bed next to me pulled down my pajama bottoms and underwear and attempted to sodomize (anal sex) me. I jabbed him as hard as I could in the stomach, so hard that he went into the bathroom and threw-up.

- 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)?

The first person I reported the abuse to was #10 I was in therapy with him from 1986-1987. I had a standing appointment with #10 every Thursday morning @ 8:30 am (\$250.00 per hour).

I also reported all the incidents to #10 who I was for therapy off and on from 7/23/2001-09/09/2010.

On February 11, 2013 I spoke to #10 OFM who is the Minister Provincial for the Franciscan Friars for Saint John the Baptist Province. #10 was a senior when I was a freshman at St. Francis Minor Seminary. I told him briefly of the history of sexual, emotional and physical abuse by Barry Coyle, OFM beginning in the sixth grade and continuing thru the 8'th. grade. He listened and then said: "You realize he is dead!" I told him that I knew he had died in Louisiana from AIDS. He then told me that: "Your case is beyond the statute of limitations and getting an attorney and attempting to sue the Province was a moot point." He told me that he "would add me to his list of daily prayers." He asked me "if there was anything else and I told him that "I went through years of therapy @ \$250.00 per hour" and his final comment was: "I pray that that was beneficial for you."

On 01/27/2014 I started seeing #10 a psychiatrist who was also my medical back up because of anxiety secondary to not being able to pass the Examination to Practice Professional Psychology. I told him about the years of abuse by Barry Coyle, OFM. I also worked with Dr. #10 another psychiatrist in Pasadena. #10 left I needed someone to fill my #6 QD (to help with the Reading and Comprehension Diagnosis). I told #10 about the molestation and the conversation with Fr. Jeffrey Scheeler, OFM on January 25, 2019.

My sister #3 sent me the link to the article published on 9/14/18 in the Santa Fe New Mexican *Archdiocese of Santa Fe publicly names priests accused of molestation by Andrew Oxford*. Father Barry Finbarr Coyle, Franciscan, deceased was included in the list. At 2:30pm, PST (9/14/2018) I called Andrew Oxford who told me to call Annette Klimka with the Victims Assistance Program for the Archdiocese of Santa Fe. I gave her a somewhat detailed report over the phone and sent a Confidential Fax to her (September 24,

2018) about a road trip to Lafayette, LA to meet a prospective seminarian and an incident that followed after Fr. Coyle, allowed #3 and me to drink beer and eat crawdads to the point of throwing up most of the night and his attempt to sodomize me (anal sex).

I also included a detailed two-page list of paid therapy, the cost of a Psycho-Educational Assessment by #10 Ph.D. (03/03/15). The fax also included costs for Therapy, Psychological Assistant Fees, EPPP Examination Fees, EPPP Study Courses & Loss of Income Due to Non-licensure.

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

I was raised in the Catholic community and was an Alter Boy 1965-1966 trained by Fr. Gerald Beck, OFM Pastor St. Anthony Church, Garden Plain KS. Alter Boy 1966-1969 St. Francis Cathedral, 131 Cathedral Place, Santa Fe, NM 87501 505-982-5619 Fr. Godfrey Blank OFM (Pastor), Finbar (Barry) Coyle, OFM. Alter Boy 1969-1973 St. Francis Seminary 10290 Mill Road, Cincinnati, OH 45210. Fr. Aldrich Heidelagge, OFM, Fr. Aubert Grieser, OFM, Tom Richstatter, OFM, Fr. Maynard Tetreault, OFM, Fr. Valentine Young, OFM, Fr. Ric Schneider, OFM, Fr. Murray Bodo, OFM, Fr. Berard Doerger, OFM, Fr. Dean (Bill) Pellman, OFM, Fr. Paul Jewett, OFM, Fr. Savio Russo, OFM, Fr. Larry Dunham, OFM, Fr. Gil Wholer, OFM, Fr. Laurian Rausch, OFM, Fr. Ronon Hoffer, OFM. Duns Scotus College Seminar Southfield, MI OFM, New Jerusalem Catholic Charismatic Community, Cincinnati OH, Saint Barnabas Catholic Church, North Haven, CT, Holy Family Parish, South Pasadena, CA, St. Edmund's Episcopal Church, San Marino, CA

- 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.

On Saturday, April 27, 1968 my older sister #3 her husband #3 and their five week old baby girl visited us in Santa Fe. My brother-in-law #3 witnessed Fr. Coyle fondling my penis under the covers on Sunday, April 28, 1968. They stayed with us until Wednesday, May 1'st. I have a diary from that year. On Sunday, April 28, 1968 I wrote: "Went to 7:30 church and we finally got to Los Alamos and Mom came." Fr. Coyle used to take us to A&W Root beer for root beer shakes. He took us for shakes that night, met #3 and #3 and chatted with my parents. We had to be in bed by 8pm because the next day was a school day. I remember we were sent to bed and he came into the bedroom to say goodnight. I believe there was a nightlight on and #3 and I slept in the same bed because my brother #3 also shared the room. I remember Fr. Coyle kneeling down to give each of us a hug. I was facing the wall and as he kneeled down he put his hand under the covers and into my underwear to stroke my penis. I believe I said loudly: "Hey cut it

out!” My brother-in-law #3 an ex-marine came into the bedroom as he pull his hand out from the covers. I believe he said: “You son of a bitch get the hell out of here” and physically removed him from the house. I don’t quite know what happened after that, I think we came out of the room and we were told to go back to bed and that they would “take care of it tomorrow.” I believe that #3 wanted to contact St. Francis Cathedral’s Pastor, Fr. Godfrey. Mom promised that she would and never followed through. My Dad was probably intoxicated when this happened and my Mom was exhausted and very depressed because she ran a Day Care Center out of our house with a husband who was an alcoholic with chronic bronchitis and emphysema. This was not the first incident, I actually believe it was the last incident and the first time anyone knew about the molestation. I should also add that #3 and I were trying to talk our parents into letting us go into the Minor Seminary beginning in August, 1969. Fr. Coyle as the Vocation Director at that time and had considerable input into who should be allowed to enter the seminary. My parents could not afford the tuition and board so they would have depended on the Franciscan for tuition and board as well as train/plane fares from Santa Fe to Cincinnati.

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)?

Father Coyle was physically abusive to me holding my hands behind my back when he would fondle me or try to masturbate me. He would take his hands holding my face and force his tongue into my mouth. He threw a heavy ashtray at me and would give me arm burns by rubbing my arms really hard because he thought it was funny. I don’t like it when anyone holds my face with both of his or her hands. I recently had to have some physical therapy because of a lower back injury. On 9/27/18 I had a physical therapy appointment with Dr. #10 Ph.D., PT. She had to pull down my sweats to put a heating pad on my lower sacroiliac crest. I had a flash back to the night with Fr. Coyle in Louisiana and wanted to throw-up.

Beginning in the 6th grade and to the present day, I have had problems with retaining information, memory and struggled academically. I was a very good student before Fr. Coyle abused me. I wrote in the diary where I recorded my sister and brother-in-law's visit that on May 7, 1968, Mr. Catnach came to teach. I remember staying after school in the 8th grade so he could tutor me in math and reading. I was on academic probation during high school at Saint Francis Seminary. During my freshman year they were not going to let me return because my grades were so poor. My twin brother was a straight A student. He wasn't abused. I used to have to study at nights for exams by the exit hall lights in the stairwells. Since 1990 to 2018 I have taken the Examination to Practice Professional Psychology 18 times (\$687.50 per exam) and have never passed it. In March 2015 I had a comprehensive Psycho-Educational Assessment by #10 Psy.D. He diagnosed me with a Specific Learning Disorder in Reading Comprehension (DSMV: 315.01). Dr. #10 wrote: "Dr. #1 has a learning disorder in reading comprehension caused by significant deficits in encoding and receiving information into and from memory. This current evaluation demonstrated that due to significant deficits in the basic psychological process of memory, Dr. #1 will be unable to encode information in this format when studying and will be unable to retrieve information in that format when test taking. Thus the results of the EPPP will be an estimate of his memory deficit rather than an estimate of his clinical competency." (#10 Psych-Educational Assessment p.11)

Medical science now shows that childhood sexual abuse, along with other factors, such as an alcoholic father, an absent mother, all can contribute to permanent changes in the brain and the ability to learn and be resilient. I know that is what has happened to my childhood brain. It got re-wired – incorrectly. I wrote an appeal to the Board of Psychology along with Dr. #10 report and letters from colleagues and patients requesting the Board of Psychology to waive the EPPP and grandparent me in as a licensed psychologist. The appeal was denied and I had to continue to work under a supervising licensed psychologist. On November 4, 2018, I was informed by the Board of Psychology that my 72 months of being a psychological assistant was over and until I can pass the EPPP I have to cease and desist the practice of psychology. I sent a certified and restricted letter to the President of the Board of Psychology asking him to reconsider my original appeal. The letter was signed by someone other than the President of the Board of Psychology (#10 JD, Psy.D.) and given to #10 who denied my appeal saying that my request for extra time to take the EPPP was not a valid reason to extend the psychological assistantship. These are the kind of life long problems Fr. Coyle has damned me with.

I have had significant periods of depression and anxiety. I was diagnosed with a Panic Disorder. When I was seeing Dr. #10 I was on 40mg. of #6 x 6 months, but discontinued it because I found that my running and exercise helped the depression better than the #6 . On May 12, 2017 I had a TIA (1:13-1:15pm) Loss of vision R eye, facial numbness R cheek, R hand and palm numbness, problems with balance. The TIA was

attributed to stress and a possible reaction to daily aspirin and Androgel 12.5 mg/1.25mg (1%) TD gel.

Physically my wife and I have not had sex for the last five years. There have been times when I have had flashbacks to those years of abuse. I struggle with some depression I hope that it does not increase and become permanent. I have had to take #6 2mg at bedtime for a number of years to help with sleep and spontaneous panic attacks that awaken me from sleep.

Fr. Coyle killed me spiritually. I wanted to be a priest – felt that I was called to be a priest. I sustained great spiritual conflict attempting, in my child's brain, to reconcile the evil Fr. Coyle inflicted upon me with the concept of a loving God. Ultimately I had to withdraw from seminary because I could not learn – because of my learning disorder caused by the years of trauma he inflicted upon me. Likewise, my ability to do the work I wanted to do – help people, has been impacted by the same learning disabilities caused by Fr. Coyle.

These memories and this trauma are permanent, the lost innocence of a normal childhood is permanent. I have worked very hard in therapy to work through the trauma that occurred during those years. I can displace it but I cannot erase it.

I have attached an itemized statement of my out of pocket expenses for counseling and a calculation of the wages I have lost as a result of the years of sexual abuse by Fr. Coyle.

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

1986-87 weekly sessions with #10 (Clinical Psychologist) #10
#10

7/23/01, 8/07/01, 12/10/01, 12/27/01, 01/08/02, 01/15/02, 01/26/02, 09/03/03, 09/10/03, 10/08/03, 04/13/04, 04/29/04, 02/01/05, 02/07/05, 02/14/05, 02/28/05, 11/17/09, 12/14/09, & 09/09/10. Treatment for panic disorder and anxiety with #10 (Clinical Psychologist) #10
#10

01/27/14, 04/25/14, 11/25/14, 01/08/15, 02/12/15, 03/26/15, 05/14/15, 07/10/15, 12/07/15, 01/28/16, 01/29/16, 03/04/16, 07/07/16, 01/28/16, 01/29/16, 03/04/16, 07/07/16, 07/26/16, 09/25/17, 02/12/18, 04/26/18, 06/18/18 Treatment for anxiety and panic disorder #10
#10 & 03/26/15 also treatment Specific Learning Disorder in Reading Comprehension (#10

02/26/15 & 03/19/15
#10

#10

09/20/18 & 01/24/19
#10

#10

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 (X) 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 (X) 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 (X) 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: April 5, 2019

Signature:

#1

Print Name:

Relationship to Sexual Abuse Claimant: Self

Therapy

1986-1987 Q Thurs. #10 \$14,000. 00 (I had a standing 8:30 am appointment every Thursday. \$250.00/hour

07/21/98	2955	#10	75
07/23/01	2953		200
08/07/01	2970	“ “	50
12/10/01	3070	“ “	100
12/27/01	3112	“ “	100
01/08/02	3119	“ “	100
01/15/02	3133	“ “	100
02/26/02	3189	“ “	100
09/03/03	3257	“ “	100
09/10/03	3270	“ “	100
10/08/03	3288	“ “	100
04/13/04	3382	“ “	100
04/29/04	3392	“ “	100
02/01/05	3560	“ “	100
02/07/05	3596	“ “	100
02/14/05	3597	“ “	100
02/28/05	3601	“ “	100
11/17/09	4582	“ “	125
12/14/09	4592	“ “	125
06/21/10	4582	#10	504 (5 sessions)
07/30/10	4706		504 (5 sessions)
09/09/10	4730		125

01/27/14	5305	#10	200
04/25/14	5347	“ “	200
11/25/14	5540	“ “	200
01/08/15	5464	“ “	200
02/12/15	5480	“ “	200
03/03/15		#10	\$7,000
03/03/15		Psycho-Educational Assessment	
03/26/15	5464	#10	200
05/14/15	5521	“ “	200
06/11/15	5535	#10	100
07/10/15	5546	#10	200
09/17/15	5576	“ “	200
12/07/15	5611	“ “	200
01/28/16	5635	#10	200
01/29/16	5636	“ “	200
03/04/16	5656	“ “	200
07/07/16	5617	“ “	200
07/26/16	5889	“ “	200
09/25/17	5914	“ “	250
02/12/18	5980	“ “	250
04/26/18	6013	“ “	250
06/18/18	6038	#10	250
09/20/18	6075	#10	400
01/24/19	6129	#10	150
1990-2015	Psych Asst.	#10 Ph.D.	600

@ 40.00 per year

1990-2018 EPPP 18 x \$687.50 12,375.00

Examination to Practice Professional Psychology

Association in Advance Training In The Behavioral Sciences

\$975.00 per year study materials +

\$795.00 per year 4 -day workshop

\$1770 from 1990-1999= 15,930.00

Psych. Prep 1999-2014 @ \$1675/year 25,125.00

Taylor Study Method 2014-2018:

\$179/month X 4 years 8,592.00

Since the Board of Psychology continues to deny the accommodations that #10 suggested in my Psycho-Educational Evaluation, I have to yearly take the EPPP. I took it on April 30, 2019: 8am-12: 30 pm. and my score scaled score was 315. According to the ASPPB: Association of State and Provincial Psychology Boards 500 is a passing score in the state of California. The examination cost \$687.50 plus \$12.50 for parking and 4.5 hours of lost income (\$787.50) = \$1,487.50.

Total \$93,017.50

From Quicken June 1997-March 19, 2019 =23 years Gross Income =\$3,132,390.00 divided by 23 years = \$136,190.00 Double this amount = \$272,380.00 x 28 years = \$7,626,640.00 Plus \$93,107.50 above expenses for therapy, EPPP, & EPPP Prep Courses = \$7,719,784.50

Grand Total: Seven Million, Seven Hundred Nineteen Thousand, Seven Hundred Eight Four Dollars and Fifty Cents (\$7,719,784,50)