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### Proof of Claim form: John Doe 94

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## Proof of Claim form: John Doe 94

### 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

20 94

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW MEXICO

FILED  
at 11:19 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. 18-13027-11

**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

\_\_\_\_\_ #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 Zip 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 (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 Zip 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?

I was abused by three priests, two of whom were also Boy Scout Leaders of our troop of mostly altar boys. Fr. Bruckner, Fr. Malloy, and Fr. Perrault committed the acts of sexual abuse. These pedophiles were empowered, protected, aided by, and acting as agents of the Archdiocese of Santa Fe, Our Lady of Assumption Parish, the Basilians who ran St. Pius H.S., the Servants of the Paraclete, and the non-Catholic organization: The Boy Scouts Of America. Attached is a copy of the lawsuit I filed against the Archdiocese of Santa Fe in late 2018.

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

The three abusers were my family's priests, and I was from a totally "all in" Catholic family. I became an altar boy for them, (and Fr. Bruckner and Fr. Malloy were also scout leaders for an all-Catholic troop). I was the altar server at Our Lady of Assumption for Fr. Bruckner, and I attended Catholic middle school and St. Pius Catholic School, mostly as arranged by the perpetrators through my parents, for their easy sexual access to me, unbeknownst to my parents. They were also teachers and administrators of the schools I attended.

- 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.

I was abused in many, many locations in northern and central New Mexico, and in the Albuquerque Metro area, including on Kirtland Air Force Base, at various private or government camp grounds, in Parish rectories such as at Our Lady of Assumption Parish, at the apartments and living quarters of these priests, and at the Basilian-run high school (St. Pius). See the attached statement I gave to the FBI in November, 2018, as a concise summary of my abuse years.

- 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 took place over nearly 7 years, from 1984 until I finally ran away in 1991 to the mountains. There were easily over 500 incidents of sexual abuse over those years by these three perpetrators. See my attached FBI statement.

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.

It started towards the end of Elementary School when I was just a smallish 9-10 year old boy, and ended when I was 16 when I ran away from St. Pius High School because the sexual harassment by Malloy just would not stop, and the Basilian administrators at St. Pius High School rejected my attempt to get some help.

- e. What happened (describe what happened):

Please review the attached statement I gave to the FBI in November, 2018, while they were preparing for a criminal trial against Fr. Perrault in Federal Court which took place in early 2019. Along with the State Attorney General's office, I believe the FBI is still investigating the conduct of Fr. Bruckner and Mr. Malloy for the Feds. I have provided several statements to both State and Federal prosecutors, as well as to their investigative agents at the FBI and the AG's office. Of course, I have no idea what, if anything, the State or Federal criminal justice systems will do with this information.

In sum and as context for the attached specific FBI questions and my answers, my parents were very involved in the Our Lady Of Assumption Parish. I first met Fr. Bruckner when I was about 5. My older brother was already an altar server, and I later became an altar server and a Cub Scout at Fr. Bruckner's request, when I was 9 or 10, so that's when the initial grooming by Fr. Bruckner started. My mom was very active in the Church every day, and along with my older sister (by many years) were heavily involved in the Parish choir. Fr. Bruckner has a twin brother who was a deacon, and at some point, Fr. Bruckner's nephew even dated my older sister.

Sexual abuse started out with Bruckner touching me and massaging my back, and one day he told me to take my clothes off and put my altar server robes on over just my underwear. Fr. Malloy was the associate pastor at the time, like a pedophile in training, (and they lived together at various times during my years of abuse). They recommended to my parents that I go to the Our Lady of Assumption School, and be in the Cub Scout troop, and all the youth activities for altar boys and youth groups, and so I was enrolled there when I was 12. That's when the abuse escalated to mutual masturbation, mutual oral sex, and eventually anal sex (on me). The earlier grooming by Frs. Bruckner and Malloy was enough to make me totally believe I was doing what altar boys were privileged to do. I understood I was involved in a secret society of special ones, pre-forgiven for all sins of any kind, any where, and I was told and could see that I could do no wrong in school, (whether I actually studied or not). This had a bad effect on my education, because rather than do the work to actually study and learn, I learned that by being a special privileged member of the club (now, I read as sex boy toy), and drug user to ease their access and my compliance, they would fix my grades.

I later met Fr. Perrault as an altar server, but the first time where he came on to me sexually was in confession towards the end of middle school. He asked questions about any sexual activities of mine in confession, couched in the language of confession and church teachings, so he could be my instructor and counselor, I guess. I now see he was just trolling for boys, but at the time I thought he was a priest interested in my soul. He became my confessor and teacher and disciplinarian, and as with Bruckner, was a guidance counselor as well. Fr. Perrault learned what Bruckner and Malloy were doing to me in confession, and he immediately wanted access to me as well. He excitedly came out from the confessional booth and handed me his phone number, and told me to give him a call.

So, from there I was abused by the three priests for the rest of the seven years total, of sexual abuse. As I tired of it and began dealing more with the addictions to drugs they had put me on, they began using a lot of threats and shaming to keep me in silence and compliant, and over time this method replaced the method of getting cooperation when I was younger, of religious promises of salvation, redemption, and pleasing God by pleasing priests. I was completely trapped and powerless, by the time I hit St. Pius H.S., and as a sex toy for three bad pedophiles, I was fully occupied with that. I had no idea what had happened to my older brother who was nine years older when he was also an altar server years earlier at the time, (and only learned that he is an abuse survivor as well since late 2018, with no details of any kind). At the time, the priests made me live in fear of what they would do if I stopped. They threatened to tell everyone that I was a liar, drug user, porn-watching alcoholic, a bad boy, and promised that it would destroy my family to find out, and made it clear they had the power to do it. They provided drugs and alcohol to me (and other children), and made sure we all watched porn a lot when drinking or high, and they had me participate in porn production for their child porn collections. I was even asked to have sex with other children (and they with me) before cameras, which I believe these three priests were fully part of on the production end.

Bruckner, Perrault, and Malloy were all friends and were on St. Pius faculty together. They were all tight with Archbishop Sanchez, or for whatever reason were fearless of him. The three of them made me perform in masturbation shows and child sex shows. I don't know who all was in attendance at these secret gatherings, but there were other adults there that may have been in the Air-Force, or even part of the Clergy. I remember the cameras, and one such event on Base I described in the attached FBI statement. I was recorded on video sometimes having sex with other boys, and one time having sex with a girl. I don't know what they did with the child porn they produced, but they would show me pictures they had taken of other kids to try to convince me that it was ok, and normal, that I was special. High School life and all this layered on top of normal life problems of being a teen, just got too much for me at a certain point. I thought other soccer players at St. Pius had normal lives, and was beginning to see that my life was not normal, as my priests kept insisting. Meanwhile, Fr. Malloy was using notes to demand I do weird things, notes he somehow could even put in my locker. I know he'd put notes on other kids lockers too, and had us deliver semen to strange places, in exchange for money.

I went to my School Guidance counselor one day at St. Pius, who was also a priest, because I thought he was just a really nice cool guy, and I told him the trap I was in. He told me to get out of there, "to just go away" and escape, and that is your best way forward. I believe

he knew without having to know any details, generally about the kind of things that were going on. It seems like most priests knew by the late 80's and early 90's that Perrault and Bruckner types were "running the show", because Archbishop Sanchez was totally compromised and useless on the topic of sexual abuse of minors. In fact, I heard from my abusers that Sanchez used to be their roommate, and they all had their own 'porn parties'.

After I told the School Guidance counselor, I went to the principal's office to tell Fr. Menner, the School principle about the abuse by Bruckner, Malloy and Perrault. Fr. Menner slammed me into the wall and punched me in the stomach, and told me I was a liar. I think he was looking into the issue of explicit notes going around the school, and was of the mind set that 'gay drug using bad teens in the promiscuous modern world' were passing notes, when it was actually Fr. Malloy. (The police reports exist and I've seen a newspaper photo in my lawyer's office of Fr. Bob and his lawyer, Ray Twohig, entering a plea to a misdemeanor for the notes, which is available upon request). When I went to the principal, I wanted to know how Malloy had access to my locker, and how can I be a normal high school kid? With the punch in the gut by Fr. Menner, that's when I snapped, and I just walked out of the school building and drove off, and parked somewhere near Four Hills, and hiked into the mountains behind Four Hills, and stayed up there for quite a while, like several weeks, while my family and authorities were looking for me, believing I was a runaway. Which I was.

I chose not to commit suicide in those mountains. I got temporarily clean in the mountains, and I quit going to St. Pius, and never returned. And I never went to Church again. Leaving the Church without explanation to my very Catholic family created a huge rift between me and my family. My mom never knew why I did that. That was when I was 16, in 1991. She still doesn't really know much, only that in late 2018, I disclosed the fact of priest abuse to her.

All my family chalked it all up to me being a messed up teen, drug user, drop out, and I'm sure the priests and teachers all quietly slandered me to my family as well. No one knew the level of abuse and brainwashing and drug addiction and educational fraud given to me by the priests as I headed into manhood.

The details of specific and routine sexual abuse events are too shocking to write out here through my lawyers, but it is enough to say that everything imaginable was done to me sexually, and by me to them as ordered or required, and that these events happened many, many times. I tried to get kicked out of schools to get away from it, and ended up a drop out. I tried to not be accepted at St. Pius by intentionally not answering entrance exam questions, but they accepted me anyway, because that was the power Bruckner and Perrault had in 1991. To this day, I don't know how they did it.

I'm very happy to see Perrault convicted last month. I hope they arrest and try Bruckner as well.

- 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 suddenly told my common law wife, #3 when we had an emotional argument in the fall of 2018. The argument arose from some of my super hyper-vigilance regarding our kids, where our son had reached the age I was when it all started. He's now 11. It just blew out of me, past the blocks and barriers I had used for 25 years. I had never told anyone. I blurted out that I had been abused by priests as a child, as sort of an explanation for my crazy protectiveness, while breaking down into sobs. I have not provided her any of the horrible details. Over the ensuing few days and weeks, I ended up in therapy, couldn't sleep, lost my job, told my mom, and got a lawyer. I totally crashed, and all my barely working coping skills gave way, completely. I told my therapist #10 at Evolution Counseling.

My therapists put me on medications trying to get me to sleep. I still have not disclosed everything to them. I told my mother about my abuse to explain my collapse and more unemployment, and my need for some money while I stopped working and that I just went to therapy, (but I've had a few jobs already since then). I discussed it with attorneys in late 2018. Brad Hall and Lisa Ford met with me for many hours, and Brad Hall took me to the FBI in November, 2018, where I told two agents (led by Agent Sandoval). My attorneys also filed suit on my behalf in November, 2018, so I told the world in my complaint, as John Doe 94. In December, 2018, this Bankruptcy case started before I was deposed by the Archdiocese before they filed their Ch. 11.

Since then, in 2019, I have drafted interrogatory answers in a case my lawyers also filed against the Boy Scouts Of America, and when those are sent out, I will be telling more lawyers.

As mentioned above, I told FBI investigators on November 10, 2018 (attached), and I've answered all follow up questions in other unrecorded interviews with the U.S. Attorney's office (Holland Kirstan, who led the team against Perrault), and with prosecutors and investigators from the Attorney General's office, like Clara Moran, Esq., and Ben Baker. I am still returning phone calls and meeting with AG investigators and lawyers, even as I'm reviewing these answers in my proof of claim form, and I am still meeting with psychiatrists and psychologists, and telling them about the abuse in incremental steps. I believe I have a long ways to go.

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

A person is born a Catholic without choice, and I grew up Catholic fully believing everything I was taught, and that I'd be a priest one day. Instead of becoming a priest, I was part of several Catholic Churches and Schools and sexually abused by three priests, until I ran away.

- 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.

When I was recorded on video being made to have sex with other children in front of and with priests and others...there were quite a few witnesses. I don't know any names. There were also witnesses when being made to have sex with Fr. Bruckner or Fr. Malloy while they were roommates. I can't think of any other 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)?

I agree with how Archbishop Wester and I think even the Pope describe sexual abuse of children by priests, as "soul murder" and the "shredding of a soul". I believe that years of childhood sexual abuse destroyed my religion, rendered my soul veritably shredded, and caused me great psychological harm that will take years and years to treat, and for the sake of my children, I am planning to try. I want to argue that suicide is not a good option. They'll win if that happens, and they'll keep their secrets; I know why abuse victims in these cases are called survivors.

I was forced to live with complete denial, minimization, compartmentalization, and disassociation, which was made easier by addiction to drugs. The priests are the ones who handed out drugs like candy. I fell into drug use and addiction, and other behavior designed to get out of school, or out of society, which only led to and fed tremendous anxiety, depression, untreated PTSD-like symptoms, some criminal charges arising from the ease of lying and drug use I was raised with, an inability to connect with others, periodic suicidal ideation and depression, loss of trust in basic institutions of trust such as Scouting and Church and cops and schools, which causes a loss of trust of everyone (even in this legal system, to be honest). There exists a general loss of meaningfulness, yet hyper-vigilance as to my own children suggests I have not given in. I am just beginning to understand fundamental problems in my life, at this age of almost 45 looking back with the help of lawyers and therapists, as related to being caused by the extensive childhood sexual abuse. I suspect that some of my medical problems are directly related to the childhood psychological problems I've buried and left unattended for 25 years; I'm starting to hear there are studies of how that relates. I know I am very

seriously and chronically under-employed, or unemployed, and probably have a huge economic loss with the proper experts. My education was a total fraud. Truly, without my partner and our children being there for me in late 2018 as I crashed, I would not care or try, but I keep trying to work jobs that help us all get by.

Since late 2018 my life has been a flurry of shrinks and lawyers and cops and prosecutors and meetings and therapy. I hope the flurry settles down. I hope the Archdiocese achieves some of the benefits of providing documents to the world in this Case, so the world can see how deep the connections were between those who ran the Archdiocese (themselves basically pedophile priests or capable of looking the other way), and the pedophile priests who were spread out over the Archdiocese. As a Catholic middle school and St. Pius High School kid, from a family like mine, I am unfortunately an expert in the ways Catholics in power can make things sound, compared to how they really are, but I do not expect that to be an impediment or a bias of any kind to my therapeutic goals. As a therapeutic matter, in this case, I hope the abuse documents I am now aware of are made available to the world, (redacted as to victims' names), in some fashion, while true reparations should be provided to the survivors. Someday my children could read about it, without automatically adopting the view that 'Dad was just a messed up kid from drugs', without understanding why, and their important role in 2018 in fighting to get some of my life back. I once got my GED. I'm eyeing college some day now too.

I hope and expect therapy to be on-going for the rest of my life, so I can be the best dad, husband, and person I can.

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

Since my complete collapse in late 2018, I have been on a complete roller coaster, and have been medicated by a psychiatrist connected with psychologists and counselors at Elevation Counseling, mostly #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  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 lawsuits:

1. Bernalillo County District Court 11/26/2018

2. Bernalillo County District Court 12/06/2018

b. The parties to the lawsuits:

1. John Doe 94 v. Archdiocese of Santa Fe, Our Lady of Assumption Parish, and Servants of the Paraclete

2. The Boy Scouts Of America, a Congressionally Chartered Corporation, and Great Southwest Council, Boy Scouts Of America, a New Mexico non-profit corportaion

c. The case number if any:

1. JD 94 vs. ADSF et al #6

2. JD v. BSA et al: #6

d. The result of the lawsuits:

1. Automatically stayed as to Archdiocese. The 3<sup>rd</sup> parties cases are pending, and the stay must either be lifted, or they must channel, as I understand it. I am also evaluating a case with my lawyers against the Basilians.



FBI  
Statement

11-10-18

Page 1

FBI interview of #1

RE: Abuse Allegations against Father Arthur Perrault,  
 Father Robert Malloy, and Father Ronald Bruckner

November 10, 2018

TRANSCRIBED BY: Katherine Gordon  
 Williams & Associates, LLC  
 1608 Fifth Street, Northwest  
 Albuquerque, New Mexico 87102

Page 2

THE WITNESS: (Inaudible) descriptive detail  
 and relieve the whole thing and just -- you know, and  
 just -- you know, I mean, just anxiety, really. Just  
 anxiety-ridden.

FEMALE FBI AGENT: Yeah.

THE WITNESS: This morning I was depressed  
 and tired, but now I'm not. I'm anxious. I was just  
 throwing up on the way over here. I just get like --

FEMALE FBI AGENT: Oh, I'm so sorry.

THE WITNESS: It's not your fault. I  
 just -- you know, I mean, so I've been processing stress  
 (inaudible). I'm trying to deal with that and like --  
 yeah.

FEMALE FBI AGENT: Well, there's a trash can  
 right there if you need that. If you need to take a  
 break --

THE WITNESS: Anyway --

FEMALE FBI AGENT: -- at any time, let us  
 know.

THE WITNESS: -- but, yeah, so --

MALE FBI AGENT: We can take a break. And  
 if you just get tired and like, look, I can't do any more  
 today, we're perfectly willing to come in and do multiple  
 meetings with you, if that's what it takes.

THE WITNESS: No. Yeah. Me too. So --

Page 3

FEMALE FBI AGENT: It does sound like you  
 have a lot to say. And we want to make sure that we get  
 everything, but we don't want you to --

THE WITNESS: Right. I don't want --

FEMALE FBI AGENT: -- feel rushed to tell  
 your story.

THE WITNESS: -- to try and like do the  
 rushed version.

FEMALE FBI AGENT: Yeah. No. And we'll  
 take it -- you know, like last time we met, it was just a  
 very brief kind of --

THE WITNESS: Uh-huh. Yeah. I gave you  
 like a general overview without telling you --

FEMALE FBI AGENT: Yeah. And so we're going  
 to just take it kind of in chunks, and we'll kind of help  
 you organize, not your thoughts, but your -- I guess, how  
 you tell the story. And in no way are we leading you to --

THE WITNESS: No. Yeah.

FEMALE FBI AGENT: -- say something, but I  
 think we're -- I'm not explaining this well at all.

MALE FBI AGENT: Just like providing a road  
 map just so it's easier to follow the story and  
 (inaudible).

THE WITNESS: No. Right. Yeah. Where  
 should I begin? I guess the beginning.

Page 4

FEMALE FBI AGENT: Well, and I can -- I can  
 help you out there. So we know from our previous meeting  
 that you had said you were abused by Arthur Perrault --

THE WITNESS: Ronald Bruckner, and --

FEMALE FBI AGENT: -- Bruckner, and --

THE WITNESS: -- Father Robert Malloy.

FEMALE FBI AGENT: -- Malloy. So who was  
 the first one of those three that you met?

THE WITNESS: Father Bruckner was the first  
 one I met. When I was a child, my parents were very  
 involved in Our Lady of Assumption parish. My brother was  
 an altar server there. I became an altar server as soon as  
 I was 9. Also, since kindergarten, since I was able to  
 read, I was in like catechism classes and everything else.

And I guess I first met Father Bruckner when I was like 5.  
 I mean, he didn't start abusing me when I was 5, but I met  
 him when I was 5. Because I was a little kid, you know, I  
 had questions, you know, "How did God make the world in  
 seven days?" They didn't have answers for me, so they'd be  
 like, "Well, go see Father Bruckner." And I'm like, all  
 right, well, so there I went. So that's, I guess, when I  
 first met him.

Then I became an altar server at age 9. And then  
 joined the Cub Scouts really thereafter. And I was an  
 altar server age 9 and 10. And it started out with him --

Page 5	Page 7
<p>1 that's when I met him. But that's when it started out with  2 him touching me, started out with massaging my back and  3 just touching me. And then there was one time when I was  4 an altar server, was getting ready to get ready for mass.  5 And then, you know, usually you put your altar boy robes  6 over your clothes, you know, I always thought. You know  7 what I mean? And this time I was encouraged to, you know,  8 not -- it was a hot day, he said, you know, and just, you  9 know, wear your -- just put your robes on just, you know,  10 wearing your underwear.  11 And then I was in Cub Scouts. And him and Father  12 Bob were -- so he was a pastor or the church, then Father  13 Bob Malloy was the associate pastor at the time. So it was  14 like he was a pedophile priest in training. And then my  15 parents decided through (inaudible) request of the priest,  16 with Father Bruckner and everything else, talking, you  17 know. My mom would go to church and confession or whatever  18 and was the choir director and had a really good  19 relationship with the priests. And through the priest's  20 advice or recommendations, it was a good idea for me to be  21 enrolled in school there, too, so I would spend all my time  22 at Our Lady of Assumption. Great.  23 So I was enrolled in school there in 1986, from  24 age 12. And that's when things really started to progress  25 as far as like -- that's when I was going on more camping</p>	<p>1 power of God forgave you, basically. You know what I mean?  2 You don't have to worry about anything you do. And it was  3 kind of -- sorry. It's really hard for me to talk about.  4 And going to school there and, you know, being an  5 altar server -- and it was kind of a difficult time. I  6 mean, I got ripped away from all my friends. I wasn't  7 really a popular kid. I was smaller than all the other  8 kids, younger. A really cute kid, too, blond hair. And,  9 you know -- and I got taken advantage of by these priests.  10 And like what else do you want me to tell you? I  11 mean, what details do you want me to give you? I mean,  12 like --  13 FEMALE FBI AGENT: So the very first time  14 you remember Father Bruckner touching you, tell me about  15 that.  16 THE WITNESS: The very first time I remember  17 him touching me was -- he was talking to my mother after  18 mass, and he began rubbing the back of my neck and rubbing  19 my shoulders. And that's when I was encouraged to become  20 an altar boy like my brother.  21 FEMALE FBI AGENT: Okay. And how old were  22 you?  23 THE WITNESS: I was 9.  24 FEMALE FBI AGENT: And at that time, did you  25 find -- how did you perceive that (inaudible)?</p>
<p>Page 6</p> <p>1 trips and stuff with Father Bruckner. And then it became  2 more from -- progressed more into touching and fondling to  3 mutual masturbation and then oral sex, and eventually anal  4 sex on these camping trips, and -- at Cochiti Lake and  5 Jemez and there at the church, because, I mean, I was  6 always -- I was always there. I lived four blocks away at  7 # 2 .  8 And like I said, my mom was always there. She  9 was the #6 . So, I mean, even though her mass  10 was at 12:30, we'd be there at eight o'clock in the  11 morning, you know, like preparing for mass. And I would,  12 you know, be left to my own devices or go see Father  13 Bruckner, whatever. And that's how that started.  14 And being enrolled in the school -- not that I  15 was a discipline problem, but every time -- like I said, I  16 had questions for (inaudible). I always -- still do. I  17 question everything. I was always getting sent to Father  18 Bruckner's office, or the principal, who then -- and then  19 send me to -- I would get sent to the principal's office,  20 who was Sister Bernice, who was a nun, who is a hard-core  21 Catholic nun, who would be like, "Well, go see the priest."  22 And then, so -- and they were very -- it was  23 very -- you know what I mean? I was kind of like trapped  24 and psychologically coerced into it. You know what I mean?  25 Like, you know, don't worry. It's okay. You know, the</p>	<p>Page 8</p> <p>1 THE WITNESS: It made me uncomfortable,  2 actually, at the time. Actually, it was -- I thought it  3 was weird. Do you know what I mean? You know, not to many  4 50-year-old guys start coming up and massaging 9-year-olds.  5 You know what I mean? To this day, I would still freak out  6 about it, you know. Yeah, it was definitely weird -- a  7 weird situation. And then it got weirder, you know what I  8 mean, as time went on.  9 FEMALE FBI AGENT: So tell me about the  10 first time that he made any kind of contact with anything  11 you would consider your private parts.  12 THE WITNESS: That would have to be the time  13 in church when I was encouraged to -- on the hot mass  14 summer day, to wear my altar boy robes with nothing on  15 underneath them. And then went back to his house, and then  16 that's when he started touching me.  17 FEMALE FBI AGENT: And where was his house?  18 THE WITNESS: Across the street from the  19 church right there, the rectory house.  20 FEMALE FBI AGENT: And what church was this?  21 THE WITNESS: Our Lady of Assumption.  22 FEMALE FBI AGENT: And that's the same --  23 you went to --  24 THE WITNESS: Yeah, that's the same --  25 FEMALE FBI AGENT: -- the same school?</p>

<p style="text-align: right;">Page 9</p> <p>1 THE WITNESS: -- school I went to through  2 eighth grade. And then, from there, I went to St. Pius  3 briefly.  4 FEMALE FBI AGENT: When you went back to his  5 house, what did he say to you? And let me --  6 THE WITNESS: Um, wow. I mean, really just  7 kind of, you know -- kind of very friendly, you know.  8 "Let's go" -- you know, "It's a hot day. Let's go get  9 something to drink, you know, and talk," and, you know --  10 and that kind of -- kind of thing. And just got me over  11 there. You know what I mean? Kind of -- I don't  12 (inaudible) actually like directly remember what he said to  13 me in detail. But I -- similar -- you know, he was like,  14 "Do you want to go?"  15 And I was like, "Yeah, I guess so." You know  16 what I mean? I didn't really -- I was a kid. I don't know  17 what else to do.  18 FEMALE FBI AGENT: Yeah. And if I ask you a  19 question and you don't remember --  20 THE WITNESS: No. Yeah.  21 FEMALE FBI AGENT: -- that's perfectly fine.  22 THE WITNESS: No. Like I said, I don't  23 remember --  24 FEMALE FBI AGENT: Let me know.  25 THE WITNESS: -- his exact words, like what</p>	<p style="text-align: right;">Page 11</p> <p>1 hugging me and stuff like that. And, you know, and like  2 kind of made it seem like he was like trying to be my  3 friend, trying to make me feel better kind of thing, you  4 know, because I kind of was, you know, trying -- I was  5 looking for guidance and stuff like that. So, you know,  6 (inaudible) trying to make me feel better. So that first  7 time, yeah, it was more of like, you know, hugging, you  8 know, let's be friends kind of thing. If you need  9 anything, you know, you can always count on old Father  10 Bruckner, you know, kind of deal.  11 And then, you know, going to school there, like I  12 said, just being constantly there, like all the time. And  13 then, you know, I was introduced to Father Bob, who was the  14 associate pastor, I just remember seeing, you know, in mass  15 and stuff, you know. I mean, being an altar server, this  16 is -- you know what I mean, you meet a ton of priests. You  17 know what I mean? You didn't always -- they would take  18 Sundays off. Like (inaudible) needed a Sunday off. But,  19 you know what I mean, you would have different guest  20 priests that you would meet. And that's how I was  21 introduced to Father Perrault, was being an altar server  22 and a student at Our Lady of Assumption.  23 Like I said, the first time I actually met him,  24 met him where it became -- where Father Perrault came on to  25 me sexually was when I met him in confession in the seventh</p>
<p style="text-align: right;">Page 10</p> <p>1 they were. (Inaudible) even -- it was a hot day.  2 (Inaudible) Dr Pepper or anything. I'm not sure. That  3 used to be my drink of choice when I was a kid.  4 FEMALE FBI AGENT: And so how did it  5 progress from let's go over, have a Dr Pepper, to any kind  6 of sexual touching?  7 THE WITNESS: Well, from then -- well,  8 actually, it progressed from not just Dr Pepper to like,  9 you know, "Hey, you know, relax," you know. Let me  10 (inaudible). You're fine. Why are you so tense? Why are  11 you so nervous," you know, to, "Have a sip of wine, you  12 know. This will (inaudible) and relax you," and, you know,  13 that kind of thing.  14 And as I got older, you know, progressively,  15 "Here, try some marijuana. Here, try some cocaine. You  16 know, everything will be fine." You know what I mean?  17 So (inaudible) through drugs, you know, kind of  18 got me to ease up and relax and get into it. You know what  19 I mean?  20 FEMALE FBI AGENT: So that very first time  21 it happened --  22 THE WITNESS: The very first time it  23 happened, it was just -- you know, it was just, more, you  24 know, have a soda and, you know, massaging my back and  25 touching my back and touching my butt, and, you know,</p>	<p style="text-align: right;">Page 12</p> <p>1 grade. And that's when he gave me the notes with his  2 number on it and encouraged me to call him and started  3 giving me gifts and wine and pot and would meet me and pick  4 me up and take me places, including the one time when he  5 took me to the base.  6 But it all started out with Father Bruckner. And  7 then it kind of eased off from Father Bruckner when I was  8 in -- going to high school, because he went to Annunciation  9 parish. And, I don't know, I guess he was looking for  10 younger boys. I'm not really sure. But that's when Father  11 Bob Malloy started pursuing me more actively. I was  12 playing soccer, and that's when he was -- like he would  13 want me to come over for oral sex and mutual masturbation  14 and to -- well, to watch me masturbate and to masturbate  15 him. And then he would want to save my semen for whatever  16 later purposes he did with it. I don't know.  17 FEMALE FBI AGENT: Tell me about Cochiti  18 Lake.  19 THE WITNESS: Cochiti Lake. (Inaudible)  20 innocent kind of thing, you know, "Hey, let's go camping,  21 Cub Scouts," you know what I mean? Thought we were going  22 to tie some knots, learn how to sail a boat. We went out  23 there, camping trip. Out comes Father Bruckner in like a  24 thong Speedo. Like -- I mean, like bikini brief underwear.  25 Like -- it's like 1985, bikini brief underwear, like --</p>

Page 13	<p>1 like all the altar boys there were like, shit. And so we                  2 were camping. We -- a day of sailing, you know. He took                  3 us out in the boat. We went sailing. We set up our tents,                  4 you know, all that good Cub Scout stuff. And then that's                  5 when he would approach, you know, me and other boys at                  6 night in their tents.                  7 FEMALE FBI AGENT: And when you say he would                  8 approach you, what -- what would that --                  9 THE WITNESS: Like he would come to your                  10 tent and, you know, and -- you know, like say -- go "shh,"                  11 kind of be quiet, you know, "Let's go over here," and we --                  12 "Let's go over here and talk," which never involved                  13 talking. You know what I mean? It always involved some                  14 kind of sexual activity, so --                  15 FEMALE FBI AGENT: Do you remember the first                  16 time that this happened?                  17 THE WITNESS: Gosh, the first time, that                  18 must have been like June 1985. It was kind of like summery                  19 weather. You know what I mean? It was a really hot day.                  20 Seemed like a good idea to go to the lake. You know what I                  21 mean?                  22 Like I said, Father Bruckner had a boat, and                  23 let's go. So (inaudible) took all the boys, you know,                  24 and -- of all ages. And my brother even went with us on                  25 some of these camping trips, my older brother. And, you</p>	Page 15	<p>1 servers at Jemez or at some church or -- there was always                  2 some kind of like Bible study or some -- some reason to                  3 have an overnight getaway with the boys and father, so --                  4 FEMALE FBI AGENT: Do you remember who the                  5 other boys were?                  6 THE WITNESS: Oh, yeah. Just other                  7 students, other guys in my class. I mean, (inaudible) a                  8 kid named #10 . There was a kid named #10 .                  9 #10 . #10 . Those are all I remember at                  10 the moment, offhand.                  11 FEMALE FBI AGENT: And were they all altar                  12 servers, as well?                  13 THE WITNESS: They were all altar servers,                  14 yeah, and students at the school, as well.                  15 FEMALE FBI AGENT: And would you say they                  16 were approximately the same age as you?                  17 THE WITNESS: Yeah, about the same age.                  18 About a year, a few months older. I was the youngest of my                  19 class, but it was around the same age group. Yeah.                  20 FEMALE FBI AGENT: And between -- I think                  21 you listed four people, four or five people. Between the                  22 group of you, did anyone ever talk about what Father                  23 Bruckner or anybody else was doing to them?                  24 THE WITNESS: No. We didn't like talk about                  25 it. We joked about him being like weird, but, you know,</p>
Page 14	<p>1 know, like I said, it seemed like -- I love the outdoors to                  2 this day. That's still my escape from everything.                  3 FEMALE FBI AGENT: Do you remember where you                  4 would camp at Cochiti Lake? Was it like kind of right on                  5 the shore, or at a campground elsewhere, or --                  6 THE WITNESS: It was kind of like right off                  7 of the shore of the lake. I mean, we would -- yeah, just                  8 like by the lake. By the boat docks, I mean. Yeah. I                  9 don't remember exactly -- like the exact location. But,                  10 yeah, it was by the boat docks. In Jemez, there was the --                  11 there's -- what's that camp called, Philmont, or something.                  12 Also at -- what's that lake at Santa Rosa? Gosh, it's been                  13 so long since I've been there. I was a little kid. Oh,                  14 God. Conchas Lake. There we go. Yeah. Boy Scout camp up                  15 at Conchas Lake.                  16 FEMALE FBI AGENT: When was the last time                  17 you went camping with Father Bruckner at Cochiti lake?                  18 THE WITNESS: Oh, wow. That was like 1988.                  19 '87, is the last time he took us sailing.                  20 FEMALE FBI AGENT: What about Jemez?                  21 THE WITNESS: Jemez? Around the same time,                  22 because it would alternate. You know, we would take                  23 several trips during the summer, you know, let's go to                  24 Cochiti, then, you know, the next month there would be                  25 another overnight retreat or something for the altar</p>	Page 16	<p>1 like -- kind of like, you know, (inaudible) like nothing's                  2 happened to me. And I was like trying to be the cool kid,                  3 too, like what do you mean? Like what are you guys talking                  4 about? You know what I mean? So, yeah. I just kind of                  5 played it off like I was the bad kid, always needed                  6 attention. You know what I mean? Like, oh, yeah, I'm just                  7 a bad ass and always going to father's house.                  8 FEMALE FBI AGENT: So at these camping                  9 trips -- I realize, it seems like there's a lot of them.                  10 THE WITNESS: Yeah.                  11 FEMALE FBI AGENT: So if you can narrow down                  12 on just like one of them and describe exactly what Father                  13 Bruckner would do to you.                  14 THE WITNESS: Well, it actually all started                  15 the first sailing boat trip. That was the first, really,                  16 camping trip, going to Cochiti. A hot summer day. I'm                  17 really fair-skinned. I don't tolerate the sun that well.                  18 Started rubbing like suntan oil on my body on the boat.                  19 And, you know, just hands all over. So, I mean, I'm like I                  20 don't need suntan oil there. You know what I mean? I'm                  21 wearing swimming trunks. You know what I mean? So, yeah.                  22 And he just started like -- like touching me all over on                  23 the boat that day and just, you know, having like just an                  24 overaggressive interest in wanting to hang out with me, you                  25 know what I mean, wanting to be with me.</p>

<p style="text-align: right;">Page 17</p> <p>1 And so we, you know, did the whole sailing thing  2 and got off of the water and put the boat away, and then  3 made a campfire and all that stuff and made dinner and said  4 some prayers, and all that noise. And then everyone went  5 to bed. And I went to my tent. And I was sharing a tent  6 with another kid, that #10 I don't know if I  7 gave him on the list, but, yeah.  8 FEMALE FBI AGENT: Uh-huh.  9 THE WITNESS: Yeah. He was a friend of  10 mine, and I was sharing a tent with him. And then that's  11 when father came and got me and, you know, he was -- wanted  12 to talk to me about being an altar server and special  13 stuff, and the special stuff involved (inaudible) him  14 touching me. So that's, I guess, the first time he ever  15 touched me.  16 FEMALE FBI AGENT: Okay. And where would he  17 touch you?  18 THE WITNESS: On my genitals, my butt, my  19 back. Kiss my neck. Kiss all over my body. I just get  20 (inaudible) think about it.  21 FEMALE FBI AGENT: And just so you know,  22 like this is our job. Like we --  23 THE WITNESS: No. I know. I mean, this is  24 what you guys do for a living. I feel comfortable telling  25 you. I mean, I didn't -- you know what I mean? I'm not</p>	<p style="text-align: right;">Page 19</p> <p>1 know what I mean? I knew the Catholic church, how they  2 work. You know, I knew he was going to be, you know,  3 reassigned somewhere or something. So I just figured  4 they'd retire and die of old age like priests do. You know  5 what I mean? And that's what I thought. And I just tried  6 to put, you know, life behind me and dissociate myself, you  7 know, from church, from everything. And just tried to get  8 into my own life, my own things, which didn't really work  9 out for me when I was younger, because it turned out to be  10 criminal activity. But, you know, I put it past me, you  11 know. I was trying -- I've been trying to rebuild my life  12 and try to focus on being a father for the last ten years.  13 And it just came out because of my 11-year-old son and  14 just -- you know.  15 It actually came out in a damn argument. You  16 know what I mean? I mean, I wasn't trying to tell anybody.  17 I wasn't even trying to tell my wife. It's just -- she's  18 constantly -- you know, telling me, you know, "You've got  19 to understand, I was abused as a child, you know, by my  20 stepfather, so I'm having issues."  21 And I was like -- I just broke down like I am now  22 and like, "You know what? I was abused, too." And that's  23 how it came out, you know. And I wasn't even going to --  24 at that point, I was just sitting in my chair, just crying  25 about it.</p>
<p style="text-align: right;">Page 18</p> <p>1 like -- I don't want to have like a press conference like  2 tomorrow and tell the whole world yet --  3 FEMALE FBI AGENT: Right.  4 THE WITNESS: -- but -- you know what I  5 mean? Like I know this is your job and we're doing this to  6 try to like --  7 FEMALE FBI AGENT: Well, I just tell you  8 that so --  9 THE WITNESS: -- investigate the situation  10 and help the -- no. I know I've never met you, but -- you  11 know what I mean? I -- so, yeah.  12 FEMALE FBI AGENT: Well, just, we don't get  13 embarrassed by this, so I hope --  14 THE WITNESS: No. I know. It's just --  15 it's just hard for me to talk about it. I'm sorry.  16 FEMALE FBI AGENT: Yeah. Yeah. No.  17 It's -- you don't need to apologize for that.  18 THE WITNESS: I mean, I never, ever, ever  19 thought I was going to tell anyone any of this, but -- I  20 thought I was going to take this to my grave.  21 FEMALE FBI AGENT: And how come you thought  22 that? What --  23 THE WITNESS: Honestly, because I thought  24 they were going to get away with it. I mean, you know, I  25 think they found him in Morocco. I mean, I knew -- you</p>	<p style="text-align: right;">Page 20</p> <p>1 And then I -- you know, I wasn't -- my father  2 like brought me a newspaper article over about -- about  3 Father Perrault coming back into town. He was like -- I  4 don't know if my father knew, or what, but he knew -- he  5 knew I didn't, you know, like the church and didn't like,  6 you know, priests and stuff, and didn't like that one in  7 particular. So -- and then just all that brought it back  8 in. And then, you know -- then in that article my wife  9 came across Brad's name and was like, "You know, maybe you  10 should contact this attorney. Maybe he can help you."  11 And, you know, maybe he may (inaudible). And I was -- you  12 know, because, you know, he had information and you're --  13 you know, you're a survivor.  14 And I was like, well -- I thought about it. And  15 I sent some weird email like at 2:00 in the morning, and  16 that's what brought me here today. I mean, I wasn't ever,  17 ever, ever planning on telling anyone. You know what I  18 mean? I just wanted to just live my life, you know, and  19 actually leave Albuquerque. I never even planned on being  20 back in Albuquerque. I was living in Colorado for a while,  21 just trying to relocate out there. And it was nice because  22 nobody knew -- you know, nobody knew me. I could work and  23 do my job, and, "Hey, you're the new guy." So that's why I  24 never wanted to come out with anything, but --  25 FEMALE FBI AGENT: (Inaudible)?</p>

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1 THE WITNESS: So, I mean, but, you know --  
 2 and then just talking to him and talking to you guys, and  
 3 then wanting to -- I just -- I just want to help protect  
 4 kids, you know, in the future, and my kids in particular.  
 5 But -- you know what I mean? I know I can do that as a  
 6 parent, but I know there's other parents out there that  
 7 still -- I mean, and just the pressure of my -- my  
 8 mother-in-law, like why haven't I baptized my children. I  
 9 mean, you know, I have like -- I don't (inaudible) my kids.  
 10 You know what I mean? This is (inaudible) person I don't  
 11 really need, you know, to like, here, father.  
 12 And I -- I'm (inaudible) every time I say  
 13 "father," because I like -- ever since 1991, I've used --  
 14 I'm like, that's reverend, this person. I knew through  
 15 cannon law and all this other stuff, they like to be called  
 16 father. But there are other weird reasons, too, but --  
 17 FEMALE FBI AGENT: And that's something --  
 18 in this room, you can call them whatever you want to.  
 19 THE WITNESS: Yeah.  
 20 FEMALE FBI AGENT: As long as we know who  
 21 you're talking about, if you want to assign them numbers  
 22 and not even refer to them by name, we can do that, too.  
 23 THE WITNESS: Yeah. I just -- I just hate  
 24 calling them -- I mean, I really hate saying Father  
 25 Bruckner --

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1 FEMALE FBI AGENT: How about we just say --  
 2 THE WITNESS: (Inaudible) Father Bob or  
 3 Father Perrault. You know what I mean?  
 4 FEMALE FBI AGENT: -- Bruckner and remove --  
 5 THE WITNESS: It (inaudible).  
 6 FEMALE FBI AGENT: -- the title (inaudible).  
 7 THE WITNESS: Yeah.  
 8 FEMALE FBI AGENT: So I --  
 9 THE WITNESS: So, anyways, back to that  
 10 first camping trip. Sorry. I digressed a minute, and --  
 11 FEMALE FBI AGENT: Well, I'm glad you  
 12 remembered where we were --  
 13 THE WITNESS: No. Back to that first  
 14 trip --  
 15 FEMALE FBI AGENT: -- because I didn't.  
 16 THE WITNESS: -- at Cochiti. Like I said,  
 17 it started out that night. You know, the sun had gone  
 18 down, everyone had gone to sleep. He invited me back to  
 19 his tent. That was the first time he gave me basically --  
 20 I don't remember if it was beer or wine -- something  
 21 alcoholic to drink. And also, like I said, Dr Pepper was  
 22 my drink of choice. But I also noticed it had -- it tasted  
 23 funny, so there was like rum or something in it -- and  
 24 marijuana. And then that's when he began touching me,  
 25 kissing me, and fondling me. Basically fondling my

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1 genitals and my butt.  
 2 FEMALE FBI AGENT: Okay.  
 3 THE WITNESS: And that was the first time.  
 4 And I went back --  
 5 FEMALE FBI AGENT: What was --  
 6 THE WITNESS: -- you know, home, like  
 7 feeling completely like weird about it, and tried to tell  
 8 my parents. But then my parents were having issues with my  
 9 older brother, just with his life, things going on, and  
 10 kind of weren't just paying attention to me. And every  
 11 time I tried to tell somebody, nobody ever believed me.  
 12 Even in high school when I tried to tell -- like the final  
 13 breaking point, the last day, I tried to tell my high  
 14 school principal. His name was Father Menner. He was the  
 15 principal. And he didn't like believe me. He called me  
 16 into his office and slammed me into the wall and punched me  
 17 in the stomach and told me, you know, I was a damn liar.  
 18 And that's when I just like kind of like ran out crying  
 19 and, you know, I drove away.  
 20 FEMALE FBI AGENT: That first --  
 21 THE WITNESS: (Inaudible).  
 22 FEMALE FBI AGENT: -- time at Cochiti Lake,  
 23 do you remember what he was wearing when he started  
 24 touching you?  
 25 THE WITNESS: He was actually wearing the

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1 same -- I think he was wearing a black thong Speedo. As a  
 2 matter of fact, it was a Speedo from Speedo. Speedo brand.  
 3 FEMALE FBI AGENT: What about -- would he  
 4 wear that on all of these boating trips, or --  
 5 THE WITNESS: Generally --  
 6 FEMALE FBI AGENT: -- did he have --  
 7 THE WITNESS: Yeah. He would either be  
 8 wearing shorts or swim trunks. But nine times out of ten,  
 9 he would always go down to the bikini swim suit, especially  
 10 at the lake. Especially at the lake. Jemez, not so much.  
 11 He would actually, you know, wear like regular shorts and  
 12 stuff like that. But it was quick to come off. But, yeah.  
 13 No. All the time -- generally on his boating outfits --  
 14 the boating trips, he would always be wearing like swimming  
 15 trunks and a black Speedo underneath -- or red.  
 16 FEMALE FBI AGENT: Okay. That was going to  
 17 be my next question, if you remembered any other colors.  
 18 THE WITNESS: Black one or red. Yeah.  
 19 FEMALE FBI AGENT: So tell me about -- I  
 20 know you said after you entered high school was kind of  
 21 when things sort of ended with Bruckner; is that correct?  
 22 THE WITNESS: Kind of, yeah. Because I kind  
 23 of lost touch with him. I kind of was just -- I was -- I  
 24 was a really busy kid. I mean, I was playing soccer and,  
 25 you know, trying to -- trying to actually like keep my

<p style="text-align: right;">Page 25</p> <p>1 sports eligibility, because my grades weren't that good.                  2 Because, like, honestly, Father Bruckner fixed my grades                  3 for me in high school (inaudible) St. Pius, because I -- my                  4 whole eighth grade and seventh grade year I, you know,                  5 didn't really do much in the way of education-wise. I                  6 mean, I spent more time being touched and fondled and                  7 coerced into sex versus learning anything about anything my                  8 parents were paying money for me to be taught.                  9 And, yeah, I kind of lost -- lost touch with him.                  10 Like I said, he became the pastor of Annunciation, and --                  11 and so he kind of quit contacting me. But that's when                  12 Father Malloy, Bob Malloy, started contacting me even more.                  13 Like he wanted to -- he started contacting me a lot. He                  14 actually found me at St. Pius. And then I -- to this day,                  15 I still have no idea -- because I had like a bottom locker,                  16 like on the bottom. And I would start finding notes in my                  17 locker, like, "Hey, meet me here," you know, "There's 100                  18 bucks in it for you," or -- you know, or -- you know, "If                  19 you" -- you know, "If you can meet me here with a jar, you                  20 know, if you can masturbate into a jar and give it to me,"                  21 or -- you know, and then -- and then from there, it                  22 progressed, like, "Hey, if you can meet me here, we'll go                  23 back to a motel room and, you know, I'll give you 100 bucks                  24 to watch you, you know, masturbate," or -- you know.                  25 And then he liked -- he liked to perform oral sex</p>	<p style="text-align: right;">Page 27</p> <p>1 bunch of other dudes for like -- like, "What am I doing                  2 here?" I'm like, great, it's Christmas Eve.                  3 And then, through the undercover detective --                  4 like they had cameras on her and stuff. And I was like                  5 "Holy shit" -- that's actually what I said, I was, "Holy                  6 shit. That's Father Bob."                  7 They're like, "What do you mean?"                  8 I was like, "That's your f-ing police chaplain."                  9 I told him, I was like, "That's Father Bob Malloy."                  10 He's like, "What do you mean that's the police                  11 chaplain?"                  12 I'm like, "Yeah, dude, that is." I was like, "He                  13 used to be my principal." I was like, "Believe me. I know                  14 that guy." You know what I mean?                  15 I -- I could spot him anywhere. I mean, he's                  16 like -- what is he, like 60 now. I haven't seen him around                  17 town. But, I mean, he was like in his forties, then. You                  18 know what I mean? I was in my twenties, so -- and I bumped                  19 into him. I was being arrested for soliciting a prostitute                  20 at that time, which the charges were later dismissed in                  21 court because I didn't actually do that. But I was                  22 involved in that same sting as him.                  23 So they were actually like -- like they caught --                  24 the undercover detective was telling him things because I                  25 was telling him kind of things -- like I was telling him --</p>
<p style="text-align: right;">Page 26</p> <p>1 on you. So then he would also want to perform oral sex on                  2 me. And then occasionally I would perform oral sex on him.                  3 But not very often.                  4 FEMALE FBI AGENT: Did you ever actually get                  5 money from him?                  6 THE WITNESS: Yes. Yes. I got money and                  7 main -- mainly money and/or marijuana, or sometimes both,                  8 but usually money. And he always was like -- you know, was                  9 like, "Oh, don't worry about it. You know, I'm the police                  10 chaplain. It's fine. I'm not going to get caught." You                  11 know, "We're good. Nothing's gonna happen, you know."                  12 FEMALE FBI AGENT: He was the police                  13 chaplain?                  14 THE WITNESS: Yeah. He was the police                  15 chaplain at the time. And then the next -- and like after                  16 1991, I didn't see him for seven years until '98. I was                  17 just working as an advertising executive. And (inaudible)                  18 through the weirdest of circumstances. I had a Chatty                  19 Cathy supervisor who was talking to an undercover                  20 detective. And to this day, I don't know what they said to                  21 each other. And she said something about my boss was going                  22 to get something from her. I said, "Oh, that's cool." The                  23 next thing I knew, I was face down in the snow with plastic                  24 handcuffs behind me. And I got thrown into a motel room.                  25 And I was literally watching a closed-circuit TV with a</p>	<p style="text-align: right;">Page 28</p> <p>1 this one APD vice cop, I was like, "Yeah, that's your                  2 police chaplain. Dude, he likes this, this, and this."                  3 And he told the undercover detective, and they totally like                  4 just popped him. You know, got him hook, line and sinker                  5 and got him arrested. And then so we all went to jail                  6 together, even in the same van. Like we got -- he got                  7 thrown in the same, you know, little paddy wagon type deal                  8 thing with us.                  9 And we all went downtown to the -- to the jail,                  10 which everybody got booked in but him. He was there for                  11 like maybe 15 minutes. And a black Lincoln with -- I                  12 forget the name of the priest that came and got him. And                  13 they like -- I don't even know how they -- like there was                  14 no bail. They -- like he just -- he walked in, and was                  15 escorted by a bunch of dudes in suits out, like -- and they                  16 took him away. And then he did his things with charges.                  17 And I was kind of contacted by APD at the time to                  18 testify against him, but I didn't. I just kind of just                  19 didn't. I just kind of like ran away from like everything.                  20 I mean, life, my parents, family, everything. Just kind of                  21 like disappeared. Dropped out of school. Everything. And                  22 then I went and got my GED. And then I got my -- tried to                  23 get my life back together and go to college, which -- and                  24 take some class. And then ended up just working forever,                  25 so -- but, yeah. (Inaudible) back to --</p>

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<p>1 FEMALE FBI AGENT: Well, tell me about 2 how -- so things with Malloy started -- 3 THE WITNESS: That started in like -- well, 4 actually, that was always -- Malloy was always like -- he 5 was even present on the camping trips and stuff like that, 6 too. More -- it -- the older I got, the more interest he 7 had in me, like 13 to age 16. Not that he wasn't around 8 before, because like I said, he was associate pastor. So 9 there would be times where I would be with Father Bruckner 10 and they like -- you know, they lived together. They were 11 roommates so, you know, he would be in the house or 12 whatever. I know he just liked to watch at that time. 13 Maybe had more voyeuristic tendencies. I'm not really 14 sure. 15 But then he started -- like when -- in seventh 16 grade, once I hit 13 and puberty started hitting, the dude 17 was like all over me. I mean, he was really, really 18 interested in me. (Inaudible), always like -- always 19 calling me, "Here's my number." You know, just like -- 20 just be there at St. Pius, you know, or after soccer 21 practice, I'd see him, like (inaudible) you were here? You 22 know what I mean? 23 And, like I said, I started finding notes in my 24 locker, notes everywhere. I had notes at my house. I 25 mean, I didn't change addresses forever until later on in</p>	<p>1 here" -- where he would want to meet you. You know, he 2 would leave, you know, specific instructions. 3 FEMALE FBI AGENT: How often would you get 4 one of those notes? 5 THE WITNESS: Oh, wow. At least a couple of 6 times a week. Sometimes weekly and, yeah, sometimes more. 7 Just all the time. There was a time, actually, when I was 8 in eighth grade when it all started where there was -- 9 there was obscene notes found in like all the kids' desks 10 with like sexually descriptive stuff about what he 11 wanted -- what he wanted to be done to the person. And 12 nobody ever knew who like wrote those notes. And, as a 13 matter of fact, our acting principal at the time, Robert 14 Kaiser, thought like that my friends and I had written 15 them. And he was like adamantly questioning us about these 16 notes. I'm like, "Dude, this is not our handwriting." And 17 I knew that Father Bob had written those notes. And I 18 don't know why he put them in kids' desks. I mean, like 19 some girls' said, "I want to fuck you. You have a nice 20 ass." Mine was like -- I had notes in my desk, and -- you 21 know, "I want your cock," you know, stuff like that. 22 And it just progressed into high school as I got 23 older. You know, he would notice, you know, I -- I think 24 he told me I had like really nice legs and a nice ass, 25 running, and he would like to meet with me. And, you know,</p>
<p>Page 30</p> <p>1 '95. I lived at a few different addresses -- well, with my 2 parents. On my own, I've had like hundreds of apartments, 3 but -- not hundreds, but I've had a few different places 4 where I've lived. 5 But, yeah, so just that's how it started out. 6 And he started -- he just -- he was just like really just 7 like blatant in his requests, like, you know, hey -- you 8 know, I mean, because if you told him no, he'd be like, 9 "I'll give you \$100," you know, or even 150, \$200. "What 10 do you need?" You know, let's do this. You know, just 11 like kind of just -- I mean, "I'll give you money. I'll 12 give you drugs." You know, he was just really -- he wanted 13 what he wanted. And that's how it started with him. 14 FEMALE FBI AGENT: And you said he would 15 leave notes in your locker? 16 THE WITNESS: Yeah. He would leave -- he 17 would actually leave notes like with instructions to meet 18 him, like, you know, meet me by the Bosque by the river, 19 down by the school, over here. Or meet me, you know, at 20 my -- at my apartment here. "Meet me in town. I'll be 21 driving this car." Or, you know -- or, "Meet me at Burger 22 King on Lomas," you know, Lomas there and Louisiana. Or, 23 "Meet me, you know, by the fairgrounds." 24 He had all sort of different, you know, little 25 locations where -- you know, or "Meet me off of Central</p>	<p>Page 32</p> <p>1 I ignored it at first, but then I developed a little bit of 2 a pot habit. And so he was like, hey -- you know, he kind 3 of capitalized on that. Like, "Do you need money?" You 4 know what I mean? "I've got a \$100 for you. I've got 5 \$200." So then that's how I got coerced into -- with 6 Father Bob. 7 FEMALE FBI AGENT: Wait -- 8 THE WITNESS: Like I said, he would have -- 9 he would have interesting requests. He would be like, "You 10 know, I'll give you 50 bucks, you know, to take off your 11 clothes and masturbate for me," you know. You know, "Come 12 in this glass," so -- you know, kind of thing. That's how 13 that would start out with him at first. And then he would, 14 you know, get really excited and, you know -- you know, 15 offer more money. You know what I mean? Like -- you know, 16 be like, "I'll give you an extra \$50 if you, you know, let 17 me perform oral sex on you," or, you know, if you perform 18 oral sex on me. Sometimes both, but, I mean, it started 19 out because -- you know, "I'll give you an extra \$50 if you 20 let me touch you," you know, "let me suck your dick," kind 21 of thing. And that's how it -- that kind of started. 22 And I was just having just kind of -- just all 23 kinds of issues with my family and just life in general. 24 And I just got really -- I don't know, like high school 25 life and all this just got too much for me. And I just --</p>

<p style="text-align: right;">Page 33</p> <p>1 I tried to tell everyone, you know, about it. And, like I  2 said, I went to -- I went to my high school guidance  3 counselor, who was -- was a one -- was a priest. He was  4 kind of sort of cool. But he told me just leave. What was  5 his name? Not Father (Inaudible). That was my chemistry  6 teacher. Swinzer, I think his name is. Like a German guy.  7 He was really nice. He didn't molest me or anything like  8 that. He was just really nice. Just a counseling kind of  9 guy. And he was like, you know, I know -- kind of like --  10 he kind of like knew, you know, the kind of things that  11 were going on. He was kind of like -- was like, you know,  12 "Just go away," you know.  13 And I went to -- the next time I went to my  14 principals office and I went to tell him. Like I said,  15 that's when I got slammed into the wall, punched in the  16 stomach. Father Menner was a way bigger guy than me. And  17 I left. I just kind of left. I left, you know, went up  18 into the hills, the mountains, and stayed there for quite a  19 while.  20 FEMALE FBI AGENT: Who was that, the --  21 THE WITNESS: The principal?  22 FEMALE FBI AGENT: -- principal?  23 THE WITNESS: That was Father Menner.  24 Menner, yeah.  25 FEMALE FBI AGENT: Menner?</p>	<p style="text-align: right;">Page 35</p> <p>1 first one confirmed when I was 16 by Archbishop Sanchez  2 before he like totally -- all kinds of scandal came out  3 with him and the church, and then he was replaced by  4 Archbishop Michael Sheehan. So -- but, yeah. I mean, I  5 never attended one confirmation class. I was always doing  6 something dirty with a priest. And they were like,  7 confirmed. I mean, I was literally the first out of all  8 the kids. It pissed like a ton of parents off.  9 My mom was even -- my mom was happy, because my  10 mom called the Archbishop and was like, you know, my son is  11 having some issues. And like literally, like -- I don't  12 know if -- what Ken Sanchez -- Ken Sanchez did. My -- he  13 came down to do my confirmation himself. And then he was  14 like, you know, "If you have any problems, you call me."  15 And he gave me his number. And I called him, and his  16 number was disconnected. So that is when I was in high  17 school. But -- and then, yeah, I ran away. I never --  18 never -- I quit church. Quit going to church. Quit  19 contact the church, which actually put a rift between me  20 and my family, because, I mean, my family is devote  21 Catholic.  22 FEMALE FBI AGENT: (Inaudible).  23 THE WITNESS: So up until the last -- a  24 couple weeks ago, my mom never knew why I quit going to  25 church. You know, she just thought I was -- you know, she</p>
<p style="text-align: right;">Page 34</p> <p>1 THE WITNESS: Menner. Yeah. He's a  2 Brazilian priest. He was my high school principal.  3 FEMALE FBI AGENT: Do you know -- like what  4 year did you enter high school?  5 THE WITNESS: 1989.  6 FEMALE FBI AGENT: 1989?  7 THE WITNESS: Yeah. August of '89.  8 FEMALE FBI AGENT: And for St. Pius, is that  9 ninth grade, high school?  10 THE WITNESS: Ninth grade, yeah.  11 Immediately after -- like I wanted to go anywhere but  12 St. Pius, but that was not even an option. I mean, I even  13 had -- like, seriously, I had like a failing grade point  14 average. I took the entrance exam. I wrote my name. You  15 know what I mean? I must have scored -- an idiot. I mean,  16 they must have thought I was retarded because I didn't even  17 answer any questions right. I was trying to purposefully  18 blow, you know, getting into St. Pius so I wouldn't have to  19 go there. So I was like, if I didn't have to go there, if  20 I didn't have to go to Catholic school anymore, I don't  21 have to see the priests every day. You know what I mean?  22 So that didn't work out for me. I mean, I don't  23 even know. Like somehow Archbishop Sanchez and Father  24 Bruckner all got me into St. Pius. I even got confirmed.  25 I never went to a single confirmation class. I was the</p>	<p style="text-align: right;">Page 36</p> <p>1 was like, "I just thought there was something wrong with  2 you." But, you know --  3 FEMALE FBI AGENT: That was 1992 when  4 (inaudible)?  5 THE WITNESS: 19 -- yeah -- '92. No. That  6 was '91. '91. 1991 is when I was confirmed.  7 FEMALE FBI AGENT: So was it shortly after  8 your confirmation that you --  9 THE WITNESS: Yeah. Yeah. Shortly after my  10 confirmation that I just kind of like said, ah, I've had  11 enough of this (inaudible). And a few other guys that I  12 really don't actually know who this -- guys -- I mean, I  13 have suspicions, but I don't remember the names, which is  14 like -- there was one kid, whose name is #1 I  15 know he -- but he -- he's deceased. Like I know that he  16 was being abused by Father Malloy because we had talked it  17 over some --  18 FEMALE FBI AGENT: What was his last name?  19 THE WITNESS: #1  20 FEMALE FBI AGENT: #1  21 THE WITNESS: Yeah.  22 FEMALE FBI AGENT: Sorry to interrupt.  23 THE WITNESS: Oh, no problem. He was  24 actually a student from like -- I believe it was Fatima is  25 where I met him from. He was an altar boy. Really cool</p>

<p style="text-align: right;">Page 37</p> <p>1 kid. Soccer player. We were on the same team. Just all 2 around good dude. And then -- but he -- he was having his 3 issues from the church, and he actually died. So he was in 4 a car accident, which I don't believe, like what happened 5 to him. But that was -- I mean, he was like a really -- 6 that was like -- like that was Father Malloy's main, like, 7 target dude. Because, I mean, he was like just a really 8 good-looking kid. I mean, he's -- he's tall, blond, 9 muscular dude. Like good-looking kid.</p> <p>10 And so -- but he would like -- because I remember 11 one time, he invited me -- Father Bob Malloy -- invited me 12 to meet with him and that guy. So that's why I'm telling 13 you about him. Because he wanted me to -- to watch us 14 together.</p> <p>15 FEMALE FBI AGENT: Okay.</p> <p>16 THE WITNESS: And that kind of like never 17 really like happened. So it was more of a 18 masturbation-type thing. We never actually had sex with 19 each other. And that's how we ended up talking about it, 20 come -- finding out, you know, he had been approaching both 21 of us. And then I think that's when he went to APD, or his 22 parents or somebody else. Like, and a few other people 23 went. That's when the investigation had picked up. And 24 then, later on, he was killed like during that school year 25 in a mysterious car accident where he was found with his</p>	<p style="text-align: right;">Page 39</p> <p>1 THE WITNESS: Yes.</p> <p>2 FEMALE FBI AGENT: And was he forced to 3 masturbate in front of you?</p> <p>4 THE WITNESS: Yes.</p> <p>5 FEMALE FBI AGENT: Okay. And when Malloy 6 would make you do these kind of things, what would he be 7 doing?</p> <p>8 THE WITNESS: He would be taking pictures 9 and like recording stuff. And also touching himself, 10 masturbating, as well.</p> <p>11 MALE FBI AGENT: When you say "recording 12 stuff," what do you mean by that?</p> <p>13 THE WITNESS: Like he had a big, you know, 14 camcorder, VHS, old-style camera. And he also had -- you 15 know, he also had like a -- I don't remember what brand. I 16 think (inaudible) camera it was, but he also had a camera, 17 you know -- you know, film-type camera that he would take 18 pictures with.</p> <p>19 MALE FBI AGENT: So photographs and video?</p> <p>20 THE WITNESS: Yeah.</p> <p>21 FEMALE FBI AGENT: And you said you can't 22 remember what kind of camera it was. Anything about the 23 camera that you can remember?</p> <p>24 THE WITNESS: Oh. The video camera, I 25 believe, was like an RCA or an Epson. I'm not really sure.</p>
<p style="text-align: right;">Page 38</p> <p>1 neck broken. But I -- like I said, I have my suspicions, 2 but I can't prove anything. So I'm not saying he was 3 murdered by Father Bob of the church, but, I mean, I know 4 that, you know, he was kind of doing the same things I was. 5 So, I mean, I don't know what happened. And, you know, I 6 mean, it led me to do some weird shit. So, I mean, I don't 7 know what happened to him, like how it led to his death.</p> <p>8 FEMALE FBI AGENT: Okay. So you said you 9 never had to do anything with him. But was he --</p> <p>10 THE WITNESS: Well, I was encouraged to 11 do -- well, it's -- we were encouraged to do stuff 12 together. And Father Bob gave us money to do stuff 13 together. But, honestly, in that situation, because we 14 knew each other, you know what I mean, from school and 15 everything, we kind of just like chickened out. And Father 16 Bob was like, okay, just, you know -- just, you know, it's 17 cool. "Just take off your (inaudible) if you guys can" -- 18 and he just wanted to mix our semen together and take it 19 with him, and he was okay with that, so --</p> <p>20 FEMALE FBI AGENT: So were you both in the 21 same room when that happened?</p> <p>22 THE WITNESS: Yeah. In the same room.</p> <p>23 Yeah. Yeah. That was -- we were in a hotel room.</p> <p>24 FEMALE FBI AGENT: And you were -- were you 25 forced to masturbate in front of him?</p>	<p style="text-align: right;">Page 40</p> <p>1 But I know it was one of those bigger style kind of -- kind 2 of, you know -- used to be kind of bulky cameras.</p> <p>3 MALE FBI AGENT: Is it one you have to hold 4 on your shoulder?</p> <p>5 THE WITNESS: Yeah. Kind of -- like, yeah, 6 they were, you know, about yea big kind of cameras, 7 camcorder. It took the big old fat VHS tapes.</p> <p>8 FEMALE FBI AGENT: What about the film 9 camera?</p> <p>10 THE WITNESS: That was just like, you know, 11 your old like Cannon-type of camera. I don't know the 12 exact name.</p> <p>13 FEMALE FBI AGENT: You made a motion like it 14 had a zoom lens, or --</p> <p>15 THE WITNESS: Oh, yeah. You know, like the 16 round Cannon-like lens, you know, load the film in the back 17 kind of camera. That's what I'm referring to.</p> <p>18 FEMALE FBI AGENT: Did you ever see what he 19 did with these pictures or these videos?</p> <p>20 THE WITNESS: No. That's kind of -- he 21 just -- no, I didn't.</p> <p>22 FEMALE FBI AGENT: Would he ever show you 23 pictures or videos?</p> <p>24 THE WITNESS: Not him. I was shown pictures 25 by Father Bruckner and Father Perrault of other -- but not</p>

Page 41	<p>1 by Father Bob, no. Father Bob was like kind of to himself.</p> <p>2 FEMALE FBI AGENT: Okay.</p> <p>3 THE WITNESS: He was more of a collector.</p> <p>4 FEMALE FBI AGENT: So going back to Bruckner</p> <p>5 now, he would show you pictures. Would he ever take</p> <p>6 pictures himself?</p> <p>7 THE WITNESS: Oh, yeah. There was pictures</p> <p>8 taken on the camping trips, at the rectory, all the time.</p> <p>9 Yeah. He always had a camera.</p> <p>10 FEMALE FBI AGENT: What kind of camera?</p> <p>11 THE WITNESS: Just -- he just had a regular</p> <p>12 film camera. He didn't have like a video camera. But he</p> <p>13 was always taking pictures.</p> <p>14 FEMALE FBI AGENT: And by "pictures," are</p> <p>15 they just kind of candid photos, or were any of these --</p> <p>16 THE WITNESS: Oh, he would take -- yeah.</p> <p>17 They were kind of candid photos of just, you know, hey,</p> <p>18 this is us on the camping trip. This is -- you know, and</p> <p>19 then he would take, you know, naked photos. And he had a</p> <p>20 thing for like taking photographs, I guess, at an angle</p> <p>21 while you were on your knees, like performing oral sex on</p> <p>22 him.</p> <p>23 FEMALE FBI AGENT: Sorry.</p> <p>24 THE WITNESS: That's okay.</p> <p>25 FEMALE FBI AGENT: I want to make sure I</p>	Page 43	<p>1 know, we'd get there and the -- he would -- like, you know,</p> <p>2 like your camera is right there, the camera would already</p> <p>3 be there and set up. So, you know, then things would be</p> <p>4 going on, you know, he would get you relaxed, you know.</p> <p>5 And he would smoke a cigar and -- you know, and strip down</p> <p>6 to his silk underwear. And then, you know -- and, you</p> <p>7 know, give you drinks and cannabis, marijuana, and, you</p> <p>8 know, cocaine, actually, and try and get you ready and in</p> <p>9 the mood kind of thing.</p> <p>10 And he would take pictures, you know, while you</p> <p>11 were -- you know, you were always encouraged to be naked.</p> <p>12 You know what I mean? Like clothing, not optional.</p> <p>13 Clothing was always off. You know what I mean? Like</p> <p>14 either underwear, jock straps, or no clothing at all, was</p> <p>15 their preference.</p> <p>16 FEMALE FBI AGENT: Just to clarify, you're</p> <p>17 talking about Perrault?</p> <p>18 THE WITNESS: Uh-huh. Yes.</p> <p>19 FEMALE FBI AGENT: Okay.</p> <p>20 THE WITNESS: Father Perrault, yes.</p> <p>21 FEMALE FBI AGENT: Tell me about his silk</p> <p>22 underwear.</p> <p>23 THE WITNESS: Yeah, he was -- had -- like he</p> <p>24 would always -- he had a thing for silk underwear. He</p> <p>25 liked to wear silk underwear. And he would -- he would buy</p>
Page 42	<p>1 write this one down. And would he ever -- oh, you said he</p> <p>2 would show you pictures. Did he show you pictures that --</p> <p>3 THE WITNESS: I'm sorry.</p> <p>4 FEMALE FBI AGENT: Sorry. Do you need to</p> <p>5 get that?</p> <p>6 THE WITNESS: No. I'm -- my phone has a</p> <p>7 mind of its own. I don't need to Facetime my son right</p> <p>8 now.</p> <p>9 When they -- yeah, (inaudible) pictures of other</p> <p>10 boys, and also -- well, the main -- mainly, actually --</p> <p>11 yes, Father Bruckner would show you a few pictures. But</p> <p>12 the main one that had photographs was Father Perrault.</p> <p>13 Father Perrault had a collection of boys and girls. And he</p> <p>14 loved to take pictures and videos. Similar-style camera.</p> <p>15 Not the same brand as Father -- I don't know why RCA stands</p> <p>16 out to me with Father Bob, because I -- I guess (inaudible)</p> <p>17 remember it more. But, yeah, it was a similar-type --</p> <p>18 similar-type camera. I think it was like an Epson or</p> <p>19 something, to be honest with you. But, I mean, it was</p> <p>20 similar VHS-type recording camera. He actually had a</p> <p>21 tripod, too, like that he would set up sometimes in</p> <p>22 advance.</p> <p>23 FEMALE FBI AGENT: What do you mean by that?</p> <p>24 THE WITNESS: Like, you know, he would -- I</p> <p>25 mean, I guess he would set it up in advance because, you</p>	Page 44	<p>1 you -- he would buy -- buy you silk underwear and buy me</p> <p>2 silk boxers. So they're very comfortable. They felt good,</p> <p>3 you know -- very (inaudible) felt good on balls, he would</p> <p>4 say.</p> <p>5 Like I said, I met him when I was in -- when I</p> <p>6 was 13 years old. The first time I met him, I was in</p> <p>7 confession at Our Lady of Assumption parish. You know,</p> <p>8 little old-style Catholic confessional. You know, you're</p> <p>9 not even supposed to be able to see the priest. I started</p> <p>10 talking to him about sex and things that were going on with</p> <p>11 the other priests. And not in very -- so much detail, but</p> <p>12 kind of just, you know, more questioning my sexual assault</p> <p>13 kind of type thing. Like a flash, the dude literally</p> <p>14 jumped around that screen, was on the same side as me, you</p> <p>15 know, was like -- grabbed my hand. Was like, you know, "I</p> <p>16 can help you out, son," like literally is what he told me.</p> <p>17 "Here is my number. Give me a call." And he's like, you</p> <p>18 know, "I can take care -- I can make -- you know, make your</p> <p>19 life a lot better."</p> <p>20 And I was like, oh, sure, you know. Hey, I mean,</p> <p>21 give Father Perrault a call. I bumped into him a couple</p> <p>22 other times. Actually, (inaudible) I bumped into him</p> <p>23 another time was actually at the Rosary Rally. I was an</p> <p>24 altar server at the (inaudible), big old gathering where</p> <p>25 they rent the pit out or whatever. I forget where it was</p>

<p style="text-align: right;">Page 45</p> <p>1 at the time. And, you know, they pray the rosary for like  2 three hours. And, actually, at that time, he -- I was an  3 altar server, and I kind of was just like standing there.  4 And he kind of like tapped me on the shoulder and was like,  5 "Hey, come on. Let's get out of here real quick."  6 And, you know, we went and smoked a cigar. And  7 then he started touching me on my leg and on my genitals.  8 And that's when he approached me and said, you know, "Hey,  9 let's -- you know, let's meet up later." And then -- then  10 we would meet up later, like either after mass or -- yeah,  11 mainly after masses because I was -- that's when I was  12 doing a lot of altar server stuff and a lot of Catholic  13 school stuff.  14 And at the school. But I met him at -- at  15 school. It was like seventh grade. We had confession like  16 all the bleeding time. How a child can sin so much, I  17 don't even know. I mean, they were always there. We  18 had -- like Father Bruckner always had like -- we always  19 had like guest priests. And like I -- my mom actually  20 had -- I'd just gone into confession right after my  21 mother -- or, no, my mom went into confession after me. My  22 mom was actually even wondering what the hell was taking so  23 long because I was in the confessional for quite a few  24 minutes, like, you know, while he was like patting my knee  25 going -- writing -- you know, he wrote me -- and I never</p>	<p style="text-align: right;">Page 47</p> <p>1 had his own experiences and freaked out and never did. And  2 to this day, I really can't get much out of him about it.  3 He just recently had surgery, so he's recovering, so I  4 haven't really talked to him lately.  5 But, yeah, then that's how things had escalated  6 with Father Perrault. And he would contact me through  7 Father Bruckner and at my school. Like I'd be at school  8 and, you know, we were having -- we had mass like every  9 Wednesday and Friday. And he would show up and give mass,  10 you know, "Hey, I'm here." And, you know, and then he  11 would let me know, you know, "Hey, you know, like meet me  12 after school," or meet me, you know, whenever.  13 And I was involved in Cub Scouts in -- but it was  14 all through the church. I mean, every damn thing I did was  15 through Assumption, whether it was clubs, whether it was,  16 you know, Cub Scouts, altar servers. So I was -- always  17 had some reason to be there. You know what I mean?  18 Whether it was a Cub Scout meeting or an altar server  19 meeting. I mean, how many -- I mean, like how many times  20 (inaudible) do you have to practice to be an altar server.  21 You know what I mean? But that was the excuse my parents  22 were given, you know, altar boy practice, you know. So  23 that's kind of how that went.  24 FEMALE FBI AGENT: Were you ever told by any  25 of them about either what not to say or what to say or --</p>
<p style="text-align: right;">Page 46</p> <p>1 even wrote the note. It was kind of like a little  2 semi-erotic note, to like, you know -- like, you know,  3 "Hey, you're a really good-looking kid." I don't really  4 remember the exact details of the note. But it was like --  5 you know, it was really -- you know, for a 13-year-old, it  6 was -- he was like, hey, you know -- hey, let's kind of  7 hook up, kind of note.  8 And I was like holy crap. And I had his number.  9 And I saved it for the longest time. And I had it until a  10 number of years ago, until almost when my son was born. I  11 was moving and I found it in my stuff and I burned it,  12 which I should never have done. I wish I still had it to  13 this day. But it had his phone number on it when he was --  14 where he was the pastor and he was working. And he also  15 expressed to me that he was -- you know, because I had  16 expressed some interest in like wanting to join the Air  17 Force and stuff like that. And he had told me, you know,  18 "Hey, you know what? I'm a military chaplain, so, you  19 know, I can help you out with that, too." You know what I  20 mean? You help me, you scratch my back, I help you. You  21 know, there's -- you know, altar boys help priests, you  22 know.  23 And I was also my -- my family wanted someone in  24 our family to become a priest, either me or my brother.  25 And I think my brother was going to become a priest, but he</p>	<p style="text-align: right;">Page 48</p> <p>1 THE WITNESS: Oh, yeah. Like I was always  2 told, you know, "Don't say anything." You know what I  3 mean? "This is between me, you, and God, and I've got the  4 hook-up with God and you're forgiven. Amen." You know  5 what I mean? You know, just -- you know, say a few Hail  6 Marys, that is, you know. This is -- doesn't even violate  7 the -- I was even told it didn't even violate the act of  8 celibacy because it wasn't -- because I wasn't, you know,  9 having sex. I was -- I was helping them, in other words.  10 You know what I mean? I was helping a man of God, so I  11 wasn't -- I don't know. They were telling me that it  12 was -- I was special and I was, you know, doing something  13 special for them. So as a little kid, I thought, well,  14 maybe I am doing something, you know, special. You know,  15 maybe I am a special kid. I don't know. I wanted to feel  16 special. You know what I mean? So -- and they took  17 advantage of that and they preyed upon that, so -- you  18 know, saying, you know, I'm -- I've got a direct line to  19 God. I -- you know, I work for the church. You know what  20 I mean? There's -- you know, you know what I mean? I  21 mean, I'm, you know, police chaplain, I'm military  22 chaplain, you know.  23 I'm kind of lumping them all together at this  24 point. But I'm saying, you know, I was given those kinds  25 of excuses. You know what I mean? They were my</p>

<p style="text-align: right;">Page 49</p> <p>1 principals, my educate -- the whole time, I mean, I always                  2 had priests as a principal or some -- all through --                  3 through -- after fifth grade. Middle school through high                  4 school, I -- you know, until I left that system, I was                  5 always in front of a priest in one way, shape, or form or                  6 another. And it always ended up in a negative -- you know,                  7 with the priest going, hey, you know, you're -- you're a                  8 bad boy. You know, I've heard about you. Let's -- you                  9 know, let's talk.</p> <p>10 FEMALE FBI AGENT: With Perrault, where --                  11 would he take you places?</p> <p>12 THE WITNESS: Yeah. Oh, yeah.</p> <p>13 FEMALE FBI AGENT: What would he drive, or                  14 how would you get there?</p> <p>15 THE WITNESS: Oh, he would drive. I didn't                  16 ever have a car until later on in life, until I was like                  17 18. So I either like walked or bussed. But, yeah, they                  18 would pick me up. I would be given instructions to meet                  19 somewhere. Like I said, it would be either a fast food                  20 restaurant or by a fast food restaurant or by -- you know,                  21 at a store. A lot of times -- excuse me -- the candy is                  22 coming back on me -- the parking lot on -- by the fair, the                  23 Fair Plaza parking lot. There, because it was close to my                  24 house, within walking distance where I could ride my bike.                  25 Usually places around where I could get to easily, like</p>	<p style="text-align: right;">Page 51</p> <p>1 they kind of kept it so we kind of didn't know each other.                  2 The one time I was there, there was a girl. I remember her                  3 name was Amanda. That's like all I remember about her.                  4 Well, name-wise because I was never given like a last name.                  5 And I was -- at that time when I was taken on base, I was                  6 filmed engaged in sexual acts with her, oral sex and lots                  7 of touching and intercourse. And then lots of touching and                  8 intercourse around the room. It was kind of like an                  9 orgy-type party.</p> <p>10 FEMALE FBI AGENT: Who was filming it?                  11 THE WITNESS: Honestly, I don't know who was                  12 filming it. Like I said, I know who was in attendance.                  13 There was -- like there was other adults there that                  14 weren't -- I don't know if they were priests or not, or if                  15 they were in the military or what. But it was at a house                  16 located on base. Like I said, now they're not base housing                  17 anymore. They're -- like now they're private apartments                  18 that you can rent off of Gibson. It was on a house like                  19 that. And that's where that was filmed at.</p> <p>20 FEMALE FBI AGENT: And how do you know it                  21 was filmed?                  22 THE WITNESS: Because I could see the                  23 cameras. I mean, I -- you know, just looking around, I                  24 was -- you know, I was like -- you know what I mean? Like                  25 looking around in every direction. I was given cocaine, so</p>
<p style="text-align: right;">Page 50</p> <p>1 around the area, because I lived at the Lomas and Wyoming                  2 area at the time. So right behind, I guess, what's now                  3 Larry H. Miller Hyundai. It was Lloyd McKee, then Zinger                  4 Dodge, and now it's the Hyundai dealership, I think. I                  5 haven't lived there in over 20 years. But that's where I                  6 lived. But I would always meet somewhere around -- like I                  7 said, it would be someplace close. Or even Los Altos Golf                  8 Course at the time, because that was like literally right                  9 across the street from the house.</p> <p>10 FEMALE FBI AGENT: And all three of them                  11 would --</p> <p>12 THE WITNESS: Oh, no. It --</p> <p>13 FEMALE FBI AGENT: -- (inaudible) do this,                  14 or just --</p> <p>15 THE WITNESS: At different times. The time                  16 I was taken to Kirtland, there was more than one person in                  17 attendance. There was -- Father Bruckner was there.                  18 Father Bob was there. There was a few other priests whose                  19 names I don't know, and to this day I don't know who they                  20 were. I mean, I could identify them by face if I ever saw                  21 them, but -- and there was a couple other guys there that                  22 weren't priests.</p> <p>23 FEMALE FBI AGENT: Adults, or kids?                  24 THE WITNESS: Adults. Yeah. All adults.                  25 Oh, and kids, too. Yeah. There was kids there. The kids,</p>	<p style="text-align: right;">Page 52</p> <p>1 I was like really amped. I was like (inaudible). You                  2 know, I mean, I -- yeah, I was like looking all around the                  3 room. So just like looking in every direction. So that's                  4 why I remember seeing cameras. I remember seeing other --                  5 other gentlemen in there filming this stuff.</p> <p>6 And like I said, I only knew the priests that                  7 were there that -- I mean, I know Father Bruckner was                  8 there. I know Father Bob was there. Father Perrault was                  9 actually the one that brought me there. And then, like I                  10 said, there were some other gentlemen there. I don't even                  11 know if they were priests or if they were in the military.                  12 I just know there was like two to three other guys there.                  13 And then there was like three boys and a -- plus myself and                  14 a girl. So I guess there was five of us total, minors, I                  15 guess, children. And then we were all given alcohol and                  16 drugs and encouraged to touch each other, engage in sexual                  17 acts with each other and with the fathers.</p> <p>18 FEMALE FBI AGENT: Tell me about that. What                  19 would you have to do with the fathers at this particular --                  20 THE WITNESS: At this particular event, then                  21 it was just -- you know, you would be doing something and                  22 you would, you know, feel a hand, you know, start touching                  23 you or another body part, a penis. Or, you know, you'd be                  24 grabbed by the hand and, you know, pulled over to the side                  25 or -- you know, and, you know, encouraged to perform oral</p>

<p style="text-align: right;">Page 53</p> <p>1 sex on them or, you know, or other stuff.  2 FEMALE FBI AGENT: And which of the priests  3 (inaudible)?  4 THE WITNESS: Bruckner and Perrault.  5 FEMALE FBI AGENT: Do you remember who gave  6 you the cocaine?  7 THE WITNESS: That would have been Father  8 Bob Malloy and Father Bruckner. Yeah.  9 FEMALE FBI AGENT: Had they given you  10 cocaine before this incident?  11 THE WITNESS: Oh, yeah. Yeah. I must have  12 tried that -- like I think the first time was 10 or 11,  13 (inaudible). And that was actually given to me for the  14 first time up at a camping trip up at Cochiti. And then at  15 Jemez, again. And then afterwards at school during  16 different times.  17 FEMALE FBI AGENT: Okay.  18 THE WITNESS: Usually on a Friday, because,  19 like I said, I was -- you know, when -- there would be some  20 excuse for some, you know, over-the-weekend activity, altar  21 boy retreat, Cub Scout camping trip, boating trip, Bible  22 study, you know. And just some reason to have an overnight  23 excursion, you know what I mean, on a Friday through  24 Sunday. You know, be back Sunday night and ready for  25 school on Monday kind of deal. That's how it was.</p>	<p style="text-align: right;">Page 55</p> <p>1 met as a fast food restaurant, and I had already -- he had  2 already started giving me, you know -- like I said, I think  3 it was like rum and Coke or Dr Pepper and rum, really. And  4 then, you know, cocaine, marijuana, trying to get me  5 loosened -- because we were -- he had -- he had already  6 told me we were going somewhere, so -- and I wasn't kind of  7 like paying attention. You know what I mean? Like I was  8 kind of already -- I weighed like 90 pounds at the time.  9 You know what I mean? I was always -- I'm still a  10 light-weight. I mean, I look stocky, but, I mean, it  11 doesn't take that much to get me like loopy. So, yeah, I  12 mean, I believe it was like a silver or a white car.  13 FEMALE FBI AGENT: It's okay.  14 THE WITNESS: Square, kind of like Chrysler  15 style -- Buick. I don't know. I'll think about it. I'll  16 get more -- you know, more detail. I mean, I don't  17 remember. I'm trying to remember. I mean, it's like a lot  18 of things that I never --  19 FEMALE FBI AGENT: Well, then --  20 THE WITNESS: I've tried to repress these  21 memories for years. You know what I mean? I'm like  22 (inaudible). And, yeah, he picked me up and then we went  23 on base. He -- we went through, I believe it was Gate B, I  24 think, you know, or something like that. And he showed his  25 military ID, and we went on in. I don't -- didn't have to</p>
<p style="text-align: right;">Page 54</p> <p>1 FEMALE FBI AGENT: What year was this party,  2 for lack of a better word?  3 THE WITNESS: Oh, yeah. That must -- in  4 1988, because I was like 14, so -- 13, 14. Yeah. '87 to  5 '88, around there.  6 FEMALE FBI AGENT: Okay. And could you  7 guess about how old the other kids were?  8 THE WITNESS: They were around my age. I  9 mean, they must have been from (inaudible). I would say  10 ages up to -- 12 to like 16, 17.  11 FEMALE FBI AGENT: What about #1 do you  12 remember how old she was?  13 THE WITNESS: I think she was like -- must  14 have been like 15 or 16, 14. Between 14 and 16. I don't  15 know her exact age. I know she was a teenage girl.  16 FEMALE FBI AGENT: And you said Perrault  17 took you there?  18 THE WITNESS: Yeah.  19 FEMALE FBI AGENT: Do you remember what he  20 brought you in, like what kind of car it was or truck or --  21 THE WITNESS: I can't remember what kind of  22 car it was. It was a car. It was like a car. I don't  23 remember like what color, what -- anything else like that.  24 I know we went -- because he would already -- we had  25 already met like outside of the church. Like I said, we</p>	<p style="text-align: right;">Page 56</p> <p>1 do anything. Just sat in the car. I don't know what he  2 told the guards or whatever.  3 FEMALE FBI AGENT: What was -- I know you  4 said you were already feeling kind of --  5 THE WITNESS: Yeah.  6 FEMALE FBI AGENT: -- loopy, I guess. What  7 was your understanding of what you were going to do?  8 THE WITNESS: We were going to have a play  9 party with the priests. A "party" was what they called  10 them. A party -- a play party with the priests, really.  11 FEMALE FBI AGENT: And so had you had other  12 play parties before?  13 THE WITNESS: Yes.  14 FEMALE FBI AGENT: Okay. Tell me about  15 another -- another (inaudible).  16 THE WITNESS: Those generally just were just  17 kind of like I said, like all -- all-boy type of things,  18 kind of. Like I said, I guess, every weekend there, like I  19 said, there was some excuse, like at Boy Scouts or, you  20 know, like I said, there was always altar boy trainings or  21 some -- like some reason, like I said, to spend the night  22 on a Friday night to -- you know, and it was always for a  23 couple nights in a row, you know, to have, you know,  24 Friday, Saturday night, you know, and most of Sunday  25 through the day, you know what I mean, until -- I didn't</p>

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1 really even have to appear back until like after -- the  
 2 afternoon, Sunday afternoon, my parents were expecting me  
 3 back. So that's when that would happen, those other, you  
 4 know, type -- and sometimes it would be individual, and  
 5 sometimes -- but, yeah, the other parties would be with  
 6 other boys, you know, (inaudible).  
 7 FEMALE FBI AGENT: Do you remember any other  
 8 kids that would be (inaudible)?  
 9 THE WITNESS: I don't. No. Because they  
 10 would try to -- they wouldn't really -- you know, they  
 11 would try to keep it -- try to keep it secretive and  
 12 separate. You know what I mean? They didn't really want  
 13 us to interact as much.  
 14 FEMALE FBI AGENT: And was there ever any  
 15 other instance where you were forced to perform sexual acts  
 16 on another child, besides the one with #1 and the #1  
 17 #1  
 18 THE WITNESS: No. Just those two times.  
 19 FEMALE FBI AGENT: Okay. How did -- going  
 20 back to the Kirtland one, was that at nighttime or daytime  
 21 or --  
 22 THE WITNESS: That was at nighttime. It was  
 23 in the evening to -- yeah.  
 24 FEMALE FBI AGENT: Do you remember where you  
 25 slept that night?

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1 THE WITNESS: I ended up -- yeah, I went  
 2 home kind of late, but, yeah, I was dropped off.  
 3 FEMALE FBI AGENT: And who dropped you off?  
 4 THE WITNESS: Father Perrault dropped me off  
 5 like kind of -- like I said, at the time I lived in a  
 6 cul-de-sac. So there was a car lot right off of Lomas, and  
 7 I was dropped off on the corner -- it was like two blocks  
 8 to my house -- and I walked home.  
 9 FEMALE FBI AGENT: And it was that same --  
 10 THE WITNESS: Yeah.  
 11 FEMALE FBI AGENT: -- same 24-hour period  
 12 (inaudible)?  
 13 THE WITNESS: Yeah. Same 24-hour period,  
 14 yeah. That party, yeah. I didn't actually spend the night  
 15 on base or anything like that. I was actually -- after the  
 16 party, you know, got dressed and went home.  
 17 FEMALE FBI AGENT: In our previous meeting,  
 18 you had mentioned something that you called "shows."  
 19 THE WITNESS: Yeah. That's the parties, the  
 20 shows. That was the -- that. That was the show, the  
 21 photographing, that's what I meant by the -- by shows.  
 22 Because I would --  
 23 FEMALE FBI AGENT: And just to make it  
 24 absolutely clear, the photographing was photographs and  
 25 video --

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1 THE WITNESS: And video, yes.  
 2 FEMALE FBI AGENT: -- of you performing  
 3 sexual acts either with a priest or with another child.  
 4 THE WITNESS: Either with a priest or with a  
 5 child or by yourself, masturbating or -- yeah.  
 6 FEMALE FBI AGENT: And you said Perrault  
 7 loved to take pictures. He had both a still and a video  
 8 camera?  
 9 THE WITNESS: Yes. Correct.  
 10 FEMALE FBI AGENT: And that Bruckner took a  
 11 lot of pictures, as well?  
 12 THE WITNESS: Yes. He took a lot of still  
 13 photographs, as well, yes.  
 14 FEMALE FBI AGENT: And these pictures also  
 15 included pictures of you performing oral sex on him?  
 16 THE WITNESS: Yes.  
 17 FEMALE FBI AGENT: And what about Malloy,  
 18 did he ever take pictures?  
 19 THE WITNESS: Malloy would take pictures.  
 20 Mainly not of us together, but like of -- he would like to  
 21 photograph and video me masturbating or of -- I remember  
 22 one time he took a picture of himself performing oral sex  
 23 on me. But he would -- yeah, that was the only other  
 24 photographs I remember. But he would -- yeah, he would  
 25 always take pictures of me masturbating and touching myself

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1 and -- and especially coming. He would love to take  
 2 pictures of that.  
 3 FEMALE FBI AGENT: And of the three, the  
 4 only one who ever showed you pictures at any time --  
 5 correct me if I'm wrong -- was Bruckner?  
 6 THE WITNESS: Father Bruckner had showed me  
 7 pictures, but Father Perrault had actually more -- more  
 8 pictures.  
 9 FEMALE FBI AGENT: How do you know he had  
 10 those pictures?  
 11 THE WITNESS: Because he would show -- he  
 12 would show them to you. Show you the pictures he  
 13 (inaudible).  
 14 FEMALE FBI AGENT: And what would these  
 15 pictures (inaudible)?  
 16 THE WITNESS: These pictures would be of  
 17 other -- of other kids. Of other naked kids in sex acts or  
 18 just naked kids.  
 19 FEMALE FBI AGENT: And where did he have  
 20 them?  
 21 THE WITNESS: He had them like in -- like  
 22 a -- just a briefcase with him. Do you know what I mean?  
 23 Like -- like a bag, kind of like -- like, you know, like an  
 24 organizer-type deal like you guys have, you know, kind of  
 25 thing. Just like in a folder. He had them just -- you

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1 know, photographs, just like a big old envelope --  
 2 FEMALE FBI AGENT: So kind of like in an  
 3 album?  
 4 THE WITNESS: Yeah. Yeah.  
 5 FEMALE FBI AGENT: Like a photo album?  
 6 Okay.  
 7 THE WITNESS: Not like in an album, but,  
 8 yeah, kind of like in a -- like a -- you know, like his  
 9 black --  
 10 MALE FBI AGENT: Portfolio?  
 11 THE WITNESS: -- folder right there. Kind  
 12 of like that kind of thing, with like a leather case sort  
 13 of -- like a briefcase. Like a purse-type briefcase, I  
 14 guess, is my best description of it.  
 15 FEMALE FBI AGENT: And they were organized  
 16 within that?  
 17 THE WITNESS: Yeah. They were organized  
 18 with that. And he actually had his camera in there and,  
 19 you know, other -- you know, would keep, you know, a bottle  
 20 of liquor and whatever else he had in there, cigars and  
 21 other -- you know, other things.  
 22 FEMALE FBI AGENT: Whenever he showed you  
 23 these pictures, what would he say, or what would --  
 24 THE WITNESS: The main reason for them  
 25 showing me the pictures was kind of to help me -- I'm a

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1 very anxious person. It was kind of -- you know, relax,  
 2 get over your anxiety. You know, "You're not the only" --  
 3 "Look. See, you know, this? Look how much fun, you know,  
 4 this person is having, this kid is having. Just, you know,  
 5 kind of -- just relax," go with the flow kind of thing.  
 6 Kind of trying to get me, you know, either aroused or  
 7 comfortable with the situation, kind of, I guess is how  
 8 they were shown to me. More arousal for them, more to get  
 9 me more comfortable so that, you know, they could do their  
 10 thing, I guess. Like, you know, "Don't worry about it.  
 11 There's other -- you know, you're not the only one. You  
 12 know, you're not the only special one this is happening  
 13 to."  
 14 "You know, like I said, this is special. You  
 15 know, this -- you're -- you're -- you're helping -- you're  
 16 helping me out. I'm a man of God, you know. And I can  
 17 help you out."  
 18 You know, I actually thought, you know, I mean, I  
 19 would get, you know, maybe get a special blessing and, you  
 20 know, all my problems would disappear magically. But, you  
 21 know, that never happened. But, you know, that's what I  
 22 was told, though. You know what I mean? Like, "Hey, you  
 23 know, you help me out and you do these things for me, and  
 24 I -- you have nothing to worry about." You know what I  
 25 mean? I've got -- I've got your back kind of -- sort of

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1 thing. I've -- I'll take care of everything with God, your  
 2 parents, you know, everything. You'll be fine. Just, you  
 3 know -- and that's how it was presented to me.  
 4 FEMALE FBI AGENT: Did you ever recognize  
 5 any children in any of those pictures?  
 6 THE WITNESS: No.  
 7 FEMALE FBI AGENT: And of the pictures that  
 8 you --  
 9 THE WITNESS: I didn't really -- I didn't  
 10 like look at them that long. You know what I mean? I  
 11 wasn't like -- you know, so I would --  
 12 FEMALE FBI AGENT: Sure.  
 13 THE WITNESS: -- kind of like see them and  
 14 be like, okay. And then -- yeah, and then I would --  
 15 FEMALE FBI AGENT: And of the pictures that  
 16 you saw, what ages would you think these children were?  
 17 THE WITNESS: Oh, wow. I would say from  
 18 ages 7 on up. I mean, between the ages of 7 to 18.  
 19 FEMALE FBI AGENT: And these are with  
 20 Perrault?  
 21 THE WITNESS: It was with Perrault and  
 22 Bruckner. I mean, Bruckner had -- had -- Bruckner always  
 23 had male picture -- had pictures of young boys and young  
 24 men around. Even -- even on -- even on like camping trips  
 25 and stuff, he would leave like, you know, like bodybuilder

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1 magazines and stuff just like lying around. I mean, all  
 2 the time, just -- you know, he would always come out in his  
 3 black Speedo. And, I mean, it was -- I mean, when I say  
 4 thong, meaning like butt cheeks thong. I mean, ass hanging  
 5 out. Like the grossest thing on a 50-year-old guy you ever  
 6 want to see. And that's how he would be. He would come  
 7 out, you know, like that on a camping trip. Especially at  
 8 the lake. I mean, he would just be at the lake, you know,  
 9 practically naked all the time.  
 10 MALE FBI AGENT: In those photographs that  
 11 Father Bruckner was showing you, you said it was young boys  
 12 and young men?  
 13 THE WITNESS: Yeah. Young boys and young  
 14 men.  
 15 MALE FBI AGENT: How did they appear?  
 16 THE WITNESS: Either just like naked solo  
 17 or, you know, just sometimes performing -- you know, like a  
 18 picture of like -- you would see like a torso of another  
 19 person with, you know, that person, you know, doing oral  
 20 sex on them, or -- you know what I mean? Just, you know,  
 21 mainly those kind of pictures, like -- or solo pictures of  
 22 them just naked, you know, just on the bed or sitting or  
 23 posing or standing or various different -- but, I mean,  
 24 sometimes it was just in various different states of  
 25 undress.

<p style="text-align: right;">Page 65</p> <p>1 MALE FBI AGENT: What did Father Bruckner  2 keep his photographs in, or where were his photographs?  3 THE WITNESS: His photographs were at the  4 house where he lived. I mean, he kept them at the rectory.  5 I mean, he didn't -- and I guess, I don't know -- I don't  6 think he packed stuff with him in his luggage for the  7 camping trips. He wouldn't take a lot of photos to the  8 camping trips. He would mostly take photos at the camping  9 trips. You know what I mean? He wouldn't be like, "Hey,  10 let's sit and reminisce." It would be more -- more active,  11 you know, participation kind of thing, but -- yeah. He had  12 all his stuff with him at his offices or wherever.  13 MALE FBI AGENT: And where were they  14 maintained at the rectory or offices?  15 THE WITNESS: He had his office -- I mean,  16 they have the office, which is right by the school, and  17 then he had his house, which was on the same street. You  18 know what I mean? Right across the street, the rectory and  19 the parish office. He had an office, you know what I mean,  20 like office-office there. He was the (inaudible).  21 MALE FBI AGENT: So the photographs were  22 in --  23 THE WITNESS: They were in his home. They  24 were in the home, as far as I know.  25 MALE FBI AGENT: And how did he store them</p>	<p style="text-align: right;">Page 67</p> <p>1 in high school, Father Bob one time, I got a notice to go  2 to my counselor's office. His name was Robert something.  3 His last name will come to me. And my counselor wasn't  4 even there. Father Bob was there. He was like, you know,  5 "Meet me tonight by the river. I'll give you 100 bucks.  6 Here." He handed me a baby food jar. Was like, "Fill this  7 up and, you know -- and we'll exchange this and I'll give  8 you the money." So that's how that first started  9 happening.  10 And then I was -- oh, in high school, I mean,  11 yeah, I was always like -- I would get like Thursday  12 detention. But then the priests would pull me out of  13 detention and be like, you know, you're going to go help me  14 clean the gym or go do something else like that, or you're  15 going to go help the priests do something for Thursday or  16 Saturday detention. So my Thursdays and Saturdays in high  17 school would be spending -- you know, become stalked by  18 priests. So I -- that's -- and I -- like I said, I just  19 was trying to -- and then I quit. I just quit high school.  20 I just literally walked out the doors and kept on going.  21 FEMALE FBI AGENT: You had mentioned that  22 Malloy liked to watch.  23 THE WITNESS: Yes. He liked to -- he had --  24 he liked to watch. He liked to watch young men touch  25 themselves.</p>
<p style="text-align: right;">Page 66</p> <p>1 inside the home?  2 THE WITNESS: He had them just in a -- in a  3 box that he would -- that I remembered he would bring out  4 and show the pictures. And then, you know, started giving  5 me drinks, marijuana, cocaine, and, you know, getting you  6 in the mood, getting you relaxed and get (inaudible) going.  7 MALE FBI AGENT: Okay.  8 FEMALE FBI AGENT: Did -- I don't know how  9 to word this question. Did you ever have to attend special  10 counseling with Bruckner?  11 THE WITNESS: As far as like --  12 FEMALE FBI AGENT: Would he ever call --  13 call a meeting with you, a counseling session?  14 THE WITNESS: Oh, yeah. Especially at  15 school, yeah. It was definitely -- like I said, I was  16 there all the time, like for one reason or another. It was  17 either he would pull me out of class, or for some reason or  18 other, I would get sent out of class to go -- go to Father  19 Bruckner's office. Damn, again? I was, you know -- so,  20 yeah, oh, yeah, he would definitely pull me out of class  21 and out of school. And that happened all the way through  22 into high school. That's kind of -- that's why I left  23 St. Pius, because I'm like, dude, I'm in high school now.  24 How the hell are you guys still pulling me out of class?  25 You know, I would get like note -- I would get --</p>	<p style="text-align: right;">Page 68</p> <p>1 FEMALE FBI AGENT: Okay. Did he ever watch  2 you with another priest?  3 THE WITNESS: Oh, yeah. Father Bruckner. I  4 mean, yeah.  5 FEMALE FBI AGENT: Okay. And you said they  6 lived together at the rectory?  7 THE WITNESS: Yeah. At that time they did.  8 And then they -- he ended up getting his own like -- you  9 know what I mean, I don't know, whatever promotions and got  10 his own parish. But, yeah, at the time when I first -- had  11 first met him, he was the associate pastor with Father  12 Bruckner.  13 FEMALE FBI AGENT: And to your knowledge,  14 did Malloy ever take pictures of you with Bruckner?  15 THE WITNESS: Not that I'm aware of, no. I  16 don't know if he did or not. He might have. I mean, you  17 know, he wasn't -- I don't know if he did.  18 FEMALE FBI AGENT: What about Bruckner  19 taking pictures of you with Malloy?  20 THE WITNESS: No. It was more of a  21 solo-type thing.  22 FEMALE FBI AGENT: And you -- have you ever  23 seen any pictures of yourself in any of these instances?  24 THE WITNESS: No. I'm sure they're out  25 there. I've never seen myself in any of the photos,</p>

Page 69	<p>1 though.</p> <p>2 FEMALE FBI AGENT: Okay. And no one you've</p> <p>3 ever recognized --</p> <p>4 THE WITNESS: No.</p> <p>5 FEMALE FBI AGENT: -- in any photos that</p> <p>6 you've ever been shown?</p> <p>7 THE WITNESS: No.</p> <p>8 FEMALE FBI AGENT: When was the -- so I know</p> <p>9 like you have this date that you walked out of school --</p> <p>10 THE WITNESS: Yeah. That was the --</p> <p>11 FEMALE FBI AGENT: -- and that's kind of</p> <p>12 like the day you're done with all the priests.</p> <p>13 THE WITNESS: Pretty much, yeah. Like I</p> <p>14 said, I kind of -- then I was -- and then I bumped into</p> <p>15 Father Bob. Like I said, we bumped into each other in the</p> <p>16 whole undercover prostitution sting, of all the weirdest</p> <p>17 things in the world. And like I said, I was -- I was</p> <p>18 literally telling the detective what to say -- to say to</p> <p>19 his detective to get Father Bruckner -- I mean, not Father</p> <p>20 Bruckner -- Father Bob all hot and bothered, and he did.</p> <p>21 And they were like, boom, we've got him. And they arrested</p> <p>22 him, and that was the beginning of his trouble.</p> <p>23 So I kind of like took kind of like peace in that</p> <p>24 aspect, that they had gotten him. And then I kind of was</p> <p>25 like, okay, cool. So I'm just going to like, you know --</p>	Page 71	<p>1 up the advertising. I was telling him I was going to go</p> <p>2 home. But I was driving because we were taking my car.</p> <p>3 And I was like, "All right. Let's go." Because I was in a</p> <p>4 hurry to get out of there. And he started talking to this</p> <p>5 like (inaudible) Asian-looking detective lady. And next</p> <p>6 thing I know, like I said, she talked to me and I said</p> <p>7 "That's cool." I said, "Oh, that's cool." And I -- you</p> <p>8 know, I didn't mean like, oh, that's cool, I wanted</p> <p>9 anything. I was just said, "Oh, that's cool." And I was</p> <p>10 like in a hurry to get out.</p> <p>11 And next thing I know, there's a big black cop</p> <p>12 wrestling me in the snow, "You're under arrest. You have</p> <p>13 the right to remain silent."</p> <p>14 I was like, "What did I do?"</p> <p>15 And then he told me, you know. And I was -- you</p> <p>16 know, they were like -- I -- actually, I think they were</p> <p>17 going to let me go, actually, even. But then I was like,</p> <p>18 "Hey, I know that guy."</p> <p>19 And they're like, "What do you mean you know that</p> <p>20 guy?"</p> <p>21 I was like, "That's your police chaplain."</p> <p>22 And they're, "What?"</p> <p>23 I said, "Yeah. That's Father Malloy,</p> <p>24 (inaudible)."</p> <p>25 FEMALE FBI AGENT: So when is the last time</p>
Page 70	<p>1 you know, fade off into the woodwork. I did my part. Can</p> <p>2 I get my charges dropped and try to go back to school and</p> <p>3 focus on my life and do my thing. Because I was -- at that</p> <p>4 point, I was trying to do MMA and -- or not -- it wasn't a</p> <p>5 thing yet. But I was trying to do martial arts, become a</p> <p>6 fighter, but bad idea.</p> <p>7 FEMALE FBI AGENT: And that sting operation</p> <p>8 you mentioned, you said that was Christmas Eve of 1998.</p> <p>9 THE WITNESS: Yeah.</p> <p>10 FEMALE FBI AGENT: Okay.</p> <p>11 THE WITNESS: Yeah. It was either Christmas</p> <p>12 Eve or a couple days before Christmas, because I know I was</p> <p>13 going out of --</p> <p>14 FEMALE FBI AGENT: So around Christmastime?</p> <p>15 THE WITNESS: I was supposed to go out of</p> <p>16 town to go with my family, because my sister was living in</p> <p>17 Oklahoma at the time, and I was late because I was at work</p> <p>18 and I had to call my mom. It was before cell phones, a</p> <p>19 pager. I had the old pager thing. And my mom had paged</p> <p>20 me. I called her. I was like, "Mom, I'm with my boss.</p> <p>21 We've just got to go pick up some more adds. We were right</p> <p>22 outside the Castle Superstore." And that's where I got</p> <p>23 arrested -- or, no. Right by the -- in front of the Castle</p> <p>24 Superstore. Somewhere around there.</p> <p>25 I was with my boss. We had just finished picking</p>	Page 72	<p>1 that you can remember being abused by any one of them? And</p> <p>2 when I say "abused," being touched in any kind of sexual</p> <p>3 way.</p> <p>4 THE WITNESS: 1991. That was the last time.</p> <p>5 FEMALE FBI AGENT: Okay. And tell me about</p> <p>6 that -- that (inaudible).</p> <p>7 THE WITNESS: That was the -- just with --</p> <p>8 like I said, with Father Bob. He, you know, paid me to</p> <p>9 masturbate for him and for him to perform oral sex on me</p> <p>10 and me to perform oral sex on him. And -- and then for me</p> <p>11 to come in a -- I think at that time it was a -- he had a</p> <p>12 wine glass. And that was it. That's the last time. And</p> <p>13 then he was -- he -- I had gotten a few more notes after</p> <p>14 that, and I just kind of don't want to do it anymore. I</p> <p>15 was -- you know, I was -- I just -- yeah, I just didn't --</p> <p>16 I just didn't want to do it anymore. I was like, "Man, you</p> <p>17 know what, I'm good. I don't want to do this anymore."</p> <p>18 I was like -- I was having -- I was a kid. I</p> <p>19 was. You know, I was trying to find myself, you know, and</p> <p>20 everything else. And I was like, "I don't want to do this</p> <p>21 anymore." I just kind of -- I went to a number of</p> <p>22 different people, from my parents to everyone, and everyone</p> <p>23 was like, yeah, yeah, whatever. And like I was even told I</p> <p>24 was lying about it, so -- and not to mention it, you know,</p> <p>25 that a priest would never do that. And you need to keep</p>

Page 73	<p>1 your mouth -- fucking mouth -- keep my fucking mouth shut</p> <p>2 and -- yeah, or -- and then I was even -- I think I was</p> <p>3 even going to be expelled or some nonsense or something.</p> <p>4 And I was like, whatever, dude. And I just -- I walked</p> <p>5 out.</p> <p>6 FEMALE FBI AGENT: That time in 1991, where</p> <p>7 did that occur?</p> <p>8 THE WITNESS: That -- oh, where did the sex</p> <p>9 occur, or where did the -- that was at St. Pius, where I</p> <p>10 left, where I --</p> <p>11 FEMALE FBI AGENT: That -- it happened on</p> <p>12 St. Pius grounds?</p> <p>13 THE WITNESS: Generally, sometimes he'd</p> <p>14 meet -- there was -- like behind St. Pius, there's a river,</p> <p>15 the Bosque area down there. There. It would happen there.</p> <p>16 And he would -- he would -- he would contact you there. It</p> <p>17 wouldn't always happen at St. Pius. It would happen mainly</p> <p>18 at motels and other places where he would want to meet you</p> <p>19 at, but -- parks, other places. Yeah. But he would</p> <p>20 contact me at St. Pius. That's where he would contact me</p> <p>21 because that's where I was at school. I was on the soccer</p> <p>22 team and a student.</p> <p>23 FEMALE FBI AGENT: Okay.</p> <p>24 THE WITNESS: Then my -- like I said, I was</p> <p>25 not even totally prepared for high school, so my grades</p>	Page 75	<p>1 THE WITNESS: No. I don't have any --</p> <p>2 FEMALE FBI AGENT: -- notes and --</p> <p>3 THE WITNESS: -- written records, no. I</p> <p>4 mean, I can -- I'm still going through a lot of my</p> <p>5 childhood things because, like I said, my parents are</p> <p>6 moving finally. And there's actually a lot of stuff I'm</p> <p>7 going through. But if I find anything, I'll let you know.</p> <p>8 I'm still looking.</p> <p>9 FEMALE FBI AGENT: You don't have to like</p> <p>10 scour your house --</p> <p>11 THE WITNESS: No. No. No. No. No --</p> <p>12 FEMALE FBI AGENT: -- on our behalf.</p> <p>13 THE WITNESS: No. Actually -- I'm actually</p> <p>14 trying to find a yearbook that I had, or like my yearbook</p> <p>15 was signed by Father Bob, so -- so that's what I'm actually</p> <p>16 looking for. But I haven't been able to locate that yet.</p> <p>17 FEMALE FBI AGENT: What did he say?</p> <p>18 THE WITNESS: Nothing -- just -- he just --</p> <p>19 you know, best wishes, something, but he wrote his phone</p> <p>20 number in my yearbook, so --</p> <p>21 FEMALE FBI AGENT: Okay. So you've</p> <p>22 mentioned St. Pius, as far as like locations where you</p> <p>23 would have to -- where you were abused. St. Pius, the</p> <p>24 Bosque.</p> <p>25 THE WITNESS: Our Lady of Assumption, the</p>
Page 74	<p>1 just completely slipped and I lost eligibility and I -- on</p> <p>2 the soccer team, and this -- I don't know. I couldn't play</p> <p>3 soccer anymore. And I just like -- then I got a note. And</p> <p>4 I just went to tell everybody, and I threw -- and I tried</p> <p>5 to show the note to Father Menner, and he -- you know, like</p> <p>6 I said, he told me I was a fucking liar and this didn't</p> <p>7 happen. Never mention it, you know, because these kind of</p> <p>8 things don't happen at St. Pius or with priests. And, you</p> <p>9 know -- you know, I -- I'm crazy. So -- and then I was</p> <p>10 like, yeah, whatever. And I just kind of -- I quit school.</p> <p>11 FEMALE FBI AGENT: What did he do with the</p> <p>12 note?</p> <p>13 THE WITNESS: I don't know. I think he</p> <p>14 crumpled it up, threw it away. I knew he took it away from</p> <p>15 me.</p> <p>16 FEMALE FBI AGENT: What about any of the</p> <p>17 other notes? I know you said you burned one of them.</p> <p>18 THE WITNESS: The other notes, they just got</p> <p>19 lost over the -- over time. You know what I mean? In the</p> <p>20 trash, or just they -- he would always encourage you to</p> <p>21 destroy them. So, yeah, he was, you know, kind of like</p> <p>22 a -- kind of like secret messages for this paper kind of</p> <p>23 thing.</p> <p>24 FEMALE FBI AGENT: So as far as you know,</p> <p>25 you don't have any --</p>	Page 76	<p>1 Bosque, Cochiti Lake. After a funeral mass in Santa Fe</p> <p>2 National Cemetery.</p> <p>3 FEMALE FBI AGENT: Okay. Tell me about</p> <p>4 that.</p> <p>5 THE WITNESS: That was a funeral. I was an</p> <p>6 altar server -- oh, gosh -- '87, '88. I was in middle</p> <p>7 school. I was altar server at a funeral mass up in Santa</p> <p>8 Fe. Went up with Father Bruckner who performed the mass</p> <p>9 and then gave me a ride home. You know, did stuff up at</p> <p>10 the cemetery and in the car.</p> <p>11 FEMALE FBI AGENT: Where at the cemetery?</p> <p>12 THE WITNESS: Kind of -- not really -- kind</p> <p>13 of like a -- not like -- it's -- I can -- the best way is</p> <p>14 to show you. A mausoleum type thing, you know, where</p> <p>15 like -- it's a building. It's like a -- it's like an</p> <p>16 office building. It's like where you would go to get like</p> <p>17 directions to whatever grave you were looking for. It's</p> <p>18 like a house-type building there, is where.</p> <p>19 FEMALE FBI AGENT: And did this happen once</p> <p>20 or more than once?</p> <p>21 THE WITNESS: That was just that one time in</p> <p>22 Santa Fe.</p> <p>23 FEMALE FBI AGENT: Do you remember how you</p> <p>24 got up to Santa Fe?</p> <p>25 THE WITNESS: I rode up with Father Bruckner</p>

Page 77	<p>1 for the mass with the whole funeral procession behind the 2 hearse type deal. 3 FEMALE FBI AGENT: You said he did stuff. 4 What stuff? 5 THE WITNESS: Oh. Touched me. Fondled me. 6 Made me touch him. And we went back home. 7 FEMALE FBI AGENT: And what parts of your 8 body did he touch? 9 THE WITNESS: Oh. My -- my butt and my 10 penis. 11 FEMALE FBI AGENT: And what parts of his 12 body did you have to touch? 13 THE WITNESS: His penis and his butt. 14 Mostly his penis. 15 FEMALE FBI AGENT: And you said that was '87 16 or '88? 17 THE WITNESS: Yeah. 18 FEMALE FBI AGENT: And he drove you home? 19 THE WITNESS: Yeah. He drove me -- yeah, 20 drove me back to church, actually. Not -- not home, back 21 to -- back do Assumption where I ended up walking home. 22 Like I said, I lived close by. 23 FEMALE FBI AGENT: What did he drive? 24 THE WITNESS: Oh, wow. I think he drove a 25 Lincoln. I'm not sure.</p>	Page 79	<p>1 FEMALE FBI AGENT: -- Santa Fe -- 2 THE WITNESS: -- the only one in Santa Fe. 3 Yeah. 4 FEMALE FBI AGENT: Okay. What about in 5 other locations that you can remember? 6 THE WITNESS: Like I said, Our Lady of 7 Assumption, Annunciation, parish rectory, the Jemez. Like 8 I said, Philmont. Conchas Lake campground. Boy Scouts. 9 And those are about it, off the top of my head. 10 FEMALE FBI AGENT: And then Kirtland? 11 THE WITNESS: Yeah. Kirtland. Yeah. 12 FEMALE FBI AGENT: Where in Jemez? 13 THE WITNESS: The Boy Scout camp in Jemez. 14 FEMALE FBI AGENT: Okay. Did you ever go to 15 the -- I guess you'd call it a church in Jemez where -- 16 THE WITNESS: Oh, yeah. Yeah. I was 17 actually shown the church, and actually the -- oh, gosh, 18 what do they call the place? I guess where they -- their 19 pedophile rehabilitation place in Jemez at the time was 20 still active. I had gone there. I'd been shown that on 21 campouts because it was a big monastery. Father Bruckner 22 was like, hey, this is historical and like (inaudible). 23 Now I come to find out why it's historical. But, yeah, 24 they -- yeah, in Jemez there. Yeah. The church up at 25 Jemez and --</p>
Page 78	<p>1 FEMALE FBI AGENT: Tell me how his clothes 2 were. 3 THE WITNESS: I never -- unless it was on a 4 camping trip, like he would always wear his, you know, 5 priest black collar uniform deal. Short-sleeved black 6 shirt. While collar. 7 FEMALE FBI AGENT: What about when the 8 touching started there at the mausoleum? 9 THE WITNESS: Yeah. When the touching 10 started, he was wearing, you know, the whole priest-type 11 robes for the mass deal. I was wearing the altar server 12 uniform. And after the mass, taking all that off. 13 FEMALE FBI AGENT: To include like shirt and 14 just everything, or -- 15 THE WITNESS: No. Actually, it was 16 clothes -- take -- because I was clothed underneath the 17 altar boy robes. But then come over and he would start 18 touching you and -- excuse me -- fondling you and 19 encouraging you to touch him and, you know, put your hand 20 in his pants and touch his penis. And he would pull his 21 pants down and then pull your pants down and touch you and 22 encourage you to touch him. 23 FEMALE FBI AGENT: Okay. And that was the 24 only incident with any of them at the -- 25 THE WITNESS: Yeah. That was --</p>	Page 80	<p>1 FEMALE FBI AGENT: Okay. And then -- 2 THE WITNESS: But mainly camping. 3 FEMALE FBI AGENT: Okay. He -- 4 THE WITNESS: But, yeah, he did -- he did 5 take us. We saw the -- you know, like I said, I don't know 6 because (inaudible) sisters or whatever. It's like a -- it 7 was like a convent-type monastery up in Jemez. Now it's 8 privately owned. I think they sold it. But -- 9 FEMALE FBI AGENT: Did anything happen 10 there, as far as abuse? 11 THE WITNESS: As far as abuse, no. No. 12 Not -- not there specifically. Up there, yes, but not -- 13 you know, he didn't take me there to abuse me, though. 14 FEMALE FBI AGENT: So all the abuse in Jemez 15 happened at the Boy Scout camp? 16 THE WITNESS: Yeah. 17 FEMALE FBI AGENT: Any other locations? 18 THE WITNESS: That's it. 19 FEMALE FBI AGENT: Any times -- any 20 instances of abuse while you were in a car with any of the 21 priests? 22 THE WITNESS: Oh, yeah. Definitely. I 23 mean, always when they would pick you up, they would touch 24 you. That's how they would get me to unwind. They would, 25 you know, give me stuff to drink in the car, stuff to</p>

Page 81	<p>1 smoke. Started touching me in the car. Me touching them.                  2 Kind of like, I guess, foreplay to drive to the location, I                  3 guess, or wherever we were going. Yeah, there was always                  4 car stuff. All the time. Especially like the Santa Fe                  5 funeral trip, it was such a long drive, the procession up                  6 there and then, you know, the mass and then back, so -- and                  7 I went back with him -- with Father Bruckner.                  8 FEMALE FBI AGENT: So did it occur on the                  9 way up there or on the way back?                  10 THE WITNESS: On the way back. More on --                  11 more so on the way back. On the way -- on the way up                  12 there, it was more -- you know, more kind of like                  13 professional, I guess, kind of get it done. But on the way                  14 back there was nobody -- you know what I mean? There was                  15 no procession or a million people around. It was kind of                  16 just, let's go back. It was kind of just us.                  17 FEMALE FBI AGENT: What would he say to you                  18 during -- like in the car when he's rubbing your leg or --                  19 THE WITNESS: Really wouldn't say anything.                  20 Just kind of just -- you know, you just -- a hand would                  21 just kind of creep up and start rubbing you, and -- you                  22 know, kind of like just sitting there, all right, then,                  23 he's touching me, so -- yeah. He wouldn't really say                  24 anything. I mean, he wouldn't -- wouldn't be like, hello.                  25 He was, you know, just -- you know, you'd start feeling</p>	Page 83	<p>1 Definitely. And I know -- you know what I mean? Like I                  2 said, I tried to go to other schools. I wanted to go to                  3 Albuquerque Academy. I wanted to go to -- oh, gosh, there                  4 was another school I wanted to go to, too. It was another                  5 private school. And I was trying to get in there. And I                  6 couldn't. Like literally I was -- you know what I mean?                  7 When they called to get a recommendation from the school or                  8 from the priest or whatever, I was even -- I was a                  9 disciplinary problem, I was told. You know, I was told                  10 that, you know, I had issues and -- like I said. But when                  11 it came to St. Pius, though, none of that was -- you know,                  12 oh, I was an angel, so I got in. I was (inaudible).                  13 And then, like I said, my confirmation, that,                  14 too, was -- you know, generally, I guess -- you know, I                  15 don't know what the length of time of confirmation --                  16 period classes you're supposed to take to, you know, do                  17 this and affirm your faith. I didn't take any of them. I                  18 didn't show up for a one. And, like I said, I was the                  19 first -- I mean, Archbishop Sanchez was like, you first.                  20 The other mothers and parents were like, him? Really?                  21 Why? Why are you confirming his -- I mean, there was even                  22 like a big argument (inaudible) confirmed some -- some                  23 lady's daughter that I was -- you know, I was never in                  24 confirmation class. I always -- never went. I would                  25 always either go to the priest's house or go do something</p>
Page 82	<p>1 hands on your body.                  2 FEMALE FBI AGENT: Do you have anything?                  3 MALE FBI AGENT: I did have a question                  4 (inaudible), I mean, this is minor. But you said that                  5 Father Bruckner was helping you fix -- fixed your grades.                  6 THE WITNESS: Oh, yeah. Like I said, I had                  7 horrible -- I was a horrible student. I mean, when I --                  8 like I said, I even -- I purposefully failed the entrance                  9 exam to St. Pius.                  10 MALE FBI AGENT: Yeah.                  11 THE WITNESS: So how I got in is -- I'll                  12 never know. I mean, I even made -- I even made the soccer                  13 team. I was like -- I was purposefully trying to sabotage                  14 going there, but it didn't happen. So, I mean, like I                  15 said, they must have, you know, fixed my transcripts or                  16 something to get me accepted, because I -- because I was --                  17 being -- because I was literally rejected by Albuquerque                  18 Academy. Every other school my parents tried to send me                  19 to, like my grades weren't good enough. Like I couldn't                  20 get in. But all of a sudden, like, you know what I mean, I                  21 had like a 3.0 to get into St. Pius. So, you know --                  22 MALE FBI AGENT: Gotcha. So it sounds like                  23 you feel like you feel like he might have altered documents                  24 to make sure you got into St. Pius.                  25 THE WITNESS: Oh, yeah. Totally.</p>	Page 84	<p>1 else.                  2 MALE FBI AGENT: When you were at the                  3 Kirtland Air Force base for the shows, were you ever shown                  4 photographs?                  5 THE WITNESS: Yes. That's when I was shown                  6 photographs of other children, you know, to -- you know, to                  7 relax me to get me in the mood.                  8 MALE FBI AGENT: So it was at that location.                  9 So were you shown photographs at other locations, as well,                  10 to relax you?                  11 THE WITNESS: Yeah. Definitely at other --                  12 at the -- at the church and on camping trips and stuff, and                  13 altar boy retreats.                  14 FEMALE FBI AGENT: I know we keep asking                  15 about these pictures. Could you tell how old these                  16 pictures were? Like you know how sometimes they'll look                  17 weathered or --                  18 THE WITNESS: They looked from, you know, I                  19 guess, old to recent. You know what I mean? From like --                  20 I would say from like, you know, early seventies on through                  21 to the eighties, you know what I mean, kind of pictures.                  22 Just judging from hair styles and just -- just pictures.                  23 You know what I mean? The type of pictures, quality kind                  24 of thing.                  25 FEMALE FBI AGENT: And then did the type of</p>

Page 85	<p>1 picture --</p> <p>2 THE WITNESS: You know what I mean, because</p> <p>3 like --</p> <p>4 FEMALE FBI AGENT: -- ever change, like --</p> <p>5 THE WITNESS: Yeah. Because sometimes there</p> <p>6 was Polaroid.</p> <p>7 FEMALE FBI AGENT: Okay. That's -- okay.</p> <p>8 THE WITNESS: You know what I mean? Like</p> <p>9 the -- there was like old Polaroid-type instant pictures.</p> <p>10 And then there was like other -- like more the, you know,</p> <p>11 photograph has been developed pictures.</p> <p>12 FEMALE FBI AGENT: Like four-by-six</p> <p>13 glossy --</p> <p>14 THE WITNESS: Yeah. Yeah. That kind of</p> <p>15 picture.</p> <p>16 FEMALE FBI AGENT: Do you know anything</p> <p>17 about Bruckner now?</p> <p>18 THE WITNESS: No.</p> <p>19 FEMALE FBI AGENT: Where he is?</p> <p>20 THE WITNESS: I have no knowledge of his</p> <p>21 whereabouts, nor do I want to.</p> <p>22 FEMALE FBI AGENT: And when was the last</p> <p>23 time you saw him?</p> <p>24 THE WITNESS: Earlier nineties. Like I</p> <p>25 think the last one we went on was like '95 or '96, just him</p>	Page 87	<p>1 FEMALE FBI AGENT: I know you said you last</p> <p>2 saw him in '98.</p> <p>3 THE WITNESS: That was the last time I saw</p> <p>4 him was in '98. And then, yeah, I kind of read about his</p> <p>5 case in the paper shortly after that, and that was that for</p> <p>6 me.</p> <p>7 THE WITNESS: What case did you read about?</p> <p>8 FEMALE FBI AGENT: He -- when he -- I guess</p> <p>9 after -- I didn't read too much into it. I don't know the</p> <p>10 details, but I know he got arrested that night and I know</p> <p>11 he had to go to court. And I think --</p> <p>12 FEMALE FBI AGENT: So it was the case</p> <p>13 stemming from that incident?</p> <p>14 THE WITNESS: Yeah. The case stemming from</p> <p>15 that incident. Yeah. So I don't know the details of that</p> <p>16 case, what exactly happened to him. I know he got</p> <p>17 arrested. Pretty much sure, slapped on the wrist. And</p> <p>18 that was it. I don't know the exact details because, I</p> <p>19 mean, the only reason I know of the case is because I was</p> <p>20 there that night. But I didn't follow it. You know what I</p> <p>21 mean? I went to my own court day, got dismissed, and that</p> <p>22 was it. I -- yeah, I -- because I was -- like I didn't</p> <p>23 do -- you know, I was more concerned with my own -- I was</p> <p>24 trying to keep my record clean because I was trying to get</p> <p>25 various different jobs, which has and hasn't always worked</p>
Page 86	<p>1 performing mass and me kind of avoiding mass with my</p> <p>2 family. But I didn't -- I didn't leave -- you know what I</p> <p>3 mean? I didn't get out of going to church completely until</p> <p>4 I was like well into my twenties as an adult where just --</p> <p>5 you know, I was like, "Mom, I'm not going," you know, kind</p> <p>6 of thing. So, yeah, I mean, I saw -- I saw him like after</p> <p>7 that. But, you know, after '91, '92, everything stopped</p> <p>8 for me because I just --</p> <p>9 FEMALE FBI AGENT: Do you think he would</p> <p>10 recognize you?</p> <p>11 THE WITNESS: I'm pretty sure. I mean,</p> <p>12 yeah.</p> <p>13 FEMALE FBI AGENT: What about Malloy?</p> <p>14 THE WITNESS: Oh, yeah. I'm sure they would</p> <p>15 recognize me. I mean, I've changed, but, I mean, I've -- I</p> <p>16 used to have a beard for 20 -- the last 20 years, but I</p> <p>17 shaved that off. And I'm pretty sure they'd recognize me.</p> <p>18 My facial features haven't changed much, other than I'm 44</p> <p>19 now and I'm not, you know, 9.</p> <p>20 FEMALE FBI AGENT: And Perrault, too?</p> <p>21 THE WITNESS: Yeah. Definitely, I think</p> <p>22 they would recognize me.</p> <p>23 FEMALE FBI AGENT: What about Malloy, do</p> <p>24 you --</p> <p>25 THE WITNESS: I had blond hair back then.</p>	Page 88	<p>1 out for me.</p> <p>2 FEMALE FBI AGENT: And Perrault, I know you</p> <p>3 had earlier mentioned you read about him in the newspaper.</p> <p>4 What is your knowledge of where he is today (inaudible)?</p> <p>5 THE WITNESS: As far as I know, he's</p> <p>6 currently locked up, I think. I mean, you guys had told me</p> <p>7 that he was locked away.</p> <p>8 FEMALE FBI AGENT: And I can confirm that he</p> <p>9 is.</p> <p>10 THE WITNESS: Yeah. That's actually a good</p> <p>11 sigh of relief, because like I said, I -- before I just</p> <p>12 thought -- you know what I mean, he was going to be -- like</p> <p>13 I said, you found him out of the country, that's where -- I</p> <p>14 thought he was going to be in some third-world country, you</p> <p>15 know, out and about doing his thing.</p> <p>16 FEMALE FBI AGENT: Prior to you reading</p> <p>17 about him in the newspaper --</p> <p>18 THE WITNESS: I had no knowledge of where he</p> <p>19 was.</p> <p>20 FEMALE FBI AGENT: Okay. Were you aware he</p> <p>21 had --</p> <p>22 THE WITNESS: I knew he left --</p> <p>23 FEMALE FBI AGENT: -- fled?</p> <p>24 THE WITNESS: Yeah. I knew he left the</p> <p>25 parish in '92. Because my parents in church, you know, he</p>

<p style="text-align: right;">Page 89</p> <p>1 was kind of (inaudible). You know what I mean? There was  2 an announcement in mass, and my mom told me about it. I  3 didn't go. And that he was gone in '92. And that was like  4 the last I had heard of him. I was like, oh, he's gone.  5 He went to go -- and I had heard rumors that, actually, he  6 was off in the Caribbean, but completely opposite of where  7 he was. But I had heard, you know, that's where they had  8 sent him. And, actually, I had heard other rumors that  9 Bruckner was out of the country. But I guess he's not.  10 He's still here in Albuquerque, but --  11 FEMALE FBI AGENT: Okay. And how do you  12 know he's still in Albuquerque?  13 THE WITNESS: I think either my lawyer told  14 me or you guys told me. I don't remember who. Said he was  15 still here, living. And Father Bob is still here, too. I  16 found out he's living down the street from me, supposedly,  17 or registered living -- I don't know if he's living there  18 or not. I was told by him that he's still registered as a  19 parish priest over at Queen of Heaven, which is not far  20 from my current house.  21 FEMALE FBI AGENT: Are there any other  22 priests or anyone else who ever abused you in this manner?  23 THE WITNESS: Just those three men.  24 FEMALE FBI AGENT: Sorry. I interrupted my  25 train of thought. Based on how you knew them or how -- you</p>	<p style="text-align: right;">Page 91</p> <p>1 wanted to keep quite and keep to themselves.  2 FEMALE FBI AGENT: And I know you had kind  3 of had some theories about what happened to #1  4 THE WITNESS: I mean, I wasn't like directly  5 threatened with like, you know, any type of violence, like  6 I will hurt you if you -- don't tell. But I was  7 definitely, you know, told, you know -- you know, we can  8 help you, things will go good for you. You know what I  9 mean? You can have a great life, you know, you can become  10 a priest, if that's your choice. Or, you know, we can help  11 you with certain things. You know what I mean? Or, on the  12 other hand, you know what I mean, things can go very badly  13 for you, kind of, is what I was told. You know what I  14 mean? You can -- you know, things can either go good or  15 very bad. You can have heaven or you can have hell, is  16 kind of what the offering kind of was. And it was like,  17 okay, don't really tell anybody.  18 And my thing, just, I didn't really want to tell  19 anyone just out of embarrassment and shame of the whole  20 thing. I just kind of didn't want -- didn't want anybody  21 to know. You know what I mean?  22 FEMALE FBI AGENT: That's, I think, a very  23 common --  24 THE WITNESS: Yeah.  25 FEMALE FBI AGENT: -- common thing. I had</p>
<p style="text-align: right;">Page 90</p> <p>1 knew these men pretty well, I would say, from your years  2 that you -- from like, well, 9 years old on.  3 THE WITNESS: Yeah. Being a student and an  4 altar server, I knew them fairly well.  5 FEMALE FBI AGENT: What do you think -- and  6 based on kind of what they told you about don't tell anyone  7 and the we're doing this in the name of God and you're  8 doing a great thing, what do you think they would do to  9 protect themselves?  10 THE WITNESS: The main thing to protect  11 themselves is secrecy. You know, don't tell anyone. Don't  12 tell your parents. Don't -- you know, just, you know, keep  13 this between us. You know, it's between me, you, and God,  14 and don't worry about it. I'll talk to God, and you're  15 set, you know. You have no sin to worry about. Nothing.  16 You know, you'll be fine. You know, I mean, don't -- don't  17 worry about it.  18 FEMALE FBI AGENT: Do you think they would  19 hurt anyone who would try to come forward or who would try  20 to get them into trouble?  21 THE WITNESS: I got that impression that  22 they would. I mean, you know, they were definitely  23 secretive about it. They didn't want -- they didn't want  24 anybody to know, you know what I mean, about any of it.  25 You know, it was kind of -- definitely something they</p>	<p style="text-align: right;">Page 92</p> <p>1 one more question, and I lost it. It must not have been  2 that important.  3 MALE FBI AGENT: You mentioned Father Malloy  4 took photographs. What photos did Father Malloy show you?  5 THE WITNESS: Father Malloy would show me  6 pictures of other boys touching themselves.  7 MALE FBI AGENT: What were the ages?  8 THE WITNESS: I would say 13 to 18, 17.  9 Young men, you know. Or even early twenties, I guess,  10 pictures of naked guys.  11 MALE FBI AGENT: Where did Father Malloy  12 keep these photographs?  13 THE WITNESS: He kept those with him, as  14 well, in a briefcase-type deal, like folder, carrier,  15 Trapper Keeper.  16 MALE FBI AGENT: Where would he show you  17 these photographs?  18 THE WITNESS: At wherever -- whatever  19 location we were at. Like at hotel rooms or in the car or,  20 you know, basically before the session or after. Usually  21 before.  22 MALE FBI AGENT: Were you ever at Father  23 Malloy's house?  24 THE WITNESS: Yes. By house, yeah, his --  25 yeah.</p>

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1 MALE FBI AGENT: The rectory or wherever he  
 2 (inaudible)?  
 3 THE WITNESS: The rectory, yeah. Where he  
 4 lived, yeah. Yes.  
 5 MALE FBI AGENT: Would he show you  
 6 photographs there?  
 7 THE WITNESS: Yes.  
 8 MALE FBI AGENT: Or videos?  
 9 THE WITNESS: Just photographs. No videos.  
 10 I was never shown any videos. Just videos were taken. But  
 11 I was never actually like -- well, not videos of -- I  
 12 was -- one time, yeah, I was shown like a porno movie, but  
 13 it wasn't like -- like, you know, it was like a  
 14 professional porno. It wasn't like a -- like any kids of  
 15 or anything. It was just an adult movie that was put on  
 16 when I was with Father Bruckner one time.  
 17 MALE FBI AGENT: And these photographs at  
 18 Malloy's house -- did you see any photographs -- sorry --  
 19 did you see any photographs at the rectory?  
 20 THE WITNESS: Yes. Sorry.  
 21 MALE FBI AGENT: And how were you shown  
 22 these photographs?  
 23 THE WITNESS: How was I shown these  
 24 photographs? Just kind of, you know, we'd be in the room  
 25 talking. I'd be drinking, ingesting other drugs, trying to

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1 loosen up, and, you know, it would be kind of a creep over  
 2 kind of thing, and, "Hey, check this out," photograph. You  
 3 know, "Do you think you'd be comfortable doing this with  
 4 me," kind of thing.  
 5 MALE FBI AGENT: Okay.  
 6 THE WITNESS: You know, because -- I mean,  
 7 they would tell me about it and be like -- you know, be  
 8 more like a show and tell, "Would you be willing to, you  
 9 know, do this," kind of deal. You know, "Would you be  
 10 willing to suck my dick," kind of thing, with a picture of,  
 11 you know, someone doing it to him or something like that,  
 12 kind of -- kind of is how it was presented to me. Like,  
 13 you know, as a -- as a -- and it was kind of also presented  
 14 to me as like, "Don't worry. See, I've got this picture of  
 15 this other guy. You know, this guy here is -- you know,  
 16 everything is fine. You know, there's nothing -- nothing  
 17 is going to happen to you. You're going to be -- you'll --  
 18 you'll be taken care of. You know, both spiritually and  
 19 everything else," so -- so that's kind of how it was done.  
 20 MALE FBI AGENT: I think you mentioned, too,  
 21 Father Malloy is the one that liked to collect semen in  
 22 jars.  
 23 THE WITNESS: Yes. Like they were like --  
 24 like they were like small jars, like baby food-style jars,  
 25 or just little jars. I don't know what specifically the

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1 contents that were in them before. But, yeah, like small  
 2 jars or glasses. Like he had a thing for wine glasses, as  
 3 well.  
 4 MALE FBI AGENT: For wine glasses, as well?  
 5 THE WITNESS: Yeah.  
 6 MALE FBI AGENT: What would he do with  
 7 these?  
 8 THE WITNESS: What would he do with them? I  
 9 don't know. I -- to be honest with you, he would like act  
 10 very -- I mean, he would be very -- like he would  
 11 photograph it and like collect it and be very -- just, you  
 12 know, very happy he got it. You know what I mean? Like,  
 13 yeah, like, you know, like a kid trick-or-treating. You  
 14 know what I mean? Like he got candy, like this --  
 15 MALE FBI AGENT: Yeah.  
 16 THE WITNESS: -- like he would take it home  
 17 with him. I don't know if he would, you know, play with it  
 18 or do -- what he would do with it. He's -- I know he  
 19 mentioned to me that he like -- mentioned that he liked the  
 20 taste of it during, you know, like -- he wanted me to come  
 21 in his mouth because he liked the taste of it. So I don't  
 22 know what he would do with it when he would take it with  
 23 him. But, yeah, sometimes he would just -- he would just  
 24 straight up buy it. You know what I mean? He's like,  
 25 "Here's this jar. Fill it, and here is 50 bucks." And

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1 that would be the end of that transaction. But some --  
 2 other times, he would want more. You know what I mean?  
 3 MALE FBI AGENT: Uh-huh. So he would take  
 4 it with him --  
 5 THE WITNESS: Yeah.  
 6 MALE FBI AGENT: -- wherever --  
 7 THE WITNESS: He would take it with him,  
 8 whatever. I don't -- what he did with it, I don't know.  
 9 MALE FBI AGENT: Okay.  
 10 FEMALE FBI AGENT: Do you recall any large  
 11 mirrors in the rectory?  
 12 THE WITNESS: Oh, yeah. There -- yeah,  
 13 there was like a big huge glass mirror case thing where the  
 14 altar boy robes and priest robes and stuff were. And then  
 15 he had a full-length mirror in his house.  
 16 FEMALE FBI AGENT: Okay. And "he" being --  
 17 THE WITNESS: In his bedroom.  
 18 FEMALE FBI AGENT: -- Bruckner?  
 19 THE WITNESS: Bruckner. Yeah. In the --  
 20 his bedroom mirror.  
 21 FEMALE FBI AGENT: And would he make you do  
 22 anything in front of this mirror?  
 23 THE WITNESS: Yeah. Like touch myself,  
 24 touch him.  
 25 FEMALE FBI AGENT: And would it


<p style="text-align: right;">Page 97</p> <p>1 purposefully -- what would the instructions be, I guess?  2 THE WITNESS: The instructions -- different  3 instructions for different -- I mean, different times. I  4 mean, sometimes, you know, you'd be on your knees in front  5 of the mirror performing oral sex, or he'd be touching me.  6 Or he'd be on the bed, you know, and he'd want you to be  7 facing the mirror so you could, you know, both see while  8 we -- you know, penetration anally or -- and stuff like  9 that.  10 FEMALE FBI AGENT: Anything else that you  11 can remember about the rectory that just kind of stands out  12 to you as kind of an unusual feature -- not unusual, but  13 just kind of a key component to these instances of abuse?  14 THE WITNESS: We're take -- there's -- under  15 Assumption there's like a bomb shelter-type room place.  16 FEMALE FBI AGENT: Okay.  17 THE WITNESS: There's -- under the church.  18 There's that. And there was actually in the rectory there,  19 there's -- there's a little room where -- it wasn't like a  20 hidden-type room. It was like they used to keep the  21 microphones and sound stuff for the choir. And then back  22 there was like the rectory where -- so like the priests had  23 everything. And there was also like a room like -- it was  24 like a hidden-type wall thing where they had like the safe,  25 a vault, where all the money would go in after collection</p>	<p style="text-align: right;">Page 99</p> <p>1 THE WITNESS: Oh, all different colors. I  2 mean, there -- I remember teal green, red, black, yellow --  3 like a golden yellow -- maroon.  4 FEMALE FBI AGENT: And he bought you silk  5 underwear, as well?  6 THE WITNESS: Yeah. He brought me a pair  7 of -- of like teal silk boxers one time that he wanted me  8 to wear for him, and --  9 FEMALE FBI AGENT: And then did -- I know we  10 talked about Bruckner's Speedos. Malloy, did he have any  11 unusual traits like that or --  12 THE WITNESS: No. I mean, he -- actually,  13 he would totally lose his priest garb and be in like  14 civilian clothes. He'd put on like a regular old  15 button-down shirt and like jeans and stuff. He would try  16 to like disguise himself as much as possible from being  17 Father Bob. He'd wear like hats and glasses and stuff.  18 You know what I mean? Try to be all as incognito as he  19 could. Like he -- yeah. He always changed his clothes.  20 Like he never -- Father Bruckner (inaudible). Father  21 Bruckner was always mister collar, black, unless he was  22 wearing a suit, but -- and he was always in his priestly  23 garb most of the time, like 90 percent of the time.  24 FEMALE FBI AGENT: Unless he was on Cochiti  25 Lake?</p>
<p style="text-align: right;">Page 98</p> <p>1 and all that stuff in there, as well.  2 FEMALE FBI AGENT: So he would abuse you in  3 these locations?  4 THE WITNESS: Yeah. He would start touching  5 you, and then it would progress, you know, over -- let's go  6 to my house, you know, across the street or to my office or  7 wherever it happened to be, depending on which time it was.  8 Like during the -- like during the school day, it would be  9 at his office in the rectory there (inaudible).  10 FEMALE FBI AGENT: With Perrault, you  11 mentioned he always had cigars with him; is that correct?  12 THE WITNESS: He liked to smoke cigars, and  13 he would bring me -- he would bring me baggies of cannabis.  14 And also -- he would also bring little bags of cocaine and  15 also alcohol with him.  16 FEMALE FBI AGENT: Any idea how he would get  17 the cocaine?  18 THE WITNESS: I have no idea where the  19 priests got their drugs from. They always had -- they --  20 yeah, they would always -- always have them.  21 FEMALE FBI AGENT: And Perrault was the one  22 who had the silk underwear.  23 THE WITNESS: Yeah.  24 FEMALE FBI AGENT: Was there specific color  25 or --</p>	<p style="text-align: right;">Page 100</p> <p>1 THE WITNESS: Yeah. Yeah. Unless -- unless  2 we got to the lake, then all that came off and it went --  3 like I said, it would start out, he'd be wearing like  4 normal swim trunks, and then those would come off. And  5 you're like, whoa, father, you must be hot. You're wearing  6 like a thong. Yeah. He would come out in black Speedos.  7 FEMALE FBI AGENT: Is there anything  8 important to you -- or maybe even not important -- anything  9 you think we should know that we haven't asked you or  10 haven't been over?  11 THE WITNESS: Nothing I can think of.  12 FEMALE FBI AGENT: Certainly, if something  13 comes up, you're --  14 THE WITNESS: Yeah. Definitely.  15 FEMALE FBI AGENT: -- welcome to call us  16 and --  17 THE WITNESS: Yeah. And you guys can call  18 me, too, if you need me to answer any -- clear anything up  19 or (inaudible) details or even, you know, show you where I  20 was (inaudible) kid or --  21 FEMALE FBI AGENT: I know I told you this  22 before, but I think your memory is very impressive as far  23 as being able to pinpoint years and locations and --  24 THE WITNESS: Yeah. I mean, well, those  25 were like the worst years of my life. I mean, I tried -- I</p>

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1 spent -- you know what I mean? I spent the rest of my time  
 2 trying to forget them. You know what I mean? Trying to  
 3 like overcompensate, as it were. I mean -- I mean, this  
 4 really doesn't have anything pertaining to the case. But I  
 5 remember my older brother, I -- I know he was abused. And  
 6 I know through his abuse, his, you know, sexual preference  
 7 became very risky, abusive, homosexual sex, which he still  
 8 engages in. And I, myself, kind of -- I mean, I  
 9 overcompensated, became a different -- took a totally  
 10 different path. I tried to get married. Several failed  
 11 relationships. I have two kids now. It hasn't been the  
 12 smoothest relationship ever. But, I mean, I tried to, you  
 13 know -- try -- I mean, I went to martial arts, I tried -- I  
 14 got into alcohol and drugs, but in a bad way. I was always  
 15 fighting, doing something stupid, to try to prove how macho  
 16 I was and that I wasn't gay. So that was just like the  
 17 dumbest thing ever. I was young. I don't know what I was  
 18 doing. And caused myself a lot of trouble over the whole  
 19 thing, just wrestling with my sexuality and all the things  
 20 that have happened to me when I was younger, just trying  
 21 to, you know, leave that behind and build a life and try to  
 22 be normal, which, I don't ever think I really actually  
 23 achieved normal. But that's a good thing for me. I try to  
 24 think outside the box, which is my success right now, so --  
 25 FEMALE FBI AGENT: Okay.

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1 IN RE: FBI Interview of #1  
 2  
 3 CERTIFICATE  
 4  
 5 I, DEBRA L. WILLIAMS, CCR, NM CCR #92, DO  
 6 HEREBY CERTIFY that the foregoing transcription was  
 7 prepared from a provided audio file, that the audio file  
 8 was reduced to typewritten transcription by KATHERINE  
 9 GORDON, and that the foregoing pages are a true and correct  
 10 transcription of the recorded proceedings, to the best of  
 11 our knowledge and hearing ability. The audio file was of  
 12 good quality.  
 13 I FURTHER CERTIFY that I am neither employed  
 14 by nor related to nor contracted with (unless excepted by  
 15 the rules) any of the parties or attorneys in this matter,  
 16 and that I have no interest whatsoever in the final  
 17 disposition of this matter.  
 18  
 19  
 20  
 21 DEBRA L. WILLIAMS, CCR  
 22 NEW MEXICO CCR #92  
 23 License Expires: 12/31/18  
 24 WILLIAMS & ASSOCIATES, LLC  
 25 1608 Fifth Street, Northwest  
 Albuquerque, New Mexico 87102



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1 THE WITNESS: I mean, I don't have any --  
 2 anything else, I mean, further.  
 3 FEMALE FBI AGENT: Well, then, I think we'll  
 4 shut off the recording, and then we'll talk about some -- I  
 5 know we previously talked about our victim advocate.  
 6 THE WITNESS: Oh, yeah.  
 7 FEMALE FBI AGENT: And so I'll give  
 8 (inaudible) about her and kind of --  
 9 THE WITNESS: Yeah, you told me.  
 10 FEMALE FBI AGENT: -- that stuff. So --  
 11 THE WITNESS: Because I'm going to have some  
 12 copayments with my new -- I was referred to a psychiatrist  
 13 to deal with my depression and anger and anxiety issues.  
 14 (Inaudible) of all the things they listed as wrong with me,  
 15 but --  
 16 (End of audio file).  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

State Court  
Complaint

11-26-18

JD 94 v. ADST et al

SECOND JUDICIAL DISTRICT  
COUNTY OF BERNALILLO  
STATE OF NEW MEXICO

FILED  
2nd JUDICIAL DISTRICT COURT  
Bernalillo County  
11/26/2018 11:08 AM  
James A. Noel  
CLERK OF THE COURT  
Latoya Grayes

JOHN DOE "94",

Plaintiff,

#6

v.

ARCHDIOCESE OF SANTA FE,  
OUR LADY OF ASSUMPTION PARISH,  
and SERVANTS OF THE PARACLETE,

Defendants.

**COMPLAINT FOR DAMAGES**  
**FOR CAUSING SEXUAL ABUSE BY PRIESTS,**  
**FAILURE TO PREVENT SEXUAL ABUSE BY PRIESTS,**  
**FOR THE SEXUAL ABUSE ITSELF, VOIDABLE TRANSACTIONS,**  
**AND RELATED CLAIMS**

Plaintiff, by and through his attorneys, states as his complaint:

1. Defendant Archdiocese of Santa Fe (hereinafter "Archdiocese" or "ADSF") is a New Mexico corporation with its principal place of business in Albuquerque, Bernalillo County, New Mexico and which operates facilities in central and northern New Mexico, including in Bernalillo County, and including schools and churches.
2. Defendant Servants of the Paraclete is a global religious order, and at the relevant times herein, was doing business in New Mexico. The Servants of the Paraclete infamously "treated" many pedophile priests from all over the United States, and released some of them directly into New Mexico communities.
3. Fr. Arthur Perrault arrived in 1966 at the Servants of the Paraclete facility in Jemez Springs, New Mexico, with unrestricted faculties, but with known psychosexual problems,

because Fr. Perrault had been credibly accused as determined by the Catholic Church of sexually abusing boys in Connecticut.

4. In 1966-1967, the Servants of the Paraclete and the Archdiocese of Santa Fe jointly operated the facility to include “treatment” for psychosexual problems of priests. At that time, the two Defendant entities maintained an on-going practice and verbal agreement to put pedophiles to work in New Mexico parishes and communities as part of their effort to help priests.

5. In 1967, the practice of placing pedophiles in local communities was documented in minutes taken at a meeting by one of the leaders of the Servants of the Paraclete at the time, Fr. John Feit.

6. Fr. Feit and the Archbishop Davis of the Archdiocese of Santa Fe jointly placed pedophile Fr. Arthur Perrault at St. Pius High School.

7. Fr. Feit, even though a supervisor at the Servants of the Paraclete, was at the time ‘on the run’ from the sexual assault and murder of a young female parishioner in McAllen, Texas, and hiding in the Paraclete facility in Jemez Springs.

8. Fr. Feit was convicted of murder in 2018, over sixty years after he committed the crimes, and he is currently in the prison system in Texas.

9. According to the minutes taken by Fr. Feit of a 1967 meeting involving the Archdiocese of Santa Fe and the Servants of the Paraclete, the two entities agreed specifically to not tell parishioners or other working priests in the Archdiocese about the potential danger to local children, when they supplied pedophile priests to New Mexican parishes.

10. Predicated and fueled by the total empowerment and impunity by his supervisors, the young pedophile Fr. Perrault then began his career at the Archdiocese of Santa Fe,

engaging in twenty-some years of sexually abusing boys and girls in New Mexico. He ruined the lives of at least over fifty New Mexican children, including Plaintiff herein in the early 1990's, and he is now awaiting trial in U.S. Federal District of New Mexico, for just a few of his rapes of area children that took place on the Kirtland Air Force base where Fr. Perrault was a chaplain in the Air Force.

11. In 1966 when Fr. Perrault was in Jemez Springs, the Servants of the Paraclete (and thus the Archdiocese) had been aware for well over a decade that pedophile priests are a grave danger to children, should never be around children without supervision, could not be treated, and even should be put on a deserted island in the Caribbean in order to protect children.

12. Years of raping of Plaintiff as a boy in Bernalillo County by three Catholic priests in the late 1980's and early 1990's, including Fr. Perrault, was the direct result of combined policies, procedures, and negligence of Defendants Servants of the Paraclete and the Archdiocese of Santa Fe.

13. Those policies, procedures and institutional negligence contributed to and caused the growth of a culture in the 1960's, 1970's, 1980's, and 1990's of unchecked and knowing sexual abuse of minors, and knowing cover-ups by Church leaders and bishops trying to keep it all secret, in order to avoid scandal.

14. Scandal would reduce the number of 'wallets in the pews', donations and gifts of cash and land, and otherwise hurt the bottom line, as well as perhaps damaging the Church's privileged place in society, and so the Church, even as a matter of centuries of Canon Law, sought to avoid such scandal. Defendants chose to promote policies of secrecy about, and protection for, the growing number of pedophiles in its midst in our State over a period of decades starting in the 1950's.

15. By the late 1980's and early 1990's, the three priests named in this lawsuit took boys and girls to sex parties, filmed them, gave kids drugs and alcohol, and acted with complete impunity and immunity, fearless of Archbishop Sanchez (their roommate for a number of years), and completely fearless of the law, (even going through the KAFB gates with the children in their cars).

16. Word spread among priests from the 1960's to 1990's that the criminal justice system did nothing about the steady stream of reports and complaints from parents or victims about the systemic sexual abuse of minors. Word also spread among priests and church officials that 'denying everything' usually worked, and the canonical rule allowing the use of "mental reservations" was *apropos* for selected use.

17. In Catholic dogma, the doctrine and practice of "mental reservations" allows lying in order to protect the Church, on the theory that the Church generally does good in the world, and needs to be protected from scandal so that it can be a force for good, so it is okay to lie about sexual abuse of kids by priests.

18. No one among the institutional Defendants told parents that altar boys in particular were at grave risk of harm as a result of these kinds of policies, and in fact, the institutions and parishes maintained the myth that altar boys were positions of honor and service in the organization, and that parents should be proud when their son was chosen by a priest to serve the priest and their God.

19. It took plaintiffs' civil attorneys bringing dozens of lawsuits in the 1990's in New Mexico, and thereafter in a steady stream of claims to date, to cause Defendants to try to address the problem of priests raping children, given years and years of concerted efforts at 'secrecy over scandal'. Those efforts by the institutions to address the twenty-five year crisis continue to date, as the United States Conference of Catholic bishops are meeting

and discussing these very issues once again, even as this case is being prepared for filing in November, 2018.

20. Defendant Our Lady of Assumption Parish is a New Mexico corporation with its principal place of business in Bernalillo County, New Mexico, which was officially formed after the alleged sexual abuse occurred, either (a) as recognition that the parish has all along functioned as an administrative sub-entity of the Diocese for many years, collecting money for the Diocese on a weekly basis, paying its own debts and bills, supervising parish employees and officials, and otherwise functioning as if it were legally incorporated under New Mexico law, and therefore in position to today accept predecessor liability independent of the Archdiocese, or (b), in order to attempt to shield assets in any future claims against the Archdiocese or even in any bankruptcy case that might ever occur.

21. While churches including Defendants do not pay taxes, and generally hold civil law in disdain, churches including Defendants do not hesitate to use civil law to their advantage in order to shield assets, and when deemed advantageous, even use the Federal Bankruptcy system for protection; at least 18 Catholic dioceses have done so around the country as of 2018, although it is not clear if Catholic diocesan bankruptcies are motivated to protect assets or to protect documentation regarding the scope of their complicit cover-up of widespread sexual abuse of children.

22. A priest functions as a corporate officer of the Parish, and prior to the official corporate formation of the parish, simultaneously functioned as the agent for the *de facto* sub-entity parish, and as agent for the Diocese, with substantial power over the lives of parishioners, and extraordinary power over children.

23. Fr. Ronald Bruckner and Fr. Arthur Perrault, as parish priests, functioned in the 1980's as the manager of wealthy Parishes, and as agents for the Diocese, while they were

raping Plaintiff.

24. Fr. Ronald Bruckner and Fr. Robert Malloy also were school teachers and administrators at Our Lady of Assumption where Plaintiff went to middle school while they were raping him.

25. Plaintiff resides in Bernalillo County, NM.

26. Defendant Fr. Arthur Perrault is currently housed in pre-trial detention in Bernalillo County.

27. Defendant Fr. Ronald Bruckner currently resides in Bernalillo County.

28. Defendant Fr. Robert Malloy currently resides in Bernalillo County, and upon information and belief, even lives in a rectory in Albuquerque near a parish school.

29. Upon information and belief, not all of these three priests are laicized, and all still receive monthly financial support from the Archdiocese priest pension fund or well-placed parishioners with money.

30. Plaintiff was a victim of childhood sexual abuse perpetrated by these three priests of the Archdiocese in the late 1980's and early 1990's, from age 10-16.

31. Fr. Ronald Bruckner first abused Plaintiff as part of his training as an altar boy. After raping the boy for a few years under the guise of normal altar boy duties, Fr. Bruckner's roommate and assistant pastor at Our Lady of Assumption, Fr. Robert Malloy, also began abusing Plaintiff. Fr. Arthur Perrault later also began sexually abusing Plaintiff from about age 13-16. The three rapists were all regularly abusing Plaintiff over a six year period.

32. The three rapists were very familiar with each other's conduct with Catholic children and teens generally, and specifically as to Plaintiff, as was their Archbishop.

33. The sexual abuse by all three priests occurred on church properties and rectories,

on Federal lands including Kirtland Air Force Base, on camping trips, in cars and in various other locations in and around New Mexico.

34. In the late 1980's and early 1990's, pedophile priests acted as agents of the Archdiocese, which actively aided their agency relationship, empowering them over minor parishioners, over altar boys, and over parochial school children like Plaintiff, even granting priests *extraordinary and substantial* power over the lives of parishioners, particularly children, and especially over Plaintiff.

35. Years of childhood sexual abuse destroyed Plaintiff's religion, rendered his soul veritably shredded, and caused him great psychological harm. By age 16, in order to survive, Plaintiff ran away from St. Pius Catholic High School, where he was essentially a prisoner of constant sexual exploitation by these three protected criminals, and lived homeless as a runaway in the east mountains for a period of time.

36. His rapists and abusers were not only priests, but Fr. Malloy was the chaplain at APD at the time he was abusing Plaintiff, while Fr. Perrault was the chaplain at Kirtland Air Force Base during those years, and while Fr. Bruckner was a chaplain with the New Mexico National Guard.

37. In order to survive this onslaught by men in triple positions of power over his life, (priests/teachers/principals/military or law enforcement personnel), and as a childhood coping device, Plaintiff suppressed everything as a child with drug abuse, minimization, compartmentalization, and other forms of denial, and he told no one about the organized, systematic sexual abuse and exploitation by these priests, until 2018, when his psychological 'house of cards' collapsed upon news of the Federal Government's recent arrest and extradition of Fr. Perrault, leaving Plaintiff currently under the care of psychiatric professionals.

38. Plaintiff's childhood coping skills of suppressing any processing of the childhood sexual abuse gave way in the year 2018. The 2018 realizations caused Plaintiff to now obtain professional therapeutic help regarding the abuse for the first time, as a result of the delayed psychological reactions to the sexual abuse by these Archdiocesan agents. Plaintiff is only now realizing and connecting the harms caused to him by the actions and inactions of Defendant and its agents in causing his harms.

39. Plaintiff did not know the extensive involvement of the Archdiocese in empowering and protecting its pedophile priests that existed by the late 80's and early 90's, until 2018. Plaintiff could not have known or discovered the direct liability of Defendants until 2018, just as an asbestosis patient could not possibly understand the link between exposure to asbestos decades earlier and his current medical problems.

40. On the other hand, Defendants have long understood and have documented the phenomena of children suppressing psychological harms and not properly processing unless with professional help any effects of being sexually abused as a child, and know that in many cases, children cannot come forward seeking help and accountability until thirty, forty, fifty, or even sixty years later.

41. Because the true nature of Plaintiff's injury is inextricably entangled with the skepticism of the general public regarding the widespread nature of priest abuse in the Archdiocese and the extent of the cover-up by Church officials, and because the Defendants' policies of institutional secrecy and evasion of transparency promoted that skepticism by preventing the disclosure of documents to the general public, Plaintiff himself has not yet realized the nature of his injury, even with the early help of professionals.

42. Plaintiff cannot realize the true nature of his injury without Defendants' full

disclosure of documents to State officials and New Mexicans, establishing that a cover-up of widespread sexual abuse and exploitation of minors by ADSF priests did in fact occur over many recent decades in our state.

43. The policies of secrecy, and the institutional failures to find and help priest abuse victims over several decades, caused Plaintiff harm and delayed his ability to come forward and seek help for over 25 years to the present, and only now as a matter of therapeutic need.

44. The sexual abuse of Plaintiff by the Defendants' priests caused Plaintiff harm.

45. The institutional failures to protect Plaintiff from known pedophile priests caused Plaintiff harm.

46. The institutional secrecy policies to avoid scandal (and to not find and help victims when the Church knew there were plenty of both victims and pedophile priests 'out there' from the late 80's forward), so empowered these three pedophile priests that with brazen impunity, they 'partied' with booze and drugs and their 'boy toys' (like altar boys), had the children (both boys and girls) provide sexual performances (some of which were even filmed), and in so doing, not only caused Plaintiff great harm, but also prevented him from realizing the source of his harm until 'breaking down' in 2018. Plaintiff was instead saddled for twenty-five years with unexplained anxiety, depression, suicidal ideation, drug issues, judgment issues, impulse control issues, anger management issues, and assorted psychological and physiological issues caused by the hundreds of rapes of his body and his soul.

47. The Archdiocese of Santa Fe, particularly through the direct knowledge of Archbishop Sanchez at the time Plaintiff was chosen to be an altar boy, knew there were numerous pedophiles in its midst, and certainly had a great deal of such knowledge well before Plaintiff was abused in the late 1980's and early 1990's. Indeed, a number of other

pedophile priests were assigned to teach at catholic schools both before and after the abuse of Plaintiff at Assumption and St. Pius, by an organization that knew these priests were sexually abusing children, but with a blind eye propagated the myth that priests were ontologically different than regular human beings, and were between parishioners and God on a different plane of existence.

48. By the late 1980's, Archbishop Sanchez was fully aware that Fr. Bruckner, Fr. Malloy, and Fr. Perrault were raping and abusing kids, but could do nothing to stop it, in part because these and many other pedophile priests in this Archdiocese all possessed compromising information on the Archbishop's own sexual proclivities and misconduct, which they threatened to use against him, if necessary.

49. Knowing of this grave and severe risk of harm to children, the Defendants had a duty to take reasonable steps to ensure that they did not hire or retain pedophile priests who would pose a danger to children, and to take reasonable steps to supervise all priests.

50. The Defendants breached this duty in this case, and in the cases of hundreds of other kids, who are now adults.

51. Knowing of this risk, the Defendants had a duty to adequately supervise all of the priests that they hired/employed, to ensure that those priests properly performed their duties, exhibited no warning signs of possible pedophilia, and that those priests did not have high-risk unsupervised contact with minors. This duty existed regardless of any particular knowledge or suspicions of pedophilia regarding any individual priest at any moment in time, because Defendants knew there were pedophiles in their midst. The Defendants should not have had to learn of such duties from civil lawyers over the past twenty-five years, while feigning ignorance during a quarter of a century of litigation regarding the number of pedophile priests in its midst, and their own protections of them.

52. The Defendants breached this legal duty to supervise.
53. Defendants owed a legal duty to hire, supervise and retain priests who would not molest and harm minors, and Defendants breached this duty.
54. The Defendants had a duty to protect minors from abuse by priests in its many parishes and missions.
55. The Defendants breached this duty.
56. The Defendants had a duty to keep the premises of its parishes and missions safe for use by Plaintiff and other parishioners.
57. The Defendants breached this duty.
58. The Defendants' knowledge of the deference to priests ingrained in Catholic minors by their upbringing in the Church encouraged and facilitated the sexual abuse of those Catholic minors, including Plaintiff, and that priests exploited that blind trust and deference to priests taught to children by the Defendants.
59. The extraordinary power of priests over the lives of Catholic children was much more complete and pervasive than the power of a prison guard over an adult serving a term of specific time in a correctional facility for a crime.
60. Defendants allowed and encouraged extraordinary powers in the priests over the parishioners and children, taught parishioners and children to always obey priests, and as such had heightened duties to help protect parishioners and children, but chose to completely ignore and abrogate those common sense, common law duties, in favor of protecting Catholic institutions.
61. The Defendants' priests knew that Catholic minors were trained to give unquestioning obedience to priests, particularly at schools operated out of their parishes, and exploited this trained obedience for sexual gratification, with total impunity.

62. The scope of the Defendant's employment of priests, and the manner in which his agency was aided by Defendants, allowed unfettered access to minors, and gave them extraordinary power over minors, including Plaintiff, who had no chance against these predatory priests when his parents sent him with pride to be an altar boy in the mid-1980's.

63. The Defendants imbued priests (and especially those who taught or administered schools) with unchecked powers over Catholic children and teens, which caused situations where sexual abuse flowed therefrom.

64. For example, Fr. Malloy was able to put notes on the inside of Plaintiff's high school locker demanding sexual acts, even though Plaintiff never gave his combination out to anyone.

65. The institutional Defendants never reported Fr. Perrault, Fr. Bruckner or Fr. Malloy to law enforcement for their crimes.

66. The institutional Defendants instead helped Fr. Perrault escape and flee the country to avoid law enforcement in the early 90's, and minimized and whitewashed their reporting of the conduct of Fr. Bruckner and Fr. Malloy even to their own "Review Boards" in the 90's and 2000's.

67. The Defendants granted priests extraordinary power over parishioners, and particularly children, and even more particularly over young Catholic children, in at least the following ways:

- 1) Priests were to maintain a continuity of interaction with parishioners, children and altar servers, not confined by particular "business hours" or anything else, so that parents did not find it unusual for altar boys to be called upon late into the evenings, or on trips;
- 2) Parishioners, children and altar servers were instructed to obey and revere the

priests, and the priests were taught to cultivate that obedience and reverence in order to facilitate discipline, counseling, teaching, educating, and other areas not involving specific religious beliefs;

- 3) An extreme “credibility gap” existed between priests and children parishioners, which priests cultivated, noted and reminded others about, including victims of sexual abuse, and Plaintiff herein was often reminded he could tell no one about what was happening, and no one would believe it anyway;
- 4) Defendants knew that viewing the priest through the eyes of the child or altar server, there existed reasonable perceptions by the child that the priest was imbued with authority over him or her (not necessarily as a religious belief matter, but as a supervisory matter, as teacher, counselor, guide, disciplinarian, school administrator, etc.); and
- 5) Defendants knew that using vestments, cloaks, wine, rituals, and intermingling religious rhetoric with physical closeness with children, that minors would be more subject to the extraordinary powers priests held, yet did not protect kids from their priests.

68. Adherence to these policies and practices of secrecy, and empowerment and protection of priests, was more important to the Defendants than warning parishioners of sexually abusive priests in their midst, which would have promoted safety and accountability for children.

69. As a direct and proximate result of childhood sexual abuse at the hands of the Archdiocesan priests, and the Defendants’ historical protection and empowerment of abusers, Plaintiff suffered and continues to suffer extreme harm.

70. Any statute of limitations in New Mexico begins running in 2018 with the rise and

discovery of this current therapeutic need in a professional setting, and discovery of the conduct of Defendants herein.

71. The harm and suffering of many victims, including Plaintiff, could have been at least partially alleviated or ameliorated by earlier professional intervention, which the Defendants' policies of secrecy and non-disclosure of documents and information to the public prevented from the early 1990's until very recent small steps towards accountability. As such, the Defendants have at the very least exacerbated harms to Plaintiff and many other adult survivors by maintaining those policies and procedures and by aiding the conduct of their priests throughout.

72. Such policies have caused a public health problem of enormous magnitude in our State.

73. The ripple effects of the childhood sexual abuse on so many New Mexican kids includes years of emotional, legal, employment, and assorted problems in the adult lives of several generations of Catholic families.

74. Plaintiff is entitled to all compensation allowable under New Mexico jury instructions for harms caused by Defendant and their priests, including punitive damages.

75. The Defendants are also responsible for any punitive damages awarded by juries against the Archdiocese or its Parishes for institutional conduct knowingly taken to protect and empower pedophile priests.

76. The Archdiocese is legally responsible for punitive damages for the harms caused by its pedophile priests on ADSF premises, even if assets have been "moved" to a land trust or other legal entities or a parish (set up as its own corporation since 2012), in an attempt to shield assets from juries.

77. Plaintiff is entitled to access any funds or properties that have been "moved" to land

trusts or parish corporations or other sham entities, to pursue compensation.

78. Defendant's own investigations were kept secret from the parishes, as well as from law enforcement, over the relevant decades.

79. By failing to inform parishioners, civil authorities, or the general public of the child sexual abuse perpetrated by their clerics, the Defendants have knowingly engaged in conduct injurious to the health, safety, and welfare of large numbers of the public – particularly minors, but including adult survivors of childhood sexual abuse as well.

80. These policies and practices of non-disclosure, which were knowingly created and are knowingly maintained by the Defendants, are injurious to the health, safety, and welfare of large numbers of the public at all times and under all circumstances, and thus constitute a *nuisance per se*.

81. Plaintiff is entitled to equitable abatement of Defendants' policies and practices allowing the non-disclosure and non-prosecution of clergy credibly accused of sexual contact with minors, and seeks the release of documents to the public, through the Office of the Attorney General or otherwise through civil courts, or even Bankruptcy Court, to wit:

- a. documents that show the Church stopped or dissuaded potential prosecutions;
- b. documents that show the Church prevented or dissuaded HSD/CYFD investigations of priests;
- c. documents that show the Church protected priest abusers and themselves from scandal, at the expense of victims, and at the risk of harming future victims, which this case is a good example of;
- d. documents that show the Church fought for a harsh Statute of Limitations in the 1990's to cut off all claims by victims, and still does not support a new, open era of

- “No Civil Statute of Limitations” for all New Mexicans raped by priests; and
- e. various timelines that show the extent of abuse by credibly accused priests from 1950-2018, (with victims’ names redacted), and the extent of institutional knowledge acquired from the handling of all of its cases in each year, and that the sexual abuse of children was occurring on a large scale.

**COUNT I  
PUBLIC NUISANCE**

Plaintiff re-alleges the facts and allegations set forth above, and adds:

82. The Defendants knowingly created and maintained numerous policies and practices of cover-up and secrecy that are injurious to the health, safety, and welfare of large numbers of the public, including minors and adult survivors of childhood sexual abuse.

83. This conduct by the Defendants constitutes a public nuisance.

84. In the past, this conduct by the Defendants proximately caused Plaintiff’s abuse, and in the present, this conduct by the Defendants continues to cause harm to Plaintiff, and other known and unknown adult survivors of child sexual abuse living in New Mexico.

85. The conduct of Defendants was willful, intentional, wanton, and/or taken in utter disregard of the safety and wellbeing of others, including Plaintiff, and subjects the Defendants to punitive damages.

WHEREFORE, Plaintiff requests abatement of Defendants’ conduct, policies, and practices constituting public nuisance (including disclosure of documents to the public as described above), and for such other and further relief as this Court may deem appropriate.

**COUNT II  
NEGLIGENCE**

Plaintiff re-alleges the facts and allegations set forth above, and adds:

86. The Defendants had and continue to have numerous duties to prevent their conduct or the conduct of their priests from harming people, including Plaintiff, and the Defendants breached these duties, resulting in damage to Plaintiff, all as described in the above paragraphs.

87. The Defendants are directly liable for their own institutional negligence in supervision, retention, hiring, training and for consciously empowering priests to act with impunity, and as if state laws are inapplicable to them.

88. The conduct of Defendants was willful, intentional, wanton, and/or taken in utter disregard of the safety and wellbeing of others, including Plaintiff, and subjects the Defendants to punitive damages.

WHEREFORE, Plaintiff requests judgment for tens of millions of dollars against the Defendants or in any amount reasonable to compensate for damages, including punitive damages, for interest including pre-judgment interest, costs, and such other and further relief as this Court may deem appropriate, including the release of documents as described above.

**COUNT III  
VICARIOUS LIABILITY FOR SEXUAL BATTERIES  
COMMITTED BY FR. BRUCKNER, FR. MALLOY AND FR. PERRAULT**

Plaintiff re-alleges the facts and allegations set forth above, and adds:

89. The criminal sexual contact and criminal sexual penetration of Plaintiff by the three priests described above constitute hundreds of sexual batteries as contemplated by New Mexico law.

90. The sexual batteries were unconsented as a matter of law.

91. The New Mexico Statute of Limitations for civil claims contemplates bringing such claims, and all the claims in this lawsuit, within three years of Plaintiff's discovering of the connections between the childhood sexual abuse (proximately caused by all Defendants), and the harms caused by the abuse, with the help of licensed therapists.

92. The sexual abuse of Plaintiff by the Defendant's priests constituting batteries, among other torts, was within the course and scope of their employment by the Defendants, or was the result of the agency relationship aided by Defendants.

93. The Defendants are vicariously liable for the conduct of the priests who abused Plaintiff.

94. The conduct of Defendants was willful, intentional, wanton, and/or taken in utter disregard of the safety and well being of others, including Plaintiff, and subjects the Defendants to punitive damages.

WHEREFORE, Plaintiff requests judgment for tens of millions of dollars against the Defendants or in any amount reasonable to compensate for damages, including punitive damages, for interest including pre-judgment interest, costs, and such other and further relief as this Court may deem appropriate, including the release of documents as described above.

**COUNT IV  
INTENTIONAL INFLICTION  
OF EMOTIONAL DISTRESS**

Plaintiff re-alleges the facts and allegations set forth above, and adds:

95. The past and present conduct of the Defendants regarding childhood sexual abuse perpetrated by its priests, constitutes intentional infliction of emotional distress on all victim-survivors, including Plaintiff.

96. As a direct and proximate cause of Defendants' conduct, Plaintiff has suffered and

will continue to suffer damages.

97. The conduct of Defendants was willful, intentional, wanton, and/or taken in utter disregard of the safety and wellbeing of others, including Plaintiff, and subjects the Defendants to punitive damages.

WHEREFORE, Plaintiff requests judgment for tens of millions of dollars against the Defendants or in any amount reasonable to compensate for damages, including punitive damages, for interest including pre-judgment interest, costs, and such other and further relief as this Court may deem appropriate, including the release of documents as described above.

#### **COUNT V VOIDABLE TRANSACTIONS**

Plaintiff realleges the facts and allegations set forth above, and adds:

98. Plaintiffs in many cases against the Archdiocese (including the Plaintiff in this case) have alleged a right to compensation from the Archdiocese for damages suffered from childhood sexual abuse perpetrated by Defendant's agents. Although this right to compensation is disputed by the Archdiocese, it constitutes a claim under New Mexico's fraudulent/voidable conveyance laws.

99. As such, the Plaintiffs in these cases against the Archdiocese (including the Plaintiff in this case) are creditors of the Archdiocese for purposes of the New Mexico's fraudulent/voidable conveyance laws, and the Archdiocese a debtor for the purposes of those same laws.

100. Beginning in 2012 (understanding its vulnerability to institutional liability and public nuisance claims, and in anticipation of a new wave of claims of childhood sexual abuse by its priests), the Archdiocese began the process of incorporating its individual

parishes as separate entities, and transferring Archdiocese corporate assets either into these newly created corporations, or into other “trusts” and “funds” under Defendant’s control.

101. Beginning in 2013 (understanding its vulnerability to institutional liability and public nuisance claims, and in anticipation of a continual wave of claims of childhood sexual abuse by ADSF priests), the Archdiocese created a Real Estate Trust and transferred hundreds of ADSF real estate parcels to the Archdiocese of Santa Fe Real Estate Corporation (Archdiocese Real Estate Corporation), which was designated as Trustee of the Real Estate Trust. The Archdiocese Real Estate Corporation shares a physical address with the corporate entity of the Archdiocese of Santa Fe.

102. The purpose of transferring these substantial assets to the newly incorporated parishes and the Archdiocese Real Estate Corporation (or other similarly used sham corporations and entities, such as a “Cemetery Fund”), was to shield assets from possible future creditors, including victims of sexual abuse. Defendants have resolved hundreds of claims of sexual abuse of minors by its priests over the past 25 years for tens and tens of millions of dollars, according to its own published “letters to the people”.

103. Upon information and belief, a comparison of the financial statements of the Archdiocese of Santa Fe before and after these transfers in 2012 and 2013 could show that the Archdiocese drastically reduced its own corporate assets, for no apparent purpose but shielding assets from possible future creditors, including Plaintiff.

104. The Archdiocese transferred virtually all of its corporate assets to the newly incorporated parishes and the Archdiocese Real Estate Corporation (in 2012 and 2013 respectively), or other entities created for this same purpose.

105. While taking steps to indicate independence on paper, the Archdiocese retains absolute control over the individually incorporated parishes and the Archdiocese Real Estate Corporation, and any other entity it has created for this same purpose.
106. Archdiocese Chancellor and Vicar General serve as listed Officers for the individually incorporated parishes, and the Chancellor serves as a Director for the individually incorporated parishes.
107. The "Presidents" of the individually incorporated parishes are all Archdiocese priests who answer directly to the Archbishop of Santa Fe, and have no authority to operate as clerics in the Archdiocese without the Archbishop's permission.
108. The Archbishop of Santa Fe serves as the Chairman of the Board of the Archdiocese Real Estate Corporation, which as Trustee for the Real Estate Trust has unilateral ultimate authority over the disposition of "Real Estate Trust" Assets.
109. Archdiocese transfers of its corporate assets to the individually incorporated parishes and the Archdiocese Real Estate Corporation, or other similarly functioning entities, were made for the primary purpose of shielding those assets from creditors like Plaintiff.

WHEREFORE, Plaintiff requests that Defendant Archdiocese's transfers of assets to the individually incorporated parishes and the Archdiocese Real Estate Corporation, or similar such entities, be deemed "voidable transactions" after discovery and briefing and upon pre-trial motion, and under New Mexico's fraudulent/voidable conveyance laws, that appropriate equitable relief be devised to protect Plaintiff's claims until such time as the Defendant's debt to the Plaintiff may be properly ascertained by jury trial(s), either in this Court or pursuant to some Bankruptcy proceeding, and for any other relief this Court may deem just and proper.

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