1	IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT
2	ST. CLAIR COUNTY, ILLINOIS
3	JAMES WISNIEWSKI,)
4	Plaintiff,
5	vs.) No. 02-L-715
6 7	The DIOCESE OF BELLEVILLE, a) religious association, and as a)
8	nonprofit corporation,) Defendant.)
9	Before the HONORABLE LLOYD A. CUETO, Judge
10	REPORT OF PROCEEDINGS
11	Jury Trial FILED ST. CLAIR COUNTY
12	August 21, 2008 AUG 2 2 2008
13 14	Volume 4 - P.M1 Session
15	22 CIRCUIT CLER
16	
17	APPEARANCES:
18	MR. J. MICHAEL WEILMUENSTER, MR. STEPHEN R. WIGGINTON, MR. FRED KECK and MR. BRIAN MANION, Attorneys at Law Appeared on Behalf of the Plaintiff; and,
19	MR. DAVID WELLS, MS. CATHERINE A. SCHROEDER and
20	MS. ANN BECK, Attorneys at Law Appeared on Behalf of the Defendant.
21	
22	
23	MARY JO JALINSKY, CSR Official Court Reporter
24	C.S.R. License No. 084-003202

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1	INDEX	1	A. I'm ready.
2	Witness Page	2	Q. Mr. Schwaegel, when we left off you had mentioned
3		3	that there was also a Personnel Board within the Chancery
4	JOSEPH SCHWAEGEL Continued direct examination by Mr. Wigginton 391		located over at the Chancery's headquarters, is that correct?
5	Cross examination by Ms. Schroeder 421	4	
6	MARCELLA WISNIEWSKI	5	A. Yes. Q. And you were a member of that Personnel Board,
7	Direct examination by Mr. Wigginton 426 Cross examination by Ms. Schroeder 445	6	
8	Redirect examination by Mr. Wigginton 457	7	correct?
9		8	A. Yes.
10		9	Q. And as part of that Personnel Board, one of the
11		10	duties and functions of that Board was to determine which
12		11	priest would be assigned to which parish, is that correct?
13		12	A. Yes.
14		13	Q. And the members of that Board included the various
15		14	Bishops who you worked for, is that right?
16		15	A. That's correct.
		16	Q. Included the Chancellor, the Vice Chancellor, and the
17		17	Vicar General, is that right?
18		18	A. Yes. I don't know if the Chancellor was on that or
19		19	not. I don't think so.
20		20	Q. But you, as the secretary to the Bishop, you were
21	!	21	always on it, right?
22		22	A. Yes.
23		23	Q. Was that true the entire time you were the secretary
24		24	to the Bishop?
	391		393
1	391 BE IT REMEMBERED AND CERTIFIED that heretofore, on	1	393 A. Yes.
1 2		1 2	
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- 1 A. Oh, gosh, no.
- 2 Q. Were they maintained?
- 3 A. No
- 4 Q. Were they destroyed?
 - A. I would erase them after I took them off the tapes,
- 6 and I would reuse them over and over again.
- 7 Q. Okay. But the actual tape recording would have all
- 8 the discussion about Fr. Kownacki, for example?
- 9 A. Yes.
- 10 Q. Okay.
- 11 MR. WIGGINTON: Mike, if you could hand me Exhibit
- 12 24.

5

- 13 Q. (By Mr. Wigginton) I'm going to hand you a document
- 14 that we looked at yesterday. This is Plaintiff's Exhibit 24.
- 15 And does this appear to be a Personnel Board meeting minutes
- 16 that you prepared?
- 17 A. Yes.
- 18 Q. Okay. And this is dated April 2nd, 1985, is that
- 19 correct?
- 20 A. Yes, that's what it says.
- 21 Q. Now, as of April 2nd, 1985, I want to direct your
- 22 attention to the members of the Personnel Board that were
- 23 present at this meeting, and that was Bishop -- among those is
- 24 Bishop Keleher, right?

395

- 1 A. Yes.
- 2 Q. Don Abell, James Margason, Joseph Schwaegel, Bernard
- 3 Sullivan. Do you see those names highlighted?
- 4 A. I do.
- 5 Q. Now, as of April 2nd, 1985, each of those individuals
- 6 had knowledge that Fr. Kownacki had molested boys, had raped a
- 7 girl, had other victims out there, had possibly fathered a
- 8 child in Guatemala, and those are the members of the Personnel
- 9 Board, is that right?
- 10 A. Yes.
- 11 MS. SCHROEDER: Object to the form of the question.
- 12 It's compound. He asks two separate questions in there.
- 13 THE COURT: Objection is overruled, and the answer
- 14 will stand, which is "Yes."
- 15 Q. (By Mr. Wigginton) All of those individuals had
- 16 knowledge of Fr. Kownacki's past as of April 2nd, 1985,
- 17 correct?

19

- 18 A. If it was discussed at that meeting.
 - Q. That's not my question, though, Mr. Schwaegel. My
- 20 question is -- my point is that here's your Personnel Board,
- 21 it's April 2nd, 1985, and I Count one, two, three, four, five
- 22 individuals within the hierarchy of the Archdiocese who are
- $23\,$ $\,$ sitting on the Personnel Board who know that Fr. Kownacki has
- 24 sexually molested young boys, sexually molested a girl and

- raped a girl, is that correct?
 - A. I don't know. How are you aware of that?
- 3 Q. Well, you're aware of it because of the events that
- 4 happened in 1982. This is 1985, Mr. Schwaegel. And know
- 5 Monsignor Sullivan is aware of it, because he typed up the
- 6 memo in April of 1973, 12 years before this meeting.
- 7 A. But I don't know -- I have not seen the minutes of
- 8 that meeting, so I'm not sure what you're --
- 9 Q. I'm sorry. I don't mean to confuse you. That's not
- 10 my question. I'm saying that individuals on this Board at
- 11 that time knew about Fr. Kownacki's past?
 - A. I presume it was brought up at that meeting, but I
- 13 have no -- I can't --
- 14 Q. I'm not asking if it was brought up at the meeting.
- 15 I'm saying each one of those individuals had at least one or
- 16 more instances where they were involved in an investigation or
- 17 complaints of sexual abuse of minor children by Fr. Kownacki?
 - A. I don't know that.
 - Q. Okay. Fr. Kownacki was discussed at that meeting,
- 20 and the only portion that was revealed to us is the statement
- 21 that says, In making assignments, must not forget about Fr.
- 22 Kownacki?
- 23 A. (Indicates affirmatively.)
- 24 Q. So the Personnel Board is contemplating where to
 - 397
- 1 assign Fr. Kownacki at that time, right?
 - A. I presume so, sir, yes.
- 3 Q. Now, in 1985, this is after we know he's been removed
- 4 from Harrisburg. Remember that before we went to lunch?
 - A. Yes
- 6 Q. We know he's been removed from Harrisburg because he
- 7 had boys living there. We know about Salem, right, because
- 8 you were involved in that. We know about Washington Park. We
- 9 know about St. Francisville. We know of at least four or five
- 10 places he's been involved in allegations of sexual abuse,
- places he's been involved in allegations of sexual abuse,
- 11 sexual molestation, rape, and he's been reassigned five times,
- 12 and now the Personnel Board has another chance now 12 years
- 13 later, right?
 - A. Uh-huh.
 - Q. To do something about him, right?
- 16 A. Yes.
- 17 Q. I'm going to show you what we marked yesterday as
- 18 Plaintiff's Exhibit 25. Again, is this is a Personnel Board
- 19 memo that you created?
 - A. Yes.
- 21 Q. Okay. Now, we know from the evidence that's already
- 22 been presented that he was removed from Harrisburg in August
- 23 of 1994 -- I'm sorry, 1984?
- 24 A. '84.

at least four or five individuals who know about this man's Q. August of 1984. Now, this is now May 1985, and the 1 past are congratulating him on appointing him to St. Patrick's 2 Personnel Board is meeting, and we have some of the same 2 3 3 players there, Bishop Keleher, Reverend Margason here, you, Bernie Sullivan, and now the Personnel Board, am I correct, 4 5 5 says Fr. Kownacki is ready for a parish, is that correct? 6 6 A. That's what it says, sir. Q. And the Personnel Board which you were a member of, 7 7 8 you made that determination as a group, I take it? 8 9 9 A. Yes. I can't recall this exact meeting, sir. 10 Q. Sure, and I wouldn't expect you to. But generally, 10 11 when the Personnel Board met you guys would vote as a group, 11 12 12 right? 13 13 A. It would be discussed. The final decision would be up to the Bishop, you know. It wouldn't be -- it would be 14 14 15 recommendations -- the Board would make recommendations to the 15 16 16 Bishop. 17 Q. But you would go back and forth in your discussion 17 and talk about the pros and cons of assigning a priest to a 18 18 19 19 particular area, is that right? 20 20 A. Yes. 21 21 Q. And, you know, whether this priest was a good fit for 22 22 this community, right? 23 23 A. Yes. 24 24 Q. And would you talk about whether or not this priest 1 was a threat to the children in that community? 1 2 2 A. I don't recall the discussion at the time about this, 3 whether that was discussed in this particular day. 3 4 Q. Do you recall at any time with Fr. Kownacki where the 4 5 5 discussion among the Board members, because all of you had 6 6 knowledge? Tell -- what was your answer? 7 7 A. I don't recall if that ever came up at this meeting, 8 8 for example. 9 9 Q. What about any of these Personnel Board meetings? 10 A. I'm not sure. Sorry. 10 11 Q. Okay. But by this time the Personnel Board, the 11 12 hierarchy of the archdiocese, says Fr. Kownacki is ready for a 12 13 parish, and this is 1985. I'm going to show you what we 13

14 marked yesterday as Exhibit 26, Mr. Schwaegel, and show you --15 16 17 Q. All right. And what does the first sentence of that 18 19 A. After consultation with and approval of the Priest 20 Personnel Board, it is a pleasure for me to appoint you pastor 21 22 parish, Madonnaville, in accordance with Canon Law. This a 23 24 Q. So, now the Personnel Committee, which is made up of

parish in Tipton and Immaculate Conception parish in Madonnaville, correct? A. Yes. Q. Do you know whether the citizens of Tipton or the citizens of Madonnaville or Valmeyer were ever warned of Fr. Kownacki's propensity to sexually molest children? I do not know that, sir. Q. Do you know if the Archdiocese issued any kind of press release or told the authorities they should watch out for this auv? A. I do not know. I am not aware of that. Q. Are you ever aware of that happening? A. No, no. Q. I mean, you know, in fact, that it didn't happen, didn't you? A. I'm not sure. There are some things -- not everything -- I never saw everything that went out from the office, you know. Q. Well, don't you think you would be aware if your office, if the Chancery issued a press release saying we're assigning this priest to your community, but, by the way, he's a child molester, don't you think you would be aware of that? 401 A. I don't recall that ever being stated. Q. It was not, was it? A. Not to my knowledge. Q. Right, and you were there? You were there continuously for 15 years in the headquarters? A. Yes. Q. And if that happened, you would know about it? Now, also here -- this is interesting -- this particular parish didn't have a grade school, a Catholic grade school, but it did have a Catholic high school, didn't it? A. Yes, sir. Q. And that's Gibault, right? Q. And despite the Personnel Board's knowledge of his past and what he does to young boys, they also encouraged him and would be grateful for his support of Gibault High School, right? A. (Indicates affirmatively.) Q. And that would be attending mass, performing services at Gibault High School, correct? A. Yes, I presume so, as all pastors of the Deanery would do, you know, would visit.

Q. But here, you are encouraging him to participate in

the activities of high school students, is that correct?

letter say?

A. Yes, it is.

that is a letter dated May 15th, 1985, is that correct?

of St. Patrick's parish, Tipton and Immaculate Conception

appointment becomes effective July 2nd, 1985.

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	402		404
1	A. Yes.	1	MR. WIGGINTON: Give me 32, 33.
2	Q. Despite what you guys all know about him?	2	Q. (By Mr. Wigginton) Now, in Valmeyer, we know that
3	A. Yes.	3	you're still the full-time you're the right-hand man of the
4	Q. I'm going to show you what we have marked as Exhibit	4	Bishop when Fr. Kownacki is at Valmeyer, right?
5	27. Take a look at that. Let me know when you're ready. Are	5	A. Yes.
6	you ready?	6	Q. We know that. And you've also by that time been
7	A. Yes.	7	elevated because now at Valmeyer we're talking 1986, right?
8	Q. Okay, would you do you this is a letter dated	8	A. 1986.
9	June 25, 1985, correct?	9	Q. '86. You see the appointment. And by this time,
10	A. Uh-huh, yes.	10	you've been elevated you are not only the full-time
11	Q. It's a letter to Raymond Kownacki from Bishop	11	secretary to Bishop Keleher who writes these letters
12	Keleher, right?	12	appointing these priests, but you are also a Monsignor
13	A. Yes.	13	yourself, correct? You have been elevated?
14	Q. Again, would you read the first sentence?	14	A. Yes.
15	A. After consultation with and approval of the Priest	15	Q. Are you telling us today, are you telling the jury
16	Personnel Board, it is a pleasure for me to appoint you pastor	16	today that you have never seen any written complaints or
17	and in residence at St. Mary parish, Valmeyer, and pastor of	17	written allegations of improprieties by Fr. Kownacki at
18	St. Patrick's parish, Tipton, and Immaculate Conception	18	Valmeyer?
19	parish, Madonnaville, in accordance with Canon Law.	19	A. I have not.
20	Q. Okay. This is the official appointment on June 25,	20	Q. This will be the first time you see them?
21	1985 appointing him to take over these three parishes?	21	A. To the best of my knowledge, sir.
22	A. Yes.	22	Q. Let me show you what we marked yesterday as Exhibit
23	Q. And that's after consultation with the Board that you	23	32. Here, you can have my copy. Take a look at that, please.
24	were a member of?	24	Okay, are you finished?
24	were a member or:	+	
1	403		405
1	403 Δ Yes	1	405 A. Yes.
1 2	A. Yes.	1 2	
2	A. Yes.Q. Now, again, in this letter there's even a reference		A. Yes.
2	A. Yes.Q. Now, again, in this letter there's even a referencenow the Bishop is telling him, In my letter to the people at	2	A. Yes. Q. Okay, I'm going to hand you the original. This is
2 3 4	A. Yes. Q. Now, again, in this letter there's even a reference now the Bishop is telling him, In my letter to the people at Valmeyer, Tipton and Madonnaville, I informed them that it	2 3	A. Yes. Q. Okay, I'm going to hand you the original. This is the court's copy with the official sticker, all right? Now, this is a document that was produced to us dated October 14th,
2 3 4 5	A. Yes. Q. Now, again, in this letter there's even a reference now the Bishop is telling him, In my letter to the people at Valmeyer, Tipton and Madonnaville, I informed them that it would be necessary for you to realign the weekend mass	2 3 4	A. Yes. Q. Okay, I'm going to hand you the original. This is the court's copy with the official sticker, all right? Now,
2 3 4 5 6	A. Yes. Q. Now, again, in this letter there's even a reference now the Bishop is telling him, In my letter to the people at Valmeyer, Tipton and Madonnaville, I informed them that it would be necessary for you to realign the weekend mass schedule for the three parishes. Do you see that?	2 3 4 5	A. Yes. Q. Okay, I'm going to hand you the original. This is the court's copy with the official sticker, all right? Now, this is a document that was produced to us dated October 14th, 1986 from the housekeeper at Valmeyer.
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			408
	406		allegations of misconduct of boys living in the house, of Fr.
1	with me. There's no reason for him to, you know, share	1	-
2	everything that came in with me if he, indeed, worked with the	2	Margason writing a love letter to a boy, a note, waiting for
3	Bishop, you know.	3	that boy to come back to the rectory, and the note says, When
4	Q. Uh-huh. Well, here's another one I want you to look	4	you come home this evening, even if it is late, please come to
5	at. This is the court's copy. This is Exhibit 33. Have you	5	my room and give me a massage. I love you. Shouldn't that
6	ever seen that complaint before?	6	type of information be brought to the attention of the
7	A. No, I haven't.	7	Personnel Board?
8	Q. This the first time you have seen that complaint?	8	A. I think what needs to be determined and I'm not
9	A. Yes.	9	the one the Personnel Board would be involved in helping
10	Q. When was that complaint written?	10	the Bishop decide on who gets placed where, but what goes on
11	A. November 7th, 1986.	11	in between, that's one of the reasons for the people assisting
12	Q. November 7th, 1986. That complaint has been out	12	the Bishop in the Chancery Office.
13	there for 22 years, and this is the first time you have seen	13	Q. But the Personnel Board met monthly?
14	it?	14	A. Well
15	A. Yes.	15	Q. That's what you have told us. I mean, this is
16	Q. Nobody at the Chancery ever shared these complaints	16	something that should have been brought to your attention if
17	with you, did they?	17	it was known, shouldn't it?
18	A. Well, it you know, it sometimes	18	A. Yes.
19	Q. You don't need to explain it. Nobody shared these	19	Q. But we know that you have never seen it and it's been
20	complaints with you, did they?	20	22 years, and we know who had the information sitting right
21	A. But it wasn't absolutely necessary for me to share	21	there.
22	everything for anyone to share everything with me. If	22	I'm going to hand you a new exhibit. This is Exhibit 36,
23	they, indeed, worked with the Bishop I didn't need to know	23	okay?
24	everything that was going on. If I would have typed a letter	24	A. Sure.
	407		409
1	for the Bishop about this, maybe I would have found out, but I	1	MR. WELLS: Do you have a copy, Steve?
2	you know.	2	MR. WIGGINTON: Oh.
3	Q. You are a member of the Personnel you are a member	3	MR. WELLS: Thank you.
4	of the Personnel Board. You determined who gets assigned to	4	Q. (By Mr. Wigginton) Okay, have you had a chance to
5	what parish. You determined what priest goes to what city.	5	read that?
6	Don't you think this is something that should have been	6	A. Yes.
7	brought to your attention?	7	Q. Okay Exhibit 36 is a 36 down there at the bottom.
8	A. The Personnel Board, as I recall, was always advisory	8	Okay?
9	to the Bishop.	9	A. Yes.
10	Q. That's not my question, sir. That is not my	10	Q. This is another Personnel Board memo. This one is
11	question. My question is you don't need to look at Fr.	11	dated March 19th, 1987 now, right?
12	Margason. My question is as a member of the Personnel Board,	12	A. Yes.
1		1	Q. Okay. And the members are Bishop Keleher, Don Abell,
1	-	l	_
13 14 15	shouldn't this kind of information, allegations of Fr. Kownacki once again now in 1986 at another community, at another parish having relationships with boys, boys living in	13 14 15	Q. Okay. And the members are Bishop Keleher, Don Abell, Reverend Margason, you, Bernie Sullivan, all the people who have known about Fr. Kownacki for now going on 17 years, 14

priest but also taking care of the Diocese, right?

said, while we must take care of our brother priests, the

16 years, something like that? And can you tell the jury what

A. This led to much discussion of Fr. Kownacki. Bishop

you wrote in your memorandum?

Q. Yes, please.

A. Do you want me to read it?

17

18

19

20

21

24

	410		412
1	A. Yes.	1	right?
2	Q. Nothing in the memo about taking care of the victims	2	A. Yes.
3	of sexual abuse by Fr. Kownacki, is there?	3	Q. But that didn't stop the Personnel Board from putting
4	A. No.	4	him someplace else, did it?
5	Q. The concern of the Personnel Board at that time in	5	A. No.
6	1987 was how do we protect ourselves, wasn't it?	6	Q. In fact, you had further discussions about where to
7	A. I don't know.	7	put him, right?
8	Q. The letter the memo speaks for itself, doesn't it?	8	A. Yes.
9	A. (No audible response.)	9	Q. In fact
10	Q. Because now you are running out of places to transfer	10	MR. WIGGINTON: Give me Exhibits 41, 42, 43, please.
11	this man, aren't you, right?	11	Q. (By Mr. Wigginton) I have got a number of Personnel
12	A. I don't know.	12	Board meeting minutes after the time you determined your
13	Q. Do you remember discussions about running out of	13	Personnel Committee, your Personnel Board, determined that
14	places to transfer him?	14	this man was dangerous, I have got a number of them now where
15	A. No, I don't remember that, sir.	15	you guys are deciding what to do with this man, and I'm just
16	Q. Okay.	16	going to have you identify them. Okay? So that I can get
17	MR. WIGGINTON: Can I have the next exhibit? 37.	17	them into evidence, all right? Start with this one, please.
18	Q. (By Mr. Wigginton) Here, you this was marked	18	This is I'm going to hand you Exhibit 41, 42 and 43, okay?
19	yesterday as Exhibit 37, okay?	19	Tell me when you're ready. Okay, have you looked at all three
20	A. Thanks.	20	of those memos?
21	Q. You had a chance to look at that?	21	A. Yes.
22	A. I did, sir.	22	Q. Yes? Okay, and are those all memos that you prepared
23	Q. Okay, Exhibit 37, this is another memo that you	23	as secretary to the Bishop and a member of the Personnel
24	prepared, correct?	24	Board?
	411		413
1	A. Yes.	1	A. I presume so, yes.
2	Q. Personnel Board meeting minutes. And the date of	2	Q. Okay. And the first one, Exhibit 41
3	this one is April 7th, 1987, okay?	3	A. 41.
4	A. Yes.	4	Q that's now we're up to 1988, March 30th, 1988,
5	Q. We just looked at the March one. Now, remember what	_	
J	Q. We just looked at the March one. Now, remember what	5	correct?
6	my last question was, you guys were having trouble finding	6	correct? A. Yes.
_	•	!	
6	my last question was, you guys were having trouble finding	6	A. Yes.
6 7	my last question was, you guys were having trouble finding where to put this guy now?	6 7	A. Yes. Q. And you see the same names, Bishop Keleher, Don
6 7 8	my last question was, you guys were having trouble finding where to put this guy now? A. (Indicates affirmatively.)	6 7 8	A. Yes. Q. And you see the same names, Bishop Keleher, Don Abell, Reverend Margason, you, Bernie Sullivan. Now in 1988,
6 7 8 9	my last question was, you guys were having trouble finding where to put this guy now? A. (Indicates affirmatively.) Q. Turn to the next page, all right?	6 7 8 9	A. Yes. Q. And you see the same names, Bishop Keleher, Don Abell, Reverend Margason, you, Bernie Sullivan. Now in 1988, the same group of men who worked at the Chancery who have
6 7 8 9 10	my last question was, you guys were having trouble finding where to put this guy now? A. (Indicates affirmatively.) Q. Turn to the next page, all right? A. Yes.	6 7 8 9	A. Yes. Q. And you see the same names, Bishop Keleher, Don Abell, Reverend Margason, you, Bernie Sullivan. Now in 1988, the same group of men who worked at the Chancery who have known about Fr. Kownacki having sexual molestation against
6 7 8 9 10 11	my last question was, you guys were having trouble finding where to put this guy now? A. (Indicates affirmatively.) Q. Turn to the next page, all right? A. Yes. Q. Fr. Ray Kownacki. Nothing much has changed. Bishop	6 7 8 9 10 11	A. Yes. Q. And you see the same names, Bishop Keleher, Don Abell, Reverend Margason, you, Bernie Sullivan. Now in 1988, the same group of men who worked at the Chancery who have known about Fr. Kownacki having sexual molestation against boys, raping young girls since at least now Sullivan has
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	my last question was, you guys were having trouble finding where to put this guy now? A. (Indicates affirmatively.) Q. Turn to the next page, all right? A. Yes. Q. Fr. Ray Kownacki. Nothing much has changed. Bishop suggested a chaplaincy somewhere. Board agreed he should be moved from Valmeyer now but should be in a hospital chaplaincy ministry. This could be dangerous. Do you recall that discussion at the Personnel Board meeting? A. No, I do not. Q. At this point, though and the cast of characters have remained the same for decades now. If you turn to the front page, there's Keleher, Reverend Abell, you, Bernie Sullivan, right? A. Yes.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. Yes. Q. And you see the same names, Bishop Keleher, Don Abell, Reverend Margason, you, Bernie Sullivan. Now in 1988, the same group of men who worked at the Chancery who have known about Fr. Kownacki having sexual molestation against boys, raping young girls since at least now Sullivan has known its since 1973, and now here we are 15 years later and you guys are still deciding on where to place him, right? A. Yes. Q. Turn the page. Now, you have even the Bishop talking to Fr. Kownacki about moving, right? A. Which one are you on now, sir? Q. I'm sorry, I'm still on 41. A. Yes. Q. Now, I skipped ahead, because in '88, now, you determined that maybe the best place to put him was just put him with the is it the Poor Clares? A. Poor Clares, uh-huh. Q. That's a group of nuns, right?

416 4 A. That's an order of contemplative nuns or cloistered nuns. Q. Cloistered nuns, but he wasn't going to live at the doister? A. No. Q. He was going to still maintain his residence here in Beleville, right? A. No. Deleville, right? A. No. Do you remember discussion about sending him all the vay down to Metropolis? A. No, I do not remember that. C. Tim going to hand you what we marked yesterday as 15 Exhibit 28, okay? Do you recognize those as minutes that you took of a priest Personnel Board meeting? A. Yes. MR. WIGGINTON: Yes. MR. WIGGINTON: Yes. MR. WILLS: Did you use it yesterday? MR. WILLS: Did you use it western that he feels that 1 remember that? A Yes. Fr. Margason made a comment that he feels that 1 that for time the farthest wast talk of putting him all the way town in Metropolis, right? A Yes. Q. I'm looking at the comment before Fr. Margason. Somebody said, Put Fr. Kownacki in Metropolis, right? A Yes. Q. And at that time, he had already been on the farthest Wethough at the comment before Fr. Margason. A Right. Q. Then you put him all the way on the farthest west University of the priest personnel Board meeting bear do not make a comment that he feels that Wethough at the comment before Fr. Margason. A Yes. Q. And at that time, he had already been on the farthest A Yes. Q. And a that time, he had already been on the farthest A Yes. Q. And a that time, he had already been on the farthest west All of the Priest Personnel Board discussed sending Fr. Kownacki to Metropolis and now messenger A Yes. A Yes Yes. A Yes Yes Yes Yes
2 nuns. 3 Q. Cloistered nuns, but he wasn't going to live at the 4 cloister? 5 A No. 6 Q. He was going to still maintain his residence here in 6 Pelleville, right? 7 Belleville, right? 8 A I presume so, yes. 9 Q. Do you remember discussion about sending him all the 10 way down to Metropolis? 11 A. No. I do not remember that. 12 Q. I'm going to hand you what we marked yesterday as 13 Exhibit 28, okay? Do you recognize those as minutes that you 14 took of a priest Personnel Board meeting? 15 A. Yes. 16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WELLS: Did you use it yesterday? 19 MR. WELLS: Did you use it yesterday? 20 MR. WELLS: I'm not sure you did. 21 MR. WELLS: I'm not sure you did. 22 MR. WIGGINTON: Yesh, 28. 23 A Yes. 24 talk of putting him all the way town in Metropolis. Do you 25 A Yes. 26 Q. I'm looking at the comment before Fr. Margason. 27 Somebody said, Put Fr. Kownacki in Metropolis, right? 28 A Yes. 39 Q. And at that time, he had already been on the farthest 30 A Right. 31 Cloistered nuns, but he was not the river is a Paducah, Kentucky. 4 A. Uh-huh. 5 Q. And that's where you guys were thinking about putting him, wasn't it? Do you remember why there was discussion about putting him all the far away? 4 A. I don't have any recollection of that. 9 Q. Now, Fr. Margason thought that was just too far away. 10 Look of a priest Personnel Board meeting? 11 A Yes. 12 A Yes. 13 Bodroth have any recollection of that. 14 A Ves. 15 Q. Do you know where he ended up? Let me show you a document we have marked as Exhibit 29, which is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? A I presume I did. D. It shows another meeting of the Priest Personnel that you prepared in 1986? A I presume I did. D. A Now, Fr. Margason and Bernard Shight Q. A Yes. 20 Q. Okay. And the Reverend Margason and Bernard 21 Q. And algain, it shows your attendance there, right? A Yes. 21 Q. And difyou turn to page two, now in this one thi
3 Paducah, Kentucky. 4 Cloister? 5 A. No. 5 A. No. 6 A. He was going to still maintain his residence here in Believille, right? 7 Believille, right? 8 A. I presume so, yes. 9 Q. Do you remember discussion about sending him all the way down to Metropolis? 11 A. No, I do not remember that. 12 Q. I'm going to hand you what we marked yesterday as Exhibit 28, okay? Do you recognize those as minutes that you took of a priest Personnel Board meeting? 14 A. Yes. 15 A. Yes. 16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WELLS: Did you use it yesterday? 19 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yes. 21 MR. WIGGINTON: Yes. 22 MR. WIGGINTON: Yes. 23 Q. My Mr. Wigginton) Now, at this meeting there was table of putting him all the way town in Metropolis. Do you know where he ended up? Let me show you a document we have marked as Exhibit 29, which is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? 16 Q. And a would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WIGGINTON: Yes. 29 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yes. 20 Q. And adajai, it shows your attendance there, right? 21 A. Yes. 22 Q. Okay. And the Reverend Margason and Bernard 23 Latlik of putting him all the way town in Metropolis, Do you 24 A. Yes. 25 Yes. 26 A. Yes. 27 C. And at that time, he had already been on the farthest 28 The had been on the farthest east part of the State you 29 Could possibly get, right? 20 A. Right. 31 C. And on that's where you guy were thinking about putting him all the way on the farthest west 32 A. I don't have any recollection of that. 33 Paducah, Kentucky. 34 A. Uh-huh. 34 C. I'mo'n have any recollection of that. 34 C. I'm looking at the comment before Fr. Margason. 35 Somebody said, Put Fr. Kownacki in Metropolis, right? 36 A. Yes. 37 Q. And at that time, he had already been on the farthest 38 The bad been on the farthest east part of the State you 39 Could
4 Cloister? 5 A No. 6 Q. He was going to still maintain his residence here in Belleville, right? 8 A. I presume so, yes. 9 Q. Do you remember discussion about sending him all the way down to Metropolis? 1 A. No. I do not remember that. 1 Q. I'm going to hand you what we marked yesterday as Exhibit 28, okay? Do you recognize those as minutes that you tow of a priest Personnel Board meeting? 1 A. Yes. 1 Q. And would you turn the page to the second page? 1 MR. WIGGINTON: Yeah, 28. 1 MR. WIGGINTON: Yes. 2 MR. WIGGINTON: Yes. 2 MR. WIGGINTON: Yes. 2 MR. WIGGINTON: Oh, I'm sorry. 2 Q. (By Mr. Wigginton) Now, at this meeting there was 2 talk of putting him that far away? 3 A. I don't have any recollection of that. 9 Q. Now, Fr. Margason thought that was just too far away. 4 d. I'm look in a priest Personnel Board meeting? 4 A. Yes. 4 Teremeber that? 5 A. A. Uh-huh. 6 A. And that's where you guys were thinking about putting him, wasn't it? Do you remember why there was discussion about sending him all the way too far away? 4 A. I don't have any recollection of that. 9 Q. Now, Fr. Margason thought that was just too far away. 4 D. I'm look in a priest Personnel Board meeting? 5 A. Yes. 6 A. Yes. 7 Q. And would you turn the page to the second page? 8 A. I don't have any recollection of that. 9 Q. Now, Fr. Margason thought that was just too far away. 4 Pessonnel Board meeting? 4 A. Ves. 6 D. Yovy know where he ended up? Let me show you a document we have marked as Exhibit 29, which is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? A. I presume I did. D. It shows another meeting of the Priest Personnel Board, right? A. Yes. 9 Q. And again, it shows your attendance there, right? A. Yes. 9 Q. Okay. And the Reverend Margason and Bernard 9 Sullivan, right? 9 Q. And if you turn to page two, now in this one this was 1 guess week later, Fr. Margason is open to Fr. Kownacki going to Metropolis and now messenger
5 A No. 6 Q. He was going to still maintain his residence here in 7 Belleville, right? 7 Belleville, right? 8 A. I presume so, yes. 9 Q. Do you remember discussion about sending him all the way down to Metropolis? 10 way down to Metropolis? 11 A. No, I do not remember that. 12 Q. I'm going to hand you what we marked yesterday as Exhibit 28, okay? Do you recognize those as minutes that you took of a priest Personnel Board meeting? 14 A Yes. 15 Q. And would you turn the page to the second page? 16 MR. WIGGINTON: Yeah, 28. 17 MR. WELLS: Did you use it yesterday? 18 MR. WIGGINTON: Yeah, 28. 19 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yeah, 28. 21 MR. WELLS: T'm not sure you did. 22 MR. WIGGINTON: Oh, I'm sorry. 23 Q. (By Mr. Wigginton) Now, at this meeting there was 24 talk of putting him all the way town in Metropolis. Do you 24 17 remember that? 18 A Yes. 19 A Yes. 10 A Yes. 11 remember that? 2 A Yes. Fr. Margason made a comment that he feels that 3 It's too far away. 4 Q. I'm looking at the comment before Fr. Margason. 5 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A Yes. 7 Q. And at that time, he had already been on the farthest 8 he had been on the farthest east part of the State you could possibly get, right? 10 A Right. 11 Q. Then you put him all the way on the farthest west 4 Clindicates affirmatively.) 11 Q. But you don't have any recollection of that. 12 Q. Now, Fr. Margason thought that was just too far away. 12 didn't he? 13 A Yes. 14 A Yes. 15 Q. Do you know where he ended up? Let me show you a document we have marked as Exhibit 29, which is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? 16 A I presume I Idd. 20 Li ts hows another meeting of the Priest Personnel Board, right? 21 A Yes. 22 Q. Okay. And the Reverend Margason and Bernard 23 Sullivan, right? 24 A Yes. 25 Q. Okay. And the Reverend Margason is open to Fr. Kownacki going to Metropolis and now meessenger
6 Q. He was going to still maintain his residence here in Belleville, right? 8 A. I presume so, yes. 9 Q. Do you remember discussion about sending him all the way down to Metropolis? 10 Way down to Metropolis? 11 A. No, I do not remember that. 12 Q. I'm going to hand you what we marked yesterday as Exhibit 28, okay? Do you recognize those as minutes that you took of a priest Personnel Board meeting? 14 A. Yes. 15 Q. And would you turn the page to the second page? 16 MR. WELLS: Did you use it yesterday? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WELLS: Did you use it yesterday? 19 MR. WIGGINTON: Yeah, 28. 19 MR. WIGGINTON: Yeah, 28. 19 MR. WIGGINTON: Yes. 20 Q. (By Mr. Wigginton) Now, at this meeting there was Q. (By Mr. Wigginton) Now, at this meeting there was 24 talk of putting him all the way town in Metropolis. Do you 17 remember that? 28 A. Yes. Fr. Margason made a comment that he feels that 18 tit's too far away. 40 Q. I'm looking at the comment before Fr. Margason. 50 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A. Yes. 6 Q. And at that time, he had already been on the farthest 8 he had been on the farthest east part of the State you could possibly get, right? 10 A. Right. 11 Q. Then you put him all the way on the farthest west 12 Q. But you don't have any recollection of that. 9 Q. Now, Fr. Margason thought that was just too far away, didn't he? 10 A. Right. 11 Q. Do you remember why there was glust too far away, didn't he? 12 Q. Do you know where he ended up? Let me show you a document we have marked as Exhibit 29, Nihich is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? 18 A. I presume I did. 19 Q. Do you know where he ended up? Let me show you a document we have marked as Exhibit 29, Nihich is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? 18 A. I presume I did. 19 Q. And again, it shows your attendance there, right? 20 Q. And again, it shows your attendance there, right? 21 Q
7 Belleville, right? 8 A. I presume so, yes. 9 Q. Do you remember discussion about sending him all the way down to Metropolis? 11 A. No, I do not remember that. 12 Q. I'm going to hand you what we marked yesterday as Exhibit 28, okay? Do you recognize those as minutes that you took of a priest Personnel Board meeting? 14 took of a priest Personnel Board meeting? 15 A. Yes. 16 Q. And would you turn the page to the second page? 16 A. I presume I did. 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WIGGINTON: Yeah, 28. 19 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yes. 21 MR. WELLS: I'm not sure you did. 22 MR. WIGGINTON: Oh, I'm sorry. 23 Q. (By Mr. Wigginton) Now, at this meeting there was talk of putting him all the way town in Metropolis. Do you 24 A. Yes. 25 Q. And if you turn to page two, now in this one this was I guess week later, Fr. Margason is open to Fr. Kownacki going to the Martopolis and now messenger 24 A. Yes. 25 Q. And a fly ou turn to page two, now in this one this was I guess week later, Fr. Margason is open to Fr. Kownacki going to the Metropolis, right? 26 A. Yes. 27 Q. And at that time, he had already been on the farthest west he had been on the farthest east part of the State you could possibly get, right? 30 A. Right. 41 Q. Then you put him all the way on the farthest west he had been on the farthest east part of the State you could possibly get, right? 41 Q. Then you put him all the way on the farthest west he had been on the farthest east part of the State you could possibly get, right? 42 A. Right. 43 Q. Then you put him all the way on the farthest west he had been on the farthest the farthest the farthest had farther the farthest
8 A. I presume so, yes. 9 Q. Do you remember discussion about sending him all the 10 way down to Metropolis? 11 A. No, I do not remember that. 12 Q. I'm going to hand you what we marked yesterday as 13 Exhibit 28, okay? Do you recognize those as minutes that you 14 took of a priest Personnel Board meeting? 15 A. Yes. 16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WIGGINTON: Yeah, 28. 19 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yes. 21 MR. WELLS: I'm not sure you did. 22 MR. WIGGINTON: Oh, I'm sorry. 23 Q. (By Mr. Wigginton) Now, at this meeting there was 24 talk of putting him all the way town in Metropolis. Do you 25 A. Yes. 26 A. Yes. 27 Q. And a gain, it shows your attendance there, right? 28 A. Yes. Fr. Margason made a comment that he feels that 29 A. Yes. 29 Q. And if you turn to page two, now in this one this was 29 I guess week later, Fr. Margason is open to Fr. Kownacki going 29 to Metropolis and now messenger 20 A. A. Yes. 21 Q. And a fivou turn to page two, now in this one this was 22 I guess week later, Fr. Margason is open to Fr. Kownacki going 29 to Metropolis and now messenger 29 A. Yes. 20 And at that time, he had already been on the farthest 20 A. Yes. 21 Q. So there were at least a couple of meetings where the 22 he had already been on the farthest 23 he had been on the farthest east part of the State you 24 could possibly get, right? 25 A. Right. 26 A. Yes. 27 Q. So there were at least a couple of meetings where the 28 Priest Personnel Board memo. Do you recognize that as being a memo 29 A. I find have a my recollection as to why they 29 A. A. Press. 20 D. you know where he ended up? Let me show you a 29 decument we have marked as Exhibit too far away. 20 A. I resume I did. 21 A. Yes. 22 Q. And again, it shows your attendance there, right? 23 Later of the Priest Personnel Board memo. Do you recognize that as being a memo 29 A. Right. 20 Q. And again, it shows your attendance there, right? 21 A. Yes. 22 Q. Okay. And the Rev
9 Q. Do you remember discussion about sending him all the way down to Metropolis? 10 way down to Metropolis? 11 A. No, I do not remember that. 12 Q. I'm going to hand you what we marked yesterday as a Exhibit 28, okay? Do you recognize those as minutes that you took of a priest Personnel Board meeting? 14 took of a priest Personnel Board meeting? 15 A. Yes. 16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WIGGINTON: Yeah, 28. 19 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yes. 21 MR. WIGGINTON: Yes. 22 MR. WIGGINTON: Oh, I'm sorry. 23 Q. (By Mr. Wigginton) Now, at this meeting there was 24 talk of putting him all the way town in Metropolis. Do you 14 Temember that? 2 A. Yes. F. Margason made a comment that he feels that it's too far away. 3 it's too far away. 4 Q. I'm looking at the comment before Fr. Margason. 5 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A. Yes. 7 Q. And at that time, he had already been on the farthest west 11 Q. Then you put him all the way on the farthest west 11 Q. But you don't have any recollection as to why they 11 Q. But you don't have any recollection as to why they 11 Q. But you don't have any recollection as to why they 12 don't have any recollection as to why they 12 don't have any recollection as to why they 12 don't have any recollection as to why they 12 don't have any recollection as to why they 12 don't have any recollection as to why they 12 don't have any recollection as to why they 12 don't have any recollection as to why they 13 don't have any recollection as to why they 14 don't have any recollection as to why they 14 don't have any recollection as to why they 15 don't have any recollection as to why they 15 don't have any recollection as to why they 15 don't have any recollection as to why they 15 don't have any recollection as to why they 15 don't have any recollection as to why they 16 don't have any recollection as to why they 16 don't have any recollection as to why they 16 don't have any recol
way down to Metropolis? A. No, I do not remember that. Q. I'm going to hand you what we marked yesterday as Exhibit 28, okay? Do you recognize those as minutes that you took of a priest Personnel Board meeting? A. Yes. Q. And would you turn the page to the second page? MS. SCHROEDER: Steve, you said 28? MR. WIGGINTON: Yeah, 28. MR. WIGGINTON: Yeah, 28. MR. WIGGINTON: Yes. MR. WIGGINTON: Oh, I'm sorry. Q. (By Mr. Wigginton) Now, at this meeting there was talk of putting him all the way town in Metropolis. Do you A. Yes. MR. WIGGINTON: Now, at this meeting there was talk of putting him all the way town in Metropolis, right? A. Yes. Q. And at that time, he had already been on the farthest east part of the State you go with the way town the farthest west didin't he? A. Yes. Q. Do you know where he ended up? Let me show you a document we have marked as Exhibit 29, which is another priest took occurrence as minutes that you prepared in 1986? A. I presume I did. Q. It shows another meeting of the Priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? A. I presume I did. Q. It shows another meeting of the Priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? A. I presume I did. Q. It shows another meeting of the Priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? A. I presume I did. Q. It shows another meeting of the Priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? A. I presume I did. Q. It shows another meeting of the Priest Personnel Board memo. Do you retared as Exhibit 29, which is another priest Personnel Board discussed sending Find Priest Personnel Boa
11 A. No, I do not remember that. 12 Q. I'm going to hand you what we marked yesterday as 13 Exhibit 28, okay? Do you recognize those as minutes that you 14 took of a priest Personnel Board meeting? 15 A. Yes. 16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WELLS: Did you use it yesterday? 19 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yeah, 28. 21 MR. WELLS: I'm not sure you did. 22 MR. WIGGINTON: Oh, I'm sorry. 23 Q. (By Mr. Wigginton) Now, at this meeting there was 24 talk of putting him all the way town in Metropolis. Do you 25 A. Yes. 26 A. Yes. 27 Q. And at that time, he had already been on the farthest 28 he had been on the farthest east part of the State you 29 ould possibly get, right? 20 A. Right. 21 Q. Do you know where he ended up? Let me show you a document we have marked as Exhibit 29, which is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? 4. I presume1 did. Q. It shows another meeting of the Priest Personnel Board, right? 4. A. Right. 4. A Yes. 4. Q. And again, it shows your attendance there, right? 4. A. Yes. 4. A. Yes. 4. Yes. 5. Q. And if you turn to page two, now in this one this was I guess week later, Fr. Margason is open to Fr. Kownacki going to Metropolis and now messenger 4. A. Monsignor. 5. Onebody said, Put Fr. Kownacki in Metropolis, right? 6. A. Yes. 7. Q. And at that time, he had already been on the farthest 4. Yes. 6. A. Yes. 7. Q. Monsignor Lombardo agrees, right? 8. A. Yes. 9. Q. So there were at least a couple of meetings where the Priest Personnel Board discussed sending Fr. Kownacki to 9. Metropolis, right? 9. A. (Indicates affirmatively.) 9. Q. But you don't have any recollection as to why they
12 Q. I'm going to hand you what we marked yesterday as 13 Exhibit 28, okay? Do you recognize those as minutes that you 14 took of a priest Personnel Board meeting? 15 A. Yes. 16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WIGGINTON: Yeah, 28. 19 MR. WIGGINTON: Yeah, 28. 19 MR. WIGGINTON: Yes. 20 MR. WIGGINTON: Yes. 21 MR. WIGGINTON: Oh, I'm sorry. 22 MR. WIGGINTON: Oh, I'm sorry. 23 Q. (By Mr. Wigginton) Now, at this meeting there was 24 talk of putting him all the way town in Metropolis. Do you 25 A. Yes. 26 A. Yes. 27 A. Yes. 28 A. Yes. 29 C. And if you turn to page two, now in this one this was 29 I guess week later, Fr. Margason is open to Fr. Kownacki going 29 to Metropolis and now messenger 20 A. Yes. 21 Mand at that time, he had already been on the farthest 22 A. Yes. 23 Q. And at that time, he had already been on the farthest 24 he had been on the farthest east part of the State you 25 could possibly get, right? 26 A. Right. 27 Q. Then you put him all the way on the farthest west 38 C. But you don't have any recollection as to why they 39 Metropolis, right? 30 A. Right. 31 Q. Then you put him all the way on the farthest west 31 G. Do you know where he ended up? Let me show you a document we have marked as Exhibit 29, which is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? 4. I presume I did. Q. It presume I did. Q. It presume I did. Q. It shows another meeting of the Priest Personnel Board in 1986? 4. A. I presume I did. Q. It me show you a document we have marked as Exhibit 29, which is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? 4. I presume I did. Q. It presume I did. Q. It me show you a document we have marked as Exhibit 29, which is another priest Personnel Board memo. Do you recognize that as being a memo that you prepared in 1986? 4. I presume I did. Q. It me have marked as Exhibit 29, which is another priest Personnel Board me
13 Exhibit 28, okay? Do you recognize those as minutes that you took of a priest Personnel Board meeting? 14 A. Yes. 15 A. Yes. 16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WIGGINTON: Yeah, 28. 19 MR. WIGGINTON: Yeah, 28. 19 MR. WIGGINTON: Yes. 20 MR. WIGGINTON: Oh, I'm sorry. 21 MR. WIGGINTON: Oh, I'm sorry. 22 Q. (By Mr. Wigginton) Now, at this meeting there was talk of putting him all the way town in Metropolis. Do you 15 A. Yes. 16 Q. And if you turn to page to the Priest Personnel 17 Board, right? 18 Board, right? 19 A. Right. 20 Q. And again, it shows your attendance there, right? 21 A. Yes. 22 Q. Okay. And the Reverend Margason and Bernard 23 SullIvan, right? 24 A. Yes. 25 Q. And if you turn to page two, now in this one this was I guess week later, Fr. Margason is open to Fr. Kownacki going to Metropolis and now messenger 4 A. Yes. 4 Q. I'm looking at the comment before Fr. Margason. 5 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A. Yes. 7 Q. And at that time, he had already been on the farthest west 8 he had been on the farthest east part of the State you could possibly get, right? 10 A. Right. 11 Q. Then you put him all the way on the farthest west 12 Light you don't have any recollection as to why they the farthest the farthest that the farthest tha
tok of a priest Personnel Board meeting? A. Yes. Q. And would you turn the page to the second page? MS. SCHROEDER: Steve, you said 28? MR. WIGGINTON: Yeah, 28. MR. WELLS: Did you use it yesterday? MR. WELLS: I'm not sure you did. MR. WIGGINTON: Oh, I'm sorry. Q. (By Mr. Wigginton) Now, at this meeting there was talk of putting him all the way town in Metropolis. Do you A. Yes. A. Monsignor. Lombardo agrees, right? A. Yes. A. Monsignor Lombardo agrees, right? A. Yes. A. Monsignor Lombardo agrees, right? A. Yes. A. Monsignor Lombardo agrees, right? A. Yes. A. Monsignor Lombardo agrees, right? A. Yes. A. Monsignor Lombardo agrees, right? A. Yes. A. Monsignor Lombardo agrees, right? A. Yes. A. Monsignor Lombardo agrees, right? A. Yes. A. Wes. A. Monsignor Lombardo agrees, right? A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. A. Yes. A. Wes.
15 A Yes. 16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WIGGINTON: Yeah, 28. 19 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yes. 21 MR. WIGGINTON: Oh, I'm sorry. 22 MR. WIGGINTON: Oh, I'm sorry. 23 Q. (By Mr. Wigginton) Now, at this meeting there was 24 talk of putting him all the way town in Metropolis. Do you 25 A. Yes. 26 A. Yes. 27 Page of Margason made a comment that he feels that it's too far away. 28 A. Yes. 29 Q. And if you turn to page two, now in this one this was it's too far away. 30 Q. I'm looking at the comment before Fr. Margason. 31 Somebody said, Put Fr. Kownacki in Metropolis, right? 32 A. Yes. 33 Og. And at that time, he had already been on the farthest with the feels that it is an additional to the farthest with the feels that is an additional to the farthest was it's the farthest east part of the State you ocould possibly get, right? 34 Og. Then you put him all the way on the farthest west in the feels that is too far away. 4 Og. I'm looking at the comment before Fr. Margason. 5 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A. Yes. 7 Og. And at that time, he had already been on the farthest with the feels that in the feels
16 Q. And would you turn the page to the second page? 17 MS. SCHROEDER: Steve, you said 28? 18 MR. WIGGINTON: Yeah, 28. 19 MR. WELLS: Did you use it yesterday? 20 MR. WIGGINTON: Yes. 21 MR. WELLS: I'm not sure you did. 22 MR. WIGGINTON: Oh, I'm sorry. 23 Q. (By Mr. Wigginton) Now, at this meeting there was 24 talk of putting him all the way town in Metropolis. Do you 415 1 remember that? 2 A. Yes. 4 Yes. 4 Yes. 4 Q. I'm looking at the comment before Fr. Margason. 5 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A. Yes. 7 Q. And at that time, he had already been on the farthest 8 he had been on the farthest east part of the State you 9 could possibly get, right? 10 A. Right. 11 Q. Then you put him all the way on the farthest west 16 A. I presume I did. 17 Q. It shows another meeting of the Priest Personnel 18 Board, right? 19 A. Right. 10 A. Q. And again, it shows your attendance there, right? 20 Q. And again, it shows your attendance there, right? 21 A. Yes. 22 Q. Okay. And the Reverend Margason and Bernard 23 Sullivan, right? 24 A. Yes. 25 Q. And if you turn to page two, now in this one this was 26 I guess week later, Fr. Margason is open to Fr. Kownacki going to Metropolis and now messenger 4 A. Monsignor. 5 Q. Monsignor Lombardo agrees, right? 6 A. Yes. 7 Q. So there were at least a couple of meetings where the Priest Personnel Board discussed sending Fr. Kownacki to Metropolis, right? 10 A. Right. 11 Q. Then you put him all the way on the farthest west 16 A. I presume I did. 17 Q. It shows another meeting of the Priest Personnel Board. 18 Board, right? 19 A. Right. 10 A. (Indicates affirmatively.) 11 Q. But you don't have any recollection as to why they
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Q. (By Mr. Wigginton) Now, at this meeting there was talk of putting him all the way town in Metropolis. Do you 415 1 remember that? A. Yes. Fr. Margason made a comment that he feels that it's too far away. 4 Q. I'm looking at the comment before Fr. Margason. 5 Somebody said, Put Fr. Kownacki in Metropolis, right? A. Yes. Q. And at that time, he had already been on the farthest A. Yes. Q. And at that time, he had already been on the farthest A. Yes. Q. And at that time, he had already been on the farthest A. Yes.
24 talk of putting him all the way town in Metropolis. Do you 415 417 1 remember that? 2 A. Yes. Fr. Margason made a comment that he feels that 3 it's too far away. 4 Q. I'm looking at the comment before Fr. Margason. 5 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A. Yes. 7 Q. And if you turn to page two, now in this one this was 2 I guess week later, Fr. Margason is open to Fr. Kownacki going 3 to Metropolis and now messenger 4 A. Monsignor. 5 Q. Monsignor Lombardo agrees, right? 6 A. Yes. 7 Q. And at that time, he had already been on the farthest 8 he had been on the farthest east part of the State you 9 could possibly get, right? 10 A. Right. 11 Q. But you don't have any recollection as to why they 12 I guess week later, Fr. Margason is open to Fr. Kownacki going 14 A. Yes. 9 Metropolis and now messenger 4 A. Monsignor. 9 Q. Monsignor Lombardo agrees, right? 10 A. Yes. 11 Q. So there were at least a couple of meetings where the 12 Priest Personnel Board discussed sending Fr. Kownacki to 13 Metropolis, right? 14 Q. But you don't have any recollection as to why they 15 Q. But you don't have any recollection as to why they
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A. Yes. Fr. Margason made a comment that he feels that it's too far away. Q. I'm looking at the comment before Fr. Margason. Somebody said, Put Fr. Kownacki in Metropolis, right? A. Yes. Q. And at that time, he had already been on the farthest he had been on the farthest east part of the State you could possibly get, right? A. Right. Q. Then you put him all the way on the farthest west I guess week later, Fr. Margason is open to Fr. Kownacki going to Metropolis and now messenger A. Monsignor. Q. Monsignor Lombardo agrees, right? A. Yes. Q. So there were at least a couple of meetings where the Priest Personnel Board discussed sending Fr. Kownacki to Metropolis, right? A. (Indicates affirmatively.) Q. But you don't have any recollection as to why they
3 it's too far away. 4 Q. I'm looking at the comment before Fr. Margason. 5 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A. Yes. 7 Q. And at that time, he had already been on the farthest 8 he had been on the farthest east part of the State you 9 could possibly get, right? 10 A. Right. 11 Q. Then you put him all the way on the farthest west 3 to Metropolis and now messenger 4 A. Monsignor. 5 Q. Monsignor Lombardo agrees, right? 6 A. Yes. 7 Q. So there were at least a couple of meetings where the 8 Priest Personnel Board discussed sending Fr. Kownacki to 9 Metropolis, right? 10 A. (Indicates affirmatively.) 11 Q. But you don't have any recollection as to why they
Q. I'm looking at the comment before Fr. Margason. Somebody said, Put Fr. Kownacki in Metropolis, right? A. Yes. Q. And at that time, he had already been on the farthest he had been on the farthest east part of the State you could possibly get, right? A. Right. Q. I'm looking at the comment before Fr. Margason. 4 A. Monsignor. 5 Q. Monsignor Lombardo agrees, right? 6 A. Yes. 7 Q. So there were at least a couple of meetings where the Priest Personnel Board discussed sending Fr. Kownacki to 9 Metropolis, right? 10 A. (Indicates affirmatively.) 11 Q. But you don't have any recollection as to why they
5 Somebody said, Put Fr. Kownacki in Metropolis, right? 6 A. Yes. 7 Q. And at that time, he had already been on the farthest 8 he had been on the farthest east part of the State you 9 could possibly get, right? 10 A. Right. 11 Q. Then you put him all the way on the farthest west 12 Q. Monsignor Lombardo agrees, right? 13 Q. So there were at least a couple of meetings where the Priest Personnel Board discussed sending Fr. Kownacki to 9 Metropolis, right? 10 A. (Indicates affirmatively.) 11 Q. But you don't have any recollection as to why they
6 A. Yes. 7 Q. And at that time, he had already been on the farthest 8 he had been on the farthest east part of the State you 9 could possibly get, right? 10 A. Right. 10 A. Right. 11 Q. Then you put him all the way on the farthest west 12 A. Yes. 13 Q. So there were at least a couple of meetings where the 14 Priest Personnel Board discussed sending Fr. Kownacki to 15 Metropolis, right? 16 A. Yes. 17 Q. So there were at least a couple of meetings where the 18 Priest Personnel Board discussed sending Fr. Kownacki to 19 Metropolis, right? 10 A. (Indicates affirmatively.) 11 Q. But you don't have any recollection as to why they
7 Q. And at that time, he had already been on the farthest 8 he had been on the farthest east part of the State you 9 could possibly get, right? 10 A. Right. 11 Q. Then you put him all the way on the farthest west 12 Q. So there were at least a couple of meetings where the 8 Priest Personnel Board discussed sending Fr. Kownacki to 9 Metropolis, right? 10 A. (Indicates affirmatively.) 11 Q. But you don't have any recollection as to why they
8 he had been on the farthest east part of the State you 9 could possibly get, right? 10 A. Right. 11 Q. Then you put him all the way on the farthest west 12 Q. But you don't have any recollection as to why they
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10 A. Right. 10 A. (Indicates affirmatively.) 11 Q. Then you put him all the way on the farthest west 12 Q. But you don't have any recollection as to why they
Q. Then you put him all the way on the farthest west 11 Q. But you don't have any recollection as to why they
40 Valmayar to the farthast tip of
12 part of the state, right? 12 were going to send him from Valmeyer to the fartnest tip of
13 A. (Indicates affirmatively.) 13 the State of Illinois?
14 Q. Then put him in the middle of the State, right? 14 A. I don't know sir, sorry. Don't know.
15 A. (Indicates affirmatively.) 15 Q. Now, ultimately, do you know where he ended up?
16 Q. Then you transferred him all the way down here on the 16 A. I don't at the moment. I can't recall all that.
17 southwestern side of the state, correct? And then he was 17 Q. You don't recall where he ultimately ended up?
40 A No I don't
19 saving where are we going to put him? Do you know where 19 Q. Okay. This is Plaintiff's Exhibit 45.
Saying where are we going to partition to yet many the partition of the pa
20 Metropolis is? 20 A. Oh, yes, yes. 21 O. Do you this is a letter dated lune 22nd 1988. It
20 Metropolis is? 21 A. I was there years ago, of course. 22 A. Oh, yes, yes. 23 Q. Do you this is a letter dated June 22nd, 1988. It
20 Metropolis is? 21 A. I was there years ago, of course. 22 Q. It's as far south in Illinois as you can get, isn't 23 A. Oh, yes, yes. 24 Q. Do you this is a letter dated June 22nd, 1988. It 25 Was produced by the Diocese. It's to Reverend Kownacki from
20 Metropolis is? 21 A. I was there years ago, of course. 22 A. Oh, yes, yes. 23 Q. Do you this is a letter dated June 22nd, 1988. It

	418		420
1	Q. And this is June 22nd, 1988, right?	1	A. I did not personally, but I don't know about the
1 2	Q. And this is June 22llu, 1900, light: A. Yes.	2	Bishop or anybody else, anybody else on the Personnel Board or
3	Q. And can you read the first paragraph?	3	any other priests in the Chancery who might have spoken to Fr.
4	A. After consultation with and approval of the Priest	4	Voss. I don't have any way of knowing that.
_	Personnel Board, I hereby appoint you to residence at St.	5	Q. You were the secretary to the Bishop. You were the
5 6	Henry parish, Belleville. Appointment becomes effective	6	Monsignor in Belleville. You would know if the Chancery
7	Friday, July 1, 1988.	7	located three blocks over from here notified the parishioners
8	Q. So, now, after all the Priest Personnel Board knows	8	of St. Henry's, which is at the 5200 block of West Main?
9	about this man and they know all the things that he's done for	9	A. Right.
10	the last 15 years, they put him at St. Henry's parish on West	10	Q. You would know that, wouldn't you?
11	Main at the residence, correct?	11	A. I was not made aware of that, sir. I'm sorry.
12	A. Right.	12	Q. No, and we know that it never happened, right? The
13	Q. And in 1988, right next door to the residence was the	13	public was never warned about Fr. Kownacki at St. Henry's,
14	Catholic grade school, wasn't it, St. Henry's grade school?	14	were they?
15	A. Yes.	15	A. I'm not sure.
16	Q. And right next to that was Althoff High School,	16	Q. In fact, he was held out as a good priest at that
17	wasn't it?	17	time, wasn't he?
18	A. Right.	18	A. (No audible response.)
19	Q. And they put him in the heart of a grade school and a	19	Q. He was held out as a safe and suitable priest to be
20	high school, didn't they?	20	around grade school children and high school students at St.
21	A. Uh-huh.	21	Henry's and Althoff Catholic High School, wasn't he?
22	Q. What is your answer?	22	A. By reason of this appointment you are saying?
23	A. Yes, they did. We did. It was	23	Q. Yes, right.
24	Q. And he would be there would be alter boys at St.	24	A. Yes, yes.
	419		421
1	Henry's, wouldn't there?	1	MR. WIGGINTON: That's all I have of this witness.
2	A. He certainly had an exemplary role model, however, in	2	THE COURT: Okay. Cross examination?
3	the pastor at St. Henry's.	3	MS. SCHROEDER: Yes, Your Honor.
4	Q. I'm sorry, I didn't	4	CROSS EXAMINATION
1		1	
5	 A. If he was going to take a residency at St. Henry's, 	5	BY MS. SCHROEDER:
5 6	A. If he was going to take a residency at St. Henry's, he certainly has an exemplary role model in the pastor of St.	5 6	BY MS. SCHROEDER: Q. Joe, do you have in front of you Exhibit 3?
_			Q. Joe, do you have in front of you Exhibit 3?A. I do.
6	he certainly has an exemplary role model in the pastor of St.	6	Q. Joe, do you have in front of you Exhibit 3?A. I do.Q. And the very last page Mr. Wigginton referred to this
6 7	he certainly has an exemplary role model in the pastor of St. Henry's, and I presume he would continue then his ministry	6	Q. Joe, do you have in front of you Exhibit 3?A. I do.Q. And the very last page Mr. Wigginton referred to this document in your direct examination, and at the very bottom he
6 7 8	he certainly has an exemplary role model in the pastor of St. Henry's, and I presume he would continue then his ministry with the Poor Clares. I don't see that in here, though.	6 7 8	Q. Joe, do you have in front of you Exhibit 3?A. I do.Q. And the very last page Mr. Wigginton referred to this
6 7 8 9	he certainly has an exemplary role model in the pastor of St. Henry's, and I presume he would continue then his ministry with the Poor Clares. I don't see that in here, though. Q. The thing is, though, is you put him right your Board, the Priest Personnel Board, after everything you have known, you put him right in the heart of kids. You put him	6 7 8 9 10 11	 Q. Joe, do you have in front of you Exhibit 3? A. I do. Q. And the very last page Mr. Wigginton referred to this document in your direct examination, and at the very bottom he referred you to the fact that Monsignor Sullivan signed it, did he not?
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		422		424
1	Α.	No.	1	MR. WIGGINTON: Objection, Your Honor. That's
2	Q.	We're a diocese, correct?	2	irrelevant to this case. That case never went to a jury
3	Α.	Correct.	3	trial.
4	Q.	St. Louis is an archdiocese?	4	THE COURT: Ladies and gentlemen, the only person
5	Α.	That's right.	5	that you're going to hear the law from is me. It's not what
6	Q.	Chicago is an archdiocese?	6	happened on some other case, be it in Federal Court or
7	Α.	Yes, ma'am.	7	anywhere else. Each case stands on its own facts. If
8	Q.	But the Belleville Diocese is not an archdiocese?	8	Monsignor Schwaegel was a target of that litigation there,
9	Α.	It is not.	9	he's not today. The Diocese of Belleville is. So, you know,
10	Q.	At the beginning of your testimony with Mr. Wigginton	10	you don't have to pay any attention to what somebody else did
11	he refer	red to the fact you have been removed from ministry,	11	in some other lawsuit. The objection is sustained.
12	correct?		12	MS. SCHROEDER: I have no further questions, Your
13	Α.	Yes.	13	Honor.
14	Q.	And you talked about a sexual addiction, correct?	14	THE COURT: Okay. Anything on redirect related to
15	Α.	Yes.	15	the cross examination?
16	Q.	That sexual addiction never included minors, did it?	16	MR. WIGGINTON: No, Your Honor. Thank you.
17	Α.	Never. Adults, males only.	17	THE COURT: Okay, you may step down. Thank you.
18	Q.	And you have admitted that, correct?		
19	Α.	Yes, I have.		
20	Q.	And you have been removed by the Review Board,		

1 Q. Your removal process did not go through the Review

Q. Or excuse me, you have been removed by the Bishop?

2 Board, did it?

correct?

21

22

23 24

- 3 A. I don't think so.
- 4 MS. SCHROEDER: May I have a moment, Your Honor?
- 5 THE COURT: Sure.

A. Yes, by the --

A. By the Bishop.

- 6 Q. (By Ms. Schroeder) Joe, you were sued in U.S.
- 7 Federal Court in East St. Louis, were you not?
- 8 A. Yes.
- 9 Q. By an individual who accused you of sexual abuse with
- 10 a minor?
- 11 A. Yes.
- 12 Q. Correct?
- 13 A. Yes, yes.
- 14 Q. And this was after you were removed from ministry?
- 15 A. Yes.
- 16 Q. By the Bishop of Belleville, correct?
- 17 A. Yes
- 18 Q. You were removed, for the members of the jury, that
- 19 was in December of 1994, correct?
- 20 A. Yes.
- Q. And that lawsuit was filed in 2001?
- 22 A. Yes, I think that's right.
- Q. And was the Diocese of Belleville dismissed from that
- 24 lawsuit?