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### Proof of Claim form: John Doe 190B

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## Proof of Claim form: John Doe 190B

### 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.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

JD190

FILED

at \_\_\_\_\_ e'clock \_\_\_\_ M

NOV 13 2019

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW MEXICO**

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**

First Name \_\_\_\_\_ #1 Middle Initial \_\_\_\_\_ Last Name \_\_\_\_\_

#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).

City \_\_\_\_\_ #2 State/Prov. \_\_\_\_\_ Zip Code (Postal Code) \_\_\_\_\_

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

May we send confidential information to your email:  Yes  No

Birth Date: \_\_\_\_\_ #2  Male  Female

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)

(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?

Father Arthur Perrault, as an agent for the Archdiocese of Santa Fe, and after being approved for work as a priest in NM by the Servants of the Paraclete just a few years prior.

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

Fr. Perrault and the Roman Catholic Church moved me and my family (my mother and my two siblings) to Albuquerque from Bristol, CT, in 1972, because she had severe asthma, and our priest here in Bristol believed NM would be a good place for her. Our parish priest here in Bristol contacted Fr. Perrault in NM. Fr. Perrault started calling us, and had my mom send him pictures of her sons, including me. He even started his contacts with me while we were still living in CT, by phone, and talking about how much I'd like it in NM, and how much help I was being to her with this move. He asked my mother for pictures of us after he made friends with her, and convinced her as a single mom that the kids (including me) would be way better off in Albuquerque. He called often to talk to us. He sometimes would call just to talk to me. He was a priest so I talked to him. He convinced my mother her asthma type issues would go away in NM, and somehow he said he got the funds from the Church to move us. They sent us airline tickets while my oldest brother drove our stuff to NM. My mom and me and two younger siblings all flew. Fr. Perrault picked us up at the airport.

- 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 occurred at Father Perrault's apartment in Albuquerque, New Mexico. I don't recall the name of the apartment complex. Fr. Perrault picked us up at the airport and took us to his apartment, after setting up my mother in a hotel for a couple of days, while my older brother was still cross-country driving. He took my little brother to the hotel to be with my mother on the second day, and I was alone with him for the next two days and nights.

- 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.

1972, for three days in his apartment upon our arrival in Albuquerque. He made me provide oral three times, sucked on me, tried to penetrate my butt with his penis several times but didn't get in very far, made me masturbate him on to my face and mouth.

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 had just turned 14 years old.

- e. What happened (describe what happened):

That monster started on the second night with a three hour time difference on arrival, jet lag and a new environment. It began while I was sleeping. Once I woke up, he started with his manipulation on me. He exploited my sick mother and mentioned that he moved us and got my mother in a healthy environment so I should just be happy for her and go along with his sick mind and not tell anyone. I was so scared for my mother and my siblings in a new place my mother could possibly be healthy and breathe normally. It continued for a total of three days/nights until I was so numb I just ran out of his apartment barely dressed down to the gym where his neighbors were exercising, screaming and crying.

The first night, straight from the airport, he had me and my brother sleeping in the same bed as him. He kissed me on the lips, but I fell asleep, as did my little brother. Fr. Perrault slept between us. The next day, he suggested my brother stay at the hotel room with my mom and little sister, to help keep them safe. The sexual abuse started the second day on arrival in Albuquerque, when he took me back to his apartment. Again, I went to sleep early, maybe because of the time change, but I awoke with him in the middle of the night molesting me, fondling me, trying to suck on me. I ran from the bedroom to the couch. He came after me naked with a full erection, and came and sat by me on the couch. He said, 'look, we moved you here, this is all secret, but you have to do it, its for your mother's future.' It was all about helping my mother. Being completely pre-sexual, I had no idea what was happening, but he was a priest, and said I had to do what he said, for the good of the family. He grabbed me by the back of the head and with a handful of hair, he forced my mouth on him, and taught me to jerk him off at the same time. He started on my genitals. I was not sexually experienced, and had not even masturbated before, and did not get hard, and was starting to choke and gag, and then he came all over me. He made me go clean myself up, and go back to his bed, while all being told this is normal, and special, and private, and will help my family. I woke up again in a while, and again I went to the couch to get away. He came out again, and this time he tried to penetrate my anus. I was too small, and I was whimpering in fear, so he made me do him orally again, and I had to clean up the come again. We then drove around all day while he showed me things in Albuquerque, preaching a theme of "we're going to get your mother healthy by moving her here". He showed me his Church which had a school, and said I could go there. As far as my mother's health, it was not true, as her lung conditions actually worsened in NM, and we went to the hospital and doctors over and over while we were in NM. Perrault had figured out I was the one sibling who wanted to protect and take care of my mom, and used that to take me back for the third day at his apartment. That night was the worst, he was too big for my butt hole, but he penetrated me with the tip. I was crying and screaming. So he went another round of oral, and him on me, but again I could not get an erection. On the final morning, again he takes me back to the bed after he comes, and he fell asleep, and I again ran back to the couch. Here he

comes again a few hours later, kissing me, touching and fondling, cooing and talking sweet, and I started screaming at the top of my lungs and ran to the apartment complex gym, mostly naked, begging for change so I could call the hotel management where my mom was, and some guy working out helped me call, and the hotel got my mom. She drove right over, but I wouldn't let her go up to get my clothes and suitcase, and we just left. I was shaking, wearing only underwear. She called the Archdiocese or the Parish later that day, and was screaming at them that her son escaped with just his underwear on and is shaking and crying, and that he had been molesting her son, me. They told her I was a liar, and Fr. Perrault had an impeccable reputation. So then we moved into the house they provided on #2, and I was to attend West Mesa High School. Her health did worsen, and I feel like I brought her down with my "problem" of being caught by Perrault, as my schooling worsened too. We all ended up moving from #2, to I think #2. I finally convinced my mom I had to get out of Albuquerque, and I went back to Connecticut on a greyhound bus, alone, and moved in with my aunt, in Bristol. Within about two years, my mom and siblings all came back. I'm still in the same house.

- 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 mother, that very day, my brother and sister at some point that Perrault had molested me, and I told that person in the gym who gave me the dime to call my mother. In fact, there was about 5-6 people in that gym at his apartment. Every one of them looked shocked by my appearance (almost naked) crying and could barely speak. My mother told the Church what Father Perrault did to her son, but they turned their back on us once she told them of his sexual abuse on her son.

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

St. Anthony's Church in Bristol, CT., and St. Anthony's School, from kindergarten to middle school.

- 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.

None.

#### **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)?

I blocked it all out as I grew up, but I had issues, for sure, especially with high schoolish drug use. But I quit all that, got a job, and got married. Then there he was on 60 Minutes one evening in the early 90's. I'm married at the time, and really flipped out. Totally. I couldn't tell my wife but was all freaked out. She lost faith in me, while I lapsed into sort of high schoolish drug use, but this time couldn't stop using. I was divorced within a year, and started and using and selling drugs. I ended up on cocaine, heroin, and anything to numb my mind. Before I went to prison, in the late 90's, I came across him with a group of young men at the #2 Bristol. It was Perrault! I had heard from the 60 Minutes thing that he was out of the country somewhere, but here he was at the #2 #2 with some teenage boys, so I stopped and yelled, "Fr. Perrault!!" And I pointed at him. He turned white, and he and his friends ran. This event sent me off again, and I became even worse with the drugs.

Later on, I was arrested and prosecuted. The prosecution saved my life. It got me clean and sober. I spent 7 years in prison, and at all the NA meetings I ever went to in prison and since, I never could say what happened as far as being sexually abused by Perrault. I could not get it out. Since then, I live alone, with my dog, who I take for walks. I live in my grandma's old house. I became a painter. I'm generally respected in Bristol. I work hard. But my life is empty. My whole life, every time the Church was mentioned on t.v., and radio, I'd collapse. Going by a Church all I can see is that monster. Now in the past year or so, I started seeing more news locally about priest pedophiles, which I ignore, and then one day I see Perrault on the newspaper at the check out stand in the *Republican Newspaper*. Again I start to collapse, but this time some friends got me to follow the leads in the paper, which said he'd just been sentenced to 30 years. I did not collapse, and instead called the NM prosecutors, and even spoke to an FBI agent, who recommended my lawyers. I had no idea there was a bankruptcy case, of course, but am glad to get help, and now we are going to find a proper therapist.

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

No, I have not. I couldn't even talk about it for all these so many years. I just found out he was finally caught. I cried with joy when I took home the newspaper that said he's going to do 30 years. I found out by a picture of him on the front page of the Waterbury Republican newspaper when I was at the grocery store, being sentenced in NM, just a few weeks ago. Then I started my search, calling the FBI, the AG office, the US Attorneys, the newspaper, until I finally found the lawyers in early November. I did not know there was a bankruptcy case in NM.

**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.)

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: #1 \_\_\_\_\_ #6

Date filed: #6 Case #6

Chapter:  7  11  12  13 Name of Trustee #6 \_\_\_\_\_

4. State whether you have previously commenced any lawsuit seeking damages for the identified sexual abuse. If yes, please state:

a. Where and when you commenced the lawsuit:

None

b. The parties to the lawsuit:

\_\_\_\_\_

c. The case number if any:

\_\_\_\_\_

d. The result of the lawsuit:

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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: 11-8-19

Signature:

Print Name

Relationship

#1