

The Roman Catholic Faithful

The pages that follow are a reproduction of a deposition made by Fr. James Haley of the diocese of Arlington, Virginia, on July 24, 2002.

The Roman Catholic Faithful, Inc.

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VIRGINIA:
IN THE CIRCUIT COURT FOR ARLINGTON COUNTY

-----x
:
JIM A. LAMBERT, :
:
Plaintiff :
:
v. : Law No. 02-423
:
:
BISHOP PAUL S. LOVERDE of :
The Catholic Diocese of :
Arlington, a Corporation :
Sole, and CATHOLIC DIOCESE :
OF ARLINGTON, a Corporation :
Sole. :
:
Defendant :
-----x

Wednesday, July 24, 2002
Arlington, Virginia

Deposition of
FATHER JAMES HALEY

a witness, called for examination by counsel for
the plaintiff, pursuant to notice, held at the law
offices of Vorys, Sater, Seymour and Pease LLP, 277
South Washington Street, Suite 310, Alexandria,
Virginia, 22314, beginning at 10:15 a.m., before
Monica L. Knight, a Notary Public in and for the
Commonwealth of Virginia, when were present on
behalf of the respective parties:



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1050 17th Street, NW
Suite 600
Washington, DC 20036
TEL 202-833-3399

MARYLAND:
51 Monroe Street
Suite 1401
Rockville, MD 20850
TEL 301-762-1606

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Suite 700
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[NEXT]

<p style="text-align: right;">Page 2</p> <p>APPEARANCES:</p> <p>For the Plaintiff:</p> <div style="border: 1px dashed black; padding: 5px; margin: 10px 0;"> <p>GREGORY L. MURPHY, ESQ. 703/837-6999 Vorys, Sater, Seymour and Pease LLP 277 South Washington Street Suite 310 Alexandria, Virginia 22314</p> </div> <p>For the Defendant:</p> <p>(No Appearance)</p>	<p style="text-align: right;">Page 4</p> <ol style="list-style-type: none"> 1. Thereupon 2. <u>FATHER JAMES HALEY</u> 3. a witness, called for examination by counsel 4. for the plaintiff, and after having been 5. first duly sworn by the Notary Public, was 6. examined and testified as follows: 7. MR. MURPHY: It's now approximately 8. 10:15 on Wednesday, July 24th. We're here 9. for the deposition of Father James Haley who 10. was served a subpoena for the taking of his 11. deposition and a request for documents on a 12. couple -- approximately a couple of weeks 13. ago. He is here pursuant to that notice. 14. For the record, I have had some 15. communication with the defendant's counsel, 16. Stuart Raphael, and for the record I want it 17. to be known that he requested a possible 18. postponement of this less than a week ago -- 19. actually, I guess, exactly a week ago -- to a 20. more convenient date for him, stating that he 21. may have a conflict. 22. My later discussion -- in later 								
<p style="text-align: right;">Page 3</p> <p style="text-align: center;"><u>C O N T E N T S</u></p> <p style="text-align: center;">Examination by Counsel</p> <p><u>Witness</u></p> <p>Father James Haley Mr. Murphy: 10</p> <p style="text-align: center;"><u>EXHIBITS</u></p> <p>***<u>(All exhibits retained by counsel.)</u></p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Deposition Exhibit No.</th> <th style="text-align: right;">Page</th> </tr> </thead> <tbody> <tr> <td>A - Folder of documents.....</td> <td style="text-align: right;">223</td> </tr> <tr> <td>B - Folder of documents.....</td> <td style="text-align: right;">224</td> </tr> <tr> <td>C - Folder of documents.....</td> <td style="text-align: right;">228</td> </tr> </tbody> </table>	Deposition Exhibit No.	Page	A - Folder of documents.....	223	B - Folder of documents.....	224	C - Folder of documents.....	228	<p style="text-align: right;">Page 5</p> <ol style="list-style-type: none"> 1. discussions with him, he indicated that he 2. actually just wanted to postpone until after 3. the motions are heard on August 29th, which 4. he 5. says may be dispositive of this case. I 6. was away all last week in trial in Nashville, 7. but I had my office communicate with him 8. on 9. several occasions to tell him that I could 10. not postpone this deposition unless Father 11. Haley agreed, since he was under subpoena, 12. unless he agreed to another date. 13. And I further communicated to Mr. 14. Raphael that I would not postpone it past 15. August 29th, since this deposition is 16. important to those motions. I finally spoke 17. with Mr. -- excuse me -- Mr. Raphael was 18. asked by my office at my direction for his 19. date 20. that I could take to or my office could 21. take to Father Haley to see if he would agree 22. to the postponed date. 23. Mr. Raphael refused to give my office 24. any dates for postponing and therefore we -- 25. he was told that we couldn't agree to a
Deposition Exhibit No.	Page								
A - Folder of documents.....	223								
B - Folder of documents.....	224								
C - Folder of documents.....	228								
Page 2 - Page 5									
Exceptional Service in Court Reporting and Litigation Support									

Page 6	<ol style="list-style-type: none"> 1. postponement as a result. I finally spoke 2. with him on Monday, July 22nd, when he 3. indicated to me that he wanted to postpone 4. this past August 29th. And I reminded him] 5. that this was unacceptable to me because I 6. needed this testimony for the dispositive 7. motions that were pending. 8. I also expressed to him, as I had 9. earlier, that I had a concern about Father 10. Haley's availability here in the future 11. because of his situation with the Diocese of 12. Arlington, which has the power to remove him 13. or move him around or alternatively, I 14. understand there is a possibility they may 15. terminate him. Not terminate -- excuse me, 16. incorrect word -- it may take some action 17. that may result in his not being available in 18. this jurisdiction. 19. And as a consequence of that I felt 20. it was important to preserve his testimony. 21. Mr. Raphael said that if there was a 22. postponement he might be able to check with
Page 7	<ol style="list-style-type: none"> 1. the diocese to see if they could assure his 2. appearance here. I told him that that 3. wouldn't work if Father Haley was with this 4. diocese and so I still had a problem with it. 5. But regardless, I told him I would try to 6. contact Father Haley and see if he would 7. agree to a short postponement. 8. As a result of that, Mr. Raphael 9. suggested some dates in the next week or so, 10. but it became clear in my discussions with 11. him that it was solely for the purpose -- for 12. his sole purpose in seeking a protective 13. order from this court to stop the discovery 14. completely. I told him that was unacceptable 15. to me, but, in any event, I will still try to 16. accommodate a short postponement. 17. I was unavailable to get ahold of 18. Father Haley on Monday evening or early 19. Tuesday and instead -- and shortly 20. thereafter, I mean -- I received from Mr. 21. Raphael on July 23rd, a motion to stay 22. discovery and for protective order with a
Page 8	<ol style="list-style-type: none"> 1. cover letter of July 23rd totally 2. misrepresenting our conversations and what 3. had occurred. 4. I have written him back by letter of 5. that same day, yesterday, July 23rd 6. informing him of his misstatements and the 7. fact that I -- the reason I had not contacted 8. him earlier in the day is I had not heard 9. from Father Haley. I thus told him in that 10. letter that I had no choice but to go forward 11. today with the deposition since there had 12. been no postponement agreed to and that it 13. was becoming clear to me that it wasn't a 14. matter of inconvenience, but rather a simple 15. desire to postpone this deposition for the 16. diocese's own purposes and trying to prevent 17. it. 18. If Mr. Raphael wasn't available, I 19. suggested to him that someone else in his 20. rather large firm of Hunton and Williams 21. might be able to attend. He cites to me in 22. his letter Rule 4:5(d) which states that --
Page 9	<ol style="list-style-type: none"> 1. states according to him, that a deposition 2. should be suspended upon a demand of an 3. objecting party. And thus, he says that he 4. will not be attending and claims that the 5. deposition was suspended by operation of law. 6. I responded to his office last night 7. to tell him that I found Rule 4:5 8. inapplicable and therefore unpersuasive in 9. this instance. It's clear to me that Rule 10. 4:5 applies to suspending a deposition when 11. during it there is some indication of 12. harassment, annoyance, embarrassment or the 13. like. There is nothing in the rule that says 14. that the deposition can be suspended simply 15. to have the court determine whether it is 16. important to have that deposition heard 17. before or after dispositive motions. And 18. it's clear that when the deposition pertains 19. to the dispositive motions there's no reason 20. for delaying it. And so even if it did come 21. under the rubric of 4:5, in this instance 22. it wouldn't apply.

Page 10	Page 12
<p>1. Despite having told Mr. Raphael all</p> <p>2. this, he is not here today. He has not</p> <p>3. called me in response to my letter and yet</p> <p>4. Father Haley has appeared here for his</p> <p>5. deposition. And so I am going to go forward</p> <p>6. in accordance with the Notice of Deposition</p> <p>7. Request for Documents that was previously</p> <p>8. served on Father Haley in order to preserve</p> <p>9. his testimony and the testimony for the</p> <p>10. dispositive motions and in this case.</p> <p>11. Having given that long preamble, let</p> <p>12. me proceed, if I may.</p> <p>13. EXAMINATION BY COUNSEL FOR THE PLAINTIFF</p> <p>14. BY MR. MURPHY:</p> <p>15. Q Father Haley, please state your full</p> <p>16. name and address.</p> <p>17. A Full name, James Raymond Haley. And</p> <p>18. address currently is 8060 East Girard Avenue,</p> <p>19. Apartment 511, Denver, Colorado, 80231-</p> <p>20. 4417.</p> <p>21. Q 4417. And are you here today</p> <p>22. pursuant to the Notice of Deposition and</p> <p>Request for Documents that was served on you?</p>	<p>1. Catholic Diocese of Arlington?</p> <p>2. A Yes.</p> <p>3. Q Would you briefly tell me what</p> <p>4. parishes you have been associated with and in</p> <p>5. what capacity?</p> <p>6. A Original assignment, Saint Marks in</p> <p>7. Vienna, Virginia, from 1987 to 1991.</p> <p>8. Q What was -- in what capacity there?</p> <p>9. A Assistant Pastor, Associate Pastor.</p> <p>10. Q Which is the higher rank? Associate</p> <p>11. or Assistant or are they the same?</p> <p>12. A They're the same. The proper</p> <p>13. terminology now is Parochial Vicar.</p> <p>14. Q Okay.</p> <p>15. A Followed by Saint Louis Parish in</p> <p>16. Alexandria, Virginia, from 1991 to 1994.</p> <p>17. Q Your role there?</p> <p>18. A Associate Pastor. Saint Ann's in</p> <p>19. Arlington, Virginia, '94 to '95. Associate</p> <p>20. Pastor, Saint John's in McLean, Virginia, '95</p> <p>21. to '97. Associate Pastor, All Saints Parish</p> <p>22. in Manassas, Virginia, 1997 to '99.</p>
Page 11	Page 13
<p>1. A Yes.</p> <p>2. Q And have you brought with you and</p> <p>3. produced documents pursuant to that?</p> <p>4. A Yes.</p> <p>5. Q I will go through those later, if I</p> <p>6. may.</p> <p>7. Let me first ask you, where are you</p> <p>8. presently employed?</p> <p>9. A Employed with the Diocese of</p> <p>10. Arlington, Virginia and their main chancery</p> <p>11. office are at 200 North Glebe Road,</p> <p>12. Arlington, Virginia.</p> <p>13. Q How long have you been employed with</p> <p>14. the Diocese of Arlington and in what</p> <p>15. capacity?</p> <p>16. A Since my ordination, May 9th, 1987,</p> <p>17. as a roman Catholic Priest.</p> <p>18. Q Where were you ordained?</p> <p>19. A The Cathedral of Saint Thomas More in</p> <p>20. Arlington, Virginia.</p> <p>21. Q And have you continued to serve as a</p> <p>22. priest since your ordination solely with the</p>	<p>1. Associate Pastor, Saint Lawrence Parish in</p> <p>2. Alexandria, Virginia, 1999 to 2001.</p> <p>3. Q Also as Associate Pastor?</p> <p>4. A Associate Pastor. Saint Mary's in</p> <p>5. Fredericksburg, 1991 until October the 23rd</p> <p>6. of 1991.</p> <p>7. Q You mean 2001?</p> <p>8. A 2001.</p> <p>9. Q Until 2001?</p> <p>10. A From June until October of 2001.</p> <p>11. Q And where have you been since October</p> <p>12. of 2001?</p> <p>13. A I have been on a period forced</p> <p>14. discernment by the Diocese of Arlington.</p> <p>15. Q I am going to come back to that.</p> <p>16. Are you familiar with Jim A. Lambert?</p> <p>17. A Yes.</p> <p>18. Q And how did you come to know Jim</p> <p>19. Lambert?</p> <p>20. A He and his wife, Nancy, and their</p> <p>21. children were parishioners at All Saints</p> <p>22. Parish in Manassas.</p>
Page 10 - Page 13	
Exceptional Service in Court Reporting and Litigation Support	

Page 14	Page 16
<p>1. Q And do you recall in what year you</p> <p>2. came to become acquainted with them? We're</p> <p>3. talking the years, I assume, 1997 to 1999?</p> <p>4. A Yes.</p> <p>5. Q And how soon after, if you recall,</p> <p>6. that you came to All Saints did you -- were</p> <p>7. you introduced to either of them?</p> <p>8. A I met Nancy fairly quickly</p> <p>9. Certainly, by the beginning of 1998, but</p> <p>10. never actually was introduced to Jim Lambert</p> <p>11. probably until somewhere in the year 2000.</p> <p>12. Q And how did you come to know Nancy</p> <p>13. Lambert in early 1998?</p> <p>14. A She was a frequent visitor at the</p> <p>15. rectory of All Saints and a friend, walking</p> <p>16. partner and mate of some sort with the</p> <p>17. pastor, Father James Verrecchia.</p> <p>18. Q And who is Father James Verrecchia?</p> <p>19. A He was the pastor of All Saints</p> <p>20. Parish during my tenure there between 1997.</p> <p>21. Q Were there any other priests there</p> <p>22. during that time other than Father Verrecchia</p>	<p>1. Q Where did he go, do you know?</p> <p>2. A He was transferred as an associate</p> <p>3. pastor to our Lady of Angels in Woodbridge.</p> <p>4. Q And do you know where he is today?</p> <p>5. A He is still Associate Pastor at Lady</p> <p>6. of Angels in Woodbridge.</p> <p>7. Q Father Paul Berghout? Do you know</p> <p>8. where he is today?</p> <p>9. A I believe that he's at Saint</p> <p>10. Anthony's Parish.</p> <p>11. Q In -- on Columbia Pike?</p> <p>12. A Yes.</p> <p>13. Q Did Ms. Lambert have any official --</p> <p>14. did she serve any official capacity in the</p> <p>15. rectory?</p> <p>16. A No.</p> <p>17. Q Or for the parish?</p> <p>18. A No.</p> <p>19. Q And you say you saw her frequently as</p> <p>20. a visitor in the rectory. How often on the</p> <p>21. average, per week or month, whatever is</p> <p>22. the easiest way to define it?</p>
Page 15	Page 17
<p>1. and yourself?</p> <p>2. A Two other associates. Father Paul</p> <p>3. Berghout and Father Daniel Gee.</p> <p>4. Q How do you spell Berghout?</p> <p>5. A B-E-R-G-H-O-U-T.</p> <p>6. Q And how do you spell Father -- what</p> <p>7. was his first name, Gee?</p> <p>8. A Daniel Gee. G-E-E.</p> <p>9. Q And were there also associate</p> <p>10. pastors?</p> <p>11. A Yes.</p> <p>12. Q So there were three of you. Were</p> <p>13. they prior to your arriving or did they come</p> <p>14. subsequent?</p> <p>15. A They had been there. Father Paul</p> <p>16. Berghout had been there a year and I believe</p> <p>17. Gee had been there two years before my</p> <p>18. arrival in 1997.</p> <p>19. Q Did either of them leave before you?</p> <p>20. A Father Daniel Gee left the parish one</p> <p>21. month before I left in July of 1999. He left</p> <p>22. in June of 1999.</p>	<p>1. A During the summer of 1998, I'd say</p> <p>2. that we saw her two, three times a week.</p> <p>3. Q And did that change at all at any</p> <p>4. time? Increase or decrease after that?</p> <p>5. A It became more hidden.</p> <p>6. Q And what do you mean by that?</p> <p>7. A But the frequency was probably the</p> <p>8. same. Hidden, she was no longer so obvious</p> <p>9. in the rectory, kitchen area, dining room</p> <p>10. area, but there was a continuing meeting</p> <p>11. of the pastor, Father Verrecchia and her,</p> <p>12. especially in outside walks and spiritual</p> <p>13. direction, counseling sessions. Especially</p> <p>14. early in the morning, late evenings.</p> <p>15. Q When she was in the rectory, where in</p> <p>16. the rectory would she be visiting?</p> <p>17. A Normally, she would be in the kitchen</p> <p>18. area, although several times, I'd say at</p> <p>19. least four, noticed her coming down the</p> <p>20. stairs from the pastor's bedroom area.</p> <p>21. Q Was this your observation?</p> <p>22. A Yes.</p>
Page 14 - Page 17	
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Page 18	Page 20
<p>1. Q Do you know if anyone else there</p> <p>2. observed her coming down from the bedroom</p> <p>3. area?</p> <p>4. A I don't know.</p> <p>5. Q How were you aware that she was</p> <p>6. engaged in walks early morning, late</p> <p>7. evenings, et cetera, with Father Verrecchia?</p> <p>8. A It was becoming a source of public</p> <p>9. discussion within the parish. Many</p> <p>10. parishioners had seen the two together and</p> <p>11. were commenting on the relationship as being</p> <p>12. inappropriate and very visible and there were</p> <p>13. many who were concerned.</p> <p>14. Q And did they bring that to your</p> <p>15. attention?</p> <p>16. A Yes. And to my knowledge to the</p> <p>17. other priests as well.</p> <p>18. Q Did you ever discuss with Father Gee</p> <p>19. or Father Berghout these concerns?</p> <p>20. A Not -- not directly, in the sense of</p> <p>21. making an official declaration to the</p> <p>22. diocese, but certainly we talked about our</p>	<p>1. would encounter them?</p> <p>2. A Yes. Typical, "Hi Nancy. What are</p> <p>3. you doing here? You're back again? Those</p> <p>4. are pretty short shorts."</p> <p>5. Q Anything else?</p> <p>6. A On my part, I think there was this</p> <p>7. growing concern that boundaries had been</p> <p>8. passed, simply because of their attire that</p> <p>9. they were wearing in each other's presence,</p> <p>10. the intimacy of conversations they were</p> <p>11. having.</p> <p>12. Q Were these the types of things that</p> <p>13. were discussed amongst the other priests</p> <p>14. there?</p> <p>15. A I think at time we felt that there</p> <p>16. was certainly a very strong friendship, but</p> <p>17. there were some events that made everyone</p> <p>18. aware that this truly had crossed the</p> <p>19. boundaries.</p> <p>20. Q At what point in time was that?</p> <p>21. A Certainly by the fall of 1998,</p> <p>22. certain events happened.</p>
Page 19	Page 21
<p>1. concerns.</p> <p>2. Q You talked amongst each other?</p> <p>3. A Yes</p> <p>4. Q So did they indicate that they were</p> <p>5. aware of the frequency of these visits and</p> <p>6. the parishioners expressed concerns about the</p> <p>7. inappropriateness of this?</p> <p>8. A Yes. It was a growing concern</p> <p>9. on their part, too. Especially, I think,</p> <p>10. among -- with Father Gee.</p> <p>11. Q Did you ever speak with Father</p> <p>12. Verrecchia about what you were observing and</p> <p>13. others were expressing concern about?</p> <p>14. A Not directly, but there were</p> <p>15. certainly gestures and indications of</p> <p>16. surprise when I had found them together in</p> <p>17. the kitchen area, when we had seen them on</p> <p>18. long walks, two and three-hour walks</p> <p>19. together. So there was a questioning of the</p> <p>20. relationship and how frequently they were</p> <p>21. seeing each other just by the surprise.</p> <p>22. Q The surprise shown by you when you</p>	<p>1. Q Before I get to that, you had</p> <p>2. mentioned also there was a lot of times spent</p> <p>3. in spiritual counseling sessions. What are</p> <p>4. spiritual counseling sessions?</p> <p>5. A Normally a priest might see a member</p> <p>6. of the parish for spiritual direction in a</p> <p>7. priest's office. It would last anywhere from</p> <p>8. a half-hour to an hour, usually entailed</p> <p>9. confession and discussion of spiritual</p> <p>10. issues. Prayer life, moral life, that would</p> <p>11. be the typical case.</p> <p>12. In Father Verrecchia and Nancy's</p> <p>13. case, much of the discussions seems to have</p> <p>14. happened on their walks together or in early</p> <p>15. morning rendezvous within the church itself.</p> <p>16. Q Is spiritual counseling something</p> <p>17. offered to the parishioners by virtue of</p> <p>18. their being members of the parish?</p> <p>19. A Usually a parishioner would ask a</p> <p>20. priest if she could have an appointment or</p> <p>21. he or she could have an appointment to</p> <p>22. discuss spiritual issues and in the process</p>
Page 18 - Page 21	
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Page 22	Page 24
<p>1. one might become a spiritual directee of a</p> <p>2. priest. Typically, I would not meet with</p> <p>3. anyone more than once a month, usually every</p> <p>4. other month.</p> <p>5. Q And is that fairly typical if you</p> <p>6. were providing spiritual counseling to me?</p> <p>7. Once a month or every other month?</p> <p>8. A Yes.</p> <p>9. Q Are there occasions when you would</p> <p>10. meet more than that?</p> <p>11. A I suppose if there was some sort of a</p> <p>12. crisis, but in my particular case I would</p> <p>13. even resist so that there wasn't a dependency</p> <p>14. that would form. and certainly once one had</p> <p>15. established that kind of relationship with</p> <p>16. the parishioner it would complicate</p> <p>17. friendships, social activity with that same</p> <p>18. parishioner.</p> <p>19. Q By that you mean, if you were going</p> <p>20. to be counseling you shouldn't be indulging</p> <p>21. in a social relationship, too?</p> <p>22. A Unlike a lawyer or a psychologist who</p>	<p>1. certain liabilities to true counseling.</p> <p>2. Q Is direction something that a</p> <p>3. parishioner can ask for and expect to receive</p> <p>4. if they ask for it from a priest in the</p> <p>5. parish?</p> <p>6. A Yes.</p> <p>7. Q How frequently from your observation</p> <p>8. was Father Verrecchia meeting with Ms.</p> <p>9. Lambert in the summer and fall of 1998?</p> <p>10. A Probably the same frequency, two and</p> <p>11. three times a week.</p> <p>12. Q Did there appear to be from your</p> <p>13. observation any crisis that she -- in her</p> <p>14. life that she would have exhibited or even</p> <p>15. mentioned that would have explained meeting</p> <p>16. that often?</p> <p>17. A From outside appearances, no.</p> <p>18. Q Did Father Verrecchia ever suggest</p> <p>19. that there was some crisis going on in her</p> <p>20. life that necessitated his meeting with her</p> <p>21. that frequently?</p> <p>22. A No. it primarily seemed to be a</p>
Page 23	Page 25
<p>1. would be prevented, prohibited from that,</p> <p>2. certainly the discretion of the priest, one</p> <p>3. would hope that he had the prudence to keep</p> <p>4. that separation, but in the life of the</p> <p>5. parish a priest is involved with all of the</p> <p>6. parishioners all the time.</p> <p>7. Q Insofar as spiritual counseling or</p> <p>8. being -- serving as a spiritual directee, I</p> <p>9. asked the question earlier and I want to make</p> <p>10. sure I understood.</p> <p>11. Is this something that the priests</p> <p>12. are trained to offer to members of the parish</p> <p>13. and something that members of the parish can</p> <p>14. ask for by virtue of being a member of that</p> <p>15. parish?</p> <p>16. A "Spiritual counseling" is probably</p> <p>17. not used. Spiritual direction.</p> <p>18. Q Spiritual direction?</p> <p>19. A. Yes. A priest has a very limited</p> <p>20. counseling, training, and certainly most don't</p> <p>21. offer any major counseling because they are</p> <p>22. not trained and I would think there would be</p>	<p>1. mutual attraction.</p> <p>2. Q When you're trained -- how long were</p> <p>3. you in training before you're -- one is</p> <p>4. ordained as a priest?</p> <p>5. A Typically, four years.</p> <p>6. Q And during those four years are you</p> <p>7. given instruction -- were you given</p> <p>8. instruction and are priests in the diocese</p> <p>9. typically given instruction on how to provide</p> <p>10. spiritual direction?</p> <p>11. A No.</p> <p>12. Q How does that come about that you --</p> <p>13. one knows how to give spiritual direction if</p> <p>14. it's requested?</p> <p>15. A Initially, most priests are very</p> <p>16. resistant towards taking on any spiritual</p> <p>17. direction because of a lack of experience.</p> <p>18. For example, Father Paul and Father Gee both</p> <p>19. refused to take any because of their</p> <p>20. inexperience as priests.</p> <p>21. Q Are you given -- in your training</p> <p>22. are priests given and were you given any</p>
Page 22 - Page 25	
Exceptional Service in Court Reporting and Litigation Support	

Page 26	Page 28
<p>1. advice, counseling, direction or instruction</p> <p>2. as to the appropriateness of fraternizing</p> <p>3. with parishioners and to the extent to which</p> <p>4. you socialize or spend personal time with</p> <p>5. parishioners?</p> <p>6. A Training varies. It was suggested to</p> <p>7. us that there should be a cordial</p> <p>8. relationship with all parishioners, men and</p> <p>9. women, but no relationships that would</p> <p>10. compromise the vows of celibacy.</p> <p>11. Q And is that an instruction that would</p> <p>12. come from the Diocese of Arlington through</p> <p>13. the bishop?</p> <p>14. A Not directly, but certainly in the</p> <p>15. moral life of a priest, prudence in</p> <p>16. maintaining your vows would be upper-</p> <p>17. handed.</p> <p>18. Q And that's given in the teachings for</p> <p>19. the priesthood?</p> <p>20. A Yes.</p> <p>21. Q During your tenure in the Diocese of</p> <p>22. Arlington, were you ever aware of any</p> <p>instruction or guidance given or even</p>	<p>1. A It certainly has. The bishop has</p> <p>2. that power and in fact, responsibility.</p> <p>3. Q And in the exercise of that</p> <p>4. responsibility -- power and responsibility,</p> <p>5. could the bishop physically remove you from a</p> <p>6. parish where the parishioner with whom you</p> <p>7. may be having too close a contact is a</p> <p>8. member?</p> <p>9. A Could be? Yes. Certainly has the</p> <p>10. power and, as I say, in most cases it's an</p> <p>11. immediate inquiry through a week or two of</p> <p>12. psychological inpatient evaluation.</p> <p>13. Q And he can require you to -- as a</p> <p>14. member priest of the diocese under the</p> <p>15. bishop's auspices to attend the psychiatric</p> <p>16. or psychological evaluation?</p> <p>17. A I don't believe that he can require,</p> <p>18. but the tone that they use would certainly</p> <p>19. indicate that it's a mandatory need in order</p> <p>20. to address the issue. And normally, it would</p> <p>21. come from the offended party. I.e., the</p> <p>22. woman who is being mistreated approaching the</p>
Page 27	Page 29
<p>1. admonition given by the diocese through the</p> <p>2. bishop or through any of his representatives</p> <p>3. about personal relationships with</p> <p>4. parishioners that may appear to be</p> <p>5. compromising their vow of celibacy or, in</p> <p>6. fact, were compromising the vows of celibacy?</p> <p>7. A Yes. In some cases there seems to be</p> <p>8. severe reactions towards what happened to be</p> <p>9. minor indiscretions what, in fact, were minor</p> <p>10. indiscretions and the diocese took severe</p> <p>11. reaction.</p> <p>12. Q What was the severe reaction?</p> <p>13. A Normally, within a week of being</p> <p>14. informed of a complaint it would be</p> <p>15. investigated by a psychological evaluation of</p> <p>16. the priest and stern disciplinary action that</p> <p>17. would indicate that the relationship should</p> <p>18. stop immediately, no contact.</p> <p>19. Q And was it within the power of the</p> <p>20. bishop and his priests that are in the</p> <p>21. diocese to demand that a relationship, as you</p> <p>22. just described, stop?</p>	<p>1. bishop or a diocesan authority or another</p> <p>2. priest in response to her complaint.</p> <p>3. Q Putting aside Ms. Lambert and</p> <p>4. Father Verrecchia for a second, was it -- did</p> <p>5. it appear to you, be then standard procedure</p> <p>6. in other cases for the bishop to react</p> <p>7. quickly and exercise his power and</p> <p>8. responsibility through stern disciplinary</p> <p>9. reaction when situations like this were</p> <p>10. presented to him?</p> <p>11. A It seemed that if there was the</p> <p>12. possibility of any kind of legal or public</p> <p>13. scandal towards the diocese, prompt action</p> <p>14. would be taken, but not necessarily if there</p> <p>15. was a scandal of the parishioners. What</p> <p>16. seemed to motivate a bishop's action was the</p> <p>17. threat of a legal action or a lawsuit from an</p> <p>18. offended party.</p> <p>19. Q Did the bishop -- does the bishop</p> <p>20. have the authority to move a priest from one</p> <p>21. parish to another within the diocese?</p> <p>22. A Yes.</p>
Page 26 - Page 29	
Exceptional Service in Court Reporting and Litigation Support	

Page 30	Page 32
<p>1. Q In fact, is that how you get assigned</p> <p>2. from one parish to another?</p> <p>3. A Yes.</p> <p>4. Q And how long is your tenure usually?</p> <p>5. A priest's tenure at one parish?</p> <p>6. A Varies. Typically, maybe three or</p> <p>7. four years as an associate.</p> <p>8. Q And how long is it typically before</p> <p>9. one becomes a pastor of a parish?</p> <p>10. A Average in the Diocese of Arlington</p> <p>11. is about 10 to 11 years.</p> <p>12. Q Do you know how long one typically</p> <p>13. remains a pastor of a parish?</p> <p>14. A Typically, a period from six to</p> <p>15. twelve years.</p> <p>16. Q Do you know how long Father</p> <p>17. Verrecchia had been at All Saints?</p> <p>18. A I believe he had been there two years</p> <p>19. before I had arrived.</p> <p>20. Q How old was Father Verrecchia or how</p> <p>21. old is he today, I guess, approximately?</p> <p>22. A He is six months younger than I, so I</p>	<p>1. A Yes.</p> <p>2. Q did you also observe them on these</p> <p>3. relatively clandestine walks they were</p> <p>4. taking?</p> <p>5. A Yes.</p> <p>6. Q What were the -- you said there had</p> <p>7. been some questionable public activities that</p> <p>8. raised some concerns with parishioners. What</p> <p>9. were those events?</p> <p>10. A The most dramatic was a party at one</p> <p>11. of Father Verrecchia's friends where many of</p> <p>12. the parishioners were in attendance. And</p> <p>13. Father Verrecchia and Nancy were in the hot</p> <p>14. tub together with glasses of wine and he had</p> <p>15. his arm around her and apparently it was</p> <p>16. quite shocking to the people involved, quite</p> <p>17. shocking to the two associates.</p> <p>18. Q The two associate priests were there?</p> <p>19. A Yes.</p> <p>20. Q Were you there?</p> <p>21. A I was not.</p> <p>22. Q How did you find out about it?</p>
Page 31	Page 33
<p>1. am 46.</p> <p>2. Q Going back to the fall of 1998, was</p> <p>3. there any change in the relationship as you</p> <p>4. observed it with regard -- between Father</p> <p>5. Verrecchia and Ms. Lambert?</p> <p>6. A There was some public incidences that</p> <p>7. aroused many people's anger and worry,</p> <p>8. concern. And when he became aware of that,</p> <p>9. as I said, there was a lot more secret,</p> <p>10. hidden, early morning away from the parish</p> <p>11. meetings.</p> <p>12. Q If they were hidden, how did you</p> <p>13. become aware of them?</p> <p>14. A For example, the Sacristan of the</p> <p>15. parish, Carol Stime, (ph) was often there</p> <p>16. first thing in the morning to open up the</p> <p>17. church. And she would later come to us with</p> <p>18. concerns that since she opened or when she</p> <p>19. opened early in the morning, Father</p> <p>20. Verrecchia and Nancy would be in the church</p> <p>21. together.</p> <p>22. Q And she would tell you that?</p>	<p>1. A Father Gee came back to the rectory</p> <p>2. and he was furious at what he had seen. And</p> <p>3. so he and Father Paul went back to the party</p> <p>4. to see if they could somehow, quote, "Knock</p> <p>5. some sense into Father Verrecchia." I think</p> <p>6. they shot a Nerf ball at his head in the hot</p> <p>7. tub.</p> <p>8. Q Was Mr. Lambert there?</p> <p>9. A I believe that he was, but I don't</p> <p>10. know.</p> <p>11. Q Any other events that you recall?</p> <p>12. A More and more parishioners, members</p> <p>13. of the school, were confronting all of us</p> <p>14. priests about their concerns. Comments</p> <p>15. about they seem like newlyweds walking or</p> <p>16. you can see that they're in love, or I saw</p> <p>17. Father Jim and some lady walking and I could</p> <p>18. hardly recognize him because he was in</p> <p>19. such an animated conversation with her.</p> <p>20. There were some letters apparently</p> <p>21. written to the school principal.</p> <p>22. Q Who is the school principal?</p>
Page 30 - Page 33	
Exceptional Service in Court Reporting and Litigation Support	

Page 34	Page 36
<p>1. A David Connors.</p> <p>2. Q From parishioners to the school</p> <p>3. principal?</p> <p>4. A Yes, concerned about the growing</p> <p>5. scandal. I think a couple of the families</p> <p>6. withdrew their children from the school</p> <p>7. because they felt it was totally</p> <p>8. inappropriate that the pastor should be</p> <p>9. having this relationship.</p> <p>10. Q David Connors was the school</p> <p>11. principal?</p> <p>12. A I believe. Maybe O'Connor, but I</p> <p>13. think it's Connors.</p> <p>14. Q Is he still the principal; do you</p> <p>15. know?</p> <p>16. A I do not know. I would say yes, but</p> <p>17. I do not know for sure.</p> <p>18. Q How did you find out there were</p> <p>19. letters written to the school principal?</p> <p>20. A someone in the parish approached me</p> <p>21. and they were good friends with one of the</p> <p>22. families that had written a letter and</p>	<p>1. complained to the diocese and that Father Gee</p> <p>2. also joined that group of parishioners and</p> <p>3. was complaining about his behavior at the</p> <p>4. party.</p> <p>5. Q Do you know when that was?</p> <p>6. A At the party?</p> <p>7. Q Yeah, when the party was?</p> <p>8. A I don't know the actual date because,</p> <p>9. as I said, I wasn't there.</p> <p>10. Q Approximately, was it in the fall or</p> <p>11. winter?</p> <p>12. A It was the fall, I think.</p> <p>13. Q Do you know to whom they made the</p> <p>14. complaint to in the diocese?</p> <p>15. A I believe that Father Rippy, the</p> <p>16. chancellor, was in charge of all sexual</p> <p>17. misconduct at the time.</p> <p>18. Q So he would have been the one they</p> <p>19. would take it to?</p> <p>20. A Yes.</p> <p>21. Q And what was his position in the</p> <p>22. diocese?</p>
Page 35	Page 37
<p>1. withdrew their children. I also had</p> <p>2. friendships with the secretaries and one of</p> <p>3. them had told me that there were people</p> <p>4. withdrawing from the school.</p> <p>5. Q Who was that?</p> <p>6. A Christine Gregas.</p> <p>7. Q How do you spell Gregas?</p> <p>8. A G - R - E - G - A - S.</p> <p>9. Q And what time frame is this?</p> <p>10. A Fall, early winter of 1988, even in</p> <p>11. that school year.</p> <p>12. Q Did there come a time when any of</p> <p>13. this was expressed to anyone in the diocese,</p> <p>14. any priests outside of the parish or anyone</p> <p>15. at the headquarters for the Diocese of</p> <p>16. Arlington including the bishop?</p> <p>17. A I never contacted the bishop and</p> <p>18. talked to the other priests about the</p> <p>19. necessity of doing so. And they felt that</p> <p>20. there wasn't sufficient proof, that they were</p> <p>21. just friends. However, after the party, I</p> <p>22. believe that a group of parishioners</p>	<p>1. A He was the chancellor/ Basically,</p> <p>2. the record-keeper.</p> <p>3. Q Is that what the chancellor is, the</p> <p>4. record-keeper?</p> <p>5. A Yes, primarily.</p> <p>6. Q And who does he report to?</p> <p>7. A At that time, Bishop Keating. He</p> <p>8. reports to the bishop.</p> <p>9. Q And that would have been Bishop</p> <p>10. Keating?</p> <p>11. A Yes.</p> <p>12. Q How long did Bishop Keating serve as</p> <p>13. the -- or when did he no longer serve as the</p> <p>14. bishop for the Diocese of Arlington?</p> <p>15. A I believe somewhere in January of</p> <p>16. '98, maybe February. Somewhere in that time</p> <p>17. period he suddenly died.</p> <p>18. Q January of 1998?</p> <p>19. A I am not -- I am trying to figure</p> <p>20. this out. I think it was a year before</p> <p>21. Bishop Loverde's installation, which was in</p> <p>22. March of -- March 25th of 1999. So I don't</p>
Page 34 - Page 37	
Exceptional Service in Court Reporting and Litigation Support	

<p style="text-align: right;">Page 38</p> <p>1. remember the date when he died, but I do</p> <p>2. remember it was about a year before the new</p> <p>3. bishop came.</p> <p>4. Q So if these complaints came in the</p> <p>5. fall of 1998, they wouldn't have gone to</p> <p>6. Bishop Keating because he was deceased by</p> <p>7. that time; is that correct?</p> <p>8. A I don't know exactly. It may have</p> <p>9. been the early part of 19 -- the fall of --</p> <p>10. it may have been in that time period, January</p> <p>11. to Marcy of 1998 that he died, I think.</p> <p>12. Q And who succeeded him after his</p> <p>13. death?</p> <p>14. A Monsignor McMurtrie took over as the</p> <p>15. administrator of the diocese for</p> <p>16. approximately a year.</p> <p>17. Q Where did he come from? Was he in</p> <p>18. the parish -- in the diocese at the time?</p> <p>19. A He's a pastor in the diocese.</p> <p>20. Q And so if this complaint was made to</p> <p>21. Father Rippy in the fall of 1998, it would</p> <p>22. have been passed on to Father McMurtrie as</p>	<p style="text-align: right;">Page 40</p> <p>1. as they say, my attitude towards him and</p> <p>2. constantly seeing her was one of surprise and</p> <p>3. a little bit of shock. Somewhere in the</p> <p>4. early part of 1999, I had caught them</p> <p>5. together in a darkened office at 1:30 a.m.</p> <p>6. Q When was this? What was the date --</p> <p>7. I'm sorry -- or the month?</p> <p>8. A I believe it was somewhere in May.</p> <p>9. Q Of 1999?</p> <p>10. A Yes.</p> <p>11. Q You caught them in a darkened room</p> <p>12. where?</p> <p>13. A I was coming out of my office and</p> <p>14. walking down the dark hallway. It was about</p> <p>15. 1:30 in the morning and I heard noise from</p> <p>16. his office and I thought it was this little</p> <p>17. mouse that we had been trying to catch. So I</p> <p>18. stood in the hallway and listened and</p> <p>19. suddenly Nancy emerged to my surprise and I</p> <p>20. said what are you doing here? And she was</p> <p>21. very evasive. She said it's a nice day. And</p> <p>22. I said, but what are you doing here at this</p>
<p style="text-align: right;">Page 39</p> <p>1. the titular head of the diocese at that time?</p> <p>2. A I suppose, yes.</p> <p>3. Q And then in the spring of 1999 Bishop</p> <p>4. Loverde was installed?</p> <p>5. A Right.</p> <p>6. Q How did you become aware that Father</p> <p>7. Gee and some of the parishioners complained</p> <p>8. to Father Rippy and the diocese about the</p> <p>9. party?</p> <p>10. A Father Gee told me that a number of</p> <p>11. parishioners had written a letter and had</p> <p>12. gone in.</p> <p>13. Q Did he indicate to you or did anyone</p> <p>14. indicate to you the result of that meeting</p> <p>15. and what action would be taken?</p> <p>16. A No.</p> <p>17. Q Did there ever come a time when you</p> <p>18. had a discussion with Father Verrecchia about</p> <p>19. all that was being said about his</p> <p>20. relationship amongst fellow priests as well</p> <p>21. as parishioners and to the diocese itself?</p> <p>22. A We never had direct words, although</p>	<p style="text-align: right;">Page 41</p> <p>1. time in the morning?</p> <p>2. And about 15 seconds later Father</p> <p>3. Verrecchia came out into the hallway and I</p> <p>4. noticed that he was sexually excited. And I</p> <p>5. looked hard at him and sternly at him and I</p> <p>6. said you two should not be here together.</p> <p>7. Q When you say, "sexually excited," was</p> <p>8. it apparent that he had an erection?</p> <p>9. A Yes.</p> <p>10. Q You told both of them they shouldn't</p> <p>11. be here?</p> <p>12. A Yes.</p> <p>13. Q What was their response?</p> <p>14. A Embarrassment. He looked at me in a</p> <p>15. surprisingly competitive -- not competitive,</p> <p>16. I think he decided that what I had seen and</p> <p>17. where I had caught them, he would have to</p> <p>18. deal with this in some way.</p> <p>19. Q Any further conversation with him at</p> <p>20. that time or later about this incident?</p> <p>21. A No direct words. But again, just</p> <p>22. comments, looking at him and kind of visually</p>
Page 38 - Page 41	
Exceptional Service in Court Reporting and Litigation Support	

Page 42	Page 44
<p>1. scrutinizing the relationship between them</p> <p>2. when I saw them together trying to get him to</p> <p>3. recognize, himself, that he needed to get</p> <p>4. away.</p> <p>5. Q Did it appear to you that he was</p> <p>6. understanding your message?</p> <p>7. A Very clearly, yes.</p> <p>8. Q Did he accept the advice you were</p> <p>9. conveying to him?</p> <p>10. A No. He became much more aggressive</p> <p>11. towards me.</p> <p>12. Q In what way?</p> <p>13. A The best defense is a good offense.</p> <p>14. Q And so how did you know that he was</p> <p>15. becoming more aggressive toward you?</p> <p>16. A Again, visual indications, but</p> <p>17. shortly after that in April there was the</p> <p>18. Easter mass at the Nissan Pavilion.</p> <p>19. Q April of what?</p> <p>20. A Of 1999.</p> <p>21. Q I thought you said it was May of 1999</p> <p>22. you caught them in the office rectory? Was</p>	<p>1. very crowded masses at the actual church</p> <p>2. facilities, so he was the principal</p> <p>3. celebrant, homilist and it was much</p> <p>4. advertised and he touted it as one of his --</p> <p>5. Q And what occurred there?</p> <p>6. A For many of the parishioners it was a</p> <p>7. fiasco because it took so long. It was so</p> <p>8. elaborate. I think the whole ceremony lasted</p> <p>9. like three hours and most people had expected</p> <p>10. to come to an Easter mass of one hour. They</p> <p>11. weren't prepared for hearing the homily</p> <p>12. repeated in Spanish, they weren't prepared</p> <p>13. for 12 baptisms, they weren't prepared for</p> <p>14. much of what went on.</p> <p>15. Q Was there any conflict between the</p> <p>16. two of you at the time of this since it was</p> <p>17. two weeks after your discovering them in his</p> <p>18. office?</p> <p>19. A By that period we had known that we</p> <p>20. were going to have a new bishop. That was</p> <p>21. announced in January, January 25th. And so</p> <p>22. Father Verrecchia was trying to make a very</p>
Page 43	Page 45
<p>1. the Nissan thing after the rectory, so that -</p> <p>2. -</p> <p>3. A It was after the rectory.</p> <p>4. Q So it's -- both were in the April/May</p> <p>5. time frame?</p> <p>6. A Right. I don't know when Easter was</p> <p>7. that year.</p> <p>8. Q Okay.</p> <p>9. A It was shortly before Easter, maybe a</p> <p>10. week or two that I had seen them.</p> <p>11. Q Okay. So that gives you the timing</p> <p>12. of it two weeks before Easter?</p> <p>13. A Right.</p> <p>14. Q And so then around Easter what was</p> <p>15. this? The Nissan --</p> <p>16. A Pavilion, which was in many people's</p> <p>17. words "The Father Verrecchia show."</p> <p>18. Q What do you mean about that? What</p> <p>19. was this about?</p> <p>20. A He had arranged to have the first</p> <p>21. year, one mass at the Nissan Pavilion. He</p> <p>22. rented it out rather than having multiple,</p>	<p>1. good impression for the new bishop and was</p> <p>2. concerned about the negative reports on the</p> <p>3. Easter mass and became very concerned when he</p> <p>4. received a letter that was addressed to all</p> <p>5. of us priests.</p> <p>6. We had all received, complaining not</p> <p>7. only of the Nissan mass, but also complaining</p> <p>8. of his involvement with some prophet that was</p> <p>9. having visions of Mary. And this particular</p> <p>10. woman was concerned that the prophet had</p> <p>11. actually written the Easter homily. It was</p> <p>12. something that caused him a great deal of</p> <p>13. anxiety when the letter was received and he</p> <p>14. demanded all of the copies from us priests.</p> <p>15. Apparently he had also been</p> <p>16. disciplined for that relationship with the</p> <p>17. prophet, Mark Brandt.</p> <p>18. Q He asked you for these copies of the</p> <p>19. letters complaining?</p> <p>20. A Yes, this particular one from Lorenda</p> <p>21. Lucas.</p> <p>22. Q And did you give him your copy?</p>
Page 42 - Page 45	
Exceptional Service in Court Reporting and Litigation Support	

<p style="text-align: right;">Page 46</p> <p>1. I did not. Father Gee had thrown his 2. away. Father Paul immediately got the letter 3. and gave it to him and he looked at me and 4. says "Where's the letter?" And I said I have 5. no idea. And there was that, again, very 6. aggressive, very threatening look towards me 7. sort of like "I'm not going to let you ruin 8. my kingdom." 9. Q Was this person who he was involved 10. that acted like a prophet, what was his name? 11. A Mark Brandt. B-R-A-N-D-T. 12. Q And did you know who he was? 13. A My first exposure to him was 14. somewhere in, I think, January of 1998. And 15. I had noticed -- I was watching a movie late 16. at night and I noticed Father Paul coming up 17. from his basement bedroom in his pajamas, 18. upstairs to Father Verrecchia's bedroom. And 19. I remember thinking what's that all about? 20. And later Father Paul had come down about a 21. half-hour later and he was crying. 22. The previous day at a dinner he had</p>	<p style="text-align: right;">Page 48</p> <p>1. leave the priesthood. And I was stunned. 2. Absolutely stunned at the sobbing, the 3. emotional outbreak of Father Paul as he had 4. told me this. And I said who is Mark Brandt? 5. Who gives him the authority to say this and 6. has this been investigated? 7. So then I went to Father Gee and I 8. said what's going on here? Who is Mark 9. Brandt? And Father Gee said Haley, you're 10. not supposed to know anything about this. 11. We're all going to get in trouble. And I 12. said who is he? What's going on? And Father 13. Gee said that he had had a similar meeting 14. about a year before when he was told that by 15. Mark Brandt, in the presence of Father 16. Verrecchia, that he had to consecrate his 17. life to Mary or he would not be saved. 18. And I said well, what did you do? 19. And he said, I consecrated my life to Mary to 20. get him off my back. And I said, does 21. anybody in this diocese know about this? And 22. he said no, if they did we'd all get into</p>
<p style="text-align: right;">Page 47</p> <p>1. been very disturbed. And I, in the presence 2. of the other priests, kept asking Father Paul 3. what's wrong. He was noticeably emotionally 4. upset. And the other two priests acted like 5. there was nothing wrong. And Father 6. Verrecchia said just leave him alone. And I 7. said well, do you guys know what's going on? 8. So I confronted Father Paul the next 9. day after seeing him going up to the bedroom. 10. I said what's going on? You were emotionally 11. upset. I see you going up to the pastor's 12. room in your pajamas. It was probably 11:30, 13. 12 o'clock at night. And he told me of an 14. incident where Father Verrecchia and Father 15. Gee and Mark Brandt, the prophet, had brought 16. Father Paul into the office, the pastor's 17. office. 18. And Father Verrecchia said to Father 19. Paul you need to listen to what this man 20. says. And Father -- or Mark Brandt proceeded 21. to tell Father Paul that he had had a vision 22. of Mary and Mary wanted Paul Berghout to</p>	<p style="text-align: right;">Page 49</p> <p>1. trouble. And after that I started hearing 2. reports from parishioners. A couple of them 3. asked me about this prophet. And did the -- 4. did Father Verrecchia know about it? And he 5. was forming a group and these people were 6. together when he was apparently having these 7. ecstatic visions. 8. Q Did you ever discuss that with 9. Verrecchia? 10. A I had heard from Father Gee that he 11. had been called in and had been told to watch 12. his relationship with this. It didn't seem 13. to have been verified that it consumed Father 14. Verrecchia. He was also together with Mark 15. Brandt quite frequently. Again, he would 16. often be seen coming down from Father 17. Verrecchia's bedroom early in the morning. 18. Mark Brandt -- 19. Q Mark Brandt would be seen coming 20. down? 21. A Yes. 22. Q By you?</p>
<p style="text-align: right;">Page 46 - Page 49</p> <p>Exceptional Service in Court Reporting and Litigation Support</p>	

<p style="text-align: right;">Page 50</p> <p>1. A By me, by the other priests. And</p> <p>2. apparently Mark Brandt was counseling and</p> <p>3. influencing Father Verrecchia and his</p> <p>4. relationship with Nancy Lambert. Encouraging</p> <p>5. it despite the fact it was an affair with a</p> <p>6. married woman, telling them that they had to</p> <p>7. go through the physical, sexualness to find</p> <p>8. this extraordinary spiritual bond. That</p> <p>9. Father Verrecchia had a great destiny in the</p> <p>10. church. He was a favorite son and priest of</p> <p>11. Mary the Mother of God. To me it was</p> <p>12. extraordinarily bizarre.</p> <p>13. Q How did you know that this</p> <p>14. information was regarding what mark Brandt</p> <p>15. was supposedly doing?</p> <p>16. A As I say, two parishioners came up to</p> <p>17. me. One, her sister wrote an article for</p> <p>18. Homilitics and Pastoral Review.</p> <p>19. Q Her sister being whom?</p> <p>20. A I don't remember the name of either</p> <p>21. one of them. They are twin sisters in the</p> <p>22. parish.</p>	<p style="text-align: right;">Page 52</p> <p>1. Q Okay.</p> <p>2. A It was --</p> <p>3. Q That was your introduction to Mark</p> <p>4. Brandt?</p> <p>5. A Right. And the deep influences he</p> <p>6. was having.</p> <p>7. Q And that's why you were familiar with</p> <p>8. Mark Brandt, April/May 1999, when people</p> <p>9. wondered whether he was writing these or had</p> <p>10. written the Easter homily, et cetera?</p> <p>11. A Right.</p> <p>12. Q Now, going back to the May of 1999</p> <p>13. time frame.</p> <p>14. A I--</p> <p>15. Q Go ahead.</p> <p>16. A If Bishop Keating had been alive, I</p> <p>17. would have certainly approached him with my</p> <p>18. concerns about Mark Brandt and probably the</p> <p>19. growing relationship with Nancy, but since</p> <p>20. Monsignor McMurtrie was the administrative</p> <p>21. head, he did not have the authority to -- he</p> <p>22. had limited authority to move or transfer any</p>
<p style="text-align: right;">Page 51</p> <p>1. Q Okay.</p> <p>2. A About private revelations and how the</p> <p>3. church has always been very cautious and</p> <p>4. needs to inquire. And so she had come to me</p> <p>5. and said what's going on here? We were</p> <p>6. invited to this meeting. This man was having</p> <p>7. a vision. Apparently he's directing,</p> <p>8. spiritually directing Father Verrecchia and</p> <p>9. writing his homilies for him. And it was all</p> <p>10. news to me.</p> <p>11. During that time from 1997 to 1998</p> <p>12. Father Verrecchia was undergoing some pretty</p> <p>13. profound changes. He kept talking about his</p> <p>14. spiritual renewal in his life, he would be</p> <p>15. saying it in public meetings. People noticed</p> <p>16. the change and there was some flags waving,</p> <p>17. what's going on?</p> <p>18. Q Did this conversation you had with</p> <p>19. Father Gee and Father Berghout about Mark</p> <p>20. Brandt and stuff is that also in this May --</p> <p>21. May 1999 time frame?</p> <p>22. A No, that was in January of '98.</p>	<p style="text-align: right;">Page 53</p> <p>1. priests. And I had personal problems with</p> <p>2. Monsignor McMurtrie.</p> <p>3. Q What were those?</p> <p>4. A He's a very heavy drinker. Many</p> <p>5. think an alcoholic. And I didn't think he</p> <p>6. was going to address the problem, so I had</p> <p>7. almost been waiting with a great deal of</p> <p>8. anxiety for the new bishop, hoping that he</p> <p>9. would address all of these concerns of Nancy</p> <p>10. and the prophet.</p> <p>11. Q In May of 1999, did any other</p> <p>12. information come to you by either your</p> <p>13. observations or what others were telling you</p> <p>14. in any manner as to what might be going on in</p> <p>15. this relationship between Father Verrecchia</p> <p>16. and Ms. Lambert?</p> <p>17. A By May of 1999, I had heard that</p> <p>18. Father Verrecchia had been asked not to be</p> <p>19. seeing her.</p> <p>20. Q Asked by whom?</p> <p>21. A The diocese. And I said -- and I</p> <p>22. heard this, I think, from Karen Stime who was</p>
<p style="text-align: right;">Page 50 - Page 53</p> <p>Exceptional Service in Court Reporting and Litigation Support</p>	

<p style="text-align: right;">Page 54</p> <ol style="list-style-type: none"> 1. telling me that he was, in fact, seeing her. 2. I asked the other priests and they knew of 3. nothing. They knew of no prohibitions, they 4. knew of no warnings, they knew of nothing 5. from the diocese to be watching anything with 6. Father Verrecchia. 7. Q So the diocese hadn't contacted you 8. or the other priests to put you on guard 9. about the relationship between Ms. Lambert 10. and Father Verrecchia? 11. A Right. And other than us who were 12. living with him and watching the behavior, 13. there was no other way they could have known 14. that something was still going so that there 15. most valuable source was not utilized. 16. Q And did any other substantiation of 17. the relationship come to your attention at 18. any point after April or May of 1999? 19. A Well, somewhere in that period, May - 20. - the end of May 1999, the bishop called me 21. in to offer me a pastorship of a new parish. 22. Q Bishop Loverde? 	<p style="text-align: right;">Page 56</p> <ol style="list-style-type: none"> 1. would have expected pastorship. 2. I waited the additional year through 3. Monsignor McMurtrie, so when Bishop Loverde 4. met me on May 26 of 1999, I was very happy. 5. He was very happy giving me a pastorship of a 6. new parish, Our Lady of Hope. And it was a 7. very cordial, very great meeting. He said it 8. was highly recommended by the personnel 9. board. 10. Q Our Lady of Hope? 11. A Yes. 12. Q Where is that? 13. A It's in Sterling, Virginia. He said 14. that Monsignor McMurtrie also had spoken very 15. highly, favorably of this, although he had 16. been powerless to make any of those changes. 17. Q And so did you get it? 18. A No. On May 26th, Father Verrecchia 19. had been on retreat or he was out of town and 20. when he came back over the weekend the 21. secretaries informed him that I'd had a call 22. from the Bishop's office. And everyone knew
<p style="text-align: right;">Page 55</p> <ol style="list-style-type: none"> 1. A Bishop Loverde had been long awaited. 2. One of the restrictions on Monsignor 3. McMurtrie as the diocesan head was that he 4. could not appoint new pastors, so my hope was 5. that in the year that Bishop Keating died I 6. was, in fact, slated to be a pastor. Someone 7. had told me that they found a list and my 8. name was on the list. 9. This was Father Gould who was the 10. first person in the Bishop's office and in 11. his home. And under instructions from the 12. Bishop, had deleted his computer files in the 13. event of his death. 14. Q And Father Gould deleted Bishop 15. Keating's? 16. A And he told me that he had seen this 17. list, my name was on it. Bishop Keating had 18. died right before -- two or three weeks 19. before announcements. Well, before he would 20. have started contacting priests about 21. potential transfers. At that point I was 22. already three years -- two years past when I 	<p style="text-align: right;">Page 57</p> <ol style="list-style-type: none"> 1. that at that point in the year, if you get a 2. call from the bishop's office you were going 3. in for transfer information. 4. So when Father Verrecchia came back, 5. he had -- was the master of ceremonies for 6. the bishop at an O'Connell graduation, Bishop 7. O'Connell High School's graduation, and had 8. asked Bishop Loverde very leading questions. 9. He basically went to Bishop Loverde 10. and told him he had some concerns. He said 11. is everything okay with Father Haley, was his 12. opening line. And the Bishop said why are 13. you asking that? I am going to appoint him, 14. you know, gonna make him the pastor of a new 15. parish. He says why, is something wrong? It 16. was a leading question. And by that Father 17. Verrecchia found out that I was truly slated 18. to be a pastor. 19. Q And how did you know -- become aware 20. of this conversation? 21. A Because the bishop later called me in 22. and said that there had been serious charges,
<p>Page 54 - Page 57</p> <p>Exceptional Service in Court Reporting and Litigation Support</p>	

Page 58	Page 60
<p>1. serious concerns raised and that he would</p> <p>2. have to withdraw his offer of pastorship.</p> <p>3. Q When was this that he called you in?</p> <p>4. A On June 10th. the O'Connell</p> <p>5. gradation was on the third.</p> <p>6. Q And did he tell you for what reason?</p> <p>7. A He said that Father Verrecchia had</p> <p>8. brought up concerns that the secretaries had</p> <p>9. brought to him. That I had -- was abusing</p> <p>10. drugs, that I was suffering depression. All</p> <p>11. of which left me absolutely dumbfounded</p> <p>12. because the secretaries were all my good</p> <p>13. friends.</p> <p>14. So I went back to them and said have</p> <p>15. you told Father Verrecchia any of this? And</p> <p>16. they said no, absolutely not.</p> <p>17. Q Who were the secretaries?</p> <p>18. A Carol Jones and Christine Gregas and</p> <p>19. Cindy Curran was the head of the accounting</p> <p>20. department.</p> <p>21. Q C-U-R-R-A-N?</p> <p>22. A C-U-R-R-A-N, yes.</p>	<p>1. She was deeply shocked.</p> <p>2. Q Which one was that?</p> <p>3. A Christine Gregas. That she and Carol</p> <p>4. Murphy -- or Carol Jones were being used as</p> <p>5. weapons or tools in his -- what she</p> <p>6. considered an obvious vendetta against me.</p> <p>7. Q What did you do when he refused to</p> <p>8. retract to the bishop?</p> <p>9. A When the bishop told me these charges</p> <p>10. I said well, they were blatantly untrue,</p> <p>11. completely untrue.</p> <p>12. Q That was originally. What did you do</p> <p>13. after you had this meeting with the</p> <p>14. secretaries?</p> <p>15. A I had told the bishop on June 10th</p> <p>16. that Father Verrecchia was lying. And he</p> <p>17. said why would he lie to me? And I said</p> <p>18. Father Verrecchia has several things to hide</p> <p>19. and he is an extraordinarily political man</p> <p>20. and he will do anything in order to protect</p> <p>21. himself. I said, but give me a week and I</p> <p>22. will give you information of the problems of</p>
Page 59	Page 61
<p>1. Q And they all denied making such</p> <p>2. accusations?</p> <p>3. A We had a meeting together with Father</p> <p>4. Verrecchia on the 14th and they denied it all</p> <p>5. and he acted like he didn't know what was</p> <p>6. going on. That the bishop had asked him in</p> <p>7. and asked for his observations, as if he</p> <p>8. hadn't freely given these. My conclusion</p> <p>9. was that it was a way to defend his own</p> <p>10. behaviors. The best defense was a good</p> <p>11. offense.</p> <p>12. Q Did he deny that he had made this</p> <p>13. accusation to the bishop saying that the</p> <p>14. secretaries had told him this?</p> <p>15. A No. And after the meeting I said</p> <p>16. well it's clear that none of the secretaries</p> <p>17. told you this, so you now need to go back to</p> <p>18. the bishop and retract everything you said.</p> <p>19. And he says I will not. And I said, but you</p> <p>20. told him a lie and all the secretaries here</p> <p>21. now know that. And one of them at that point</p> <p>22. resigned. She wrote a letter of resignation.</p>	<p>1. Father Verrecchia.</p> <p>2. And I had anticipated going back and</p> <p>3. gathering together statements from some of</p> <p>4. the parishioners about his relationship with</p> <p>5. Nancy. Statements of the secretaries about</p> <p>6. his lying, using them. Statements of some of</p> <p>7. the people in the parish about his</p> <p>8. association with Mark Brandt.</p> <p>9. Q What else did you gather?</p> <p>10. A There was a mutual computer that we</p> <p>11. had all used in the basement of the rectory</p> <p>12. and I got on that computer. And Father</p> <p>13. Verrecchia hadn't been very good about his --</p> <p>14. he wasn't very smart with his computer</p> <p>15. skills, didn't have many. And about six</p> <p>16. months before that the parish had bought a</p> <p>17. laptop, which he appropriated as his own and</p> <p>18. took on all of his trips to the beach and</p> <p>19. things. But when he would come back, he</p> <p>20. would merge the laptop with that computer</p> <p>21. down in the basement.</p> <p>22. So I had on that computer seen</p>

<p style="text-align: right;">Page 62</p> <p>1. various letters and some email that revealed</p> <p>2. the relationship he was having. And I had</p> <p>3. been in charge of the computer systems and</p> <p>4. personnel at All saints, so I checked the</p> <p>5. computer in the office, which was all</p> <p>6. networked and found a complete --</p> <p>7. Q That's on the first floor, not</p> <p>8. the basement, right?</p> <p>9. A This was in the parish office. The</p> <p>10. rectory and the office are two separate</p> <p>11. buildings. But he had merged the laptop</p> <p>12. with both the downstairs computer and his</p> <p>13. computer, not his -- the parish computer in</p> <p>14. the office.</p> <p>15. Q And they were networked with -- the</p> <p>16. rectory's were networked with one in the</p> <p>17. office?</p> <p>18. A No. All of the computers in the</p> <p>19. office were networked together.</p> <p>20. Q Okay.</p> <p>21. A The reason they had this information</p> <p>22. was because he was using this laptop and</p>	<p style="text-align: right;">Page 64</p> <p>1. network of computers, correct? So that he</p> <p>2. was in all of the computers?</p> <p>3. A Right, but it wasn't really his</p> <p>4. laptop, it was a computer -- the parish's</p> <p>5. laptop.</p> <p>6. Q Right.</p> <p>7. A The one that he had been using.</p> <p>8. Q And it's your assumption that he</p> <p>9. wasn't very sophisticated with computers, but</p> <p>10. you don't know for a fact whether he intended</p> <p>11. to synchronize it or not. You haven't</p> <p>12. discussed that with him, I assume?</p> <p>13. A NO. But in viewing those computer</p> <p>14. files I found everything plus tons more in</p> <p>15. order to truly give the bishop an accurate,</p> <p>16. factual picture of, quote, "Why Father</p> <p>17. Verrecchia had lied."</p> <p>18. Q When you say you found -- what did</p> <p>19. you find? Emails are you talking about?</p> <p>20. A I found letters, email on the parish</p> <p>21. computer. In fact, the whole collection.</p> <p>22. Some two years, two and a half years of email</p>
<p style="text-align: right;">Page 63</p> <p>1. synchronizing the computers. He didn't</p> <p>2. realize he was doing that. Every time he had</p> <p>3. connected the laptop they would synchronize</p> <p>4. all files.</p> <p>5. Q And how do you know that he didn't</p> <p>6. know?</p> <p>7. A He didn't know that much about</p> <p>8. computers.</p> <p>9. Q That's just your assumption. For all</p> <p>10. you know he could have been doing it on his</p> <p>11. own and --</p> <p>12. A He could have been.</p> <p>13. Q You never asked him, have you,</p> <p>14. whether he knew?</p> <p>15. A We had set it up that way. Father</p> <p>16. Gee had set up the laptop to do that. And</p> <p>17. both he and I had worked on the networking of</p> <p>18. the computers, so we had access to all of</p> <p>19. them, had often been working on them.</p> <p>20. Q Well, regardless of how it got there,</p> <p>21. it was Father Verrecchia that synchronized</p> <p>22. his laptop with the other computer -- other</p>	<p style="text-align: right;">Page 65</p> <p>1. that he had written. He had been using the</p> <p>2. parish computer as his personal outlet for</p> <p>3. his emails in actual violation of parish</p> <p>4. policy -- diocesan policy.</p> <p>5. Q And what did these -- how many emails</p> <p>6. and letters approximately were on there,</p> <p>7. either by page or number of correspondence,</p> <p>8. whatever?</p> <p>9. A It was some 90 megs of email</p> <p>10. information on there, which is an</p> <p>11. astronomical amount and, put into</p> <p>12. perspective, why I had often seen him almost</p> <p>13. daily in his office typing on the computer.</p> <p>14. I had always thought he was typing judgments</p> <p>15. for diocesan cases.</p> <p>16. It turns out that he spent two and</p> <p>17. three hours on the computer each day writing</p> <p>18. emails. That was his -- I think, his first</p> <p>19. one says "I have discovered email on the</p> <p>20. computer. What a wonderful thing it is."</p> <p>21. Q And in those letters and emails was</p> <p>22. there any verification that he was having an</p>

Page 66	<ol style="list-style-type: none"> 1. intimate relationship with Ms. Lambert? 2. A Absolutely. There was so much 3. information that it was almost boggling to 4. me. And I remember going through that seeing 5. an amazing amount of letters and email from 6. Mark Brandt and fellows and terminology of 7. fellow consecraty -- consecraty, I guess 8. that's what you would call them -- consecrated 9. members of this prophet's group. 10. And influencing letters from the 11. prophet and love letters between him and 12. Nancy. And Nancy and him -- talks about them 13. going out and dancing together and how 14. wondrous it was. Affectionate names. I was 15. stunned at how much was there and how 16. conclusively it proved of an adulterous 17. relationship and of an absolutely dangerous 18. association he had with this Mark Brandt, the 19. prophet. 20. And as I started to look through all 21. of the files, came across his Netscape 22. history file and further shocked by a 	Page 68	<ol style="list-style-type: none"> 1. counseled Father Verrecchia on this issue, I 2. think, he was well aware of his struggles, 3. either a homosexual past or homosexual 4. encounters. 5. There were some questions, I think 6. that Nancy even knew that he was hiding 7. something. There were rendezvous at beaches 8. and pictures that he was writing to other men 9. to hide and "Boy, if this came out I'd be 10. ruined." 11. Q When you say there were young persons 12. sexually, young males sexually excited, could 13. you tell what ages they were? When you say 14. "young," what age range do they appear they 15. might or could be in? 16. A I would say they were all in their 17. young 20s, maybe some of them in their late 18. teenage years. Many of the sites looked at - 19. - actually young men dressed as priests who 20. were sexually excited, so in the pages you 21. could pick out a certain physique and 22. occupation and he had picked out priests or
Page 67	<ol style="list-style-type: none"> 1. collection of homosexual material and sites 2. that he had visited, which he had tried to 3. carefully delete, but had not completely done 4. that. 5. Q When you say "homosexual," what was 6. it? What type of material? What was it 7. showing? Males in sexual activity or just 8. expressing relationships and if so what ages 9. are these people? 10. A A lot of young males sexually 11. excited, usually solitary. And it completely 12. amazed me, but through the course of the 13. emails and the letters and the exchanges of 14. Mark Brandt, started to see references to 15. Father Gee. And Father Verrecchia struggles 16. with Father Gee and that he was obviously 17. very attracted to him. 18. And, you know, I thought gee, Father 19. Gee is relatively homophobic and if he knew 20. that the pastor was in love with him he would 21. be shocked and in that you could see some 22. relation that Mark Brandt had also apparently 	Page 69	<ol style="list-style-type: none"> 1. at least young men wearing collars. 2. Q What did you do with the information 3. that you discovered on this sort of communal 4. computer? 5. A I spent a week gathering it all 6. together in a notebook, which I gave to 7. Bishop Loverde on June 22nd. And I said as 8. promised, here is the Jim Verrecchia story 9. and it's worse than anything I could have 10. imagined and needs immediate attention from 11. you. He felt that the new priests that were 12. coming in to the parish were a risk from his 13. homosexual inclinations. 14. I realized that the relationship with 15. Nancy had crossed sexual barriers. There 16. were some references to, not maybe direct, 17. but some -- seemed like oral sexual activity 18. and panic on his part, you know, hide this, 19. delete these letters, so I conveyed that to 20. Bishop Loverde in the strongest terms 21. possible and was left totally dumfounded when 22. he said I can't even read it because I'm

<p style="text-align: right;">Page 70</p> <ol style="list-style-type: none"> 1. going on vacation for the full month of July. 2. And I said you need to read this tonight. I 3. said I realize there is a lot of information 4. here 5. So I gathered together the most 6. pertinent email of three sections. The one 7. about the prophet, another section about the 8. woman, Nancy, and then the section about the 9. secret homosexual life. I said read those 10. summaries. I read those, I had underlined 11. pertinent passages. You can read that in an 12. hour and you will understand the magnitude of 13. this scandal. And he again said I won't have 14. time to even read it until I get back from 15. vacation. And I said then let me read you 16. some of it now. 17. And I read some excerpts about her 18. waiting for him in a hot tub without her 19. clothes on and the affectionate names and the 20. "love you's" and "piglets" and "my heart and 21. soul" and "bonded together" and Mark Brandt 22. saying "the irony of your relationship is 	<p style="text-align: right;">Page 72</p> <ol style="list-style-type: none"> 1. Q So this was contrary to the typical 2. policy of action in these situations? 3. A Yes. 4. Q Did the bishop, Bishop Loverde, have 5. any other reaction to this information you 6. were bringing to him? Did he make any other 7. comment about what he knew or had thought 8. about the prior accusations of the 9. relationship between Father Verrecchia and 10. Ms. Lambert? 11. A He said nothing directly, but his 12. whole demeanor indicated to me that he knew 13. all of this except for the -- like he knew 14. all of this before it was even presented. 15. Q And is that because of his lack of 16. showing any surprise? 17. A Yes. There was no, Oh, my gosh, you 18. know. The -- no outside questions to me, did 19. you know this was going on? How long did 20. you? No questions about -- just an 21. acceptance of this notebook and I wouldn't be 22. able to do anything with this for a while.
<p style="text-align: right;">Page 71</p> <ol style="list-style-type: none"> 1. that you have to keep it secret. What would 2. the parish do if they knew of a full-fledged 3. affair between the pastor and a married 4. woman?" 5. And then I read him some of the sites 6. that he had been visiting and showed him some 7. of the things to which he responded "I know, 8. but I have to tell you again I won't even be 9. able to read it until July. And I said but 10. you have two priests coming in. I said he 11. should be immediately suspended. I said the 12. material should be given to an outside of the 13. diocese psychological evaluation because this 14. is very serious stuff. 15. I said that in relationship to one 16. of your previous questions. What was the 17. normal 18. response when there were scaldalist or 19. inappropriate behaviors brought to the 20. bishop? I knew of three other circumstances 21. where they were minor violations and when 22. presented to the bishop there was immediate 23. action. 	<p style="text-align: right;">Page 73</p> <ol style="list-style-type: none"> 1. Q Did he have any discussion with you 2. about what precipitated this and that was 3. your appointment as a pastor at that June 4. 22nd meeting? 5. A He told me that he would have to 6. consider all of this information and that he 7. would like to get Father Verrecchia and I 8. together to get to the bottom of this. And I 9. said I think that would be a good idea. He 10. said Father Verrecchia is saying you have 11. these problems and now you're saying that 12. Father Verrecchia is having these problems. 13. And I said oh, no, there's a 14. significant difference. Father Verrecchia is 15. saying I have problems. I am presenting to 16. you his own words. I have not said anything 17. about Father Verrecchia. This is completely 18. self-incriminating, horrible documentation. 19. It's beyond the realms of hearsay or someone 20. else saying this or that. It's absolute 21. proof. 22. The next day Father Verrecchia

Page 74	<p>1. was deleting his computer system.</p> <p>2. Q When you say when you finished the</p> <p>3. meeting with the bishop, was there any</p> <p>4. discussion about what would happen next?</p> <p>5. Whether you would meet next? Whether he was</p> <p>6. going to take any action, at least when he</p> <p>7. returned or was it just left with nothing</p> <p>8. being said?</p> <p>9. A He said he was going to arrange</p> <p>10. a meeting between me and Father Verrecchia</p> <p>11. when he got back. And I said that's a great</p> <p>12. idea.</p> <p>13. Q And did he give you any instructions</p> <p>14. about what you should or should not be doing</p> <p>15. in the interim with regard to your knowledge?</p> <p>16. A He did not say well, we're going to</p> <p>17. put you back in the parish or anything like</p> <p>18. that.</p> <p>19. Q Now, did you -- you said the next day</p> <p>20. you found Father Verrecchia deleting and how</p> <p>21. did you come to find that out?</p> <p>22. A I saw him in the office and I had</p> <p>23. and said there's been a breach here, someone</p>	Page 76	<p>1. in the chancery has told Father Verrecchia</p> <p>2. and he is now trying to destroy the evidence.</p> <p>3. Q What was the bishop's reaction?</p> <p>4. A He said I haven't told him. And I</p> <p>5. said well, someone has, whether it was Father</p> <p>6. Rippy, his friend or a diocesan lawyer,</p> <p>7. who said get rid of this stuff before we're</p> <p>8. in trouble, somebody told. And I said let</p> <p>9. me reiterate that it is only a portion of</p> <p>10. what I have.</p> <p>11. He asked me when I gave him the</p> <p>12. notebook, he said do you have copies? And I</p> <p>13. said yes, I do, absolutely, And I said I</p> <p>14. have all of the files.</p> <p>15. Q Meaning, files on the computer?</p> <p>16. A All of the files on the computer.</p> <p>17. Expecting that he would say "great" and thus,</p> <p>18. then using me as some sort of a resource to</p> <p>19. get to the bottom of this and find out what</p> <p>20. was -- what he was really facing.</p> <p>21. In retrospect, I think he knew what</p> <p>22. he was facing and the only threat was not</p>
Page 75	<p>1. fully expected that the bishop would read the</p> <p>2. excerpts and that the following day that</p> <p>3. Father Verrecchia would be pulled out of the</p> <p>4. parish. That he would be put into an</p> <p>5. evaluation similar to what has happened in</p> <p>6. previous cases. And I saw him in there, he</p> <p>7. checked the files on the network and he was</p> <p>8. erasing all of the email.</p> <p>9. It had, however, been backed up on</p> <p>10. the network and he didn't know that. I</p> <p>11. called the bishop and I said what's going on</p> <p>12. here?</p> <p>13. Q This was the next day still?</p> <p>14. A Yes. I said Father Verrecchia is now</p> <p>15. deleting all of these. When I presented the</p> <p>16. notebook to him I said this is just a portion</p> <p>17. of what is actually on this computer. I said</p> <p>18. it's your computer, you need to go in there</p> <p>19. and confiscate it.</p> <p>20. So I was shocked to see that Father</p> <p>21. Verrecchia knew somehow. I called the bishop</p> <p>22. and said there's been a breach here, someone</p>	Page 77	<p>1. Father Verrecchia's behaviors because there</p> <p>2. was no, quote, "Threats from an outside woman</p> <p>3. for lawsuit. She was very comfortable in a</p> <p>4. relationship with this priest." The only</p> <p>5. threat at that point was the information</p> <p>6. itself.</p> <p>7. Q What was the -- Loverde's reaction to</p> <p>8. your calling and telling him about this</p> <p>9. deletion of files by Father Verrecchia?</p> <p>10. A He just repeated "I didn't tell</p> <p>11. him." And at that point I realized that</p> <p>12. something was very awful. About a week after</p> <p>13. that I gave him some phone records and it was</p> <p>14. a brief meeting. He asked me if I had copies</p> <p>15. of them and I said no. And he said would</p> <p>16. you like them? And I said actually, I</p> <p>17. would.</p> <p>18. And a couple of days after that</p> <p>19. Father Verrecchia was now wanting all of the</p> <p>20. accounting, all of the financial records of</p> <p>21. the parish. And he was the only one who had</p> <p>22. the key, which he would not even give to the</p>

Page 78	Page 80
<p>1. head of accounting. So he was obviously</p> <p>2. concerned because he had been using the</p> <p>3. wireless phone of the parish to make many of</p> <p>4. the calls to Nancy. Many of them early</p> <p>5. in the morning to 1 o'clock. Long, lengthy</p> <p>6. calls.</p> <p>7. Q How did you obtain these?</p> <p>8. A I was, for a period of about eight</p> <p>9. months, in charge of the accounting. The</p> <p>10. head of the accounting, Sarah Riggins, had</p> <p>11. left and we were left with this huge mess.</p> <p>12. And I remember telling Father Verrecchia,</p> <p>13. well, I'm a computer expert, so I'll do the</p> <p>14. accounting until we can find somebody to do</p> <p>15. that.</p> <p>16. So I was the one who paid all of the</p> <p>17. personnel in the school, paid all of the</p> <p>18. checks, became very familiar with all of the</p> <p>19. accounting. Was amazed at how much we were</p> <p>20. paying for certain things. I mean to pay</p> <p>21. four or five hundred hundred dollars a month for a</p> <p>22. wireless phone was -- so I started checking</p>	<p>1. I don't trust him here. And I think that</p> <p>2. Father Rippy shouldn't be involved in this at</p> <p>3. all. He's a good friend of Father Verrecchia</p> <p>4. and I have personal knowledge that he is not</p> <p>5. dependable and that his confidence -- his</p> <p>6. confidentiality is extraordinarily poor.</p> <p>7. Q And how did you know that?</p> <p>8. A From previous experience with Father</p> <p>9. Rippy and some of his friends. Rippy is one</p> <p>10. of the greater gossips of the diocese.</p> <p>11. Q And was that public knowledge? I</p> <p>12. mean was that well known amongst the priests?</p> <p>13. A Yes. He had two or three friends who</p> <p>14. seemed to know everything that happened in</p> <p>15. the chancery before anybody else did.</p> <p>16. Q Who were they?</p> <p>17. A Father Danny Spychala and Father Bill</p> <p>18. Erbacher.</p> <p>19. Q How do you spell Danny's last name?</p> <p>20. A I think it's S-P-Y-C-H-A-L-A.</p> <p>21. Q What was Bishop Loverde's reaction to</p> <p>22. that comment about not trusting the</p>
Page 79	Page 81
<p>1. the records and cross-referencing them to</p> <p>2. phone numbers I found. Her number kept</p> <p>3. showing up, so I submitted it as further</p> <p>4. evidence.</p> <p>5. Q You gave copies of those bills to</p> <p>6. Bishop Loverde?</p> <p>7. A Yes.</p> <p>8. Q did you keep copies of those</p> <p>9. yourself?</p> <p>10. A Yes.</p> <p>11. Q And I thought you said -- did he ask</p> <p>12. you if you had copies?</p> <p>13. A He asked me if I had copies and he</p> <p>14. gave me those copies. I have those copies.</p> <p>15. Q So he made you copies that you kept</p> <p>16. for the parish?</p> <p>17. A Yes.</p> <p>18. Q Or these were the copies that you had</p> <p>19. that were under your charge at the parish?</p> <p>20. A I remember Father Rippy leaving the</p> <p>21. room to make the copies. And at that point I</p> <p>22. took the opportunity to say to Bishop Loverde</p>	<p>1. confidences of Rippy?</p> <p>2. A He said he needed to trust his staff</p> <p>3. and I said why, you've only been here for</p> <p>4. about a month. I'm telling you, he's not</p> <p>5. trustworthy, so you need to take the</p> <p>6. information and have it evaluated by an</p> <p>7. outside source.</p> <p>8. At one point in the meeting, Father</p> <p>9. Rippy brought up the question and he said I</p> <p>10. don't understand, how can Father Rippy be</p> <p>11. involved or how can Father Verrecchia be</p> <p>12. involved with this woman if he's gay? And I</p> <p>13. said well, that answer is beyond you, Father</p> <p>14. Rippy and is beyond you, Bishop Loverde, that</p> <p>15. is for a very professional psychologist or</p> <p>16. psychiatrist to answer.</p> <p>17. Q Did -- after your meetings in June of</p> <p>18. 1999 with Bishop Loverde over the</p> <p>19. relationship between Ms. Lambert and Father</p> <p>20. Verrecchia, did he indicate to you in any</p> <p>21. manner what you should do with that</p> <p>22. information or what he was going to do with</p>

Page 82	Page 84
<p>1. that information because of this illicit</p> <p>2. affair between Father Verrecchia and Ms.</p> <p>3. Lambert? Other than the fact he'd look at</p> <p>4. all this information when he got back from</p> <p>5. vacation?</p> <p>6. A That's all he said, but my</p> <p>7. expectations of the meeting were absolutely</p> <p>8. shattering. I thought that he would be</p> <p>9. shocked at what I showed him. I thought that</p> <p>10. he would be appreciative of the incredible</p> <p>11. amount of work I had done to get this. There</p> <p>12. was no sign of "Thank you, very much. Boy,</p> <p>13. this must have taken a tremendous amount of</p> <p>14. work to get. You know, your assistance has</p> <p>15. been invaluable to us in the diocese."</p> <p>16. No reactions like that, so I was just</p> <p>17. -- he took the material and that was the end</p> <p>18. of that meeting.</p> <p>19. Q Had you been aware at that point in</p> <p>20. time of whether Mr. Lambert had expressed</p> <p>any</p> <p>21. concern to the parish or the diocese about</p> <p>22. this relationship between his wife and the</p>	<p>1. Q And how were you copied on these</p> <p>2. letters?</p> <p>3. A She sent me a copy of the letter that</p> <p>4. she had written to the bishop and Father</p> <p>5. Rippy sent me a copy back. I was surprised</p> <p>6. at the letter because there was no</p> <p>7. acknowledgment that she and Father Verrecchia</p> <p>8. were in trouble, but --</p> <p>9. Q Is there any acknowledgment that they</p> <p>10. were aware that there was actually a</p> <p>11. relationship going on between her and Father</p> <p>12. Verrecchia?</p> <p>13. A No. And I think that letter from</p> <p>14. Father Rippy was somewhere at the end of</p> <p>15. July.</p> <p>16. Q July 26, 1999?</p> <p>17. A No.</p> <p>18. Q The letter from Ms. Lambert to Mr. --</p> <p>19. to Bishop Loverde?</p> <p>20. A Yes, that was her letter.</p> <p>21. Q And the response back was about a</p> <p>22. month later that you're referring to Father</p>
Page 83	Page 85
<p>1. pastor, Father Verrecchia?</p> <p>2. A No, at that time, no.</p> <p>3. Q And were you aware whether the Bishop</p> <p>4. was knowledgeable of any concern expressed</p> <p>by</p> <p>5. Mr. Lambert as of June of 1999?</p> <p>6. A He made no indication to me.</p> <p>7. Q Now, after this meeting, did you have</p> <p>8. a -- when did you have next a meeting with or</p> <p>9. a discussion with Father Verrecchia, one of</p> <p>10. the other pastors there, Father Rippy or the</p> <p>11. bishop about the Lambert situation involving</p> <p>12. Father Verrecchia?</p> <p>13. A I received a copy of a letter that</p> <p>14. Nancy Lambert had written to the bishop</p> <p>15. expressing her great concerns that a priest</p> <p>16. in the parish, myself, was investigating her</p> <p>17. personal life and received a reply that</p> <p>18. Father Rippy had written and completely</p> <p>19. threw me because he says "If you know of any</p> <p>20. inappropriate action that Father Haley is</p> <p>21. doing, if you know of any further</p> <p>22. investigation, please contact me right away."</p>	<p>1. Rippy's response back to Ms. Lambert?</p> <p>2. A That was on August the 24th, when he</p> <p>3. acknowledges a telephone conversation,</p> <p>4. acknowledges that Bishop Loverde needs to be</p> <p>5. away from the office the first week of August</p> <p>6. and then basically excusing the diocese.</p> <p>7. Father Haley was not working upon</p> <p>8. instructions from the diocese. We have</p> <p>9. spoken to Father Haley to express our</p> <p>10. concerns. He was transferred to hopefully</p> <p>11. resolve your concerns.</p> <p>12. I found myself the victim. I found</p> <p>13. myself being somehow incriminated in this</p> <p>14. when they at that point had full knowledge of</p> <p>15. Father Verrecchia.</p> <p>16. Q How long -- excuse me -- you</p> <p>17. indicated earlier that you were transferred</p> <p>18. to Saint Lawrence in Alexandria. When was</p> <p>19. that?</p> <p>20. A I was transferred on July the 26th.</p> <p>21. Q Is that when you were actually</p> <p>22. transferred or told you were going to be</p>

<p style="text-align: right;">Page 86</p> <p>1. transferred or do they occur on the same day, 2. in any event? 3. A that was the day of the transfer. I 4. think I was told on the 7th of July. 5. Q By whom? 6. A By a letter, I believe. 7. Q And you were transferred on July 8. 26th. That's the same day of the letter to 9. Bishop Loverde from Ms. Lambert on which 10. you 11. were copied? 12. A Yes. 13. Q You were also copied on the August 14. 24th response from Father Rippy? 15. A Yes. 16. Q And you were also copied on a reply 17. to that from Ms. Lambert of September 7th, 18. 1999? 19. A Yes. Which she's now threatening 20. some sort of legal action against me for 21. damage to her reputation. 22. Q Was there any further communication 23. after September 7th from Ms. Lambert or to</p>	<p style="text-align: right;">Page 88</p> <p>1. of October 12th, there was a reference, was 2. there not, by Father Rippy to Ms. Lambert 3. about concerns of other parishioners about 4. this relationship and an acknowledgment that 5. her husband had expressed his concern about 6. it the previous fall and again more recently 7. to the diocese? 8. A Yes, I believe. Let me see -- I 9. don't think it does mention that. It just 10. says they apologize, first, "Express for your 11. husband, last fall, again more recently." 12. And then "We apologize for the pain, 13. embarrassment, and humiliation you've 14. experienced as the result of any inquiries by 15. Father Haley." 16. Q Is that the first time that you were 17. aware that Mr. Lambert had brought his 18. concerns to the attention of the diocese? 19. A Yes. 20. Q Actually the previous -- it would 21. have been the previous fall of 1998, and more 22. recently somewhere around the October or fall</p>
<p style="text-align: right;">Page 87</p> <p>1. Ms. Lambert? 2. A And then on October the 12th, they 3. wrote her a letter, which finally 4. acknowledged to her that there may be some 5. reason for investigating Father Verrecchia, 6. but it clearly wasn't my role. 7. Q This is the letter of October 12th, 8. 1999 from Father Rippy to Ms. Lambert? 9. A Yes. 10. Q You were also copied on that? 11. A Yes. 12. Q Did they indicate on any of this 13. correspondence that they were aware from you 14. of the fact that there was this intimate 15. relationship going on between Ms. Lambert and 16. Father Verrecchia? 17. A No. They talked about other 18. parishioners, they talked about others 19. reporting, recommending Father Verrecchia 20. limit contacts, but there was no mention of 21. absolute proof of this relationship. 22. Q When you were copied on this letter</p>	<p style="text-align: right;">Page 89</p> <p>1. time of 1999? 2. A Yes. That was the first time that I 3. knew that they already knew about the 4. problem. 5. Q Well, they -- is that the first time 6. that you were aware that they were hearing 7. directly from Mr. Lambert? 8. A Yes. 9. Q Do you know what they were -- do you 10. know if they were telling Mr. Lambert they 11. were already aware from you about the fact 12. that this relationship actually existed? 13. A I do not know what they were telling 14. him. 15. Q These letters seem to indicate that 16. -- well, these letters don't indicate that 17. they have proof that there is such a 18. relationship and seem to be accepting 19. whatever Ms. Lambert is saying. Was that 20. your impression also? 21. A Yes. And my pain about it, that 22. somehow I was becoming the fall guy for this.</p>

<p style="text-align: right;">Page 90</p> <p>1. And when they asked me if I had been making 2. inquiries I said no, absolutely not. I 3. presented the material to you and I never 4. inquired of anybody other than the fact that 5. there was a lady who did our gardening work 6. and knew her and I said -- I made some 7. comment. I said do you know of anything 8. going on between Nancy and Father Jim? And 9. she immediately reacted "Oh, it's terrible, 10. everybody is talking about it." 11. Q Who is the gardener? 12. A I don't know. I can't remember her 13. name, but apparently she was the next-door 14. neighbor or the neighbor to Nancy. It wasn't 15. an inquiry as much as a -- talking to 16. somebody who was picking weeds out front. 17. Q Well, when Ms. Lambert wrote this 18. letter of July 26th complaining about your 19. quote, "investigation," end of quote, had you 20. informed her about what you had discovered in 21. June and told the bishop? 22. A I told Nancy?</p>	<p style="text-align: right;">Page 92</p> <p>1. A I did not have any contact with them 2. then, but in the meetings that I had in late 3. October I expressed my anger that I was 4. somehow being accused for something I did not 5. do and they were yet not acknowledging the 6. problem. 7. Q When you were transferred in July of 8. 1999, you went to Saint Lawrence, correct? 9. A Yes. 10. Q And how long -- had you expected to 11. be transferred prior to that as early as July 12. of 1999? 13. A No. Normal transfers would have come 14. in June. As I have said, Father Gee was 15. transferred in June and then I think -- I 16. think it was July 7th when I received the 17. letter that I was going to be transferred on 18. the 26th. 19. Q And when you were transferred, were 20. you told how long you would be there at Saint 21. Lawrence? 22. A I was told that I would be there for</p>
<p style="text-align: right;">Page 91</p> <p>1. Q Yes. 2. A No. 3. Q Do you know if that could be the 4. quote, "investigation" that she was referring 5. to, your reporting? 6. A It quite -- it actually may have 7. been. 8. Q Do you know if anyone in the diocese 9. informed her of what you had brought to the 10. bishop's attention, although it doesn't 11. appear that way in these letters? 12. A Obviously Jim Verrecchia knew about 13. it and since he and Nancy were involved, I'm 14. sure she knew about it the moment he knew 15. about it. 16. Q Did you have any discussion with 17. Bishop Loverde or Father Rippey about the -- 18. when you saw these letters between July and 19. October about the fact that they weren't 20. quite being candid with her about their 21. knowledge of the relationship between her and 22. Father Verrecchia?</p>	<p style="text-align: right;">Page 93</p> <p>1. a few months and at most a year. And the 2. bishop shook my hand and he said I want you 3. to know this about me, I never say anything 4. about dates, but I am telling you because I 5. want you to know that. And I said should I 6. do a dance on your desk? And he looked at me 7. and I said maybe I should stand up on my 8. head. And he looked at me. He said what are 9. you talking about? And I said you'll know 10. one day, you'll know. 11. And later, almost seven or eight 12. months later when he had not moved me, I 13. reminded him 14. Q Moved you out of Saint Lawrence? 15. A Out of Saint Lawrence. I reminded 16. him of that statement and he said oh, I never 17. made a statement like that. And I said do 18. you remember me talking about doing a dance 19. on your desk or standing on top of my head? 20. And he said yes. And I said now you know why 21. I said those. 22. Q And why did you say that?</p>

Page 94	Page 96
<p>1. A They were memory jogs so that</p> <p>2. you would remember telling me that you</p> <p>3. promised to move me in a few months, at</p> <p>4. most a year.</p> <p>5. Q Did you anticipate that move would be</p> <p>6. to be a pastor?</p> <p>7. A Yes.</p> <p>8. Q Had he brought up the issue of pastor</p> <p>9. in your July conversation after having it</p> <p>10. been the conversation initiated by him that</p> <p>11. spring?</p> <p>12. A He did not indicate to me that I was</p> <p>13. no longer considered to be moved for a</p> <p>14. pastorship, so my expectation was that I was</p> <p>15. going to be moved in a few months to another</p> <p>16. pastorship.</p> <p>17. Q After you were transferred, this</p> <p>18. exchange of letters went back and forth, did</p> <p>19. you then have a meeting with the bishop after</p> <p>20. the October 12th letter?</p> <p>21. A Yes.</p> <p>22. Q What occurred at that meeting? Who</p>	<p>1. information?</p> <p>2. And he said well, I'm not assured</p> <p>3. that you haven't doctored it. And I said why</p> <p>4. am I under suspicion here? I said this --</p> <p>5. Q And who said this to you, the bishop?</p> <p>6. A The bishop. It became very clear</p> <p>7. at that point that they were trying to</p> <p>8. discredit the information, discredit the</p> <p>9. giver of the information, finding some way</p> <p>10. out of this. It was in anticipation of that</p> <p>11. kind of a threat that I had done such a</p> <p>12. through job.</p> <p>13. For example, of numbering all of the</p> <p>14. pages of the original notebook, so that from</p> <p>15. their perspective certain pages wouldn't</p> <p>16. suddenly be missing. That they wouldn't be</p> <p>17. able to take out certain sensitive issues.</p> <p>18. Q This is the notebook of materials</p> <p>19. that you --</p> <p>20. A Gave on the 22nd.</p> <p>21. Q -- gave from the communal computer</p> <p>22. that you gave to them in June --</p>
Page 95	Page 97
<p>1. called it and for what purpose?</p> <p>2. A He called me in. I was relieved to</p> <p>3. finally have some contact after having waited</p> <p>4. from June 22nd to the end of October and</p> <p>5. knowing that nothing had been done with</p> <p>6. Father Verrecchia through the secretaries</p> <p>7. there. That there was no evaluation he had</p> <p>8. never been gone, that there was no suspension</p> <p>9. of his faculties, that nothing seems to have</p> <p>10. happened, so I was very relieved to finally</p> <p>11. be called in.</p> <p>12. During the meeting they asked me --</p> <p>13. Q "They" being whom?</p> <p>14. A Father Rippy and the bishop asked me</p> <p>15. many questions about the email and how it had</p> <p>16. been obtained. And there was suggestions</p> <p>17. that I had, first, written all of the email.</p> <p>18. And I said, "Are you serious that I could</p> <p>19. write 287 pages of material in one week and</p> <p>20. that it would have references to friends who</p> <p>21. I have never met and credit card numbers and</p> <p>22. addresses and sister and personal</p>	<p>1. A Right.</p> <p>2. Q -- in response to Father Verrecchia's</p> <p>3. apparent attempt to discredit you?</p> <p>4. A Right. I was surprised that they</p> <p>5. were giving more credence to him and what he</p> <p>6. was saying, even though it had already been</p> <p>7. proven untrue by the testimony of the</p> <p>8. secretaries who he had claimed were giving</p> <p>9. him this information.</p> <p>10. Q And did you tell them of that meeting</p> <p>11. with the secretaries?</p> <p>12. A Yes. And they weren't giving any</p> <p>13. credence to me even though I wasn't saying</p> <p>14. anything about him. I was giving</p> <p>15. self-incriminating evidence.</p> <p>16. Q What did they tell you is the purpose</p> <p>17. of this meeting in late October?</p> <p>18. A They just wanted to ask me more</p> <p>19. questions about how I had gotten the email</p> <p>20. and did I have to go through any passwords</p> <p>21. and where had I gotten this and had I gone</p> <p>22. into his room.</p>

Page 98	Page 100
<p>1. There were no questions about Father Verrecchia and his relationship, there was no questions about my own knowledge or any other priest's knowledge about this relationship, it all centered about trying to somehow discredit me or the information that had been presented.</p> <p>8. Q And did you tell them what you stated here essentially, that this was information that Father Verrecchia apparently synchronized on his own, whether knowingly or not, from his laptop into the communally networked computers at the rectory and the office?</p> <p>15. A Yes. I told them that he had written the majority of the emails from the office in the computer. I had read to them the policies prohibiting personal use of parish computers.</p> <p>20. Q Did they indicate to you whether they had spoken to Father Verrecchia at this point</p> <p>22. --</p>	<p>1. Q Did they indicate to you at all whether they had informed the other priests at All Saints to be vigilant about this reported relationship between Father Verrecchia and Ms. Lambert as a result of the information you gave them?</p> <p>7. A They made no indication to me. I pursued to that and asked the priests and they had not been told anything, I asked the secretaries if anything had changed, these were people who had daily contact with him and apparently nothing was done and I brought that up to the bishop.</p> <p>14. He said you don't know what we've done and I said but I know what you have not done. He has not been removed, he has not been suspended, no one in the parish has been warned, he is not under any supervision from the people who would see his activities. I said there are still many, many people concerned about the relationship and that's what all of this was about now, me rather</p>
Page 99	Page 101
<p>1. A No.</p> <p>2. Q -- about any of those?</p> <p>3. A No.</p> <p>4. Q And they didn't indicate or they indicated they had?</p> <p>6. A They did not indicate anything. I asked at the meeting, I said I thought we were going to have a meeting together and he didn't acknowledge even saying that. And I said remember, I thought it was a great solution, get everybody involved together? I said -- I fully expected Father Verrecchia to have been at that meeting in October.</p> <p>14. Q In July, your meeting on July 26th with the -- when you were transferred, had the bishop indicated to you at that time that he would call for a meeting between yourself and Father Verrecchia?</p> <p>19. A Yes.</p> <p>20. Q And is that the meeting you were referring to?</p> <p>22. A Yes.</p>	<p>1. than him.</p> <p>2. Q What was the response?</p> <p>3. A I think he basically indicated that they had to be very careful about this, that these were serious charges and they just needed to get all the information they could. And I said all of the information you need is right there. And emphasized --</p> <p>9. Q That's in the documents that you--</p> <p>10. A The documents that I gave. And emphasized again, I wrote none of them. They were terribly damning because they were self-written, self-incriminating, showed the complete history. I said you can't get better proof than self-incriminating evidence.</p> <p>17. Q Had they indicated yet, at all, that they would take the action that you say is typically taken within a couple weeks of receiving this kind of information about a priest where they react strongly and expeditiously? Had they indicated yet that</p>

Page 102	Page 104
<p>1. they were going to take any action against</p> <p>2. Father Verrecchia to stop the relationship</p> <p>3. with Ms. Lambert?</p> <p>4. A They said that he had been told not</p> <p>5. to have any contact with her. And I said</p> <p>6. what do you mean, you shook his hand and</p> <p>7. said don't have contact with her? Is that</p> <p>8. what happened? I said nobody knows this,</p> <p>9. nobody is watching him, he's not under any</p> <p>10. supervision. I said you have had this</p> <p>11. evaluated by some psychologist, right?</p> <p>12. I was dumbfounded again at their lack</p> <p>13. of reaction to this.</p> <p>14. Q Had they indicated that they had any</p> <p>15. psychiatric or psychological analysis done?</p> <p>16. A No. And as I say, to my knowledge</p> <p>17. there was no opportunity for any kind of</p> <p>18. in-treatment patient evaluation.</p> <p>19. Q Did they indicate how long preceding</p> <p>20. your meeting with them at the end of October</p> <p>21. that they had told him, Father Verrecchia,</p> <p>22. not to have any further contact with Ms.</p>	<p>1. they were talking about the past activities</p> <p>2. or they were talking about the present</p> <p>3. activities?</p> <p>4. A Current.</p> <p>5. Q Present activities?</p> <p>6. A Yes.</p> <p>7. Q Between Father Verrecchia and Ms.</p> <p>8. Lambert?</p> <p>9. A Right. That people like Carol were</p> <p>10. telling -- I made a visit to her and she said</p> <p>11. oh, I still see them in the church.</p> <p>12. Q Carol Stime?</p> <p>13. A Yes. And I said you're kidding.</p> <p>14. Q When is the -- did you have between</p> <p>15. the -- excuse me. Let me go back. Did</p> <p>16. anything else go on in the October -- late</p> <p>17. October meeting other than their inquiry</p> <p>18. about the emails, the source of the emails</p> <p>19. and what you've already testified to?</p> <p>20. A No. I answered their questions as</p> <p>21. best I could. I was surprised about the</p> <p>22. direction of the questions and I expressed</p>
Page 103	Page 105
<p>1. Lambert?</p> <p>2. A No, but I -- no, they didn't tell me.</p> <p>3. Q Were you aware at that time whether</p> <p>4. there had been any recent contact or did you</p> <p>5. become aware after that there was still</p> <p>6. contact going on between the two?</p> <p>7. A I was aware at the time and I was</p> <p>8. aware after that time and told him that</p> <p>9. you know they're still seeing each other.</p> <p>10. Q When did you tell the bishop that</p> <p>11. they were still seeing each other?</p> <p>12. A At the end of the meeting in October.</p> <p>13. Q Right. But you said you became aware</p> <p>14. also, after that meeting that they were also</p> <p>15. having contact. Did you inform the bishop</p> <p>16. later again, that this was still going on?</p> <p>17. A I told him on -- he came to a</p> <p>18. confirmation dinner at Saint Lawrence and I</p> <p>19. told him that night that people were still</p> <p>20. talking about it and that was November 30th</p> <p>21. of 1999.</p> <p>22. Q When you say "people were talking,"</p>	<p>1. my surprise that no further questions were</p> <p>2. asked to me about the relationship.</p> <p>3. I said have you talked to Father Gee</p> <p>4. and Father Paul about this? And they said --</p> <p>5. they started giving me the line that</p> <p>6. priests's confidentiality in these matters</p> <p>7. would prevent them from going and describing</p> <p>8. this to any other priest or anybody else.</p> <p>9. And I said, but who's watching him? Who's</p> <p>10. supervising? If it's not the guys in the</p> <p>11. house then who's doing this? Who is making</p> <p>12. sure of this?</p> <p>13. Q At your next meeting with the bishop</p> <p>14. on November 30th at Saint Lawrence, did you</p> <p>15. have any other conversation other than what</p> <p>16. you just spoke about?</p> <p>17. A I had a meeting with him at the end.</p> <p>18. Q Did you have any further discussion</p> <p>19. after the November 30th meeting other than</p> <p>20. what you've already said?</p> <p>21. A About?</p> <p>22. Q You indicated at the November 30th</p>

Page 106	Page 108
<p>1. meeting you told him you were being told by</p> <p>2. people in Manassas that Father Verrecchia and</p> <p>3. Nancy were still seeing each other</p> <p>4. frequently. Did you tell him anything other</p> <p>5. than that or have any further discussion at</p> <p>6. the November 30th meeting?</p> <p>7. A No. He knew -- in one of the</p> <p>8. meetings in October I had told him that I was</p> <p>9. very concerned of what appeared to be a</p> <p>10. double standard, that certain priests were</p> <p>11. being treated in one way and other priests</p> <p>12. were not. I expressed my concerns that for</p> <p>13. example, I, myself, was being treated very</p> <p>14. harshly and had been in the past and for</p> <p>15. some reason Father Verrecchia didn't seem to</p> <p>16. be required.</p> <p>17. Father Paul Berghout was another</p> <p>18. typical example. He had indiscreetly touched</p> <p>19. a woman's thighs. He was talking to her on</p> <p>20. the couch. She complained and he was</p> <p>21. investigated by Father Verrecchia and Father</p> <p>22. Steve Leva who were best friends and the</p>	<p>1. had been very surprised that I had not heard</p> <p>2. back from Father Avella.</p> <p>3. Q Where were you seeking to be</p> <p>4. transferred to?</p> <p>5. A Just anywhere outside of Saint</p> <p>6. Lawrence and hopefully to a pastorship</p> <p>7. because I had -- I had not done anything to</p> <p>8. cause a difference in opinion about me</p> <p>9. receiving that pastorship.</p> <p>10. Q So this is the -- this transfer</p> <p>11. request is what you had expected might happen</p> <p>12. from July of 1999, a transfer for the purpose</p> <p>13. of being a pastor and that's what you were</p> <p>14. requesting?</p> <p>15. A Yes.</p> <p>16. Q And what was the response to that?</p> <p>17. A I did not hear back from Father</p> <p>18. Avella, so in the beginning of May we had a</p> <p>19. priest's meeting and I used the occasion to</p> <p>20. have a meeting with the bishop and I told him</p> <p>21. that I was very surprised that I had not been</p> <p>22. contacted by Father Avella. I was very</p>
Page 107	Page 109
<p>1. result was within a week. Father Berghout was</p> <p>2. in inpatient therapy.</p> <p>3. Q When was that?</p> <p>4. A I was still there, so it was sometime</p> <p>5. before my departure in July of 1999.</p> <p>6. Q After the November 30th what was --</p> <p>7. meeting of 1999 -- when was your next contact</p> <p>8. with the bishop over any of these issues?</p> <p>9. A It wasn't until May of 2000.</p> <p>10. Q Prior to that were you still at Saint</p> <p>11. Lawrence?</p> <p>12. A Yes.</p> <p>13. Q And had you made a request prior to</p> <p>14. that to leave Saint Lawrence to be</p> <p>15. transferred?</p> <p>16. A Yes. In January he sent out a letter</p> <p>17. to all priests expressing his need to get to</p> <p>18. know us a little bit better, so he asked us</p> <p>19. to fill out a questionnaire and if we had</p> <p>20. requested a transfer we were to be</p> <p>21. contacted by Father Avella. So I filled out</p> <p>22. the questionnaire, requested a transfer and</p>	<p>1. surprised I hadn't been contacted by him</p> <p>2. about being made a pastor.</p> <p>3. And that's when I reminded him of his</p> <p>4. promise to move me after a few months, almost</p> <p>5. a year, that the other priest at Saint</p> <p>6. Lawrence, Father Ziegler, had heard from</p> <p>7. Father Avella. He had filled out the form</p> <p>8. and heard back and knew he was being</p> <p>9. transferred. I said why am I not being</p> <p>10. moved? What's going on? And he said you</p> <p>11. have no right to be a pastor, which I</p> <p>12. responded, well, no offense intended, but you</p> <p>13. have no right to be a bishop.</p> <p>14. We're not talking about rights, we're</p> <p>15. talking about the greatest privileges of our</p> <p>16. life. I said my call to the priesthood was</p> <p>17. the greatest gift that God could give me and</p> <p>18. I want to use it to the fullest of my</p> <p>19. potentials. And I do not understand why I am</p> <p>20. no longer being considered for pastorship.</p> <p>21. And he had brought up a former issue of a</p> <p>22. relationship that I had had in the parish my</p>

Page 110	Page 112
<p>1. first -- in my first years.</p> <p>2. Q This was in January of 2000?</p> <p>3. A This was in May of 2000, this</p> <p>4. meeting.</p> <p>5. Q Okay. This was --</p> <p>6. A And was very surprised that he was</p> <p>7. bringing this issue up.</p> <p>8. Q "He" being Father Avella?</p> <p>9. A No, the bishop, himself.</p> <p>10. Q Oh, the bishop. I'm sorry. You had</p> <p>11. a meeting in May to express your surprise of</p> <p>12. not being contacted for the transfer?</p> <p>13. A Yes.</p> <p>14. Q And it's in that meeting that the</p> <p>15. bishop brings up this prior accusation?</p> <p>16. A Yes.</p> <p>17. Q What did he tell you in particular</p> <p>18. about this and the prior accusation and what</p> <p>19. it was about and where it was coming from?</p> <p>20. A He said that he had read the file and</p> <p>21. that there was nothing in the file to</p> <p>22. indicate that the allegation against me had</p>	<p>1. intense from her side than it was from my</p> <p>2. side.</p> <p>3. At a certain point I realized that</p> <p>4. her affections and her dependency were</p> <p>5. growing too strong and I broke the</p> <p>6. relationship off in 1995. And somehow in</p> <p>7. March of 1996, this all erupted and I was</p> <p>8. immediately taken in for evaluation. At the</p> <p>9. time I had been seeing a psychologist about</p> <p>10. my concerns of some of the priests' behavior</p> <p>11. in the diocese.</p> <p>12. Q You were already seeing someone</p> <p>13. regarding the priests' behavior in the</p> <p>14. diocese?</p> <p>15. A Yes.</p> <p>16. Q So in 1995 there was this</p> <p>17. relationship of some sort with Ms. Evans that</p> <p>18. she eventually related to a social worker who</p> <p>19. told her to write a letter?</p> <p>20. A Yes.</p> <p>21. Q When she was dealing with this</p> <p>22. herself in 1996, to whom did she write the</p>
Page 111	Page 113
<p>1. ever been sufficiently investigated. And I</p> <p>2. said oh, quite the contrary. I said I have</p> <p>3. never been shown the allegations and i said,</p> <p>4. but I had been going to a psychologist for a</p> <p>5. period of nine months and the friendship that</p> <p>6. I had with this woman had been much of the</p> <p>7. topic of the conversation.</p> <p>8. And I said Bishop Keating accepted</p> <p>9. the psychologist's reports after that</p> <p>10. evaluation and after this psychologist had</p> <p>11. seen an evaluation done on me at Saint</p> <p>12. Luke's, two-week inpatient evaluation, which</p> <p>13. was immediately done to me after accusations</p> <p>14. by this woman back in 1996.</p> <p>15. Q So in 1996 what was the accusation</p> <p>16. that was made and by whom?</p> <p>17. A The accusations were made by a woman</p> <p>18. by the name of Jackie Evans, who basically</p> <p>19. claimed -- she wrote a letter based on her</p> <p>20. psychologist, her social worker's advice</p> <p>21. explaining her insights into a friendship</p> <p>22. that we had and it was apparently much more</p>	<p>1. letter?</p> <p>2. A She wrote it to me, but she never</p> <p>3. gave it to me, she never sent it, but she did</p> <p>4. give the letter apparently to the diocese,</p> <p>5. who has never shown me the letter or any</p> <p>6. allegations.</p> <p>7. Q So the diocese called you in</p> <p>8. regarding that in 1996?</p> <p>9. A Yes. I had a meeting with Bishop</p> <p>10. Keating and Father Rippy. They asked me</p> <p>11. certain excerpts from this letter.</p> <p>12. Q What were the excerpts?</p> <p>13. A Were you friends with this lady?</p> <p>14. Yes. Was she the head of the Marion Society?</p> <p>15. Yes. Did you go on a pilgrimage with her and</p> <p>16. another group. Yes. Did you say on the</p> <p>17. pilgrimage, your hair smells like candy?</p> <p>18. Yes. Why would you say such an inappropriate</p> <p>19. thing?</p> <p>20. Given the context that we were all</p> <p>21. walking together looking for a place to eat</p> <p>22. and we were all ravenously hungry. I was</p>

Page 114	Page 116
<p>1. walking behind her and I said gee, you know I</p> <p>2. can eat anything. I said your hair smells</p> <p>3. like candy, I could eat it. I said we had</p> <p>4. been friends. She was like a sister to me,</p> <p>5. but when I realized that her affections had</p> <p>6. been too strong, I stopped it. And she</p> <p>7. apparently was very angry about that.</p> <p>8. She had -- was a woman who had</p> <p>9. suffered some tremendous losses. Loss of</p> <p>10. her mother, loss of her father and she had</p> <p>11. breast cancer and she had lost her breasts in a</p> <p>12. mastectomy, she had lost her husband in a</p> <p>13. separation and a divorce or in a separation.</p> <p>14. So I had been trying to be a friend to her</p> <p>15. and support her as a friend.</p> <p>16. Q Did they suggest that there had been</p> <p>17. any kind of intimate, physical relationship</p> <p>18. between her?</p> <p>19. A Yes. To which I categorically denied</p> <p>20. numerous times.</p> <p>21. Q What did they indicate, whether she</p> <p>22. said there had been?</p>	<p>1. except a Christmas hug, an Easter hug.</p> <p>2. Q You wrote rules to who?</p> <p>3. A To limit those kind of behaviors.</p> <p>4. Q Rules to whom?</p> <p>5. A To Jackie. And said you can't</p> <p>6. be calling me every week, you can't be</p> <p>7. calling me. So limited contact, no more than</p> <p>8. one call a week and no more than one -- could</p> <p>9. not be in her presence more often than once</p> <p>10. every two weeks, so if there was a meeting</p> <p>11. and she was present, that was it. I was</p> <p>12. trying to back away from it without hurting</p> <p>13. her.</p> <p>14. Q Did they ever show you the letter</p> <p>15. from her?</p> <p>16. A No.</p> <p>17. Q They intimated what it said?</p> <p>18. A Yes.</p> <p>19. Q So do you have any proof that that's</p> <p>20. what she actually said or not? Other than</p> <p>21. their intimating what she said?</p> <p>22. I received a letter through my</p>
Page 115	Page 117
<p>1. A They indicated that there was</p> <p>2. sexual misconduct. And I said what kind of</p> <p>3. sexual misconduct are you talking about? And</p> <p>4. he said did you fondle her breast? I said</p> <p>5. no, I did not.</p> <p>6. However, she had a mastectomy and she</p> <p>7. had what is known as a translap operation</p> <p>8. where they take part of the stomach, they</p> <p>9. bring it up to form a new breast and she was</p> <p>10. concerned that it wasn't the same size and it</p> <p>11. didn't look the same and she asked me if I</p> <p>12. would touch it. And I said no, to which she</p> <p>13. placed her hand on mine and made me touch it.</p> <p>14. And I said oh, they feel the same.</p> <p>15. Q And that was -- was that the only</p> <p>16. physical touching ever of her other than</p> <p>17. handshakes or you know, or just what would be</p> <p>18. generally --</p> <p>19. A At a certain point, I mean there were</p> <p>20. some certain hugs. Birthday hugs, Christmas</p> <p>21. hugs to which I responded by writing rules</p> <p>22. that said there would be no physical contact</p>	<p>1. psychologist. I do not know if it's the same</p> <p>2. one that the diocese received. I have never</p> <p>3. seen my files, I have never seen any of the</p> <p>4. accusations or notes, but they keep throwing</p> <p>5. it at me.</p> <p>6. Q How did your psychologist get this</p> <p>7. letter?</p> <p>8. A He received it from her social</p> <p>9. worker, they apparently are neighbors, it</p> <p>10. turns out. My psychologist, a doctor of</p> <p>11. psychology for 23 years, a clinic with seven</p> <p>12. or eight doctors of psychology, which was</p> <p>13. rather rare.</p> <p>14. Q Who was your psychologist?</p> <p>15. A Dr. -- I think is Michael Ruxer</p> <p>16. Q How do you spell Ruxer?</p> <p>17. A R-U-X-E-R.</p> <p>18. Q And who was her social worker?</p> <p>19. A Beverly Worthington. She just</p> <p>20. received kind of a mail-order social work</p> <p>21. degree from Richmond.</p> <p>22. Q for what reason -- for how long had</p>

Page 118	Page 120
<p>1. you been seeing Dr. Michael Ruxer before this 2. came up? 3. A I had started seeing him in October 4. of 1995 because I was currently at a parish, 5. Saint Ann's, and I had become aware of some 6. homosexual activity between the priests, 7. between the pastor and another pastor. In 8. the spiritual and confession I was becoming 9. aware of some significant sexual problems 10. among some of our priests, which I could not 11. say to anybody. 12. So I had gone to this psychologist 13. for the original purpose of helping me to 14. deal with the emotional burden of knowing 15. what I did not want to know about my fellow 16. priests through confession. And I 17. originally approached him and asked him if he 18. could make me forget it. And he says, no, I 19. can't and I won't because if I force that it 20. will be a trauma that comes out in other 21. ways. 22. And then in March when this whole</p>	<p>1. was how the diocese was reacting to this. 2. The evaluation that came out of Saint Luke's, 3. which was extraordinarily positive except for 4. the conclusion which said "recommended 5. inpatient treatment." 6. Q You went to Saint Luke's in what 7. month? 8. A It was in March of 1996. 9. Q And you went for a couple of weeks 10. evaluation at the request of Bishop Keating? 11. A Yes. And I went, consented because I 12. had nothing to hide and I figured that if 13. they weren't going to take the time to ask me 14. the questions that I thought they would, that 15. Saint Luke's would solve the problem. They -- 16. - 17. Q And so did you inform this, whoever 18. was the evaluator at Saint Luke's, regarding 19. everything you had told to Dr. Ruxer? 20. A Yes. And they had actually made 21. contact and had talked together. 22. Q They did?</p>
Page 119	Page 121
<p>1. thing erupted with Jackie Evans, he was an 2. invaluable asset who had already known me, 3. had already known about the struggles of 4. stopping the relationship back in August of 5. 1995 and was invaluable in assessing the 6. evaluation of Saint Luke's. 7. MR. MURPHY: Hold on just one second. 8. (Brief break.) 9. BY MR. MURPHY: 10. Q So he was already aware of this 11. relationship and how you saw to put 12. restraints on it with Jackie Evans and so you 13. continued obviously with him to deal with 14. what was being told to you at the time? 15. A Yes. He not only heard the whole 16. relationship, he saw the letters that I had 17. written to her and the letters that she had 18. written to me. 19. Q And how long did you continue with 20. Dr. Ruxer after that in dealing with this? 21. A I'd say it was somewhere in August. 22. I think that what then became the difficulty</p>	<p>1. A Yes. 2. Q And did you inform the knowing of the 3. Jackie Evans situation while you were seeing 4. Ruxer regarding your observations of other 5. priests's homosexual relationships? 6. A Yes. 7. Q And so in there -- who was it at 8. Saint Luke's who was doing the evaluation? 9. A They have a team of about six or 10. seven who -- each member of the team meets 11. with you about 20 minutes total in the 12. two weeks and then from those 20 minutes, 13. half-hour, the seven of them get together 14. and they write up this evaluation. I was -- 15. Q What do you do the rest of the time 16. you are at Saint Luke's? 17. A You are sitting there with sexual 18. predators, many who are -- mostly priests, 19. bishops are there because of legal 20. entanglements with child pornography, child 21. molestation, homosexual activity. It is a 22. treatment center for priests.</p>

Page 122	Page 124
<p>1. I was surprised that it was used as</p> <p>2. an evaluation place for me since the diocese</p> <p>3. had many psychologists that they used and</p> <p>4. they could have had the evaluations there.</p> <p>5. Q So they conferred with Dr. Ruxer and</p> <p>6. after this two weeks of meeting with you they</p> <p>7. gave you an evaluation.</p> <p>8. Did they inform you of that</p> <p>9. evaluation orally or in writing?</p> <p>10. A The end of the two weeks there was an</p> <p>11. oral presentation of the results.</p> <p>12. Q And who was the oral presentation</p> <p>13. made to?</p> <p>14. A Myself and to Father Rippy who</p> <p>15. represented the diocese. And I took notes</p> <p>16. during the oral presentation, he did not.</p> <p>17. The evaluation was very different than the</p> <p>18. reasons why I had gone to Saint Luke's.</p> <p>19. Q What do you mean?</p> <p>20. A For example, apparently the diocese</p> <p>21. had told Saint Luke's, the head of the</p> <p>22. facility, Steve Montana, told him that Father</p>	<p>1. pencil or sharp object or a belt, so when I</p> <p>2. was released I said what's going on here?</p> <p>3. Why am I here under these kind of</p> <p>4. circumstances?</p> <p>5. And that's when he told me that</p> <p>6. Father Rippy had said that you were going to</p> <p>7. kill yourself unless I had a sexual</p> <p>8. relationship with this woman. I said the</p> <p>9. relationship with this woman, the last time I</p> <p>10. saw her was in August of 1995, this is March</p> <p>11. of 1996.</p> <p>12. Q You were still alive.</p> <p>13. A What's going on? And in the oral</p> <p>14. evaluation there was no mention of suicidal</p> <p>15. tendencies, there was no mention of any kind</p> <p>16. of drug use or any depression.</p> <p>17. Q So at the end of all of this you're</p> <p>18. saying in the evaluation they gave that</p> <p>19. Father Rippy heard -- that he expressed no</p> <p>20. concern about suicidal tendencies, about</p> <p>21. drugs --</p> <p>22. A Right.</p>
Page 123	Page 125
<p>1. Rippy had said to him, quote, "That Father</p> <p>2. Haley was going to kill himself unless he had</p> <p>3. sexual contact with Jackie Evans."</p> <p>4. And when Steve Montana said that to</p> <p>5. me my mouth fell open and he sat back in his</p> <p>6. chair and he said I wish I just had a tape of</p> <p>7. your reaction. He says "That's what I teach</p> <p>8. my students about the reaction of innocence</p> <p>9. and shock." And I said I have never said</p> <p>10. anything like that. Never implied that</p> <p>11. anything like that.</p> <p>12. Q Who made a comment about that's an</p> <p>13. action of innocence?</p> <p>14. A Steve Montana.</p> <p>15. Q He was pointing out that your</p> <p>16. reaction to this accusation was an indication</p> <p>17. of innocence of the statement?</p> <p>18. A Yes. At that point I was taken</p> <p>19. off, quote, "suicide watch." When I</p> <p>20. originally was put at Saint Luke's I was</p> <p>21. placed by myself in a room basically for the</p> <p>22. first three days in my underwear with no</p>	<p>1. Q -- or did they express any further</p> <p>2. concern about the relationship with Ms.</p> <p>3. Evans?</p> <p>4. A No. What became clear to me was that</p> <p>5. I had been set up. That I had been put into</p> <p>6. Saint Luke's and information that I had never</p> <p>7. seen had been given to them and statements</p> <p>8. made that were completely untrue. And later</p> <p>9. learned from my psychologist that the --</p> <p>10. really the only way they can commit somebody</p> <p>11. to an evaluation is by saying that he is a</p> <p>12. risk to himself by suicide or depression or</p> <p>13. somebody else.</p> <p>14. Q Did you confront Father Rippy as to</p> <p>15. his -- why he made that statement?</p> <p>16. A Oh, yes.</p> <p>17. Q What did he tell you?</p> <p>18. A He said it's what I believed to be</p> <p>19. true at the time. And I said based on what?</p> <p>20. And he said conversations with Jackie. And I</p> <p>21. said what gave her the reason or basis for</p> <p>22. saying this? I have not seen her since 1995.</p>

Page 126	Page 128
<p>1. Q In the evaluation that was given to</p> <p>2. you at Saint Luke's, other than expressing</p> <p>3. that they had seen no concern with the Evans</p> <p>4. relationship or drugs or suicide, was there</p> <p>5. anything else that said -- mentioned that</p> <p>6. they saw no concern about or does that pretty</p> <p>7. much cover it?</p> <p>8. A In the report they actually said that</p> <p>9. I was to be commended for realizing that</p> <p>10. boundary violations had been made and for</p> <p>11. correcting the relationship and discontinuing</p> <p>12. the relationship.</p> <p>13. Q It also recommended, though, I guess</p> <p>14. you said, it recommended -- at the end they</p> <p>15. recommended further evaluation or treatment,</p> <p>16. I should say?</p> <p>17. A Six to nine months inpatient</p> <p>18. treatment.</p> <p>19. Q For what purpose based on this</p> <p>20. evaluation?</p> <p>21. A That was just their recommendation.</p> <p>22. It was based on their prognosis or</p>	<p>1. that there was nothing wrong here, that there</p> <p>2. was nothing wrong with the relationship.</p> <p>3. That he, in fact, handled it in a great way.</p> <p>4. That he had indicated he read all of the</p> <p>5. evaluations, saw the raw data, that he could</p> <p>6. not agree with the conclusions of Saint</p> <p>7. Luke's, and others could not agree with the</p> <p>8. thing of St. Lukes and, in fact, stated his</p> <p>9. reputation of 23 years on that and said that,</p> <p>10. in fact, an in-treatment hospitalization for</p> <p>11. this man would be detrimental to his health.</p> <p>12. All of which Bishop Keating accepted. I had</p> <p>13. a meeting --</p> <p>14. Q When did you meet with Bishop Keating</p> <p>15. over this? After the two weeks in Saint</p> <p>16. Luke's, the report to Father Rippy and the</p> <p>17. subsequent meetings with Dr. --</p> <p>18. A The report came out somewhere in</p> <p>19. April and was sent to the --</p> <p>20. Q It was Dr. Ruxer, Excuse me.</p> <p>21. A Ruxer.</p> <p>22. Q Dr. Ruxer.</p>
Page 127	Page 129
<p>1. psychiatric codes, which was an unspecified</p> <p>2. sexual disorder. So instead of having the</p> <p>3. report sent to Bishop Keating, I had the</p> <p>4. report sent to the psychologist I was</p> <p>5. seeing, who saw the report and said this is</p> <p>6. pure nonsense. This evaluation code is not a</p> <p>7. psychiatric evaluation code and a treatment</p> <p>8. center that puts this down is just fishing</p> <p>9. for business.</p> <p>10. So he went back to Saint Luke's and</p> <p>11. requested all of the raw data, the original</p> <p>12. answers, the answers that I had put down for</p> <p>13. the personality test, all of those raw data,</p> <p>14. everything I had put down. And had it -- he</p> <p>15. evaluated it and had two or three of his</p> <p>16. psychologists evaluate it on a blind study</p> <p>17. and none of them came up to any kind of a</p> <p>18. reaction, any negativity.</p> <p>19. And so he wrote two evaluation</p> <p>20. reports to Bishop Keating stating that there</p> <p>21. was no reason that Father Haley should not be</p> <p>22. given full -- a stamp of a full approval,</p>	<p>1. A And he and I both went back to Saint</p> <p>2. Luke's and said this report is an error and</p> <p>3. these are factual errors. There is</p> <p>4. incredible, factual errors written down in</p> <p>5. the report. Subjective conclusions based on</p> <p>6. absolutely no evidence, so they rewrote the</p> <p>7. report for him.</p> <p>8. Q Saint Luke's rewrote it for whom?</p> <p>9. A For Dr. Ruxer. So somewhere</p> <p>10. probably in June, I had a meeting with Bishop</p> <p>11. Keating, he received the evaluation from Dr.</p> <p>12. Ruxer. I had the evaluation of Saint Luke's</p> <p>13. and I said do you want to see this?</p> <p>14. Q "This," the original one?</p> <p>15. A Yes. I said you are free to see it,</p> <p>16. you are free to read it, but under no</p> <p>17. circumstances on the advice of a lawyer am I</p> <p>18. going to release it to you. At advice of a</p> <p>19. lawyer I am not to release my medical records</p> <p>20. to anyone. And I concur with that advice,</p> <p>21. but you may see it.</p> <p>22. You may do -- and he said he read the</p>

Page 130	Page 132
<p>1. report of Dr. Ruxer and he said this is all I 2. need, we need something in the file. We have 3. it, thank you very much. And he asked me a 4. couple other times after that in a series of 5. months, you know, was everything fine? And I 6. said yeah, it's great. And then tragically 7. he died. And then later I'm hearing -- 8. Q Excuse me. From 1996, he died in 9. 1998, was there any other -- was this issue 10. ever raised again prior to his death? 11. A No. And, in fact, he had given me 12. the assignments to All Saints. He had given 13. me the assignment to Saint John's and again, 14. no indication that this was hanging over me 15. or that this was something in the way of my 16. eventual pastorship. 17. Q Did you have any contact with Ms. 18. Evans or anyone regarding this after that? 19. A I had conversations with some people 20. who had talked to her and shockingly she had 21. been told on the day she brought the, quote, 22. "allegations" to the bishop, she had met</p>	<p>1. Q You related this when he said it was 2. unresolved? 3. A Yes. And I said then this is a case 4. of clear double-jeopardy. I am now being 5. retried for something of the past. 6. Q What did he -- how did he respond 7. when you told him that? 8. A He said that there was nothing in the 9. file, that there was no indication from 10. Bishop Keathing that it had been resolved. 11. And I said you have the evaluations from 12. the psychologist and he said that's your 13. doctor, we want our doctor. And I said why 14. would I want to trust a doctor that had been 15. hired by you, paid by you, given information 16. by you to adequately and unbiasedly evaluate 17. me? 18. I said already Saint Luke's was given 19. information that was patently, blatantly 20. untrue about me. And I had been going to Dr. 21. Ruxer on my own. I had been paying for that. 22. He is a noted clinical psychologist, he has</p>
Page 131	Page 133
<p>1. Father Rippy. She had been assured by Father 2. Rippy that I would be put in Saint Luke's for 3. in-treatment -- for treatment for at least 4. nine months. This was before any evaluation 5. had been made he was assuring her. 6. And it confirmed my goal and my 7. conclusion that the diocese is only concerned 8. about potential money loss, not the truth or 9. the facts or the evidence and they saw this 10. as a potential suit. I had assured Bishop 11. Keating that there was no possibility of suit 12. because there was no misconduct. And he 13. agreed with that, he accepted the evaluation 14. and that was that. 15. Q So this next gets raised, though, 16. with Bishop Loverde, correct? 17. A Right. And significantly in May of 18. 1999 -- of 2000. 19. Q And did you relate to him everything 20. you've just related now about this whole 21. incident? 22. A Absolutely. And my shock at --</p>	<p>1. accreditation for all of the tests that Saint 2. Luke's had given, but they refused to accept 3. it. 4. Q How did that meeting end with regard 5. to your status with the bishop? 6. A He basically said that it was an 7. unresolved issue and I countered by saying 8. no, it's not. And I said I think at this 9. point, if the diocese is going to treat me 10. this way, I am going to need to make some 11. contact with an outside attorney. 12. Q Now, at this point in time, May of 13. 2000, had you -- did you -- were you aware of 14. the status of Father Verrecchia? 15. A Yes. 16. Q And what was his status by that point 17. in time? 18. A That he had left All Saints in a 19. scandalous departure. Apparently he had 20. gone into the bishop on Friday, according to 21. the secretaries, and on Saturday he moved out 22. with all of his stuff.</p>

Page 134	Page 136
<p>1. Q Of what month?</p> <p>2. A That was in March of 2000.</p> <p>3. Q At that point in time, were the</p> <p>4. Lambert's still married?</p> <p>5. A Apparently they had divorced in</p> <p>6. February. I had heard about that, I had</p> <p>7. heard about the custody battles, I had heard</p> <p>8. about the concerns.</p> <p>9. Q Well, I want to keep a time frame.</p> <p>10. At that point in time was it known publicly</p> <p>11. by anyone that Ms. Lambert was pregnant or</p> <p>12. did that come out later?</p> <p>13. A I knew at that point. In fact, I</p> <p>14. told him.</p> <p>15. Q At what point did you know that she</p> <p>16. was pregnant? I believe she delivered in</p> <p>17. October of 2000; is that correct?</p> <p>18. A Yes.</p> <p>19. Q And she divorced Mr. Lambert in</p> <p>20. February of 2000?</p> <p>21. A I think, I heard in April. And I</p> <p>22. think I heard it from Christine and I heard</p>	<p>1. regard to the children as a result of this</p> <p>2. marriage by Ms. Lambert to Father</p> <p>3. Verrecchia?</p> <p>4. A No, I didn't actually. I do remember</p> <p>5. in the May 2000 meeting with the bishop,</p> <p>6. telling him that you know she's pregnant and</p> <p>7. you know they got married and how could you</p> <p>8. have let this happen and why wasn't there any</p> <p>9. stoppage of this? Why didn't you tell the</p> <p>10. other -- and he said we responded in a</p> <p>11. professional manner.</p> <p>12. And I said professional?</p> <p>13. Professional? I was quite upset at the</p> <p>14. meeting because I felt that they had done</p> <p>15. nothing and that the thing that was happening</p> <p>16. here was that I was suffering repercussions</p> <p>17. for being the whistle-blower.</p> <p>18. Q In late May of 2000, when you had</p> <p>19. this meeting with Bishop Loverde, did you</p> <p>20. inquire or was there any indication from him</p> <p>21. that he had informed Mr. Lambert or anyone of</p> <p>22. the information you had brought to him almost</p> <p>23. a year earlier about the relationship that</p>
Page 135	Page 137
<p>1. it from a couple other people.</p> <p>2. Q Now, by time you heard in April of</p> <p>3. 2000 that she, Ms. Lambert, was pregnant, had</p> <p>4. she married Father Verrecchia yet? Is that</p> <p>5. when they got married?</p> <p>6. A He left very quickly in April and I</p> <p>7. guess on Holy Saturday he got married to her</p> <p>8. rather quickly, so obviously it had been</p> <p>9. planned or talked about.</p> <p>10. Q And it was sometime after that you</p> <p>11. had heard that she was pregnant when they got</p> <p>12. married?</p> <p>13. A I heard that she was pregnant before</p> <p>14. they had gotten married.</p> <p>15. Q But it was some time in the April</p> <p>16. time frame?</p> <p>17. A Yes.</p> <p>18. Q And he left the parish in March of</p> <p>19. 2000 -- left the diocese, I guess?</p> <p>20. A Yes.</p> <p>21. Q Did you then become aware that there</p> <p>22. was still a custody proceeding going on with</p>	<p>1. existed --</p> <p>2. A I had never --</p> <p>3. Q -- between Father Verrecchia and Ms.</p> <p>4. Lambert?</p> <p>5. A -- heard him say or mention or any</p> <p>6. mention of any of this material that I</p> <p>7. brought. It was almost as if it hadn't been</p> <p>8. acknowledged.</p> <p>9. Q What was his response when you</p> <p>10. expressed your concern about the fact that</p> <p>11. nothing had been acted on with regard to the</p> <p>12. information you had given him and that this -</p> <p>13. -</p> <p>14. A He kept saying you don't know what we</p> <p>15. did. And I kept saying, I know what you</p> <p>16. didn't do. I know what you have done in</p> <p>17. other cases, I know what you didn't do here</p> <p>18. and you can't say that it was professional</p> <p>19. because somewhere around Christmas a pastor</p> <p>20. of a parish is getting a married woman</p> <p>21. pregnant, after you have known and been</p> <p>22. repeatedly told that the relationship was</p>

Page 138	Page 140
<p>1. continuing on. How, in any way, can you call</p> <p>2. this professional?</p> <p>3. Q And what was his response?</p> <p>4. A He just became more aggressive</p> <p>5. towards me.</p> <p>6. Q On what issues was he becoming more</p> <p>7. aggressive with you about?</p> <p>8. A Bringing up the past, of my past and</p> <p>9. at one point he even compared the two. And I</p> <p>10. said, oh, gosh, there is nothing to compare</p> <p>11. the two.</p> <p>12. Q Going back to the 1995 incident?</p> <p>13. A Yes.</p> <p>14. Q Now let me ask you, you had said</p> <p>15. earlier that you had actually begun some</p> <p>16. counseling with Dr. Ruxer in 1995 because of</p> <p>17. your having to deal with the concern over the</p> <p>18. homosexual relationships of several priests.</p> <p>19. And I believe you indicated some of which you</p> <p>20. had observed and others that were told to you</p> <p>21. in confessional.</p> <p>22. I don't want to get into the ones</p>	<p>1. every week for an hour or two just to</p> <p>2. converse about priestly things? He said oh,</p> <p>3. no, I couldn't do that. He said, but I can</p> <p>4. do it every two weeks, which I jumped at as</p> <p>5. one of the greatest opportunities.</p> <p>6. And we had probably six or seven of</p> <p>7. those meetings where we talked at length</p> <p>8. about some of the problems and he indicated</p> <p>9. the problems from a bishop's perspective</p> <p>10. that he could not do anything about</p> <p>11. homosexual priests or their activities.</p> <p>12. Canon law limited him of this and I said,</p> <p>13. well as a canon lawyer and the head of The</p> <p>14. Canon Law Association or Society in the</p> <p>15. United States, do something about it, change</p> <p>16. the rules.</p> <p>17. And in some of those conversations he</p> <p>18. had indicated a problem that existed even</p> <p>19. among the bishops and cardinals, naming some</p> <p>20. that surprised me, so I was becoming a lot</p> <p>21. more aware of how significant the problem was</p> <p>22. and how guarded it was.</p>
Page 139	Page 141
<p>1. that were told to you in the confessional,</p> <p>2. but what had you observed outside of the</p> <p>3. confessional about some homosexual activity</p> <p>4. amongst priests that caused you concern that</p> <p>5. you sought to discuss with the psychologist?</p> <p>6. A The homosexuality within the</p> <p>7. priesthood is something that I did not know</p> <p>8. about when I was ordained, but from my very</p> <p>9. first assignment at Saint mark's became more</p> <p>10. and more aware of. And it was a growing</p> <p>11. concern because I started to see associations</p> <p>12. between those who were exhibiting homosexual</p> <p>13. behaviors and friendships and particular</p> <p>14. friendships, support of one another and</p> <p>15. almost a defensive attitude towards anyone</p> <p>16. who might threaten them.</p> <p>17. I had gone to Bishop Keating and one</p> <p>18. of the outcomes of the Jackie Evans thing was</p> <p>19. that when we met in June of 1996, I had said</p> <p>20. to him, I don't think you know me and I don't</p> <p>21. know you and I'd like the opportunity to know</p> <p>22. you better. So I said, can we possibly meet</p>	<p>1. Q Other than, again, what you</p> <p>2. learned in the confessional, what were the</p> <p>3. observations from the time you became</p> <p>4. ordained until then? This was with regard to</p> <p>5. priests that were serving with you or in the</p> <p>6. diocese?</p> <p>7. A I recanted to Bishop Keating kind of</p> <p>8. a whole list and litany of the priests that</p> <p>9. I had been assigned with and some of the</p> <p>10. behaviors that struck me.</p> <p>11. For example, my first assignment, I</p> <p>12. had been there a week. A man came to the</p> <p>13. back door asking for Billy. And I thought he</p> <p>14. meant somebody at the AA meeting, which was</p> <p>15. in the basement of the rectory just around</p> <p>16. the corner. I said, I think you want to go</p> <p>17. around the corner. And he said no, I want</p> <p>18. Billy. And I said I don't know who you're</p> <p>19. talking about. And he said Bill Shart, who</p> <p>20. was the associate there. I said, oh, I said,</p> <p>21. well, let me see if I can reach him. And I</p> <p>22. didn't know how to use the phone, so I said</p>

<p style="text-align: right;">Page 142</p> <ol style="list-style-type: none"> 1. wait here and I'll go see if I can get him. 2. I went upstairs, knocked on the door, 3. and he opened the door and he was stark 4. naked. And he was surprised to see me, but 5. he was not surprised the door -- that 6. somebody had knocked at the door. And he 7. kind of closed the door halfway. And he said 8. what do you want? And I said there's 9. somebody down here who wants to see "Billy." 10. To Which he responded, "Send him up." 11. I recanted this to Bishop Keating who 12. said oh, that's very unfortunate. Oh, that's 13. very terrible. And I said and then I was at 14. Saint Louis and my pastor, Father Irace, used 15. to have an extraordinarily gay-looking 16. masseuse come and give him personal 17. massages 18. in his bedroom. And there were dinner 19. conversations that would indicate that there 20. was a rupture in these priests' life. 21. For example, he said celibacy and 22. chastity are separate. Just because you're 23. celibate doesn't mean you have to be chaste. 	<p style="text-align: right;">Page 144</p> <ol style="list-style-type: none"> 1. challenged them? 2. A I never knew that there was -- that a 3. diocese or a bishop would knowingly ordain a 4. homosexual man, never knew that. And I 5. though that they would want to know that a 6. man or a seminarian or a priest was 7. homosexual. And they couldn't care less, so 8. I started to feel like the outsider, like 9. maybe I was the unique guy. That it wasn't 10. the gay men that were unique, it was the 11. straight men that were unique. And as I say, 12. it became painfully obvious when I went and 13. was assigned in July of 26 -- July 26 of 199 14. -- 15. Q 5? 16. A 9, I guess with Father Erbacher at 17. Saint Lawrence. Who, as I have indicated, 18. was best friends with the chancellor, Bob 19. Rippy and Danny Spychala. And they were 20. three of the most notable gossips of the 21. diocese and he gave me so much information 22. that I actually went to lawyers and said, can
<p style="text-align: right;">Page 143</p> <ol style="list-style-type: none"> 1. And if you're gay, you know, you could be 2. attracted and even involved sexually with 3. other men and you haven't broken your vow of 4. celibacy. 5. And I said even in the seminary 6. we had seminarians who were approached by 7. others to have, quote, "blow jobs," and you 8. know, if it was brought to the attention, 9. maybe the seminarian would leave for a week 10. and then he would come back, quote, "cured." 11. So it was all a revelation that was starting 12. to become painfully obvious by 1996, but I 13. had no idea the interconnections of all of 14. this until I lived with Father Erbacher. 15. Q Now, is that what you mean when you 16. said -- you said earlier that you weren't 17. aware until after you were ordained, you're 18. not saying you weren't aware of 19. homosexuality, I assume then that you weren't 20. aware of the, I guess, the power structure 21. that this formed for those. And you said 22. that there were threats of anyone who 	<p style="text-align: right;">Page 145</p> <ol style="list-style-type: none"> 1. I tape this, because no one could possibly 2. believe what I'm hearing. 3. Q And that's what you told lawyers or 4. asked of lawyers? But when you -- what did 5. you discover with regard to when you were 6. with Father Erbacher that you -- that caused 7. you concern? 8. A He knowingly pointed out members of 9. the clergy in Arlington who were gay and gave 10. evidence of that, associations. For example, 11. he had gone through the picture book of Saint 12. Lawrence and showed me the boys of the 13. previous pastor, Father McAfee. 14. I was becoming aware through other 15. means that other pastors and priests had 16. problems. And certainly one of my classmates 17. had gone into the bishop several times with 18. incidents that would shock anyone. Came home 19. and saw his pastor at Saint Mary's anally 20. raping or having intercourse with the black 21. maintenance man in the living room or going 22. to a parish where the priest had an 18-year

<p style="text-align: right;">Page 146</p> <ol style="list-style-type: none"> 1. relationship with a gay man. 2. Complaining to the diocese, becoming 3. depressed over their inactivity and he 4. finally left the priesthood. Other priests 5. who came to me said that they had been 6. molested by priests of our diocese, that they 7. had been fondled and approached. It was just 8. becoming much, much, much more apparent to me 9. how significant the problem was and how 10. secret it was. 11. Q Going back to Father Erbacher for a 12. second, how did you get into a conversation 13. with him where he was pointing out gay 14. members of the diocese? Did he initiate this 15. and just offer it as a general conversation or 16. was there some purpose to a conversation with 17. him? 18. A He's a natural gossip and talks 19. amazingly. Initial conversation started out 20. with his own history and his relationship, 21. painful relationship with his mother. His 22. mannerisms had indicated that there may be 	<p style="text-align: right;">Page 148</p> <ol style="list-style-type: none"> 1. we know where he goes with that and boy he 2. better protect his crown jewels and 3. references to men's body parts that I was 4. astounded at to be talked about among four 5. men, four priests. So the suspicion was in 6. their minds that I was gay. I guess they 7. didn't know why a motorcyclist wears leather 8. as a second skin. They saw it as some other 9. thing. 10. And so I suppose, encouraged the 11. suspicion one night at a dinner when Father 12. Erbacher had a dog and I said why would you 13. get a dog without a thing? And he looked at 14. me with this stunned expression and I imagine 15. he probably called his friends and said he's 16. gay, I know he's gay. Because after that he 17. started confiding in me all of those who were 18. and their behaviors and -- 19. Q Did he mention about the relationship 20. between he and Father Rippy and others, any 21. others? 22. A The two years that he was at Saint
<p style="text-align: right;">Page 147</p> <ol style="list-style-type: none"> 1. something at least effeminate about him. And 2. then I overheard a conversation between him 3. and Father Rippy and Father Spychala and 4. Father Saunders and they were talking about 5. various priests in the diocese and my name 6. came up. 7. Q Where was this conversation being 8. held? 9. A At Saint Lawrence. It was an 10. outside conversation that they were having 11. during dinner and overheard remarks of 12. suspicions about me. 13. Q Is this at the dinner table? 14. A Yes. 15. Q And you were in the area, but not at 16. the table? 17. A Right. 18. Q What did they -- what were they 19. mentioning about you? 20. A I had bought a motorcycle and 21. they were commenting on the leather that I 22. sometimes wore and references to, oh, well, 	<p style="text-align: right;">Page 149</p> <ol style="list-style-type: none"> 1. Lawrence, I knew the assignments before they 2. were announced and made because Father Rippy 3. had told Father Spychala who told Father 4. Erbacher, so there was nothing really secret. 5. I had heard, you know, activities 6. about Father Verrecchia basically coming 7. down 8. through that same chain and one could tell 9. that there was an extraordinary friendship. 10. I mean Father Rippy and Father Erbacher had 11. traveled together to Las Vegas several times. 12. There were conversations that 13. indicated Father Erbacher had been trained by 14. certain priests of the diocese on how to 15. handle and obtain money. Conversations he 16. not only had with me, but other people in the 17. parish about if you were going to take cash 18. from the collection, you had to be 19. consistent, you know. 20. And there was a priest at the time, 21. Father Ciullo had been arrested for 22. inappropriating -- misappropriating funds.

<p style="text-align: right;">Page 150</p> <p>1. didn't do it right, you have to be 2. consistent. So flags were being raised all 3. over the place for me and I became aware that 4. even Father Erbacher, himself, was engaged 5. in stealing funds and in homosexual activity, 6. a large collection of homosexual material. 7. Q How did you become aware of that? Of 8. the -- I'm sorry, of the -- 9. A The financial irregularities? 10. Because there were a number of things that he 11. was doing that were outside the policy 12. procedures for handling money. Keeping 13. collection money for a week, not locking the 14. safe, giving me Sunday off and telling me to 15. go away. And then I would notice that the 16. collection had been counted and that it was 17. altered from the time it had been placed in 18. the safe until the money was counted on 19. Monday. 20. Procedures were that the money should 21. be collected the same day and counted the 22. same day and deposited in the bank. In</p>	<p style="text-align: right;">Page 152</p> <p>1. Q Was there any express or inference of 2. any relationship between Bishop Loverde and 3. Archbishop Cronin of a homosexual nature? 4. A No. But certainly there was about 5. Bishop Loverde and his -- and a Brother David 6. Eddie who lives with him and has lived with 7. him for more than 15 years, 18 years or 8. something. 9. Q Did Bishop Erbacher -- I am sorry, 10. excuse me, Father Erbacher sort of took you 11. into his confidence after you, I believe you 12. sort of encouraged him with a comment about 13. the dog, that he opened up to you after that 14. about these matters? 15. A Yes. 16. Q Did he indicate -- one thing I want 17. to go back to -- you said, I don't know if it 18. was after that or prior to that he had 19. already shown you a book of -- picture book 20. of Saint Lawrence showing the, quote, "boys 21. of Father McAfee." 22. What did you mean by the "boys of</p>
<p style="text-align: right;">Page 151</p> <p>1. public places, his office or where the money 2. was placed in the safe, there were certain 3. financial documents, including personal 4. documents that indicated large deposits of 5. cash into his own personal accounts. His 6. office and public space that he was in had 7. incredible effeminant looks to it. 8. There were various pictures of people 9. that he had talked about. He had given me 10. the full history of Bishop Loverde, his 11. assignment, his friendship with an Archbishop 12. Cronin. And how Archbishop Cronin was such a 13. pearl of a man and basically indicating 14. incredible discretions of Archbishop Cronin 15. with other men. 16. Q So it -- but what was his 17. relationship with Bishop Loverde? 18. A Apparently, Archbishop Cronin was 19. either Bishop Loverde's bishop as a priest 20. and apparently, according to Father Erbacher, 21. there was -- he was instrumental in obtaining 22. his episcopacy for Bishop Loverde.</p>	<p style="text-align: right;">Page 153</p> <p>1. Father McAfee"? 2. A Apparently, Father McAfee used to pay 3. teenage boys five hundred dollars, in some 4. cases a thousand dollars in cash for 5. continuing on as alter boys during their 6. postpubescent teenage years. And apparently, 7. according to Father Erbacher, he had taken 8. many of these boys to his beach home. 9. And he told me about similar problems 10. with Father Fasano and how he had taken boys 11. to his beach home. And all flags, but became 12. substantiated by conversations and evidence 13. that I got from other people, from other 14. priests. 15. Q He said -- he also pointed out to 16. you gay members of the diocese? You mean 17. other gay priests? 18. A Yes. 19. Q Did he say -- did any of those 20. resonate with you as being closely aligned 21. with each other to be supportive and 22. protective of each other?</p>

Page 154	Page 156
<p>1. A Absolutely.</p> <p>2. Q Who were those?</p> <p>3. A Certainly it seemed that the</p> <p>4. chancellor, Father Rippy and Bill Saunders</p> <p>5. and Danny Spychala and Bill Erbacher were all</p> <p>6. gay and had a very strong bond and were very</p> <p>7. supportive and defensive of each other.</p> <p>8. There was conversations about Father</p> <p>9. Verrecchia and some of his relationships with</p> <p>10. some of the gays in the diocese, including</p> <p>11. his replacement as MC.</p> <p>12. Q What's "MC"?</p> <p>13. A Master of Ceremonies for the bishop.</p> <p>14. Q Who was his replacement?</p> <p>15. A Richard Mullins and, you know, in</p> <p>16. conversations that were just phenomenal. You</p> <p>17. know, Richard Mullins has a -- he's always</p> <p>18. over there with Monsignor Bransfield, you</p> <p>19. know. And I said who's Monsignor Bransfield?</p> <p>20. He said he's the -- he runs the National</p> <p>21. Shrine, you know the Immaculate Conception.</p> <p>22. And I said what are you telling me? He said</p>	<p>1. had been looking at, but much more extensive.</p> <p>2. Gay guides, he took frequent trips to Mexico</p> <p>3. and Indonesia and he had, you know, The Gay</p> <p>4. Mexican Guide to the best gay beaches. And</p> <p>5. so I had gone to Bishop Loverde and told him</p> <p>6. he had a significant problem at Saint</p> <p>7. Lawrence. That there was immoral and</p> <p>8. criminal activity occurring and that it was</p> <p>9. very obvious an that he needed to go and see</p> <p>10. it. And he wanted documentation.</p> <p>11. And after having been assaulted for</p> <p>12. the self-incriminating factual evidence that</p> <p>13. I had presented on Father Verrecchia, I was</p> <p>14. reticent to give him any documents for fear</p> <p>15. that he would then claim that I had doctored</p> <p>16. it or manufactured it or created it, rather</p> <p>17. than to believe in the truth of what I was</p> <p>18. saying.</p> <p>19. So I gave him the key to the rectory</p> <p>20. and told him to see for himself and he</p> <p>21. refused, claiming that documents by me would</p> <p>22. be better. And I said what could be more</p>
Page 155	Page 157
<p>1. he's one of the boys. He's got a big boy's</p> <p>2. club. They have their big parties over</p> <p>3. there. Just phenomenal stories.</p> <p>4. Q Now when you say "boys," this is</p> <p>5. parties with young boys?</p> <p>6. A No, fellow gay priests.</p> <p>7. Q Oh, gay priests, okay.</p> <p>8. A Now, I made a personal decision that</p> <p>9. I was not going to talk about any of this to</p> <p>10. anyone until I had some substantial</p> <p>11. information and verification of some of these</p> <p>12. things that he was telling me.</p> <p>13. Q And did you obtain that?</p> <p>14. A I have. And have shown some of that</p> <p>15. to Bishop Loverde. I obtained factual</p> <p>16. information about Father Erbacher and his</p> <p>17. homosexuality.</p> <p>18. Q What did you obtain that you showed</p> <p>19. Bishop Loverde?</p> <p>20. A Pictures of his homosexual</p> <p>21. pornography collection of basically young</p> <p>22. boys, very similar to what Father Verrecchia</p>	<p>1. better than your own eyewitness testimony,</p> <p>2. then when Father Erbacher says who told you</p> <p>3. this, you can slam your fist on the table and</p> <p>4. say I saw it and it makes me sick. And I</p> <p>5. said it does make you sick, doesn't it?</p> <p>6. And it began a whole series of</p> <p>7. conversations with Bishop Loverde about his</p> <p>8. stance towards homosexuality. What he was</p> <p>9. willing to do if he knew that priests were</p> <p>10. homosexual or that they were inclined to</p> <p>11. this. Whether he was going to make any</p> <p>12. precautions towards the assigning two</p> <p>13. homosexual priests together in a rectory</p> <p>14. unsupervised, whether he was going to inform</p> <p>15. clergy of fellow priests who might be</p> <p>16. homosexuals so that prudence or safeguards</p> <p>17. might be up.</p> <p>18. I told Bishop Loverde, I said you</p> <p>19. forced me to live with a gay man and you</p> <p>20. didn't tell me. He said he didn't know.</p> <p>21. Q That being Father Erbacher?</p> <p>22. A Yes. He said that he never asks.</p>

Page 158	Page 160
<p>1. And I said what do you mean you never ask?</p> <p>2. How can you assign two men to live together</p> <p>3. and now know or ask if one of them is gay?</p> <p>4. He said I have no right to ask. And I said</p> <p>5. you have a responsibility if you're going to</p> <p>6. place them in a living situation, which can</p> <p>7. be an incredible temptation to them.</p> <p>8. And it became apparent to me that</p> <p>9. again, more substantial information that was</p> <p>10. concurring with the stories and the rumors</p> <p>11. that I have heard from Father Erbacher and</p> <p>12. other priests in the diocese.</p> <p>13. Q When you gave him the key, this</p> <p>14. was to the rectory and the offices of which</p> <p>15. are under the -- under his auspices as the</p> <p>16. head of the Diocese of Arlington?</p> <p>17. A Yes.</p> <p>18. Q And you understand he would have a</p> <p>19. right because it's under him to access</p> <p>20. anything in the diocese?</p> <p>21. A Yes.</p> <p>22. Q And instead you said he wanted the</p>	<p>1. the parish, but only after it had become</p> <p>2. public.</p> <p>3. Q Where is Erbacher now?</p> <p>4. A I do not know. Apparently, for a</p> <p>5. while he was at Saint Leo's Parish in Fairfax</p> <p>6. living there in secret, but I have lately</p> <p>7. heard that he's no longer probably with the</p> <p>8. diocese. He's going to leave.</p> <p>9. Q And what -- did you provide -- what</p> <p>10. information did you provide from your</p> <p>11. eyewitness accounts to Bishop Loverde</p> <p>12. regarding financial information?</p> <p>13. A When he received the information, he</p> <p>14. questioned me about it and I said I can</p> <p>15. verify all of the information.</p> <p>16. Q And where did he get the information?</p> <p>17. A It was sent to him anonymously,</p> <p>18. apparently.</p> <p>19. Q And he -- did he have it when he met</p> <p>20. with you on this? I mean, did he have the</p> <p>21. information with him when he met with you or</p> <p>22. did he just mention what it was?</p>
Page 159	Page 161
<p>1. documentation to come from you from there?</p> <p>2. A Yes.</p> <p>3. Q And did you then follow his request</p> <p>4. and go and obtain that information and give</p> <p>5. it to him?</p> <p>6. A I told him that you have the greatest</p> <p>7. documentation possible. You have the</p> <p>8. eyewitness testimony of a priest who is</p> <p>9. credible and was in a meeting with his bishop</p> <p>10. and he was officially telling you that you</p> <p>11. have criminal and immoral activity going on.</p> <p>12. And I said I would expect there to be some</p> <p>13. investigation.</p> <p>14. And there was no investigation, there</p> <p>15. was no interviews, there was no inquiry. And</p> <p>16. seven, eight weeks later information was</p> <p>17. apparently sent to the bishop and to the</p> <p>18. media sources and it became immediately</p> <p>19. public. And only after that two months and</p> <p>20. only after that public attention was Father</p> <p>21. Erbacher removed, immediately evaluated and</p> <p>22. immediately there was a financial audit at</p>	<p>1. A He had never -- he never really had a</p> <p>2. conversation with me. This all became public</p> <p>3. after I had been transferred to Saint Mary's</p> <p>4. in Fredericksburg. I had been there about</p> <p>5. three weeks when I, too, saw the news</p> <p>6. accounts of his being investigated for</p> <p>7. financial irregularities.</p> <p>8. Q Is this the same time as the public</p> <p>9. information about the prosecution of -- who</p> <p>10. was it you mentioned?</p> <p>11. A Father Sal Ciullo.</p> <p>12. Q Father Ciullo?</p> <p>13. A Yes.</p> <p>14. Q This was at the same time they</p> <p>15. mentioned something about Erbacher?</p> <p>16. A Yes.</p> <p>17. Q Okay. And this -- what little was</p> <p>18. reported publicly, this was consistent with</p> <p>19. what you had observed and told to Father --</p> <p>20. to Bishop Loverde?</p> <p>21. A Absolutely.</p> <p>22. Q Did it involve financial misdealings</p>

<p style="text-align: right;">Page 162</p> <p>1. by Father Erbacher?</p> <p>2. A There were large amounts of cash</p> <p>3. that were being deposited. Two, three, four</p> <p>4. thousand dollars of cash and in addition</p> <p>5. to what he would normally be paid as a</p> <p>6. priest. And certainly that raised flags.</p> <p>7. Q How often were these deposits?</p> <p>8. A Usually every week, sometimes</p> <p>9. biweekly.</p> <p>10. Q How much does a -- do you and would</p> <p>11. Father Erbacher be making as priests?</p> <p>12. A At the time we were being paid I</p> <p>13. think, \$520 a month, \$6,000 a year. And he</p> <p>14. was making -- putting in his bank account</p> <p>15. over \$100,000 a year and recording on</p> <p>16. personal income tax that he was only making</p> <p>17. about \$7,000 a year, so I understand that the</p> <p>18. IRS is also after him.</p> <p>19. All of which, again, in the</p> <p>20. conversations we had, he talked about how to</p> <p>21. deal with tax issues, how to buy parish</p> <p>22. things on your personal credit card so that</p>	<p style="text-align: right;">Page 164</p> <p>1. Yes, I think the date --</p> <p>2. Q Or was it after that?</p> <p>3. A -- of the story was when he was</p> <p>4. removed, so -- which in my estimation</p> <p>5. should have been done on June 6th when</p> <p>6. he was told that there was criminal and</p> <p>7. immoral activity going on. These should have</p> <p>8. been an immediate investigation.</p> <p>9. Q Do you know if there has ever been</p> <p>10. any criminal prosecution for Father Erbacher</p> <p>11. much like there was for Father Ciullo</p> <p>12. regarding taking of monies from the parish?</p> <p>13. A I don't know. I know that there was</p> <p>14. a very extensive five- or six- month financial</p> <p>15. inquiry by Price Waterhouse criminal</p> <p>16. investigators and they interviewed me and</p> <p>17. the secretaries of the parish who apparently</p> <p>18. filled them with stories that made their hair</p> <p>19. stand up on end. Because the conversations</p> <p>20. that Father Erbacher used to tell me were</p> <p>21. not exclusive to me, he would tell other</p> <p>22. secretaries how to deal with other issues and</p>
<p style="text-align: right;">Page 163</p> <p>1. you could take that off as a deduction to the</p> <p>2. parish. I said, but you didn't buy it and</p> <p>3. you're going to get reimbursed? I said</p> <p>4. that's fraud. And he said that's what</p> <p>5. Monsignor Brown had taught him and Danny</p> <p>6. Spychala how to do it. The conversations</p> <p>7. were priceless.</p> <p>8. Q Were these things that you related to</p> <p>9. Bishop Loverde?</p> <p>10. A Yes.</p> <p>11. Q How much time passed between the time</p> <p>12. you told him and you became aware that there</p> <p>13. was at least some investigation being</p> <p>14. undertaken?</p> <p>15. A I met him on June the 6th and on</p> <p>16. July the 31st of 2001, apparently this story</p> <p>17. became public in the Washington Post and in</p> <p>18. the local news.</p> <p>19. Q I'm sorry, when did it become public?</p> <p>20. A July 31st.</p> <p>21. Q Is that when Father Erbacher was</p> <p>22. removed?</p>	<p style="text-align: right;">Page 165</p> <p>1. how to get money. And they indicated that</p> <p>2. there was a lot of irregularities.</p> <p>3. Certainly there was violation of</p> <p>4. diocesan policies, but that it may be very</p> <p>5. difficult to actually show theft of cash. In</p> <p>6. conversations with Bishop Loverde I said, I</p> <p>7. think the diocese needs to set up if we are,</p> <p>8. quote, "Truly a professional organization,</p> <p>9. set up procedures here." I said you can go</p> <p>10. into McDonald's or Burger King and they have</p> <p>11. a cash register. They have cameras watching</p> <p>12. the cash. Why don't we have any similar,</p> <p>13. quote, "Professional systems set up within</p> <p>14. the church."</p> <p>15. Q Let me go back a second. Did there</p> <p>16. come a time after you met in late May with</p> <p>17. the bishop, May of 2000, expressing -- where</p> <p>18. you had these conversations about the</p> <p>19. Verrecchia/Lambert situation? Did there come</p> <p>20. a time after that where you received a</p> <p>21. subpoena for documents?</p> <p>22. A I was given a subpoena on June the</p>

Page 166	Page 168
<p>1. 1st, Ascension Thursday.</p> <p>2. Q From whom?</p> <p>3. A From Cathy Farrell, (ph) who</p> <p>4. represented Jim Lambert in a custody battle</p> <p>5. that was going on with his wife. She had</p> <p>6. apparently been given full custody and he was</p> <p>7. fighting to get his children.</p> <p>8. Q And had you met him at this point in</p> <p>9. time?</p> <p>10. A No.</p> <p>11. Q What did you provide in response to</p> <p>12. that subpoena?</p> <p>13. A I provided the evidence that was</p> <p>14. asked for. All of the documentation I had on</p> <p>15. Father Verrecchia and any pornography,</p> <p>16. homosexual pornography he was involved in.</p> <p>17. Q This is what you were requested to</p> <p>18. provide?</p> <p>19. A Right.</p> <p>20. Q And is that the set of documents that</p> <p>21. you had given to Bishop Loverde?</p> <p>22. A I gave them those documents plus</p>	<p>1. And then shortly after that, maybe</p> <p>2. two hours, another call that says "If you</p> <p>3. have been subpoenaed you don't need to turn</p> <p>4. in the material on the 5th." And I thought</p> <p>5. that was unusual because I had a document</p> <p>6. that was given to me, served by a court</p> <p>7. server that said I had to the 5th and I was</p> <p>8. receiving a phone call from a diocesan lawyer</p> <p>9. saying no don't turn it in on the 5th. So</p> <p>10. since I had no counter-document to this</p> <p>11. subpoena, I followed the subpoena and felt</p> <p>12. uncertain why the diocese was giving me the</p> <p>13. call.</p> <p>14. Q Did you receive a subsequent</p> <p>15. subpoena?</p> <p>16. A The subpoena that I received subsequent</p> <p>17. to that is the current one that</p> <p>18. brings me here.</p> <p>19. Q Was there a subpoena of your</p> <p>20. personnel records by the diocese?</p> <p>21. A Yes.</p> <p>22. Q When was that?</p>
Page 167	Page 169
<p>1. more, plus a CD that had contained all of the</p> <p>2. email, all of the letters that were on the</p> <p>3. computer system. I had originally told</p> <p>4. Bishop Loverde when they gave him the emails</p> <p>5. that it was just a small portion.</p> <p>6. Q Anything else that you provided other</p> <p>7. than all the documents and the CD pursuant to</p> <p>8. the subpoena?</p> <p>9. A Everything I had on Father</p> <p>10. Verrecchia.</p> <p>11. Q And when did you turn that over after</p> <p>12. receiving the subpoena on June 1st, if you</p> <p>13. recall?</p> <p>14. A I turned it over on Monday the 5th,</p> <p>15. because the subpoena asked for that, but on</p> <p>16. the 2nd, which was a Friday, I got a call</p> <p>17. from the diocesan lawyers asking me if I had</p> <p>18. been subpoenaed. It was a voice message.</p> <p>19. They said apparently some of the priests had</p> <p>20. been subpoenaed, the priests of All Saints,</p> <p>21. and we wondered if you had received a</p> <p>22. subpoena.</p>	<p>1. A June 23rd, Cathy Farrell gave me a</p> <p>2. subpoena that she had received, which</p> <p>3. apparently the diocese had received</p> <p>4. requesting my personnel records.</p> <p>5. Q She had a copy of the subpoena of the</p> <p>6. diocese for your personnel records by -- was</p> <p>7. that by Ms. Lambert's counsel?</p> <p>8. A Yes.</p> <p>9. Q Did you have a discussion with anyone</p> <p>10. about what they would do with your personnel</p> <p>11. records?</p> <p>12. A I immediately called Father Mealey</p> <p>13. and asked him what the diocese's policy was</p> <p>14. on this, whether they were going to fight</p> <p>15. this subpoena. And he said no, we won't.</p> <p>16. And I said you're going to give my personnel</p> <p>17. records out in this case? And he said we</p> <p>18. will not fight it. If you would like to do</p> <p>19. that, if you feel that you need to do</p> <p>20. that, then you hire your own lawyer. I said</p> <p>21. why? I said it's a subpoena for the records</p> <p>22. from you.</p>

Page 170	Page 172
<p>1. You're not going to defend one of</p> <p>2. your priests? And he said we will not fight</p> <p>3. the subpoena. And I said well, can I see my</p> <p>4. records? And for the multiple time again it</p> <p>5. was denied. This was a conversation that</p> <p>6. later, that Father Mealey completely lied</p> <p>7. about and said that the reason that I had</p> <p>8. called him was to see if I can see the</p> <p>9. personnel records and made my mention of the</p> <p>10. real reason to see what the diocese was going</p> <p>11. to do.</p> <p>12. Q Why did you call Father Mealey? What</p> <p>13. was his position?</p> <p>14. A The last time that Father Rippy was</p> <p>15. involved in a meeting with the bishop and</p> <p>16. myself was way back in October 1999, and</p> <p>17. after that there was a change. And there's a</p> <p>18. letter sent to all the priests that Father</p> <p>19. Rippy would no longer be involved in the</p> <p>20. sexual conduct, but Father Mealey would. And</p> <p>21. then in every other meeting that I had with</p> <p>22. Bishop Loverde, Father Mealey has been</p>	<p>1. A Yes.</p> <p>2. Q - relationship had gone on?</p> <p>3. A Yes.</p> <p>4. Q Did he indicate to you that's the</p> <p>5. first time that he became aware that they</p> <p>6. knew as far as back as a year before that</p> <p>7. when you gave them this information?</p> <p>8. A He indicated that it was a gold mine,</p> <p>9. that it was going to help him obtain his</p> <p>10. children, that the diocese had never told him</p> <p>11. about this, that they kept it quiet. He</p> <p>12. didn't even know it existed.</p> <p>13. Q Did he indicate to you that the</p> <p>14. diocese was making contrary representations</p> <p>15. to you throughout that previous year and</p> <p>16. before, that they had no indication that</p> <p>17. there was a relationship going on from their</p> <p>18. investigation?</p> <p>19. A It was the first time I learned,</p> <p>20. yes, that he had gone in. Like I said,</p> <p>21. learned from the one letter, but he told me</p> <p>22. that he had gone in and he had complained and</p>
Page 171	Page 173
<p>1. present.</p> <p>2. Q Has Father Rippy also been present?</p> <p>3. A No.</p> <p>4. Q Did there come a time later in June</p> <p>5. that you first became acquainted with Mr.</p> <p>6. Lambert?</p> <p>7. A We had a lunch, I think, on the 22nd</p> <p>8. of June at the Amphora Restaurant and it was</p> <p>9. an attorney, Kirk Smith and Jim. And that</p> <p>10. was actually the first time I had ever met</p> <p>11. him. Said that he had seen the email that</p> <p>12. had been given to him over the subpoena and</p> <p>13. that he had -- was thinking about using this</p> <p>14. lawyer and so we talked for the first time</p> <p>15. about things.</p> <p>16. Q Did he indicate to you that that was</p> <p>17. the first time in June of 2000, mid-June</p> <p>18. 2001, he saw the emails you turned over</p> <p>19. pursuant to the subpoena? That's the first</p> <p>20. time that he was aware that the Diocese of</p> <p>21. Arlington actually knew that there was this -</p> <p>22. -</p>	<p>1. he kind of gave me the story and I said --</p> <p>2. and then I felt this, wait a minute. Boy, if</p> <p>3. everybody in these stories gets together</p> <p>4. we're going to find out one little center and</p> <p>5. it always is the bishop in the diocese. And</p> <p>6. they seem to know, but they will protect</p> <p>7. every single other person from knowing what</p> <p>8. they know.</p> <p>9. Q Did you advise him then that they had</p> <p>10. received this information as long as a year</p> <p>11. prior to that back in June of 1999?</p> <p>12. A Yes.</p> <p>13. Q And did he indicate to you that he</p> <p>14. was not aware that they had such knowledge</p> <p>15. until that meeting with you as to when they</p> <p>16. received the emails and stuff?</p> <p>17. A He had no idea that the email</p> <p>18. existed. He hoped for it.</p> <p>19. Q Did you have a conversation, meeting</p> <p>20. after this meeting in June with Jim Lambert</p> <p>21. and your documents being subpoenaed, did you</p> <p>22. have the occasion to have any discussion with</p>

Page 174	Page 176
<p>1. Bishop Loverde or Father Rippy or Father 2. Mealey about the fact that they had 3. apparently deceived Mr. Lambert for over a 4. year about their knowledge, which they at 5. least had when you gave them the emails, if 6. not prior to that in June of 1999? 7. A No. I wouldn't want to have 8. compromised his case that he was trying to 9. work up here with Kirk Smith by telling him 10. anything about him. 11. Q No, did you have any discussion -- 12. did you have a discussion subsequent to that 13. asking the bishop why they hadn't told Mr. 14. Lambert the truth during that previous year 15. when they knew it at least from the 16. information you had given them? Did it ever 17. come up in any of your subsequent 18. conversations with them about how they kept 19. this information from Mr. Lambert? 20. A I know that in that May meeting in 21. 2000, I said you know, if this ever gets 22. out, if it ever is put into a court case,</p>	<p>1. tried to squash the information based on 2. privacy concerns because I think they were 3. worried about any information in Father 4. Verrecchia's files becoming public. 5. And then there was an article and it 6. was published in Roman Catholic Faithful 7. about certain sex scandals and it included 8. references to some of the material that I had 9. originally given the bishop back in June and 10. he wanted to know how in the world it was 11. obtained. And I really have no knowledge 12. other than the fact the material was turned 13. over in a subpoena on June 1st, June 5th. 14. MR MURPHY: Let's take a short 15. break. 16. (Brief break.) 17. BY MR. MURPHY: 18. Q Do I understand that after your -- 19. the subpoena of June 23rd, 2000, that you 20. requested or you inquired of the diocese 21. whether they were going to resist the 22. subpoena of your personnel records and Father</p>
Page 175	Page 177
<p>1. you're in trouble, big trouble. And he 2. indicated well, he didn't seem -- he had no 3. comment. 4. Q That was Bishop Loverde? 5. A Yes. 6. Q And despite that he still didn't -- 7. at least when you -- excuse me. A month 8. later in June when you first met with Mr. 9. Lambert on June 22nd, was it clear to you 10. that Bishop Loverde still hadn't come forward 11. to Mr. Lambert and told him what he had 12. known 13. throughout that year? 14. A Yes. 15. Q Has there been discussions between 16. you and the bishop regarding your cooperation 17. at that point in going forward with Mr. 18. Lambert and complaints by the bishop about 19. you doing anything in that regard? 20. A I think certain strategies emerged. 21. I did hire a lawyer to squash the subpoena 22. based on irrelevancy. At the same time the diocese appeared at this court case and</p>	<p>1. Mealey flatly said no, but that in mid-July 2. they actually did for some reason seek to -- 3. A Yes. 4. Q -- squash it? 5. A Yes. 6. Q And it's your understanding that your 7. belief was that had to do with ultimately not 8. wanting Father Verrecchia's personnel records 9. to be gotten into? 10. A Yes. 11. Q Had there been a subpoena for his 12. records; do you know? 13. A I do not know whether there had been 14. or not. 15. Q Now, you indicated there was an 16. article in Roman Catholic Faithful in -- was 17. that in the winter of 2000? 18. A Yes. 19. Q On sex scandals in the Arlington 20. Diocese? 21. A Yes. 22. Q You had a meeting before or after</p>

Page 178	Page 180
<p>1. that with the bishop regarding the -- your</p> <p>2. concern about this homosexual network or</p> <p>3. power base of homosexual priests in the</p> <p>4. diocese.</p> <p>5. Do you recall whether it was before</p> <p>6. or after that article or as a result of that</p> <p>7. article?</p> <p>8. A It was a result of that article that</p> <p>9. he started to become very concerned with the</p> <p>10. publicity and wanted to know what the source</p> <p>11. was. And I said, I think it's facts, it's</p> <p>12. the reality, it's the source of this and</p> <p>13. inquired about what he was going to do with</p> <p>14. the problems that he was facing.</p> <p>15. Again, several discussions about the</p> <p>16. inappropriateness of homosexual priests</p> <p>17. living together regardless of whether they're</p> <p>18. celibate or not.</p> <p>19. Q Did you perceive there to be any</p> <p>20. resistance or any reaction, I should say, to</p> <p>21. you as a result of the information you had</p> <p>22. in the Lambert case as well as this other</p>	<p>1. outcome was that I was just transferred out</p> <p>2. of the situation, similar to what had</p> <p>3. happened at All Saints. An assignment that</p> <p>4. should have been continued on was suddenly</p> <p>5. suspended in July out of the course of</p> <p>6. events.</p> <p>7. Q Were you aware that sometime after</p> <p>8. June of 2000 and into 2001 that Mr. Lambert</p> <p>9. had brought to the attention of the diocese</p> <p>10. his complaint that they had known at least</p> <p>11. through you, if not of their own accord, of</p> <p>12. the truth of Father Verrecchia's relationship</p> <p>13. with Mrs. Lambert and they did nothing to</p> <p>14. stop it?</p> <p>15. A No., I didn't know that.</p> <p>16. Q Did you come to know eventually --</p> <p>17. A Yes.</p> <p>18. Q -- that he had made a complaint?</p> <p>19. A Yes.</p> <p>20. Q And obviously that meeting or the</p> <p>21. luncheon meeting that you had with him on</p> <p>22. June --</p>
Page 179	Page 181
<p>1. information you were bringing to the bishop's</p> <p>2. attention regarding sexual problems with</p> <p>3. sexual conduct and financial dealings within</p> <p>4. the diocese?</p> <p>5. A Continually he was becoming more</p> <p>6. aggressive and his treatment of me seemed to</p> <p>7. be the treatment I would have expected he</p> <p>8. would have given to his priests who were</p> <p>9. causing him so much trouble.</p> <p>10. Q What was the treatment of you that</p> <p>11. you thought was inappropriate?</p> <p>12. A For example, when I told him of</p> <p>13. Father Erbacher's problems, Father Erbacher</p> <p>14. was not moved, but I was transferred again to</p> <p>15. another parish.</p> <p>16. Q Where were you transferred? Is that</p> <p>17. Saint Mary's in Fredericksburg?</p> <p>18. A Saint Mary's in Fredericksburg. And</p> <p>19. again, the expectation was that presented</p> <p>20. with this kind of activity, Father Erbacher</p> <p>21. would have been immediately suspended or</p> <p>22. evaluated or investigated, but this -- the</p>	<p>1. A 22nd?</p> <p>2. Q -- 22nd of the year 2000, when he</p> <p>3. became aware through you that this</p> <p>4. information had been within the hands of the</p> <p>5. diocese for a long time and there was</p> <p>6. confirmation of this relationship.</p> <p>7. As a result of that, were you -- did</p> <p>8. you later become aware that he had made a</p> <p>9. complaint to the diocese that's now resulted</p> <p>10. in this lawsuit?</p> <p>11. A Yes.</p> <p>12. Q Have you felt any resistance by the</p> <p>13. diocese to your aiding Mr. Lambert any</p> <p>14. further in his complaint against the diocese</p> <p>15. as a result of his being misled?</p> <p>16. A I believe that part of the motivation</p> <p>17. for my move to Fredericksburg, which was a</p> <p>18. significant distance away from Washington,</p> <p>19. was perhaps to prevent me from seeking legal</p> <p>20. advice or being in contact with anybody in</p> <p>21. the area. I don't know for a fact, but that</p> <p>22. was the feeling.</p>

Page 182	Page 184
<ol style="list-style-type: none"> 1. Again, instead of being looked at for 2. a pastarship since I had not done anything 3. wrong. I was now being moved again after a 4. very short assignment to be an associate 5. somewhere else. 6. Q Well, did you find that coincidence 7. somewhat suspicious in your being transferred 8. to Saint Lawrence on July 26 of 1999, after 9. you gave the information a month earlier to 10. the bishop regarding Father Verrecchia? 11. A Yes, very suspicious. 12. Q And did you attribute any suspicion 13. to the coincidence of your complaint 14. about Father Erbacher in June and the ongoing 15. matters regarding Mr. Lambert and your 16. being transferred a couple of weeks later 17. then to Saint Mary's in Fredericksburg? 18. A Yes, there seemed to be direct 19. correlations. 20. Q How long did you stay at Saint Mary's 21. and if there was a change in that, how did 22. that come about? 	<ol style="list-style-type: none"> 1. could find another place because I was now 2. thoroughly disgusted not only with what I 3. presented to the bishop, but also with what I 4. know and have not yet fully presented to the 5. bishop. 6. I thought it was the best solution 7. for him, for myself and for any embarrassment 8. to the diocese, so I requested that in 9. September and -- 10. Q At that time did you or prior to that 11. time or at that time, did you present to 12. Bishop Loverde the fact that you were aware 13. of the Saint Mary's pastor? What was his 14. name? 15. A Father Daniel Hamilton. 16. Q Father Hamilton's collection of 17. masochistic and pornographic materials? 18. A No. I indicated to him that there 19. were also problems at Saint Mary's, but I 20. didn't specify. 21. Q Did he ask you what they were? 22. A He said that he was tired of me
Page 183	Page 185
<ol style="list-style-type: none"> 1. A Almost immediately upon arriving at 2. Saint Mary's I realized that there was a 3. significant problem there with the pastor. 4. That he was involved in extraordinarily 5. graphic and incredibly disturbing 6. sadomasochism, sexual torture, cross- 7. dressing, transgender, pornography that 8. involved she-males. That he was completely 9. addicted, daily immersed in this kind of 10. sexual horror and felt that it would probably 11. accomplish nothing for me to make the bishop 12. aware of this because I didn't want to face 13. again what I had faced with Father Verrecchia 14. and Father Erbacher. 15. So I thought the best solution would 16. be to see if I could somehow find a place in 17. the church outside of the Diocese of 18. Arlington where a true respect for priestly 19. holiness and morality and some sort of 20. policies against homosexuals and homosexual 21. activities was to be found. And so I asked 22. the bishop for a leave of absence so that I 	<ol style="list-style-type: none"> 1. telling him these vague references to people 2. -- priests with problems and unless I gave 3. him substantial, credible information that he 4. couldn't do anything about it. 5. And again, discussions about what 6. credible was. Was it more credible to 7. believe a priest or more credible to believe 8. a document that could be altered or changed 9. or whatever. 10. Q So this is similar to his previous 11. request after being given the -- 12. A Yes. 13. Q -- material in the Lambert matter, 14. this was his further request when you pointed 15. out the Erbacher stuff, that you should just 16. get him that material? 17. A It seemed to me that the only person 18. that was getting into trouble was me and 19. that I was somehow suffering for what I 20. thought I should be thanked for. That there 21. should have been an appreciation over Father 22. Verrecchia and Erbacher that I had given them

Page 186	<ol style="list-style-type: none"> 1. an indication of some real problems that I 2. thought they would address. 3. Q Did you indicate to him at that time 4. where he could go and find this material 5. since he had the presumed right to do that? 6. Did you point out that it was with Father -- 7. A Hamilton. 8. Q Hamilton? 9. A No. My solution at that point was to 10. try and negotiate another diocese because 11. it was becoming horribly and painfully clear 12. that this bishop was not going to do anything 13. significant about these significant problems. 14. Q During the months and years prior to 15. that in these meetings, was he still 16. challenging you on the 1995 matter? 17. A It has always been the weapon or tool 18. of his, quote, "concerns with me." A very 19. ancient allegation that was never shown to 20. me, that had been covered clearly and 21. thoroughly, but kept coming up again and 22. again and again and what I consider now a
Page 187	<ol style="list-style-type: none"> 1. triple and quadruple jeopardy that I would 2. not -- he was going to use this. 3. So I initially had a meeting with him 4. on September 11th, which was cancelled 5. because of the terrorist strike and we met on 6. the 13th. And I told him my problems, I kind 7. of summarized the frustration I had. I tried 8. to have him see it from my perspective. 9. I asked him whether there was 10. anything wrong with homosexual priests and he 11. kept saying that there was nothing wrong and 12. I was floored by that. He says as long as 13. they're not active and I was still floored. 14. And I said will you sign your name to that 15. there was nothing wrong with homosexuals 16. sleeping together as long as they're chaste? 17. I said that's the same, saying we can 18. have have priests and nuns live together 19. because 20. they're both chaste and there's not going to 21. be any problems. Of course there's going to 22. be problems. There is going to be incredible
Page 188	<ol style="list-style-type: none"> 1. and friendships that are sexual in nature, 2. whether they become sexual, in fact is 3. immaterial. They are sexual in nature. 4. They're attracted to each other. 5. And the discipline of the church has 6. always been to separate those who could be 7. sexually attracted. And here he was putting 8. homosexual men together, forcing them to live 9. in a state, an occasion of sin. So he denied 10. the request after a very lengthy wait. 11. On October the 11th he said that he 12. would not give me any leave of absence or 13. discernment. That the personnel needs of the 14. diocese would not allow it and that I hadn't 15. done the proper groundwork. Such a request, 16. that would take very much time and counseling 17. with a spiritual director. 18. Q What is a "period of discernment"? 19. What does that mean? 20. A It's more his term than mine. At the 21. time I was just asking for a leave so that I 22. would have an opportunity to find another
Page 189	<ol style="list-style-type: none"> 1. diocese and perhaps investigate religious 2. life to try and find the holiness and the 3. moral uprightness, the sanctity of men who 4. represent Christ. 5. Again, just shocked at his apparent 6. indifference or inactivity towards what I 7. found horrible scandals within in his 8. diocese. And he seemed at that time to think 9. that the only horrible scandal was that any 10. of this become public. Not that it existed, 11. but that anybody would find out about it. 12. Q And when he denied this leave of 13. absence, what occurred next? 14. A The majority of the letter was about 15. the proper procedures. That I would need to 16. have spiritual direction, find a specific 17. community and make a specific request for 18. that. And I indicated, how can you find a 19. specific community if you don't have the 20. freedom to spend some time with them, 21. investigate them. But after having been 22. thoroughly denied it and I'm sorry, we

Page 190	Page 192
<p>1. request you to go back to Saint Mary's.</p> <p>2. At the bottom of the letter it said</p> <p>3. you have often indicated you were distressed</p> <p>4. by the behavior of the priests, but I cannot</p> <p>5. do anything until I have factual or credible</p> <p>6. information. So in response to that request,</p> <p>7. one week later I had a meeting with him in</p> <p>8. which I presented factual, self-incriminating</p> <p>9. information on Father Hamilton's completely</p> <p>10. outrageous sexual addiction.</p> <p>11. And at the end of the meeting, which</p> <p>12. was basically a slide show of the pictures of</p> <p>13. his incredible collection, the bishop told me</p> <p>14. that I had better watch out, that he -- that</p> <p>15. I did not know what he was capable of doing.</p> <p>16. Q "He" being whom?</p> <p>17. A Him, the bishop. And one week after</p> <p>18. that I was called for a meeting at the</p> <p>19. chancery, which I had assumed would be to</p> <p>20. obtain more information about Father</p> <p>21. Hamilton. Tragically, I thought even after</p> <p>22. two previous times that the bishop would</p>	<p>1. important day he needed these witnesses and I</p> <p>2. said, oh. And we sat down, he pushed a piece</p> <p>3. of paper across the desk and I remember</p> <p>4. reading the first words. It said "I, James</p> <p>5. Haley, hereby resign my offices of parochial</p> <p>6. vicar of Saint Mary's parish." And I said</p> <p>7. what's this all about? And he says I want</p> <p>8. you to resign. And I said why in the world</p> <p>9. would I want to resign? I love the</p> <p>10. priesthood.</p> <p>11. And he pressed the issue and I said I</p> <p>12. am not resigning. I certainly haven't done</p> <p>13. anything wrong. I said, what are you going</p> <p>14. to do about Father Hamilton? And then he</p> <p>15. took back that piece of paper, which I said</p> <p>16. are you not giving that to me? Oh, no, you</p> <p>17. can't have this, you didn't sign it. And he</p> <p>18. pushed another piece of paper that said "I</p> <p>19. hereby instruct you to get out of Saint</p> <p>20. Mary's parish by 7 o'clock this evening."</p> <p>21. Pack up your belongings and move into a hotel</p> <p>22. and basically get out of town.</p>
Page 191	Page 193
<p>1. still want to know about the information that</p> <p>2. was presented, the circumstances of the</p> <p>3. people, the relationships that we saw, rather</p> <p>4. than to attack me on the credibility of</p> <p>5. evidence.</p> <p>6. So I went in thinking that the</p> <p>7. meeting would be about Father Hamilton and</p> <p>8. was surprised to see Father Mealey, Father</p> <p>9. Avella and the bishop there. And when I</p> <p>10. expressed my surprise --</p> <p>11. Q Who is Father Avella?</p> <p>12. A He's the moderator of the clergy. I</p> <p>13. met him twice in my priesthood. He was the</p> <p>14. vocation director that accepted me after a</p> <p>15. 10-minute interview and I met the moderator</p> <p>16. of the Curia for the second time as he was</p> <p>17. sitting as a witness at this meeting.</p> <p>18. Q Who else? Father Avella was there?</p> <p>19. Who else was there?</p> <p>20. A Father Mealey and the bishop</p> <p>21. Q So three?</p> <p>22. A And he told me that on such an</p>	<p>1. And I said I don't understand why is</p> <p>2. this about me? What's happening to Father</p> <p>3. Hamilton? The bishop told me that he was</p> <p>4. being told of the allegations, not the</p> <p>5. evidence, but the allegations against him</p> <p>6. that I had been -- that I had brought. And I</p> <p>7. said wait a minute. How was he told? You're</p> <p>8. here, Father Mealey's, Avella, who is telling</p> <p>9. him?</p> <p>10. I said he must be in some secure</p> <p>11. facility because you certainly wouldn't want</p> <p>12. to tell him this. It's an incredible</p> <p>13. revelation without having supervised care. I</p> <p>14. said he could easily take his life much as</p> <p>15. Monsignor Reinick did when he was accused of</p> <p>16. his pedophilia or the Pastor Keith Ramey did</p> <p>17. when his homosexuality was discovered. I</p> <p>18. said he's in some sort of secure environment,</p> <p>19. right?</p> <p>20. And I said people need to know that</p> <p>21. this is going on. To which he threw another</p> <p>22. document which said if you tell anybody by</p>

Page 194	<p>1. any means what has happened to Father 2. Hamilton or anybody you will be immediately 3. suspended from the priesthood without any 4. warning. And gave me a further document that 5. if I said anything about any priest past, 6. present or future in any behavior, I suppose 7. it would include criminal behavior or child 8. rape, that I would be suspended. 9. And I said you mean I'm going to get 10. suspended if I tell the truth to anyone but 11. you, but if I tell you the truth you don't 12. seem to do anything about it. So he took 13. away my faculties, he took away my ability to 14. preach. 15. Q What does it mean, "take away 16. your faculties" ? 17. A Faculties are what allows a priest to 18. hear confessions, to say mass, to do 19. baptisms, so he said the only thing you can 20. do is to say private mass. 21. Q You mean by yourself? 22. A Um-hmm. This is not why I was</p>	Page 196	<p>1. Whitestone who were, quote, "starting a -- 2. Q Father who? 3. A Roos. 4. Q How do you spell Roos? 5. A R-O-O-S. 6. Q Who is he? 7. He's the head of the tribunal and 8. Father Whitestone who is one of the judges on 9. the tribunal. 10. Q Tribunal for what? 11. A Tribunal usually hears the marriage 12. cases of a diocese, but it's the judicial 13. branch, I suppose, of the diocese. It would 14. investigate anything ecclesiastical. And 15. they spent the time asking me exclusively 16. about the same things that Bishop Keating -- 17. or Bishop Loverde had often asked. How did 18. this information get obtained? 19. Nothing about Father Hamilton, per 20. se, nothing about the relationship towards 21. Father Hamilton, nothing about does anybody 22. else know this? Just questions about me.</p>
Page 195	<p>1. ordained, this is not why I gave my life to 2. God, to say mass by myself. And repeatedly 3. asked him in that meeting as well in previous 4. meetings what have I done wrong that I am 5. being so punished? 6. He made a financial offer of \$500 a 7. month. And I said there's no way I can live 8. on \$500 a month, so I can't go to Denver or 9. anywhere else like you want me to do. I am 10. going to sit in front of the chancery on \$500 11. a month unless you can find me a place to 12. live for that. The meeting was left, I 13. called my lawyer on the 25th. 14. Two days later he called me back in 15. and said that he was willing to pay me \$2,000 16. after having investigated the cost of living 17. in Denver. And I won't say I agreed, but in 18. obedience to the bishop, accepted what I 19. consider completely unjust, unmerited 20. behavior on his part towards me. And then on 21. the following Saturday he asked me to have a 22. meeting with Father Roos and Father</p>	Page 197	<p>1. And I later found out that Father Mode, who 2. had also seen the material of Father 3. Hamilton, was brought in and he was not 4. questioned about Father Hamilton, but about 5. me. 6. Q Who was questioned about -- Father 7. Mode, who is he? 8. He was the other associate at Saint 9. Mary's. 10. Q And what questions were they asking 11. about you? 12. A He was not supposed to tell me 13. anything. He was, quote, "sealed to 14. secrecy." But does Father Haley have a 15. camera, does he have a digital camera, have 16. you ever seen him with a digital camera, have 17. you ever seen him entering the room? So it 18. seemed -- it appeared to be more of an 19. investigation. 20. Q Were you in the meeting? 21. A No. This was reported to me by 22. Father Mode later. And so I have been on a</p>

<p style="text-align: right;">Page 198</p> <ol style="list-style-type: none"> 1. leave of absence since October the 23rd and 2. to my knowledge no action has been taken 3. against Father Hamilton. And recently had a 4. meeting on June the 28th, which I expressed 5. what I had already written to the bishop that 6. I find that completely untenable. 7. How can he defend the fact that I 8. have no faculties and I cannot preach for 9. having done nothing wrong, but that Father 10. Hamilton still remains a pastor and preaching 11. and, quote, "Leading a parish in the moral 12. life and holiness of Jesus Christ." And he 13. repeated the line often used "You do not have 14. any idea what I've done to Father Hamilton." 15. To which I replied I know he's still 16. the pastor, I know that he was not put in an 17. inpatient facility for evaluation or 18. treatment, I know that his faculties weren't 19. removed or his preaching. I know now what 20. you are capable of doing to a priest because 21. I have the precepts of silence, I have my 22. faculties removed and I haven't done anything 	<p style="text-align: right;">Page 200</p> <ol style="list-style-type: none"> 1. what he has paid to me and have told him that 2. I would not consent to any kind of an 3. evaluation he is pressuring me to have. 4. Q So he raised the 1995 allegations 5. against you as recently as -- 6. A June 29. 7. Q June 28. 8. A 2002. 9. Q Did he -- has he attempted to 10. restrict your reporting on the Lambert Matter 11. or any of these other matters that have been 12. used to -- adversely to you? 13. A In every letter he has sent me on my 14. period of discernment he has reminded me of 15. the serious consequences in violating the 16. penal precept of silence. I would be 17. immediately suspended for talking about 18. Father Verrecchia, for talking about Father 19. Hamilton, for talking about Father Erbacher 20. or for talking about any of the other priests 21. whose names I have mentioned to Bishop 22. Loverde.
<p style="text-align: right;">Page 199</p> <ol style="list-style-type: none"> 1. wrong. So the unfair treatment of being 2. persecuted when other priests are not 3. continues. 4. Q How did he respond to that? 5. A The latest meeting he gave me a 6. letter requesting all of the receipts for the 7. financial stipend he had given me and asking 8. me 9. why I had blocked Father Mealey 10. from an email account. And again, insisting 11. that I have some sort of an in-treatment 12. evaluation at a facility chosen by him. 13. And in this lengthy meeting I spoke 14. of my surprise that only a bishop can choose 15. a person's doctor, that any kind of 16. evaluation from allegations which I have 17. never seen in 1996, are still irrelevant 18. after having been transferred twice by him to 19. parishes and twice by Bishop Keating to 20. parishes with no mention of any restrictions. 21. So in response to the letter and the 22. request, I have given him the expenses of the 	<p style="text-align: right;">Page 201</p> <ol style="list-style-type: none"> 1. And have told him that I would not 2. offer any of those names unless I already had 3. credible information that they were violating 4. moral precepts of the church. He has 5. requested numerous times credible information 6. and I am trying to fulfill his requests. 7. Q And you have fulfilled those requests 8. by providing those documents that you 9. previously mentioned? 10. A Yes. He's a very hard guy to give 11. credible information to. 12. Q As to what he views as credible, yes, 13. I guess. 14. Does he -- where do you understand 15. you stand right now with the bishop as to 16. your position in the diocese? 17. A I am an incardinated priest who has 18. no ministerial assignment and will not have 19. any kind of ministry within the diocese until 20. I will submit to an inpatient evaluation at a 21. facility chosen by him. 22. Q For what period of time?

<p style="text-align: right;">Page 202</p> <p>1. A Indefinitely. Until such point as I 2. would consent to that. He, quote, "In 3. conscience cannot assign me to a parish." I 4. am still under this penal precept of silence, 5. I am living on a stipend that does not allow 6. me to function. I am losing money every 7. single moment. 8. And he mentioned in his letter that 9. he would inform the clergy of the diocese 10. that I was not to be invited to celebrate any 11. of the sacraments to them. And I said you're 12. going to make this public to the other clergy 13. that I can't celebrate sacraments and for 14. what reason? Are you going to tell them that 15. I have no faculties, that I have no ministry? 16. He said he was still thinking about that. 17. Q Did he say when he would next meet 18. with you and what he expected from you in the 19. interim? 20. A Immediately after the meeting on the 21. 28th, he tried to contact me in Denver by 22. email, which I had already indicated to him</p>	<p style="text-align: right;">Page 204</p> <p>1. come forward because high-priced lawyers 2. hired by the church will prove that they are 3. not the victims but the aggressors. That 4. they have somehow done something wrong. And 5. apparently in response to that, he called me 6. delusional and apparently thought twice about 7. the comment. 8. Q How do you know he thought twice 9. about the comment? 10. A I don't know why else he would have 11. immediately called me in for a meeting to 12. address that hypothetical. 13. Q And when was your last meeting with 14. him? 15. A That was June 28th, 2002, and he's 16. requested a meeting with him as soon as he 17. returns from his month-long vacation 18. somewhere around August the 8th. 19. Q And where do you presently stand in 20. the diocese? 21. A I think initially, when it was 22. published in the Herald that I was on a leave</p>
<p style="text-align: right;">Page 203</p> <p>1. was no longer accessible since I had to 2. discontinue email service since he wasn't 3. paying me enough money. And I -- by a letter 4. -- when he knew I was in Arlington and had 5. just had a meeting with him and he wanted to 6. have an immediate meeting with me to address 7. some concerns I had made to him at the end of 8. the meeting. 9. Again, challenging him on what he was 10. going to do about the homosexual priests in 11. his diocese, the significant problem that he 12. has and voicing my frustration that he does 13. not seem to respond to allegations or 14. evidence or solid proof of bad behaviors of 15. his priests. And I gave him some conjecture, 16. I would be afraid now to come in to you and 17. tell you that I had been raped by a fellow 18. priest because I wouldn't want to go through 19. the scrutiny of having my credibility 20. attacked. 21. Very similar to the victims who have 22. been abused by priests and who are afraid to</p>	<p style="text-align: right;">Page 205</p> <p>1. of absence for a period of discernment to 2. consider religious life, which is what I had 3. originally requested on September 13th, and 4. which had been denied to me on October the 5. 11th. That people in the diocese and the 6. fellow priests thought that I was becoming 7. more holy by my vocation or my calling to 8. religious life. 9. And recently, I think more have come 10. to understand that what has happened to me 11. was a complete injustice and in fact, 12. fabrication on the Diocese of Arlington's 13. part. 14. Q Has there been an indication as to 15. what the bishop is looking to do with you or 16. for you to do? 17. A I believe that he's trying to 18. strangle me out of the church. In the 19. letters that he wrote to me in my period of 20. discernment, that's his term, he indicated at 21. the bottom of every one of the letters "Since 22. it is your intention to leave the priesthood,</p>

Page 206	Page 208
<p>1. since it seems that you want to leave the</p> <p>2. priesthood, I am more than happy to help you</p> <p>3. in your laicization from the priesthood."</p> <p>4. Q What does that mean?</p> <p>5. A Meaning my official request to Rome</p> <p>6. to leave the priesthood.</p> <p>7. Q Have you ever made such a request?</p> <p>8. A No. In fact, I wrote him a letter</p> <p>9. and told him emphatically, I have never in</p> <p>10. the whole course of my priesthood asked to</p> <p>11. leave the priesthood. So in the meeting, in</p> <p>12. June I said, it's like receiving a letter</p> <p>13. from your employer and at the bottom of each</p> <p>14. letter, if there's any way to help you get</p> <p>15. out of this company, I am more than glad to do</p> <p>16. that.</p> <p>17. I told him I found it offensive,</p> <p>18. aggressive. That if he was going to push me</p> <p>19. out of the church like this he needed to face</p> <p>20. the demands of justice.</p> <p>21. Q Have you ever expressed the desire to</p> <p>22. want to be out of the priesthood as opposed</p>	<p>1. protect the institution at all costs and my</p> <p>2. calling from God is to love and serve the</p> <p>3. church with all my heart. That's what I'm</p> <p>4. trying to do.</p> <p>5. Q Is it possible for you to transfer</p> <p>6. to another diocese when your faculties have</p> <p>7. been remove here?</p> <p>8. A Ordinarily, if a priest wants to</p> <p>9. transfer to another diocese he needs to get</p> <p>10. the approval of the new diocese, the bishop</p> <p>11. of the new diocese, and he then needs to be</p> <p>12. -- his incardination within his present</p> <p>13. diocese needs to be released. So it depends</p> <p>14. upon the request of a bishop and the release</p> <p>15. of your present bishop.</p> <p>16. Q From your understanding in the</p> <p>17. practice, have you been tainted by the manner</p> <p>18. in which you have been treated by the bishop?</p> <p>19. A Absolutely. I have no idea what is</p> <p>20. in my personnel file, although the minor</p> <p>21. quotes of meeting minutes that he has read to</p> <p>22. me are totally inaccurate. And whether they</p>
Page 207	Page 209
<p>1. to pursuing your vocation?</p> <p>2. A No. In fact, sent him a letter that</p> <p>3. said I was open and have always been open to</p> <p>4. any assignment he would offer me in the</p> <p>5. Diocese of Arlington. My feeling is that he</p> <p>6. fears to a great degree what I might preach</p> <p>7. about and what I might say.</p> <p>8. Again, his greatest concern is not to</p> <p>9. address the issues, is not to solve the</p> <p>10. issues, is not to set up safeguards to avoid</p> <p>11. future issues, is to not make a change in</p> <p>12. structures of the diocese, but is simply to</p> <p>13. make sure that no scandals emerge publicly.</p> <p>14. He said that any priest who would go</p> <p>15. to the public, to a newspaper with</p> <p>16. information about the bad conduct of priests,</p> <p>17. quote, "Does not love the church." And I</p> <p>18. countered with you're telling me is that a</p> <p>19. priest who goes to the people of God with the</p> <p>20. truth about their priests does not love the</p> <p>21. church?</p> <p>22. So my feeling is he is there to</p>	<p>1. have been falsified or whether the person who</p> <p>2. took the notes was inaccurate, I do not know.</p> <p>3. But I would feel that my success in obtaining</p> <p>4. another bishop's approval is extraordinarily</p> <p>5. hampered by these unseen files that he would</p> <p>6. see that I would not see. And I cannot</p> <p>7. verify whether what's in them is true or not,</p> <p>8. false, made up, anything.</p> <p>9. He indicated to me in the letter on</p> <p>10. June 28th that on his part, he would not give</p> <p>11. approval for a transfer to any other bishop.</p> <p>12. So even if a bishop would want me, Bishop</p> <p>13. Loverde will not allow me to be transferred.</p> <p>14. Q You basically -- subject to his will</p> <p>15. other than leaving -- other than electing to</p> <p>16. leave the vocation in which you have trained</p> <p>17. for?</p> <p>18. A Yes.</p> <p>19. Q Let me ask you, has there been any</p> <p>20. recent publicity that you seen at All Saints</p> <p>21. regarding this lawsuit and Father Verrecchia</p> <p>22. and -- former Father Verrecchia -- and Ms.</p>

Page 210	Page 212
<p>1. Lambert and Mr. Lambert?</p> <p>2. A I received a phone call from one of</p> <p>3. the secretaries on the day of a front-page</p> <p>4. article about the Verrecchia lawsuit in the</p> <p>5. Manassas Journal. That she had just attended</p> <p>6. mass and that Father Cilinski, the now</p> <p>7. present pastor, had read a letter from</p> <p>8. the bishop to all of the parishioners about the</p> <p>9. lawsuit. Her statement was "The spin</p> <p>10. continues, Father." And I later got a copy</p> <p>11. of that letter and was shocked to see out and</p> <p>12. out lies that, again, were said to the</p> <p>13. people.</p> <p>14. Q And what were those lies?</p> <p>15. A "I want you to know that when the</p> <p>16. diocese of Arlington received news of an</p> <p>17. emotional, romantic relationship of the</p> <p>18. pastor and an adult woman parishioner in June</p> <p>19. of 1999," -- as if it hadn't heard from the</p> <p>20. very husband of the woman before that -- "it</p> <p>21. initiated an investigation." And Bishop</p> <p>22. Loverde told Jim Verrecchia that he, quote,</p>	<p>1. fall of 1998.</p> <p>2. Q And when you took the information</p> <p>3. that made it absolutely conclusive in June of</p> <p>4. 1999, did the bishop and the diocese respond</p> <p>5. as you would have expected it to respond</p> <p>6. between June of 1999 and the following year</p> <p>7. through June of 2000?</p> <p>8. A No. And I was horribly dismayed that</p> <p>9. it didn't.</p> <p>10. Q What did it fail to do that you would</p> <p>11. have expected it to do based on your</p> <p>12. understanding for what the -- how the diocese</p> <p>13. professes to respond and has responded in</p> <p>14. similar situations?</p> <p>15. A Based on the knowledge how it</p> <p>16. responded in my situation and how it</p> <p>17. responded in Father Paul Berghout's situation</p> <p>18. and how it responded to other allegations</p> <p>19. within the diocese, I expected and I told him</p> <p>20. that I expected that there would be an</p> <p>21. immediate evaluation done on Father</p> <p>22. Verrecchia.</p>
Page 211	Page 213
<p>1. "Must break all contact in any shape or form</p> <p>2. with her."</p> <p>3. He had my complaints that she was</p> <p>4. still seeing him and he was still seeing her</p> <p>5. after June of 1999. As late as January of</p> <p>6. 2000, I was telling him that they were still</p> <p>7. seeing each other. "And in March of 2000,</p> <p>8. when the former pastor asked for a personal</p> <p>9. leave of absence from the priesthood, the</p> <p>10. diocese learned then that it had to subade</p> <p>11. the bishop's orders." Untrue.</p> <p>12. Q During the time that you were aware</p> <p>13. from maybe spring of 1998 through June of</p> <p>14. 1999, when you gave the emails and letters to</p> <p>15. the bishop, I think you previously testified</p> <p>16. that there was an extraordinary amount of</p> <p>17. discussion and concern raised by parishioners</p> <p>18. and amongst your fellow priests.</p> <p>19. Would you say that at that time it</p> <p>20. was certainly beyond suspicion that this</p> <p>21. relationship appeared to be going on?</p> <p>22. A It was a full-blown scandal by the</p>	<p>1. And I told him that in this case,</p> <p>2. given what I had seen, he should be</p> <p>3. immediately suspended, immediately</p> <p>4. suspended. And again, encouraged him to take</p> <p>5. as much time as he needed that day even if it</p> <p>6. meant losing a couple of hours of sleep at</p> <p>7. night to protect the church from this wolf in</p> <p>8. sheep's clothing and from this scandal which</p> <p>9. was devastating the life of this community,</p> <p>10. this -- the church at All Saints.</p> <p>11. He never acknowledged to me that he</p> <p>12. realized the magnitude of the public scandal,</p> <p>13. but certainly by June of 1999 it was the talk</p> <p>14. of everyone that the pastor was having an</p> <p>15. affair with a married woman.</p> <p>16. Q Would it then surprise you to know</p> <p>17. that during that year from June -- even after</p> <p>18. it had the information from you in June of</p> <p>19. 1999 through June of 2000, that it had been</p> <p>20. denying this based on its own claimed</p> <p>21. investigation to Mr. Lambert?</p> <p>22. A Yes.</p>

<p style="text-align: right;">Page 214</p> <p>1. Q And if it had been denying this to 2. Mr. Lambert, would that have been a truthful 3. denial by Bishop Loverde or Father Rippy or 4. Father Mealey or anyone else who was 5. involved? 6. A No, certainly Father Rippy. 7. Q Would those denials or failure to 8. tell the truth to Mr. Lambert be counter to 9. what you understand to be all the teachings 10. of the Catholic Church? 11. A Honesty, integrity, truthfulness, 12. yes, it was a complete cover-up of what could 13. be and still could be a potentially 14. devastating scandal for the diocese that 15. could have been stopped if they had 16. procedures. I was surprised that when I 17. arrived -- when complaints were made by a 18. parishioner about a relationship between 19. a pastor and his wife that there was no 20. precautions given to the other priests in the 21. house. 22. We were the ones who lived with him.</p>	<p style="text-align: right;">Page 216</p> <p>1. about it and still failed to do anything 2. about it. I suppose given the current media 3. it seems to be the tactic, procedure of most 4. bishops to ignore and hope it doesn't emerge 5. publicly. 6. Q Was any action taken, to your 7. knowledge, against Father Verrecchia prior to 8. his apparent voluntarily resigning in Marcy 9. of 2000? 10. A The only thing I know from outside 11. sources, the secretaries, and the only thing 12. I know from Bishop Loverde himself was that 13. he was asked not to see her. 14. Q That's it? 15. A Yes. And then he indicated, you 16. don't know -- when I said what, just a 17. gentleman's handshake? I had brought up to 18. him the fact that apparently people had 19. brought up the difficulties with the prophet 20. to the chancellor and Father Rippy told me 21. that the problem had been resolved. I 22. said how do you know that? And he said</p>
<p style="text-align: right;">Page 215</p> <p>1. Of anyone that would know that he was 2. continuing the behavior and anyone that the 3. bishop could trust to get reliable 4. information, it was from the fellow priests. 5. So at the least he should have told us, I 6. want to know if Father Verrecchia is still 7. seeing this woman, I want to know right away 8. because he has clearly been told not to. 9. That was never done. He had no way 10. of knowing other than the testimony of Father 11. Verrecchia who had already proven himself a 12. liar and a cheat as to whether he was 13. actually doing -- breaking the relationship. 14. Q Did he ever come down to check on his 15. own? Did Bishop Loverde or Father Rippy ever 16. come down to check on their own? 17. A No. There are no procedures to do 18. that. There are no structures within the 19. church to do that. So this scandal is 20. like so many scandals in the church, it's 21. unsupervised. What makes this scandal 22. unique, maybe, is that the bishop was told</p>	<p style="text-align: right;">Page 217</p> <p>1. Father Verrecchia told me. And I said you 2. have no other verification of that? He said 3. Father Verrecchia told me. 4. And I said, well let me tell you and 5. let me prove to you that he has in fact not 6. stopped his relationship with the prophet. 7. So apparently they trusted him and what he 8. would do in their request despite the 9. overwhelming evidence that he had misled 10. them, lied to them, deceived them, that he 11. was continuing on in behaviors that they were 12. not investigating, that they were not 13. supervising. And the bishop said they were 14. professional in their response. 15. Q Would it have been appropriate for 16. Mr. Lambert as a parishioner of the parish who 17. supported it financially with 18. contributions and payments to the school and 19. by his participation as a member of the 20. parish to expect that the bishop and/or 21. Father Rippy or Father Mealey would have 22. been truthful with him about this had he made</p>

Page 218	Page 220
<ol style="list-style-type: none"> 1. inquiry? 2. A It should be an expectation of Jim 3. Lambert or any other parishioner even if they 4. had never paid a dime to the parish. 5. MR MURPHY: Let's take a short 6. break. 7. (Brief break.) 8. BY MR. MURPHY: 9. Q You mentioned one of your early 10. meetings, if not your initial meeting with 11. Bishop Loverde, I guess and early meeting in 12. May of 1998 or approximately around that time 13. I think, in that he indicated that he was 14. considering you for a pastorphism, correct? 15. A Yes. 16. Q How soon after that time did he 17. appear to take a totally different attitude 18. towards you? 19. A Within a week. 20. Q And that was the result of, as I 21. understood your earlier testimony, Father 22. Verrecchia talking to him? 	<ol style="list-style-type: none"> 1. a big, big parish in this very wealthy, 2. affluent neighborhood of Virginia and that it 3. was a big job, but people had assured him 4. that I was up to the task. 5. So when a week later that was 6. withdrawn and based on lies by Father 7. Verrecchia, I just felt demoralized, 8. frustrated, persecuted, silenced. I felt 9. that he's used every opportunity to discredit 10. me, to challenge me, challenge my truth. I 11. should say to somehow make the problems that 12. I factually presented my problem. In one of 13. the later meetings I reacted by saying all of 14. this is just absolutely amazing. And he said 15. no, what's amazing is you. You are amazing, 16. which I found very aggressive and -- 17. Q Did he say that in a complimentary 18. sense or a challenging, critical sense? 19. A Oh, it was very critical in the sense 20. that none of this is the problem. None of 21. this is a problem. The only problem we have 22. here, the only amazing thing is you, you're
Page 219	Page 221
<ol style="list-style-type: none"> 1. A Yes. 2. Q After that you brought to him all of 3. the information that you discovered shortly 4. thereafter regarding Father Verrecchia and Ms. 5. Lambert? 6. A Yes. 7. Q And based on his reaction then and 8. his reaction to everything else you have 9. brought to him since then, how have you felt 10. in response to his attitude toward you with 11. regard to you bringing these matters to him? 12. A I have felt threatened. Certainly 13. having the threat of suspension hanging over 14. your head constantly is not what you would 15. expect from the bishop of your diocese for 16. doing a good thing. 17. Initially, I felt very confused about 18. his change. My initial meeting with Bishop 19. Loverde was unbelievably cordial, he said 20. nothing but nice things. He said the 21. personnel committee had just spoken so highly 22. of me, that our Lady of Hope was going to be 	<ol style="list-style-type: none"> 1. the only problem we have. 2. Q These things that you brought to 3. him throughout this period of time, the 4. illicit affair, the apparent intimate 5. relationship between -- what appeared to be 6. an intimate, physical relationship between a 7. married woman and Father Verrecchia, that 8. being Ms. Lambert, and the pornography and 9. the financial affair matters that you 10. brought, did you consider these to be other 11. than just amoral or immoral, did you also 12. consider these to be in violation of civil 13. law? 14. A As far as I know, having an affair in 15. the State of Virginia is a felony. I don't 16. know for sure. I heard some people react to 17. the fact that if they were ever caught in 18. adultery and certainly the custody rights and 19. the alimony payments are drastically altered 20. by the fact and -- 21. Q With regard to that as well as the 22. financial dealings and the pornographic

<p style="text-align: right;">Page 222</p> <p>1. material, did you consider these to be civil 2. matters, not just church matters? 3. A Yes. 4. Q And how have you felt -- how have 5. you perceived the attitude of the bishop 6. toward you in revealing these matters? Has 7. it been intimidating to you? 8. A Yes. He sees me as an enemy and my 9. expectation is that I should be seen as a 10. good guy, as one who is actively trying to 11. help the diocese to either establish 12. mechanisms or structures to truly become some 13. sort of a professional organization. 14. As I said, when you compare the 15. church to a McDonald's or a Burger King it 16. becomes rather frustrating that we don't do 17. as much as they in protecting the interests 18. of the people who give them money, protecting 19. the interests of the employees, protecting 20. justice for -- 21. Q Did you see these matters that you 22. brought to the bishop's attention that you've</p>	<p style="text-align: right;">Page 224</p> <p>1. A Yes. Initially he said I wrote all 2. of that in a week. 3. Q All right. I'm going to identify 4. Exhibit B. 5. Is this the material that you 6. discovered and presented to him regarding 7. Father Erbacher to which you were challenged 8. on? 9. A I know that that material was sent to 10. the diocese and I have assured him that it 11. has all been substantiated, that I can verify 12. the presence of all that material. 13. Q So this is what you told him he could 14. discover if he would go and look? 15. A Yes, easily. It was all out in 16. public view. 17. Q And these are accurate pictures of 18. what you saw in the rectory? 19. A Yes. 20. Q I'm looking in particular, just for 21. by way of example, the second page of colored 22. pictures. Lots of cash in drawers and in</p>
<p style="text-align: right;">Page 223</p> <p>1. described here as going beyond just church- 2. related matters, but also matters that arise 3. under normal civil law and outside of just 4. the church administration? 5. A I believed and still believe that the 6. church has extraordinarily civil liabilities 7. in the occasions I have mentioned. 8. Q In response to the subpoena, you have 9. produced here today some folders and I'm 10. going to identify them, if I may. I'll 11. identify the first folder which has the 12. heading "Reverend James A. Verrecchia" and 13. at 14. the bottom says "Presented June 22nd 1999 to 15. Bishop Paul Loverde." I'll make that Exhibit 16. A. 17. Is this the material that you 18. presented to the bishop regarding Father 19. Verrecchia? 20. A Yes. 21. Q And this material that he refused 22. to take action on, but challenged your credibility and integrity on?</p>	<p style="text-align: right;">Page 225</p> <p>1. pouches. What is that, do you know? 2. A That was the money that was in his 3. office desk. A significant amount, I don't 4. remember exactly. 5. Q Was money to be kept that way? You 6. handled accounting at times and-- 7. A No. 8. Q -- so how was it to be kept? 9. A Money cash was supposed to be 10. deposited in the bank as soon as possible. 11. Most parishes had a minor petty cash account 12. of \$100. I think the one pouch there was 13. something like 3 or 4 thousand dollars worth 14. of cash. 15. Q There's also pictures here of boxes 16. filled with naked boys or men on the covers. 17. Like one that says "Merry Christmas," for 18. instance. Where were these? 19. A There were a collection of three 20. boxes sitting right next to the dirty laundry 21. basket, which the housekeeper had access to 22. every week.</p>

Page 226	Page 228
<p>1. Q And this shows a box that says</p> <p>2. "Priority mail from San Francisco to William</p> <p>3. Erbacher at 6222 Franconia Road, Alexandria,</p> <p>4. Virginia." What address is that?</p> <p>5. A That is the parish address of Saint</p> <p>6. Lawrence.</p> <p>7. Q I'm looking at this page, it shows</p> <p>8. pictures of something called "South African</p> <p>9. Son," which shows to be very young males,</p> <p>10. teenagers possibly. Are you able to discern</p> <p>11. whether they are teenagers or young adults?</p> <p>12. Could they be teenagers, in other words?</p> <p>13. A Yes. The shipping address on the</p> <p>14. labels and many of the films are manufactured</p> <p>15. overseas, which would make one suspect that</p> <p>16. members might be underage or else illegal in</p> <p>17. the United States.</p> <p>18. Q One here says "Richie's Finest."</p> <p>19. Also appears to be a relatively young boy, is</p> <p>20. that correct?</p> <p>21. A Yes.</p> <p>22. Q "Spartacus International Gay Guide,"</p>	<p>1. A Some of them appear to be 12, 13, 14</p> <p>2. years old. I know that there was a number of</p> <p>3. unmarked videos of very young boys</p> <p>4. masturbating.</p> <p>5. Q Mark that Exhibit B. And the final</p> <p>6. would be Exhibit C, which you have produced.</p> <p>7. This includes the material on Father Hamilton</p> <p>8. that you presented on October 16th, 2001 to</p> <p>9. Bishop Loverde?</p> <p>10. A Yes.</p> <p>11. Q And this is again, these are pictures</p> <p>12. of what's to be found around the residence</p> <p>13. and rectory?</p> <p>14. A Yes.</p> <p>15. Q And there's a picture of a lot of</p> <p>16. videotapes. What are those of?</p> <p>17. A It's a box of nine -- shows nine</p> <p>18. tapes that showed -- I don't think triple X</p> <p>19. would be a vivid enough description. They</p> <p>20. were hundreds and hundreds and hundreds of</p> <p>21. acts of human copulation in every way</p> <p>22. conceivable.</p>
Page 227	Page 229
<p>1. that was also amongst these things?</p> <p>2. A Yes.</p> <p>3. Q Here's one that says "Boys Galleria."</p> <p>4. I guess these are young boys. I'm looking at</p> <p>5. a page that has all the little covers, maybe</p> <p>6. 60 or so?</p> <p>7. A That's from the internet sites that</p> <p>8. he was looking at.</p> <p>9. Q This is a young, naked, young boy?</p> <p>10. A They're all naked.</p> <p>11. Q They're all naked.</p> <p>12. A And there is no women and there are</p> <p>13. no men with women.</p> <p>14. Q And on this page they do appear to be</p> <p>15. young boys for the most part, don't they?</p> <p>16. Several pages, I guess?</p> <p>17. A Father Erbacher had what you might</p> <p>18. call a --</p> <p>19. Q Good God, how old is --</p> <p>20. A -- groin fixation.</p> <p>21. Q -- this one, how old does that boy</p> <p>22. look to you?</p>	<p>1. Q This one here refers to "Sissy She-</p> <p>2. Males," do you know what that is?</p> <p>3. A Father Hamilton had an incredible</p> <p>4. addiction to she-males. Men who have the</p> <p>5. desire to be women and who take hormonal</p> <p>6. treatments or whatever to develop breasts and</p> <p>7. feminine attributes.</p> <p>8. Q There's a picture here, I assume it</p> <p>9. was found there, it says "When men who want</p> <p>10. to be women meet women who are dominant or</p> <p>11. want to be men." It appears to be a very</p> <p>12. vivacious, voluptuous woman with a penis.</p> <p>13. A Yes.</p> <p>14. Q Or maybe it's a man with breasts. I</p> <p>15. don't know how you would describe it.</p> <p>16. Q On one of these pages it shows, it</p> <p>17. looks like a cover of an envelope sent to</p> <p>18. Daniel Hamilton at Valleywood Drive in</p> <p>19. Woodbridge. What address is that?</p> <p>20. A That's Saint Elizabeth Ann Seton</p> <p>21. where he was a pastor for 13 years.</p> <p>22. Q And this one is stamped heavily, says</p>

Page 230	Page 232
<p>1. "Sexually oriented material for adults only,"</p> <p>2. correct?</p> <p>3. A Yes.</p> <p>4. Q What is this in this drawer? Oh,</p> <p>5. this is hard to tell, a gift?</p> <p>6. A Latex glove.</p> <p>7. Q Are these newspapers in one of these</p> <p>8. pictures of "The best bondage video releases.</p> <p>9. Two sets of genitals on one hot body," and</p> <p>10. another marked "Ass Reaming Adventures."</p> <p>11. These were all Father Hamilton's?</p> <p>12. A Yes. He had a large collection of</p> <p>13. kinky context, which he read every line of</p> <p>14. and said he was the sole person responsible for</p> <p>15. phone bills at Saint Mary's.</p> <p>16. Q "She-male Slaves" appears to be</p> <p>17. another?</p> <p>18. A Yes.</p> <p>19. Q And magazines called "Centurions on</p> <p>20. Transformation"?</p> <p>21. A A Centurions is the largest fetish</p> <p>22. cross-dressing magazine. There's a box there</p>	<p>1.</p> <p>2. - - -</p> <p>3. [Whereupon, at 4 p.m.,</p> <p>4. the deposition concluded.]</p> <p>5. - - -</p> <p>6. I have read the foregoing</p> <p>7. pages, 3-232, which contain a</p> <p>8. correct transcription of the</p> <p>9. answers given by me to the</p> <p>10. questions therein recorded,</p> <p>11. except as noted on the attached</p> <p>12. errata sheet.</p> <p>13.</p> <p>14.</p> <p>15.</p> <p>16. _____</p> <p>17. FATHER JAMES HALEY</p> <p>18.</p> <p>19. -oo0oo-</p> <p>20.</p>
Page 231	Page 233
<p>1. that was laying in his mail from Centurion</p> <p>2. magazines.</p> <p>3. Q There's one here on submission and</p> <p>4. looks like bondage?</p> <p>5. A Right.</p> <p>6. MR MURPHY: Since these are so</p> <p>7. thick, I'm just going to mark these and I'll</p> <p>8. have them available, okay. I think that's</p> <p>9. everything. Thank you.</p> <p>10. -oo0oo-</p>	<p>1. CERTIFICATE OF NOTARY PUBLIC</p> <p>2. I, Monica L. Knight, the officer before</p> <p>3. whom the foregoing deposition was taken, do</p> <p>4. hereby certify that the witness whose</p> <p>5. testimony appears herein was duly sworn by</p> <p>6. me; that the testimony of said witness was</p> <p>7. taken by me in shorthand and this transcript</p> <p>8. typed under my direction; that said</p> <p>9. transcript is a true record of the testimony</p> <p>10. given by said witness; that I am neither</p> <p>11. counsel for, related to, nor employed by any</p> <p>12. of the parties to the action in which this</p> <p>13. deposition was taken; and, further, that I am</p> <p>14. not a relative or employee of any attorney or</p> <p>15. counsel retained by the parties hereto, nor</p> <p>16. financially or otherwise interested in the</p> <p>17. outcome of the action.</p> <p>18. _____</p> <p>19. Notary Public in and for the</p> <p>20. Commonwealth of Virginia at Large</p> <p>21. My commission expires:</p> <p>22. January 31, 2004</p>