



(For purposes of these requests, sexual contact means any one of the following: any contact between two or more persons by penetration of the penis into the anus, contact between the mouth and genitalia or contact between the finger or hand of one person and the genitalia or anus of another person, fondling or touching the person's pubes or genitals, fondling or touching the inner thigh, groin, buttock, anus, touching the clothing covering the immediate area of the inner thigh, groin, buttock or anus, soliciting or permitting a person to fondle or touch the inner thigh, groin, buttock or anus of the person).

REQUEST NO. 1: Admit you have had improper sexual contact with minors under the age of majority.

RESPONSE: Objected to for the reason it would have no relevancy in this proceeding; has no specifics as to time and place; and such Interrogatory would raise issues relating to the 5th Amendment of the United States Constitution and similar provisions of the Iowa Constitution.

REQUEST NO. 2: Admit that you have had improper sexual contact with the Plaintiff in this case while he was under the age of 18.

RESPONSE: Denied

REQUEST NO. 3: Admit that you have had improper sexual contact with the Plaintiff in this case when he was younger than 14 years of age.

RESPONSE: Denied

REQUEST NO. 4: Admit that you performed an oral sex act on the Plaintiff in this case while he was younger than 18 years of age.

RESPONSE: Denied

REQUEST NO. 5: Admit that from 1948-1990, you were a paid employee, serving as a priest within the Diocese of Davenport, as a moral and spiritual leader of members of the Diocese.

RESPONSE: Admit to being a priest within the Diocese, but the "moral and spiritual" leader is governed by Canon Law, thus any further response is objected as the First Amendment to the Constitution prohibits this inquiry

REQUEST NO. 6: You have admitted to other people that you have had improper sexual contact with the Plaintiff in this case while he was under the age of 18.

RESPONSE: Denied

REQUEST NO. 7: You have had improper sexual contacts with more than ten male members of parishes within the Davenport Diocese under the age of 18.

RESPONSE: See Response to RFA #1

REQUEST NO. 8: You have had sexual contacts with minors at a parish where you served as a pastor.

RESPONSE: See Response to RFA #1

REQUEST NO. 9: As an adult, you have had sexual contacts with minors.

RESPONSE: Denied

REQUEST NO. 10: Sexual contact by you with a minor is wrong.

RESPONSE: See Response to RFA #1

REQUEST NO. 11: Sexual contact by you, as an adult priest, with a minor injures that minor.

RESPONSE: Denied because use of the word "you" assumes guilt on the part of this Defendant; and even then the word "injures" would be subject to different interpretations

REQUEST NO. 12: As a parish priest, you exert emotional control over minor members of the parish that look to you for educational and spiritual leadership.

RESPONSE: Denied since "emotional control" is not part of a priest's exertion

REQUEST NO. 13: As a parish priest, you hold yourself out as a devoutly religious holy man.

RESPONSE: Denied

REQUEST NO. 14: As a parish priest, you hold yourself out as a spiritual advisor to the minor members of the parish.

RESPONSE: Denied since minors do not generally come to a priest in an advisory role

REQUEST NO. 15: As a parish priest, you are to lead a priestly life and set an example for minor aged members in developing their religious beliefs.

RESPONSE: There are many responsibilities for the parish priest imposed by The Code of Canon Law. Any further answer is objected to if this refers to the provisions and definitions of Canon Law, the First Amendment to the Constitution prohibits this inquiry

REQUEST NO. 16: Your religion and your belief is that you are Christ's example of spiritual leadership to the members of your parish.

RESPONSE: See Response to RFA #15

REQUEST NO. 17: Any sexual contact by you as a priest with anyone is a violation of your sacred vow of celibacy.

RESPONSE: See Response to RFA #15

REQUEST NO. 18: You have violated your vow of celibacy.

RESPONSE: See Response to RFA #15

REQUEST NO. 19: You are a pedophile.

RESPONSE: Denied

REQUEST NO. 20: You had sexual contacts with a minor member of St. Paul the Apostle Parish in Davenport, Iowa, while you were an assistant pastor there.

RESPONSE: Denied

REQUEST NO. 21: You had sexual contacts with a minor member of St. Paul Parish in Burlington, Iowa, while you were an assistant pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 22: You had sexual contacts with a minor member of St. Irenaeus Parish in Clinton, Iowa, while you were an assistant pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 23: You had sexual contacts with a minor member of St. Joseph Parish in East Pleasant Plain while you were an assistant pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 24: You had sexual contacts with a minor member of Sacred Heart Parish in Newton, Iowa while you were an assistant pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 25: You had sexual contacts with a minor member of St. Michael Parish in Holbrook while you were a substitute pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 26: You had sexual contacts with a minor member of St. Patrick Parish in Delmar, Iowa, while you were the administrator there.

RESPONSE: See Response to RFA #1

REQUEST NO. 27: You had sexual contacts with a minor member of St. Mary's Parish in Davenport, Iowa, while you were an assistant pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 28: You had sexual contacts with a minor member of St. Joseph's Parish in Fort Madison, Iowa, while you were an assistant pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 29: You had sexual contacts with a minor member of St. Joseph's Parish in Sugar Creek, Iowa, while you were a pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 30: You had sexual contacts with a minor member of St. Mary's Parish in Bryant, Iowa, while you were a pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 31: You had sexual contacts with a minor member of St. Anthony's Parish in Davenport, Iowa, while you were a co-pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 32: You had sexual contacts with a minor member of Ss. Philip & James Parish in Grand Mound, Iowa, while you were a pastor there.

RESPONSE: See Response to RFA #1

REQUEST NO. 33: You told John Doe III that if you had sexual contact with him, it would help him develop trust in you.

RESPONSE: Denied

REQUEST NO. 34: Admit that complaints about sexual contact between you and minors under the age of majority were received by the Diocese of Davenport before January of 1964.

RESPONSE: Denied for lack of information

REQUEST NO. 35: Admit that complaints about sexual contact between you and minors under the age of majority were received by you before January of 1964.

RESPONSE: Denied

REQUEST NO. 36: You have shown sexually explicit movies to minor age boys under the age of 18.

RESPONSE: Denied

REQUEST NO. 37: You have attended sexually explicit movies with minor age boys under the age of 18.

RESPONSE: Denied

REQUEST NO. 38: You have supplied alcohol to minor age boys under the age of 18.

RESPONSE: Objected to as irrelevant to any of the issues involved in this suit

REQUEST NO. 39: You have encouraged boys under the age of 18 to smoke.

RESPONSE: Objected to as irrelevant to any of the issues involved in this suit

REQUEST NO. 40: You have supplied cigarettes to boys under the age of 18.

RESPONSE: Objected to as irrelevant to any of the issues involved in this suit

REQUEST NO. 41: You have placed the penis of a minor aged boy under the age of 14 in your mouth.

RESPONSE: Denied

REQUEST NO. 42: You have had a minor aged boy under the age of 14 place his lips on your penis.

RESPONSE: Denied

REQUEST NO. 43: You have instructed a minor aged boy under the age of 14 to move his head up and down and suck on your penis while he was doing so.

RESPONSE: Denied

REQUEST NO. 44: You have been involved in group sexual acts with boys under the age of 18, including mutual masturbation.

RESPONSE: Denied

REQUEST NO. 45: You have had group sexual actions, including mutual masturbation and fellatio with more than one boy under the age of 18 at a time.

RESPONSE: Denied

REQUEST NO. 46: You have inserted your finger into the anus of a boy under the age of 14.

RESPONSE: Denied

REQUEST NO. 47: You have shown pornographic sexually explicit magazines to a boy under the age of 14.

RESPONSE: Denied

REQUEST NO. 48: You stayed overnight with Theodore Geerts, Father James Janssen and minor aged boys under the age of 18, in a cabin along the Mississippi River and engaged in fellatio and masturbation with the minor aged boys under the age of 18.

RESPONSE: Objected to as not having any relevancy to the issues involved in this case

REQUEST NO. 49: You told a boy under the age of 14 that if he ever told anyone of your actions, the boys would never get married and would never be trusted around children.

RESPONSE: Objected to as irrelevant to any of the issues involved in this case. If it relates to Plaintiff in this case, it is denied

REQUEST NO. 50: You have encouraged shoplifting by minor age boys under the age of 18.

RESPONSE: Objected to as irrelevant to any of the issues involved in this suit

REQUEST NO. 51: In the St. Joseph School basement in Fort Madison, Iowa, in your office under the stairway next to the gym, you have touched a 12 year old boy's genitalia on the outside of his pants.

RESPONSE: Denied

REQUEST NO. 52: In the St. Joseph School basement in Fort Madison, Iowa, in your office under the stairway next to the gym, you have stroked the penis of a 12 year old boy.

RESPONSE: Denied

REQUEST NO. 53: In the St. Joseph School basement in Fort Madison, Iowa, in your office under the stairway next to the gym, you have stroked the penis of a 12 year old boy while asking "Does that feel good"?

RESPONSE: Denied

REQUEST NO. 54: You have had sexual contact with a boy under the age of 14 in your office at St. Joseph School in Fort Madison, Iowa.

RESPONSE: Denied

REQUEST NO. 55: You have had sexual contact with a boy under the age of 14 in the gym locker room at St. Joseph School in Fort Madison, Iowa.

RESPONSE: Denied

REQUEST NO. 56: You have stimulated a minor age boy under the age of 18 with an electric vibrator.

RESPONSE: Denied