

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
For The County Of Los Angeles - Central District

Coordinated Proceedings  
Special Title (Rule 1550(b))  
THE CLERGY CASES I

JUDICIAL COUNCIL  
COORDINATION  
PROCEEDING NO.: 4286

This Document Relates to Santa  
Barbara Superior Court Case No.  
01131929

ANDREW RUIZ, an individual,  
  
Plaintiff,

v.

ARCHDIOCESE OF LOS ANGELES  
EDUCATION AND WELFARE  
CORPORATION; ROMAN CATHOLIC  
ARCHBISHOP OF LOS ANGELES;  
and DOES 3 - 100, inclusive,  
  
Defendants.

VOLUME 1  
(PAGES 1-123)

Videotaped deposition of [REDACTED]  
taken on behalf of Plaintiff, commencing at 10:15 A.M.,  
Monday, January 22, 2007, at 600 East Esplanade Drive,  
Oxnard, California, before SUSAN E. LANSING, C.S.R.  
#6355.

--oo0oo--

1 APPEARANCES OF COUNSEL:  
 2  
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14 For Defendants:  
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 16 BY: BLESS YOUNG, ESQ.  
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20 Also present:  
 21 David Kastner, Videographer  
 22  
 23  
 24  
 25

1 OXNARD, CALIFORNIA; MONDAY, JANUARY 22, 2007  
 2 10:15 A.M.  
 3 THE VIDEOGRAPHER: We are on the record. My  
 4 name is David Kastner. I am a certified videographer  
 5 representing Telegenics located in Ventura, California.  
 6 The date is January 22nd, 2007. The time is 10:15 a.m.  
 7 This deposition is taking place at 600 East Esplanade,  
 8 Oxnard, California. Judicial Council Coordination  
 9 Proceeding No. 4286, entitled Andrew Ruiz v. Archdiocese  
 10 of Los Angeles. The deponent is [REDACTED]  
 11 MR. HALE: Not Father, just [REDACTED].  
 12 THE VIDEOGRAPHER: Excuse me, [REDACTED].  
 13 This deposition is being taken on behalf of the  
 14 plaintiff. Your court reporter is Sue Lansing from  
 15 Tri-County Reporting.  
 16 May we please have introductions from counsel.  
 17 MR. HALE: Tim Hale for plaintiffs.  
 18 MR. GRIFFITH: R. Thomas Griffith for  
 19 plaintiff.  
 20 MS. YOUNG: Bless Young for defendant Roman  
 21 Catholic Archbishop of Los Angeles.  
 22 THE VIDEOGRAPHER: Thank you. Will the court  
 23 reporter please swear in the witness.  
 24 --oo0oo--  
 25 --oo0oo--

I N D E X		
WITNESS	EXAMINATION	PAGE
[REDACTED]	BY MR. HALE	5, 115
	BY MS. YOUNG	89

E X H I B I T S		
PLAINTIFF'S		
EXHIBIT NO.	DESCRIPTION	PAGE
1	Deposition Subpoena (4 pgs)	88

2  
 3  
 4  
 5  
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1 --oo0oo--  
 2 [REDACTED]  
 3 having been duly administered an oath in accordance  
 4 with CCP 2094 was examined and testified as  
 5 follows:  
 6 EXAMINATION  
 7 BY MR. HALE:  
 8 Q. Good morning, Mr. [REDACTED]. My name is Tim Hale.  
 9 Could you state your full name for the record, please.  
 10 A. I already did.  
 11 Q. I know but you weren't on video yet. We've  
 12 just got to preserve --  
 13 A. [REDACTED].  
 14 Q. Okay. Could you spell your last name for the  
 15 record.  
 16 A. [REDACTED].  
 17 Q. Thanks. We're here today for a deposition to  
 18 document your testimony, preserve your testimony  
 19 regarding some events that took place at Our Lady of  
 20 Guadalupe in Santa Barbara. Before we begin I wanted to  
 21 kind of go over some of the ground rules of the  
 22 deposition with you to make sure we're on the same page  
 23 as far as what is taking place, okay.  
 24 Do you understand that you've been placed under  
 25 oath by the court reporter?

1 A. Yes, I do.  
 2 Q. Okay. Do you understand that your testimony  
 3 today has the same force and effect as if we were in a  
 4 court of law before a judge and a jury?  
 5 A. (Witness nods head affirmatively.)  
 6 Q. Is that a yes?  
 7 A. Yeah.  
 8 Q. We're in a relatively informal setting of the  
 9 hotel, but just I want to make sure you understand that  
 10 this could be used in court testimony so it has the same  
 11 force and power as if you were in front of a judge and  
 12 in front of a jury. Okay?  
 13 A. (Witness nods head affirmatively.)  
 14 Q. Is that a yes?  
 15 A. Yes.  
 16 Q. As you can see, the court reporter is typing  
 17 down everything I say and everything you say and she'll  
 18 be typing down anything everyone else says as well, so,  
 19 it's important for us to have a clear record that we  
 20 speak affirmatively and when we answer questions or when  
 21 you answer a question when I ask a question, that we  
 22 avoid "uh-huhs" and "huh-uhs" and answering a question  
 23 with nods of the head and that kind of thing. Do you  
 24 understand that?  
 25 A. Yeah.

1 Q. Great. Have you consumed any alcohol in the  
 2 last 12 hours?  
 3 A. No.  
 4 Q. Have you consumed any drugs in the last 24  
 5 hours?  
 6 A. No.  
 7 Q. Is there any reason you can't give your best  
 8 deposition testimony today? In other words, is there  
 9 anything impairing your memory or your cognitive ability  
 10 in any way?  
 11 A. Yeah.  
 12 Q. What's that?  
 13 A. Well, what happened, I was a kid.  
 14 Q. But have you taken any --  
 15 A. But as the years went by I became an alcoholic  
 16 and addict. My brain was distorted, okay.  
 17 Q. I understand it's been a long time and no one  
 18 is going to expect you --  
 19 A. You're talking about 40 years.  
 20 Q. Right, right. There is going to be points  
 21 today where you simply don't remember --  
 22 A. I don't.  
 23 Q. -- and that's okay. That's perfectly fine. We  
 24 don't want you to guess to the answer to any question we  
 25 ask you. But if there is something you recall or if

1 there is something you can give an estimate to, we are  
 2 entitled to that. Do you understand that?  
 3 A. Let me remind you, I'm here to tell you the  
 4 truth.  
 5 Q. Right.  
 6 A. Only what I know.  
 7 Q. I understand that. And that's all we're asking  
 8 from you. Don't worry.  
 9 A. I'm not going to lie.  
 10 Q. No, we don't want you to lie. In fact, that's  
 11 why you've been placed under oath.  
 12 A. Because I'll be in contempt.  
 13 Q. Okay. We appreciate that. So, is there any  
 14 reason you can't give your best deposition testimony  
 15 today though?  
 16 A. I really don't think that my testimony --  
 17 because I did not see nothing.  
 18 Q. Okay. We'll get into what you saw.  
 19 A. Hearsay.  
 20 Q. Okay. I understand.  
 21 A. In a court of law that doesn't mean nothing.  
 22 Q. Okay. I understand that. You're doing a good  
 23 job so far. When I ask you a question, please try and  
 24 wait till I finish my question before you answer.  
 25 A. Okay.

1 Q. And by the same token, excuse me, when you're  
 2 answering my question I will try and wait until you  
 3 finish your answer before I ask you a question. That  
 4 way when this is finished we'll have a nice, clear  
 5 record for the reporter. Do you understand that?  
 6 A. Okay.  
 7 Q. Is that a yes?  
 8 A. Yes.  
 9 Q. Thanks. We talked a little bit about that if  
 10 you can estimate an answer to a question that I ask you  
 11 we're entitled to that. Do you understand the  
 12 difference between a guess and an estimate? And if you  
 13 don't I can give you an example.  
 14 A. No.  
 15 Q. Okay. Here's the example. For instance, if I  
 16 ask you to estimate the size of this table, you could  
 17 look at this table and give me an estimate of what the  
 18 size is because it's sitting here in front of you;  
 19 right?  
 20 A. Of course.  
 21 Q. If I ask you to tell me the size of the desk in  
 22 my office, you've never been in my office so you would  
 23 be guessing at the size of the desk; is that correct?  
 24 A. That's right.  
 25 Q. So, does that help you understand the

- 1 difference between a guess and an estimate?  
 2 A. Yeah.  
 3 Q. Great. Okay. If I ask you a question today  
 4 and you respond to it, I'm going to assume that you  
 5 understood what I meant by the question. So, it's  
 6 really important that if you don't understand something  
 7 I'm saying or if something doesn't make sense to you,  
 8 just tell me that and ask me to rephrase and I'll try to  
 9 ask it in a way that makes more sense. Okay?  
 10 A. Yes.  
 11 Q. Okay. Do you have any questions?  
 12 A. No.  
 13 Q. Okay. We're not holding you prisoner here  
 14 today, so, if you need to take a break, if you need to  
 15 use the restroom, if you just want to get a drink of  
 16 water or something, just let me know and we'll take a  
 17 break. Okay?  
 18 A. Okay.  
 19 Q. Just want to start by getting some of your  
 20 background information first if that's okay. Where were  
 21 you born?  
 22 A. Santa Barbara, California.  
 23 Q. Okay. What's your date of birth?  
 24 A. 12/25/43.  
 25 Q. Okay. Were you born in Cottage Hospital?

- 1 A. No.  
 2 Q. Where were you born in Santa Barbara?  
 3 A. I think I was born in General Hospital.  
 4 Q. In General Hospital, okay. And did you spend  
 5 your entire childhood in Santa Barbara?  
 6 A. Yes.  
 7 Q. Okay. Did you attend school in Santa Barbara?  
 8 A. Yes.  
 9 Q. Okay. Let me ask you this: Is English your  
 10 first language? Did you grow up speaking English or did  
 11 you grow up speaking Spanish?  
 12 A. I grew up speaking Spanish. I did not speak  
 13 English at all, period.  
 14 Q. Okay. When did you learn to speak English?  
 15 A. At an early age, I'd say -- here I am guessing,  
 16 I don't remember.  
 17 Q. That's fine. Definitely do not want you to  
 18 guess to any questions we ask you, okay.  
 19 Did you attend school in Santa Barbara?  
 20 A. Yes, I did.  
 21 Q. Where did you attend school in Santa Barbara?  
 22 A. Catholic school, Our Lady of Guadalupe School  
 23 was my first school.  
 24 Q. Okay. Did you attend Our Lady for  
 25 kindergarten?

- 1 A. Kindergarten?  
 2 Q. Yes.  
 3 A. Yes, I did.  
 4 Q. And did you attend -- how long did you attend  
 5 Our Lady for?  
 6 A. Not very long because I didn't, did not know  
 7 how to talk English.  
 8 Q. Okay. Do you think it was for --  
 9 A. I couldn't communicate with the nuns.  
 10 Q. Okay. Do you recall how old you were when you  
 11 started kindergarten?  
 12 A. No, I do not remember.  
 13 Q. Okay. Did you attend Our Lady for first grade?  
 14 A. Beg your pardon?  
 15 Q. For first grade, did you attend Our Lady  
 16 School, Our Lady of Guadalupe School, for first grade?  
 17 A. Yes.  
 18 Q. And what about for second grade, did you attend  
 19 Our Lady of Guadalupe School?  
 20 A. No.  
 21 Q. Where did you go for second grade?  
 22 A. I started, I started to learn how to talk  
 23 English, I was transferred to Franklin School.  
 24 Q. Okay. So, you did kindergarten at Our Lady?  
 25 A. Uh-huh.

- 1 Q. And then you did first grade at Our Lady and  
 2 then second grade was at Franklin School?  
 3 A. Uh-huh.  
 4 Q. Okay. What about third grade, where was that  
 5 at?  
 6 A. Franklin School.  
 7 Q. Okay.  
 8 A. I stayed at Franklin School until six years.  
 9 Q. Until sixth grade?  
 10 A. Yeah.  
 11 Q. Okay. And where did you, where did you go for  
 12 school after sixth grade?  
 13 A. Santa Barbara Junior High.  
 14 Q. Okay. And were you there for seventh and  
 15 eighth grade or seventh, eighth and ninth grade?  
 16 A. To ninth grade.  
 17 Q. Okay. And did you finish ninth grade at Santa  
 18 Barbara Junior High?  
 19 A. Yes. I graduated.  
 20 Q. Okay. Did you attend Santa Barbara High  
 21 School?  
 22 A. Yes, I did.  
 23 Q. Okay. And did you attend Santa Barbara High  
 24 School for all four years?  
 25 A. No, I didn't.

1 Q. How many years did you finish at Santa Barbara  
2 High School?

3 A. Two.

4 Q. So, you did tenth grade at Santa Barbara High  
5 School?

6 A. Uh-huh.

7 Q. And you did eleventh grade at Santa Barbara  
8 High School?

9 A. No.

10 Q. Did you start eleventh grade and not finish it?

11 A. No.

12 Q. Okay. Did you drop out of Santa Barbara High  
13 School at some point?

14 A. No.

15 Q. What happened?

16 A. I went to Boys Camp.

17 Q. Okay. Do you recall what year --

18 A. Los Prietos Boys Camp.

19 Q. Do you recall what year or what school year you  
20 went to Los Prietos Boys Camp? Was it in tenth grade or  
21 was it eleventh grade?

22 A. Eleventh grade.

23 Q. And had you started eleventh grade before you  
24 went to Los Prietos Boys Camp?

25 A. No. Started eleventh grade at Boys Camp.

1 Q. Okay. And then what about twelfth grade; was  
2 that in Los Prietos to?

3 A. I went back to Santa Barbara High after I got  
4 out of Boys Camp.

5 Q. And did you do the entire twelfth grade year at  
6 Santa Barbara High?

7 A. No, I did not.

8 Q. How far did you get in your twelfth grade year  
9 of Santa Barbara High?

10 A. Almost the entire year. I dropped out because  
11 they told me I would, I wouldn't graduate with the other  
12 normal people in June. They told me I would graduate in  
13 January, so, I just dropped out.

14 Q. Okay. So, they told you you would graduate the  
15 next January?

16 A. Uh-huh.

17 Q. Is that a yes?

18 A. Yes.

19 Q. Thanks. Don't take it personally, I'm going to  
20 remind you occasionally to make sure you have an  
21 affirmative answer.

22 A. Okay.

23 Q. What school year do you think it was that you  
24 dropped out of Santa Barbara High School; was it, do you  
25 think it was the 1960/'61 school year?

1 A. As a matter of fact I think '59.

2 Q. '59 was when you dropped out. The '59/'60  
3 school year?

4 A. That's the year I would have graduated.

5 Q. '59 was the year you would have graduated?

6 A. No, '63.

7 Q. '63, okay. So, was your twelfth grade year at  
8 Santa Barbara High School, was that 1962/'63?

9 A. Uh-huh.

10 Q. Okay. Now I'm going to work my way backwards,  
11 so, be patient with me, okay. All right, so, twelfth  
12 grade was the 1962/'63 school year but you didn't finish  
13 that school year because you dropped out; correct?

14 A. Right.

15 Q. Okay. And then, was the 1961/'62 school year,  
16 was that in Los Prietos?

17 A. I don't understand that question again. Say  
18 that again.

19 Q. Eleventh grade would have been the 1961/'62  
20 school year, the year before your twelfth grade year at  
21 Santa Barbara?

22 A. Yes.

23 Q. And were you at Los Prietos Boys Camp for that  
24 year?

25 A. Yes.

1 Q. Okay. And then, tenth grade, would that have  
2 been the 1960 to '61 school year?

3 A. Uh-huh.

4 Q. Is that a yes?

5 A. Yes.

6 Q. Okay. Let me ask you this: Were you ever held  
7 back from school during any of your school years? Did  
8 you ever flunk a grade and have to take it over again?

9 A. Yes.

10 Q. How many times? More than once?

11 A. Once.

12 Q. What grade did you have to take again?

13 A. I guess it was -- here I am going to guess.

14 First grade when the Catholic school told me not to come  
15 back to school.

16 Q. Okay.

17 A. I'm not sure if it was in, when I was  
18 kindergarten or first grade.

19 Q. Okay. So, you think you had to take first  
20 grade twice, once at Our Lady and then once at Franklin?

21 A. Yes.

22 Q. Okay.

23 A. I was one year behind.

24 Q. Okay. Yeah, I was going to say, because if  
25 '62/'63 would have been your twelfth grade year, I think

1 that would have made you 19 or 20 years old if my math  
 2 is not off.  
 3 A. No.  
 4 Q. No?  
 5 A. 18.  
 6 Q. Okay. Okay. How sure are you? Because if my  
 7 math isn't wrong you would have been 17 and 18 years old  
 8 during the 1960 and '61 school year. You think maybe it  
 9 was '61 and '62 that was your twelfth grade year at  
 10 Santa Barbara High School?  
 11 A. You might be correct.  
 12 Q. Are you pretty confident that you were 18  
 13 sometime during that year that you dropped out of Santa  
 14 Barbara High School?  
 15 A. No, I'm not confident of that.  
 16 Q. Okay. How old do you think you were the year  
 17 you dropped out of Santa Barbara High School?  
 18 A. 17.  
 19 Q. Okay. So, your birthday is on December 25th,  
 20 so, and do you think you dropped out of -- you said you  
 21 dropped out of Santa Barbara High School towards the end  
 22 of that school year, towards the end of your twelfth  
 23 grade year?  
 24 A. Yes.  
 25 Q. Okay. And you think you were still 17 when you

1 A. No.  
 2 Q. How long were you there for?  
 3 A. Eleven months.  
 4 Q. Eleven months, okay. Do you recall --  
 5 A. That, I remember.  
 6 Q. Okay. And was that your first time at Los  
 7 Prietos?  
 8 A. Yes.  
 9 Q. Do you recall what time of year you went into  
 10 Los Prietos; was it in the summer months or was it the,  
 11 during the school year?  
 12 A. I do not remember.  
 13 Q. Do you recall when you got out; summer months  
 14 or during the school?  
 15 A. No, I don't remember that. All I know that I  
 16 was there. I don't know what year it was. I believe it  
 17 was either '59 or '60.  
 18 Q. That you were in Los Prietos?  
 19 A. Yeah.  
 20 Q. Okay. Could it have been both?  
 21 A. Possible. You're talking about 50-something  
 22 years ago.  
 23 Q. I know it's been a long time. I realize that.  
 24 Again, just do your best and whatever that is is what it  
 25 will be. Believe me, you're doing much better than I

1 dropped out? I'm not trying to cross you up or play any  
 2 games here, just want to try and make sure we understand  
 3 our dates here as best we can.  
 4 A. I believe so.  
 5 Q. Okay, okay. Is it possible you dropped out of  
 6 Santa Barbara High School during the 1959/1960 school  
 7 year, which is when you would have been 16 and then 17  
 8 years old in the second half of that school year?  
 9 A. Yeah, it's possible.  
 10 Q. The eleventh grade you did at Los Prietos Boys  
 11 Camp. Do you remember when you came back to Santa  
 12 Barbara High School, had you received credit for doing  
 13 eleventh grade at Los Prietos Boys Camp?  
 14 A. Yeah.  
 15 Q. Okay. But you think you were 17 when you  
 16 dropped out of high school?  
 17 MS. YOUNG: Objection; asked and answered.  
 18 THE WITNESS: Yeah.  
 19 Q. BY MR. HALE: Is there anything you can, you  
 20 can link to that being the age of 17 and dropping out of  
 21 high school? Is there an event or something that you  
 22 can connect that age to dropping out of high school?  
 23 A. No.  
 24 Q. Okay. And did you spend the entire year at Los  
 25 Prietos Boys Camp in the '61 to '62 school year?

1 expected already.  
 2 Did you get your driver's license when you were  
 3 16, turned 16?  
 4 A. No.  
 5 Q. No. Did you ever get your driver's license?  
 6 A. Huh?  
 7 Q. Did you ever get your driver's license?  
 8 A. Yes.  
 9 Q. How old were you when you got your driver's  
 10 license?  
 11 A. I know I was over 18 years old.  
 12 Q. Okay.  
 13 A. I can't exactly tell you what old I was when I  
 14 got it.  
 15 Q. Okay. Did you, did you live with your birth  
 16 parents all the way through school?  
 17 A. No.  
 18 Q. Okay. When did you stop living with your birth  
 19 parents?  
 20 A. That, I cannot tell you. That was at an early  
 21 age and I still don't remember. Even today I don't  
 22 remember.  
 23 Q. Okay. Who did, who did you live with after  
 24 your birth parents?  
 25 A. I was taken out of St. Vincent where they have

1 foster kids, and I can not tell you what year it was.  
 2 Q. Okay. And do you remember who they sent you --  
 3 did you go live with a family?  
 4 A. Yeah, Mexican family that didn't know how to  
 5 talk English.  
 6 Q. Do you remember what their names were?  
 7 A. Yes, I do.  
 8 Q. What were their names?  
 9 A. Her name was Mrs. [REDACTED].  
 10 Q. Okay.  
 11 A. [REDACTED].  
 12 Q. And how long did you live with Mrs. [REDACTED]  
 13 for, or Mrs. [REDACTED]?  
 14 A. Until the age of 29.  
 15 Q. Okay. So, you lived with them uninterrupted  
 16 until you turned 29, aside from when you lived in Los  
 17 Prietos or anywhere else?  
 18 A. (Witness nods head affirmatively.)  
 19 Q. But certainly when you were in school you were  
 20 living with Mrs. [REDACTED], that's her last name?  
 21 A. Yeah.  
 22 Q. Okay.  
 23 A. Her daughter is the one that taught me how to  
 24 talk English.  
 25 Q. What's her daughter's name?

1 A. [REDACTED]  
 2 Q. [REDACTED]  
 3 A. [REDACTED]. That's from her marriage.  
 4 Q. And how old do you think you were when you went  
 5 to go live with Mrs. [REDACTED]; were you just a little  
 6 kid?  
 7 A. Yes.  
 8 Q. Do you remember what year you were in school?  
 9 A. No, I don't.  
 10 Q. Do you think you were still attending Our Lady?  
 11 A. I do not -- I can't give you that exact year.  
 12 I don't remember.  
 13 Q. Do you think you were in school by then?  
 14 A. I don't remember nothing. By the time I  
 15 started talking English.  
 16 Q. Okay. When you, when you went to Los Prietos  
 17 Boys Camp during eleventh grade, was that your first  
 18 time in any kind juvenile facility? In other words, had  
 19 you ever been to Juvenile Hall before?  
 20 A. No.  
 21 Q. That was your first time?  
 22 A. Going to a boys camp, but I've been to other  
 23 facilities before that.  
 24 Q. What kind of facilities?  
 25 A. Juvenile Hall.

1 Q. Okay. When was the first time you went into  
 2 Juvenile Hall?  
 3 A. When I was 12.  
 4 Q. Okay. And how long were you in Juvenile Hall  
 5 that first time?  
 6 A. I can't recall.  
 7 Q. Okay. Do you recall, so, you think you were  
 8 12. Do you recall whether that was during your sixth  
 9 grade or seventh grade school year?  
 10 A. No, I was in junior high.  
 11 Q. You were in junior high. So, it had to be --  
 12 A. I remember that.  
 13 Q. Okay. So, do you think it was seventh grade or  
 14 eighth grade or ninth grade?  
 15 A. I believe, I think it was seventh grade.  
 16 Q. Okay. What did, between the time you went to  
 17 Juvenile Hall that first time in seventh grade and the  
 18 time you went to Los Prietos Boys Camp in eleventh  
 19 grade, were there any other instances where you went to  
 20 Juvenile Hall or a boys camp or anything like that?  
 21 A. Yeah.  
 22 Q. How many do you think?  
 23 A. In my junior high year?  
 24 Q. Well, between the first time you went to  
 25 Juvenile Hall in seventh grade and the time you went to

1 Los Prietos in eleventh grade, how many times do you  
 2 think there were between those two?  
 3 A. Before I went to Boys Camp?  
 4 Q. Yeah.  
 5 A. I'll say three or four times.  
 6 Q. Okay. And were those three or four times all  
 7 with Juvenile Hall or were they somewhere else?  
 8 A. No. Right there at Juvenile Hall.  
 9 Q. Okay. That first time you went to Juvenile  
 10 Hall, what, why, what happened? Why did you get -- were  
 11 you arrested?  
 12 A. Yes, for out of control.  
 13 Q. Okay. What do you mean by out of control; did  
 14 you run away from home?  
 15 A. No. I just didn't come home.  
 16 Q. Okay. And so they put you in Juvenile Hall  
 17 because you didn't come home to Mrs. [REDACTED]?  
 18 A. Yeah. She was receiving aid from the County  
 19 and she didn't have no control over me, so, back in  
 20 those days if you don't come home you go to Juvenile  
 21 Hall.  
 22 Q. Okay. And how long were you in Juvenile Hall  
 23 for that first time; a week? A month?  
 24 A. Something like that, yes.  
 25 Q. So, not too long?

1 A. No.  
 2 Q. Okay. What about the next time you were in  
 3 Juvenile Hall; was that also for being out of control or  
 4 was it something else?  
 5 A. Yes -- it was something else.  
 6 Q. What was it?  
 7 A. Possession of a firearm.  
 8 Q. Okay. And how old were you when that happened?  
 9 A. I can't recall what year.  
 10 Q. But you were older than 12; correct?  
 11 A. Yeah.  
 12 Q. Okay.  
 13 A. Young enough to go to Juvenile Hall.  
 14 Q. Okay. Have you ever lived in Mexico?  
 15 A. Where?  
 16 Q. In Mexico. Have you ever lived in Mexico?  
 17 A. No.  
 18 Q. Okay. Do you ever recall there being a fire in  
 19 the sacristy at Our Lady of Guadalupe, did you ever hear  
 20 anything about that happening?  
 21 MS. YOUNG: Objection; lacks foundation.  
 22 THE WITNESS: A what?  
 23 Q. BY MR. HALE: A fire.  
 24 A. A fire?  
 25 Q. Yes.

1 A. No.  
 2 Q. Okay. Have you ever heard that Father Kelly  
 3 died in April of 2002?  
 4 MS. YOUNG: Objection; lacks foundation.  
 5 THE WITNESS: Yeah, I did hear that.  
 6 Q. BY MR. HALE: How did you hear that?  
 7 A. How did I what?  
 8 Q. How did you hear that he had died?  
 9 A. How did I deal with that?  
 10 Q. No, no, no. How did you hear that he had died?  
 11 A. Through him.  
 12 Q. Through Mr. Griffith?  
 13 A. Yes.  
 14 Q. Okay. I take it you did not go to Father  
 15 Kelly's funeral?  
 16 A. I didn't.  
 17 Q. Just asking, that's all.  
 18 Do you remember, before you, before you lived  
 19 with Mrs. [REDACTED], do you remember attending mass at  
 20 Our Lady of Guadalupe?  
 21 A. Yeah. She's the one that made me go to church.  
 22 Q. Mrs. [REDACTED] was?  
 23 A. Yeah .5:00 o'clock in the morning every day.  
 24 Every Sunday.  
 25 Q. Okay. Was that when -- did you begin attending

1 Our Lady of Guadalupe for church when you were living  
 2 with Mrs. [REDACTED]?  
 3 A. Yes.  
 4 Q. Okay. Did she also send you to attend school  
 5 at Our Lady of Guadalupe?  
 6 A. Yes.  
 7 Q. Okay. So, you started school at Our Lady of  
 8 Guadalupe, not, with Mrs. [REDACTED], not with your birth  
 9 parents?  
 10 A. No. I was taken away from my parents, my  
 11 natural born parents, when I was young. I don't know  
 12 how old I was.  
 13 Q. Okay. Do you recall what year it was when you  
 14 began attending -- when she began sending you to attend  
 15 mass at Our Lady of Guadalupe?  
 16 A. Well, no, I can't tell you that.  
 17 Q. Okay. Would she go with you when you would  
 18 attend mass?  
 19 A. Yes.  
 20 Q. Okay. Would anyone else go with you and her  
 21 when you would attend mass?  
 22 A. Can you repeat that, please?  
 23 Q. Sure. Would anyone else --  
 24 A. You need to -- I have a hearing problem.  
 25 Q. I'll speak up, I'm sorry.

1 A. Okay. Plus I got this cold and it makes it  
 2 even more difficult to hear.  
 3 Q. All the more important. If you don't  
 4 understand something I say, tell me to speak up or tell  
 5 me to speak more clearly.  
 6 So, would anyone else go with you when you went  
 7 to mass with Mrs. [REDACTED]?  
 8 A. No.  
 9 Q. Did you have any sisters or brothers who went  
 10 with you, anything like that?  
 11 A. Yes.  
 12 Q. Who?  
 13 A. I had another brother.  
 14 Q. What was his name?  
 15 A. Natural brother.  
 16 Q. Okay. And did he live with Mrs. [REDACTED] too?  
 17 A. Yes.  
 18 Q. What was his name?  
 19 A. [REDACTED].  
 20 Q. Is he still alive?  
 21 A. Yes.  
 22 Q. Where does he live?  
 23 A. In Santa Barbara.  
 24 Q. Okay. Do you remember who the pastor was when  
 25 you began attending mass at Our Lady?

1 A. I can't remember his name but it was a  
 2 heavy-set guy.  
 3 Q. Was it Father [REDACTED]?  
 4 A. Yeah, yes.  
 5 Q. Okay. Do you remember if he had any assistants  
 6 or associate pastors, anybody helping him?  
 7 A. I don't recall.  
 8 Q. Okay. Did Mrs. [REDACTED] have a husband?  
 9 A. No.  
 10 Q. Okay. Did you ever serve as an alter boy at  
 11 Our Lady of Guadalupe?  
 12 A. Yes, I did.  
 13 Q. For how long did you serve as an alter boy,  
 14 when did you start?  
 15 A. I cannot tell you when I started and I cannot  
 16 tell you when, how long it was.  
 17 Q. Do you think it was for more than a year that  
 18 you served?  
 19 A. No.  
 20 Q. It was less than a year?  
 21 A. Yeah.  
 22 Q. Okay. And do you recall, when you served as an  
 23 alter boy were you going to school at Our Lady or had  
 24 you already started at Franklin?  
 25 A. I had started at Franklin.

1 Q. Okay. And how was it you came to serve as an  
 2 alter boy; did someone ask you to serve?  
 3 A. No. My mother.  
 4 Q. Okay. She told you you're --  
 5 A. She was very religious.  
 6 Q. Okay. Do you know if she went to one of the  
 7 priests and ask that you serve as an alter boy or how  
 8 did it happen?  
 9 A. I do not know how she did it. All I know I was  
 10 an alter boy.  
 11 Q. Okay. Did anyone train you to be an alter boy?  
 12 One of the priests, did they show you what you had to  
 13 do?  
 14 A. Yeah.  
 15 Q. Who?  
 16 A. Father [REDACTED].  
 17 Q. Father [REDACTED] did, okay. Did you ever serve  
 18 as an alter boy for Father Kelly?  
 19 A. He was there. Never, no.  
 20 Q. Okay.  
 21 A. He might have been his associate but I do not  
 22 recall if he was. I didn't know. I was too young to  
 23 know what associate was at that time.  
 24 Q. Right, right. Do you remember at some point  
 25 Father Kelly leaving Santa Barbara for a few years?

1 A. No.  
 2 Q. Okay. Do you remember at some point Father  
 3 [REDACTED] left and Father Kelly became the pastor?  
 4 A. Yes, I do.  
 5 Q. Okay. Do you recall what year -- at some point  
 6 did you meet Father Kelly?  
 7 A. Yes.  
 8 Q. What year do you think that was? How old do  
 9 you think you were?  
 10 A. I can't give you that year because I don't  
 11 remember.  
 12 Q. Were you attending school at Franklin?  
 13 A. Yes.  
 14 Q. Okay. Did you know one of Father Kelly's  
 15 assistants or associates, did you know Father [REDACTED]?  
 16 [REDACTED]?  
 17 A. Yes.  
 18 Q. Do you remember when he was first assigned to  
 19 Our Lady?  
 20 A. No, I don't.  
 21 Q. Okay. How long -- did you attend mass at Our  
 22 Lady from the time your, Mrs. [REDACTED] first took you up  
 23 until you started junior high or until you started high  
 24 school? How long did it last do you think?  
 25 A. I started attending Sunday masses every Sunday

1 up to junior high.  
 2 Q. Through junior high?  
 3 A. Yeah. My first year of junior high.  
 4 Q. In your second year of junior high did you  
 5 stop?  
 6 A. Yes.  
 7 Q. Okay. So I understand, you attended mass at  
 8 Our Lady until, all the way through seventh grade at  
 9 Santa Barbara Junior High; is that correct?  
 10 A. Yeah.  
 11 Q. Okay. And then, in eighth grade you stopped  
 12 attending mass at Our Lady?  
 13 A. Yeah.  
 14 Q. Do you remember at some point Father [REDACTED]  
 15 being introduced as a new priest?  
 16 A. Yes.  
 17 Q. Okay. Do you remember, was that before you  
 18 were in junior high or during that seventh grade year in  
 19 junior high?  
 20 A. Before.  
 21 Q. Okay. And at some point did you get to know  
 22 Father [REDACTED]?  
 23 A. Yes, I did.  
 24 Q. How did that happen?  
 25 A. Started a club called the Blue Jacket Club.

1 Q. Okay. And did you become a member of the Blue  
 2 Jackets?  
 3 A. Yes, I did.  
 4 Q. Do you recall, were you in Franklin or were you  
 5 at the junior high when you became a Blue Jackets, a  
 6 member of the Blue Jackets?  
 7 A. I think it might have been last year, fifth or  
 8 sixth grade Franklin School.  
 9 Q. Okay. And how did you become a member of the  
 10 Blue Jackets? Did you ask if you could join or did  
 11 someone invite you or --  
 12 A. No, because all my friends were in there and I  
 13 decided I wanted to get in there with them.  
 14 Q. Okay. So, did you go and ask Father [REDACTED]  
 15 or Father Kelly or somebody if you could join?  
 16 A. I asked Father [REDACTED].  
 17 Q. Okay. Do you remember if Father Kelly was  
 18 involved in the Blue Jackets Club?  
 19 A. Yes he was too. They both were.  
 20 Q. Okay. And when you asked Father [REDACTED] if  
 21 you could be in the Blue Jackets Club, what did he say  
 22 to you?  
 23 A. What was that again?  
 24 Q. When you asked Father [REDACTED] if you could  
 25 join the Blue Jackets Club, did he just say yes or what

1 did he say to you?  
 2 A. He said yes.  
 3 Q. Okay. Was there any kind of -- did he ask you  
 4 how old you were or was there any kind of application  
 5 process to join the Club?  
 6 A. No.  
 7 Q. He just said you're in and that was it?  
 8 A. Uh-huh.  
 9 Q. Is that a yes?  
 10 A. Yes.  
 11 Q. Okay. So, did you wear a blue jacket?  
 12 A. No, I didn't get one yet.  
 13 Q. Okay. At some point did you get one?  
 14 A. No.  
 15 Q. Never got one. What kind of things -- how many  
 16 boys were in the Blue Jackets Club when you were in the  
 17 Blue Jackets?  
 18 A. Ten.  
 19 Q. Okay.  
 20 A. But there were other kids, I don't remember  
 21 their names.  
 22 Q. Okay. Do you remember any of the names of the  
 23 kids who were in the Blue Jackets Club with you?  
 24 A. Yes.  
 25 Q. Who were there?

1 A. They weren't all my friends.  
 2 Q. Can you remember any of their names.  
 3 A. There was [REDACTED].  
 4 Q. Okay. Isn't that -- there was another [REDACTED]  
 5 [REDACTED]?  
 6 A. There was another [REDACTED].  
 7 Q. Oh, okay.  
 8 A. His brother [REDACTED].  
 9 Q. Okay.  
 10 A. There was a guy named [REDACTED].  
 11 Q. Okay.  
 12 A. [REDACTED].  
 13 Q. Okay.  
 14 A. [REDACTED].  
 15 Q. Okay. Were you related to [REDACTED] [REDACTED]?  
 16 A. Huh?  
 17 Q. Were you related to [REDACTED] [REDACTED]?  
 18 A. Yeah, he was my cousin. Through the foster  
 19 parents.  
 20 Q. Okay.  
 21 A. Not a --  
 22 Q. Not a blood cousin?  
 23 A. Yeah. But I considered him as my true cousin  
 24 because I was raised by them.  
 25 Q. Okay. Do you think you were in the Blue

1 Jackets Club for more than a year?  
 2 A. No, I don't think so, no.  
 3 Q. How long do you think you were in the Blue  
 4 Jackets Club for?  
 5 A. I cannot tell you that because I know I wasn't  
 6 there for a whole year.  
 7 Q. Okay. What kind of things did you do in the  
 8 Blue Jackets Club?  
 9 A. Meetings every week, and sometimes it would go  
 10 to, camping.  
 11 Q. Okay.  
 12 A. During the weekend.  
 13 Q. Okay.  
 14 A. Where I wasn't allowed to go because of my  
 15 foster mother.  
 16 Q. Where were the meetings for the Blue Jackets  
 17 Club held?  
 18 A. Right across the street from the Catholic  
 19 church. They had an auditorium. They would have coffee  
 20 and doughnuts there.  
 21 Q. And do you know if it was called the parish  
 22 hall?  
 23 A. Yeah.  
 24 Q. Do you know where the rectory is for the  
 25 church? Where the priests live? You know, the house

1 where the priests live?  
 2 A. No, it's in back of the priests' house.  
 3 Q. Right.  
 4 A. They have a big auditorium there. And it still  
 5 stands there when I go to Santa Barbara.  
 6 Q. That was, actually, that was my question.  
 7 And so how often would these meetings take  
 8 place; once a week? Once a month?  
 9 A. Yeah, once a week.  
 10 Q. Okay. And who would come to these meetings;  
 11 the members of the Club but who else would come?  
 12 A. Yeah.  
 13 Q. Would Father [REDACTED] come?  
 14 A. Father Kelly did.  
 15 Q. Okay.  
 16 A. Father [REDACTED] was too involved with something  
 17 else. I don't know what it was.  
 18 Q. Okay. So, Father Kelly usually came to the  
 19 meetings?  
 20 A. Yeah.  
 21 Q. And would he supervise the meetings?  
 22 A. Yeah.  
 23 Q. And what would you guys do at the meetings?  
 24 A. Just go and have coffee and doughnuts.  
 25 Q. Okay. And would you play games or sit around

1 and talk?  
 2 A. Yeah, sit around and talk. And I don't recall  
 3 what the conversations were but that's what we did.  
 4 Q. Okay. And then you said there were, did you  
 5 say the Club took camping trips sometimes?  
 6 A. Yeah.  
 7 Q. Who took the Club on camping trips?  
 8 A. Father Kelly.  
 9 Q. And did all the boys go on camping trips?  
 10 A. Not all of them.  
 11 Q. You didn't go; right?  
 12 A. No.  
 13 Q. Because your mom didn't let you go?  
 14 A. No.  
 15 Q. Do you know where they went on the camping  
 16 trips?  
 17 A. What I understand from the other guys, that  
 18 they had a, they had a cabin in the mountains above  
 19 Santa Barbara.  
 20 Q. Okay. Did you have any understanding as to who  
 21 owned that cabin?  
 22 A. I'm not sure who owned it.  
 23 Q. Did anyone ever tell you that Father Kelly  
 24 owned the cabin?  
 25 A. No.

1 Q. Okay. Did they tell you where the cabin was?  
 2 A. No.  
 3 Q. Okay.  
 4 A. Just in the mountains.  
 5 Q. Okay. Do you remember the names of any of the  
 6 boys who went -- who would take them to the cabin?  
 7 A. Father Kelly.  
 8 Q. How do you know Father Kelly took them to the  
 9 cabin?  
 10 A. How do I know that?  
 11 Q. Yes.  
 12 A. Who else would they go with.  
 13 Q. Well, did anyone ever tell you that Father  
 14 Kelly --  
 15 A. They were all kids. They're not going to go by  
 16 themselves.  
 17 Q. They couldn't drive themselves; correct? Did  
 18 anyone ever tell you that Father Kelly took them to the  
 19 cabin?  
 20 A. No.  
 21 Q. Did you ever see anyone get in a car with  
 22 Father Kelly and go to the cabin?  
 23 A. No.  
 24 Q. Okay. But was it your understanding there was  
 25 a Blue Jackets Club camping trip to the cabin?

1 A. Yeah.  
 2 Q. Okay. And were you ever aware of any adult  
 3 taking --  
 4 A. No.  
 5 Q. -- taking the kids to the cabin?  
 6 A. No.  
 7 Q. Okay. And was it your understanding they had  
 8 to drive though to get to the cabin?  
 9 A. I assumed that he, I just assumed that he would  
 10 take them up there. He was in charge of them.  
 11 Q. Okay.  
 12 A. Nobody else was.  
 13 Q. Okay. Have you ever heard of something called  
 14 the St. Mary's Boys Club?  
 15 A. Yes.  
 16 Q. What do you know about the St. Mary's Boys  
 17 Club?  
 18 A. I know it was on the west side of Santa  
 19 Barbara.  
 20 Q. Was Father Kelly involved in that in any way to  
 21 your knowledge?  
 22 A. I don't know. I never been there.  
 23 Q. Okay. Did you know anyone who was a member of  
 24 the St. Mary's Boys Club?  
 25 A. No.

1 Q. Okay. What about, were you ever aware of there  
 2 being some kind of boxing club that Father Kelly was  
 3 involved in?  
 4 A. No.  
 5 Q. Okay. When you were, when you were going to --  
 6 A. I'll tell you why I wasn't there, because I was  
 7 placed in another foster home.  
 8 Q. Okay. When did that happen?  
 9 A. When I was in junior high.  
 10 Q. Was that after seventh grade?  
 11 A. Because, because I got arrested again for --  
 12 yeah, after seventh grade. I got arrested again for  
 13 being out of control, spending, you know, the weekend  
 14 over at a friend's house without telling my foster  
 15 mother.  
 16 Q. Who was your foster mother that second time?  
 17 A. All I knew her name was Mrs. [REDACTED].  
 18 Q. Mrs. [REDACTED]. Do you know how to spell her  
 19 last name?  
 20 A. No, I don't know how to spell that. Italian  
 21 name is all I can tell you.  
 22 Q. Okay. Did you have a stepfather at that new  
 23 home?  
 24 A. It was not a stepfather.  
 25 Q. I'm sorry, a foster father.

1 A. Yeah.  
 2 Q. And what was his name?  
 3 A. Mr. [REDACTED].  
 4 Q. Okay. All right. And did you go to live with  
 5 them during seventh grade or during eighth grade?  
 6 A. Eighth grade.  
 7 Q. Okay. Were there any other foster kids living  
 8 with them when you moved in with them?  
 9 A. Yes.  
 10 Q. Who was that?  
 11 A. I can't remember their name. There were three  
 12 other kids. All I remember, one, his name was [REDACTED]  
 13 [REDACTED].  
 14 Q. Is he still alive do you know?  
 15 A. I beg your pardon?  
 16 Q. Do you know if he's still alive, [REDACTED]  
 17 [REDACTED]?  
 18 A. I haven't heard.  
 19 Q. Do you know where he is now?  
 20 A. I don't know if he is or not.  
 21 Q. Okay. When was the last time you spoke to him;  
 22 long time ago?  
 23 A. Long time ago.  
 24 Q. Okay. And while you were living with the  
 25 [REDACTED] you were arrested again for being out of

1 control?  
 2 A. While I was -- I ran away from there.  
 3 Q. Okay. So, you ran away from the [REDACTED].  
 4 And you think that was eighth grade?  
 5 A. Yes.  
 6 Q. Why did you run away from the [REDACTED]?  
 7 A. Because Mrs. [REDACTED] was abusive, was hitting  
 8 me with a TV antenna, radio antenna. I still have the  
 9 scars showing, right here on my lip.  
 10 Q. Really.  
 11 A. She would whip me with it. And, and her  
 12 husband was trying to make me play with myself in the  
 13 shower.  
 14 Q. So, he was sexually abusing you?  
 15 A. Yeah. Well --  
 16 Q. He tried?  
 17 A. He tried.  
 18 Q. And you think that was your eighth grade year  
 19 at Santa Barbara Junior High?  
 20 A. Yes.  
 21 Q. Okay. Do you remember there being a convent  
 22 next to Our Lady when you were attending church and  
 23 school there, a convent of nuns? Let me strike that.  
 24 Let me ask it like this: Do you remember there  
 25 being some nuns who lived at or near Our Lady of

1 Guadalupe when you were attending church there?  
 2 A. You mean -- I don't understand that question.  
 3 Q. Do you remember there being any nuns who lived  
 4 either -- let me -- I'll back up again.  
 5 Do you remember ever seeing nuns at Our Lady of  
 6 Guadalupe?  
 7 A. Yes.  
 8 Q. Where would you see nuns?  
 9 A. At school. Before I was taken out of that  
 10 school.  
 11 Q. So, were they on the faculty? Were they  
 12 teachers?  
 13 A. Yeah.  
 14 Q. Was one of them a principal?  
 15 A. Yes. And I can't remember her name. I hated  
 16 her. She used to hit me.  
 17 Q. Okay. Do you remember -- did those, did those  
 18 nuns, while you were at school, did they all speak  
 19 Spanish?  
 20 A. No.  
 21 Q. Did any of them speak Spanish?  
 22 A. No.  
 23 Q. Do you remember there being some nuns though  
 24 that did speak Spanish who didn't teach at the school?  
 25 A. All I remember, as far as I remember, I was

1 taken out of that school because nobody -- I couldn't  
 2 communicate with any of them.  
 3 Q. Okay.  
 4 A. Because I was taught Spanish.  
 5 Q. Okay. Do you remember there being any nuns who  
 6 lived nextdoor to Our Lady who could keep Spanish?  
 7 A. Yeah.  
 8 Q. What do you remember about them?  
 9 A. All I remember that they had a little house  
 10 next to the church, that nuns lived there.  
 11 Q. Okay. So, if we were looking at the church,  
 12 would the house be to the left of the church?  
 13 A. Like if it -- it would be --  
 14 Q. So let me ask, so, if we're standing in the  
 15 street and we're looking at the church, was that nuns  
 16 house right to the left nextdoor to the church?  
 17 A. Yeah.  
 18 Q. Do you remember seeing any of those nuns at the  
 19 school?  
 20 A. No.  
 21 Q. Okay. How --  
 22 A. I'm not -- I wouldn't recognize anybody if I  
 23 did.  
 24 Q. How was it you were aware that there were nuns  
 25 living in that house next to the school?

1 A. Because I would go by there when I would go to  
 2 church in the morning with my mother.  
 3 Q. Okay. You would see the nuns going into the  
 4 convent at the house?  
 5 A. Yeah.  
 6 Q. Would you ever see those nuns at the church,  
 7 not the school but the church?  
 8 A. Yes.  
 9 Q. The ones that speak Spanish.  
 10 A. Yes.  
 11 Q. What would you see them doing at the church?  
 12 A. Singing.  
 13 Q. Okay. Attending mass?  
 14 A. Up above on the balcony.  
 15 Q. Okay. Would you ever see them anywhere else at  
 16 Our Lady of Guadalupe?  
 17 A. I could not tell you that because I did not  
 18 look at those nuns. I didn't know what they looked like  
 19 but I know they were nuns.  
 20 Q. Okay. Did you ever know a Sister [redacted], a  
 21 Sister [redacted], does that name sound familiar to you at  
 22 all?  
 23 A. No.  
 24 Q. How about a Sister [redacted]?  
 25 A. That name sounds familiar.

1 Q. Do you remember why?  
 2 A. I don't remember her.  
 3 Q. Okay. Do you know what the name of those nuns  
 4 who lived next to the church were; does the Sisters of  
 5 Bethany sound familiar to you at all?  
 6 A. No, it doesn't.  
 7 Q. What about the names of the nuns who worked at  
 8 the school, do you know, does the Sisters of Notre Dame  
 9 sound familiar?  
 10 A. No.  
 11 Q. No, okay.  
 12 A. I'll tell you, I was taken out of that school.  
 13 Q. Right.  
 14 A. Because I didn't understand. I didn't stay at  
 15 that school very long. I know there was nuns there but  
 16 I didn't know if they worked at the school, teacher or  
 17 what. But I knew they were there.  
 18 Q. Okay. All right. Did you ever, when you were  
 19 a kid, did you ever visit the rectory where the priests  
 20 lived?  
 21 A. That house?  
 22 Q. Yes.  
 23 A. The priests' house?  
 24 Q. Yes.  
 25 A. Yes.

1 Q. Okay. And how was it you came to visit the  
 2 rectory where the priests lived?  
 3 A. When I go talk to Father [redacted], borrowed  
 4 money from him.  
 5 Q. Okay. And do you remember when you would go do  
 6 that, would you go in through the front door of the  
 7 rectory or would you go in through the backdoor?  
 8 A. Front door.  
 9 Q. And when you would go to go into the rectory,  
 10 would you knock first or would you ring a bell?  
 11 A. Ring the bell.  
 12 Q. Okay. And would somebody usually answer the  
 13 door or would you just go in?  
 14 A. There would be a lady that works for them.  
 15 Q. Okay.  
 16 A. I don't remember her name.  
 17 Q. Okay. Do you remember, was she a secretary or  
 18 a housekeeper?  
 19 A. Housekeeper.  
 20 Q. Okay. And so when she would answer the door --  
 21 did you do this more than once?  
 22 A. Me?  
 23 Q. Yeah.  
 24 A. Yeah.  
 25 Q. Okay. How many times do you think you went

1 inside the rectory to see Father [REDACTED]?

2 A. I can't, I couldn't count to how many times.

3 Q. Were there many times?

4 A. Quite a few times.

5 Q. More than ten?

6 A. No. Yeah, you could say that.

7 Q. More than twenty?

8 A. No.

9 Q. Okay. So, less than twenty?

10 A. Less than twenty.

11 Q. Okay. And when you would go in, when you'd

12 ring the bell and she would let you in, would she take

13 you to Father [REDACTED] or would Father [REDACTED] come to

14 you?

15 A. He would come to me.

16 Q. Okay. And where would you guys meet usually?

17 A. In his office.

18 Q. And would that be on the first floor?

19 A. The first floor, to your left.

20 Q. So, when you'd walk in the door his office

21 would be to your left?

22 A. Yeah.

23 Q. Did you ever meet with Father Kelly in the

24 rectory?

25 A. I never talked to him.

1 Q. Okay. You never talked to Father Kelly?

2 A. No.

3 Q. Did you ever, did you ever go upstairs to

4 Father [REDACTED]'s room?

5 A. No.

6 Q. Okay. Do you remember there being any, a

7 janitor at the rectory?

8 A. A what?

9 Q. A janitor. Somebody who cleaned the rectory

10 or, you know.

11 A. I don't recall seeing him.

12 Q. Okay. Did you ever know someone named [REDACTED]

13 [REDACTED]?

14 A. Yes, I did.

15 Q. Do you remember him spending time at the

16 rectory while you were there?

17 A. Not that I can recall.

18 Q. Okay. How do you know [REDACTED]?

19 A. School.

20 Q. From Franklin and Santa Barbara --

21 A. Yeah.

22 Q. Santa Barbara Junior High?

23 A. Yeah.

24 Q. Do you remember seeing him anywhere at Our Lady

25 of Guadalupe?

1 A. Yeah.

2 Q. He would hang out there?

3 A. As a matter of fact, that's one of the guys

4 that was in the Club too.

5 Q. In the Blue Jackets Club?

6 A. Yeah.

7 Q. Okay.

8 A. Now that you mention his name. I know so many

9 people in Santa Barbara, I forget their name. Even

10 today.

11 Q. I believe it. What about when you -- were you

12 aware, did you know that there was a cook or a

13 housekeeper in the rectory where the priests lived?

14 A. That lady was, cooked dinners for the priests,

15 all the priests that lived there.

16 Q. Okay. How did you know that? Did you know her

17 name?

18 A. No, I don't.

19 Q. Okay. How did you know that she was cooking

20 dinner for them?

21 A. That was her job.

22 Q. Okay. Do you remember if there was any kind of

23 maintenance person for the rectory?

24 A. No.

25 Q. Somebody who worked on problems at the rectory?

1 A. No.

2 Q. You don't remember?

3 A. No, don't remember.

4 Q. Did you ever come into the rectory any way

5 other than through the front door?

6 A. No.

7 Q. Were you aware there was a backdoor to the

8 rectory?

9 A. Yes.

10 Q. How did you know there was a backdoor to the

11 rectory?

12 A. Because the backdoor goes right to the, to the

13 auditorium that they have there, behind there.

14 Q. Okay. So, sometimes would you leave the

15 rectory by going through that backdoor to go to the

16 parish hall?

17 A. The priests go back through there.

18 Q. Did you ever go back through there with Father

19 [REDACTED]?

20 A. No.

21 Q. Did you ever go back through there by yourself?

22 A. No.

23 Q. How did you know about it?

24 A. Because --

25 MS. YOUNG: Objection; asked ask and answered.

1 THE WITNESS: -- when we had meetings there we  
 2 would be on that side of the auditorium and you could  
 3 see.  
 4 Q. BY MR. HALE: So, you could see the priests  
 5 come out the door?  
 6 A. Yeah. You could hear them coming out the  
 7 backdoor.  
 8 Q. Okay. Did you ever, did you ever have dinner  
 9 at the rectory with Father [REDACTED]?  
 10 A. No, never.  
 11 Q. Okay. Did you ever have any meals at the  
 12 rectory?  
 13 A. No.  
 14 Q. Did they ever give you any kind of food at the  
 15 rectory?  
 16 A. No.  
 17 Q. Okay. When you were attending school at Our  
 18 Lady of Guadalupe do you ever remember any of the  
 19 priests teaching any classes?  
 20 A. No.  
 21 Q. Okay. Do you remember, was there a secretary  
 22 at the school when you attended Our Lady of Guadalupe?  
 23 A. I don't recall.  
 24 Q. Okay. Do you remember who the principal was?  
 25 A. She was a nun.

1 Q. But you don't remember her name?  
 2 A. I don't remember her name.  
 3 Q. Okay. Do you remember the names of any of your  
 4 teachers at Our Lady of Guadalupe?  
 5 A. No.  
 6 Q. Okay. Was there a cafeteria --  
 7 A. How can a Spanish person, kid, know the  
 8 teacher's name?  
 9 Q. I understand. Was there a cafeteria at Our  
 10 Lady of Guadalupe?  
 11 A. No.  
 12 Q. So, you brought your own lunch to school?  
 13 A. Yes.  
 14 Q. And I take it since you were so young you  
 15 didn't play on any sports teams while you were at Our  
 16 Lady of Guadalupe?  
 17 A. There?  
 18 Q. Right.  
 19 A. No.  
 20 Q. Were you ever aware of there being a basketball  
 21 team for the parish, not the school but for the parish?  
 22 A. I hate basketball.  
 23 Q. Okay. But did you --  
 24 A. I know they played basketball. I would sit  
 25 there and watch them.

1 Q. Okay. Do you remember who the coach was?  
 2 A. I think it was Father Kelly.  
 3 Q. Okay. Do you remember seeing Father Kelly at  
 4 some of the basketball games?  
 5 A. Yeah.  
 6 Q. Did you ever go to any of Our Lady of  
 7 Guadalupe's touch football games?  
 8 A. No.  
 9 Q. Okay. When you went into the rectory, did you  
 10 ever go anywhere other than to Father [REDACTED]'s office?  
 11 A. No.  
 12 Q. Okay. So, every time you met with Father  
 13 [REDACTED] it was in his office?  
 14 A. Yes.  
 15 Q. Okay. Do you remember what his office looked  
 16 like?  
 17 A. No.  
 18 Q. Did he have a desk in it?  
 19 A. Today I could not tell you that.  
 20 Q. Okay. Did you ever go into the rectory with  
 21 any of your friends?  
 22 MS. YOUNG: Objection; asked and answered.  
 23 THE WITNESS: Yes.  
 24 Q. BY MR. HALE: And how would that come about?  
 25 A. When I was going to go to baptize someone.

1 Q. Into the rectory?  
 2 A. Yeah.  
 3 Q. Who would you bring with you for that?  
 4 A. Father Kelly.  
 5 Q. But what about your friends though? Do you  
 6 understand when I say "rectory" I mean where the priests  
 7 live.  
 8 A. I was already older when I went there, when I  
 9 went there with my friends.  
 10 Q. To the rectory?  
 11 A. To baptize one of my parents' daughters.  
 12 Q. So, when you say older, how old?  
 13 A. That's the only time I gone there with a  
 14 friend.  
 15 Q. How old do you think you were; over the age of  
 16 18?  
 17 A. I was already in late 20s. Early 20s.  
 18 Q. Okay. Okay.  
 19 A. Not, I never went there with any of my friends  
 20 when I was young.  
 21 Q. Okay. Before you turned 18 did you ever hear  
 22 about any boys going up to the second floor of the  
 23 rectory?  
 24 A. Going where?  
 25 Q. To the second, where the priests lived, the

1 upstairs part of the rectory.  
 2 A. No.  
 3 Q. Okay.  
 4 A. If they did they didn't tell me.  
 5 Q. Okay. Did you ever see any alcohol in the  
 6 rectory where the priests live?  
 7 A. No.  
 8 Q. Did you ever see Father Kelly drinking any  
 9 alcohol in the rectory?  
 10 A. No.  
 11 Q. Was there ever any time where you smelled  
 12 alcohol on Father Kelly's breath?  
 13 A. No.  
 14 Q. Did you ever hear anyone talking about Father  
 15 Kelly having a drinking problem?  
 16 A. No.  
 17 Q. Okay.  
 18 A. I think they all do.  
 19 Q. Why do you say that?  
 20 A. Why do I say that?  
 21 Q. Yeah.  
 22 A. Because I run a Catholic house and I have a  
 23 Catholic priest in my house that is a recovering  
 24 alcoholic. When they have a service, he used to have  
 25 service in L.A., tell me stories about put vodka in

1 things. So, that's the reason why I say that. When  
 2 you tell me that, that was an at early age. I didn't  
 3 know nothing about alcoholic, what they smelled like or  
 4 whatever. Doesn't that make sense to you?  
 5 Q. Yep. Absolutely. Let me ask you the names of  
 6 a couple other priests and see if they sound familiar to  
 7 you at all.  
 8 A. Okay.  
 9 Q. Do you remember a Father [redacted], [redacted]  
 10 [redacted]?  
 11 A. What's that?  
 12 Q. [redacted], do you remember him, a priest of  
 13 that name at Our Lady?  
 14 A. What's his name?  
 15 Q. [redacted], [redacted]. I'm probably  
 16 mispronouncing it.  
 17 A. No.  
 18 Q. What about [redacted] [redacted]?  
 19 A. No.  
 20 Q. [redacted] or [redacted]?  
 21 A. No.  
 22 Q. [redacted] [redacted]?  
 23 A. Those aren't names that don't ring a bell.  
 24 Q. How about [redacted] [redacted] [redacted]?  
 25 A. No.

1 Q. How about [redacted] [redacted]?  
 2 A. No.  
 3 Q. Okay.  
 4 A. Let me remind you that I'm hard about names.  
 5 Q. I'll speak up. How about Father [redacted] [redacted]?  
 6 A. No.  
 7 Q. And I'm just asking to see if you knew these  
 8 guys.  
 9 A. No.  
 10 Q. If you don't, that's fine.  
 11 A. Here I am 63 years you expect me to have a good  
 12 clear memory of all those people's names?  
 13 Q. No.  
 14 A. That's 50 years ago.  
 15 Q. I have no expectation at all.  
 16 How about Father [redacted] [redacted], does that name  
 17 sound familiar to you at all?  
 18 A. No.  
 19 Q. Okay. Do you remember a priest named [redacted]  
 20 [redacted] or [redacted] [redacted]?  
 21 A. No.  
 22 Q. Do you remember a guy who was a, training to be  
 23 a priest, living at the rectory during the summers  
 24 around '58 and '59?  
 25 A. I didn't know his name. I seen somebody like

1 that.  
 2 Q. Okay.  
 3 A. But he wasn't dressed like a priest.  
 4 Q. He was training to be a priest. Do you  
 5 remember somebody who was just staying there for the  
 6 summer?  
 7 A. I didn't know his name.  
 8 Q. Do you remember him living at the rectory  
 9 though?  
 10 A. Yeah, I saw him at the auditorium.  
 11 Q. At the parish hall?  
 12 A. Yeah.  
 13 Q. Okay. And did someone tell you that he was  
 14 training to be a priest?  
 15 A. No.  
 16 Q. How do you know he was training to be a priest?  
 17 A. Because -- I didn't know he was training as a  
 18 priest.  
 19 Q. Okay. Did you see that he was living at the  
 20 rectory?  
 21 A. I don't know if he was living there or not.  
 22 Q. Okay.  
 23 A. I never saw him.  
 24 Q. Did somebody, when you were at the parish hall  
 25 did somebody tell you about him?

1 A. No.  
 2 Q. How do you remember this guy?  
 3 A. Because I saw him with one of the priests. I  
 4 don't know which one.  
 5 Q. Okay. And this was in the late 1950s?  
 6 A. Going there for help or something. I didn't  
 7 know he was studying for no priest. But I did see  
 8 somebody like that.  
 9 Q. Did you remember hearing him have a funny  
 10 accent?  
 11 A. No. I never paid attention to how people  
 12 talked, what kind of -- if somebody talked to me I know  
 13 it's an accent.  
 14 Q. Okay. You said there was another [REDACTED]  
 15 [REDACTED]?  
 16 A. Yeah.  
 17 Q. Do you know where he lives now?  
 18 A. In Santa Barbara somewhere.  
 19 Q. Okay. When was the last time you talked to  
 20 him?  
 21 A. I can't -- while back. Long time ago.  
 22 Q. Was he the same age as you?  
 23 A. No. I'm older than he is.  
 24 Q. Okay. Did you ever --  
 25 A. He lived at Ladero Street in Santa Barbara but

1 I don't know if he still lives there or moved out or  
 2 what.  
 3 Q. Okay. Did you ever know a priest named [REDACTED]  
 4 [REDACTED]?  
 5 A. [REDACTED] who?  
 6 Q. [REDACTED]  
 7 A. No.  
 8 Q. No, okay.  
 9 A. The only two priests that I know, three  
 10 priests, that I knew, don't ask me about no other  
 11 priests; Father [REDACTED], Father Kelly and Father  
 12 [REDACTED]. And that's it.  
 13 Q. Okay. Fair enough.  
 14 A. Except I had contact with them more than the  
 15 other priests, whoever you're talking about.  
 16 Q. Let me ask you one more, okay, let me see if I  
 17 can refresh. Do you remember a priest coming from  
 18 Mexico named Father [REDACTED], does that sound  
 19 familiar to you?  
 20 A. That's the priest that took over the parish.  
 21 Q. Father [REDACTED]?  
 22 A. He was a Mexican guy but I didn't know if that  
 23 was his name. Must be him.  
 24 Q. Okay.  
 25 A. He taught Spanish.

1 Q. Okay. Do you ever remember seeing Father Kelly  
 2 with a camera?  
 3 A. No.  
 4 Q. Did you ever hear anyone say that they saw  
 5 Father Kelly taking pictures?  
 6 A. No. Not going to say yes if I don't know.  
 7 Q. And I don't want you to. You're under oath, I  
 8 want you to tell what you remember.  
 9 When you were attending, when you were  
 10 attending church and school at Our Lady, was it common  
 11 or uncommon for you to see teenage boys hanging around  
 12 with Father Kelly?  
 13 MS. YOUNG: Objection; calls for speculation.  
 14 THE WITNESS: I do not pay attention to that.  
 15 Q. BY MR. HALE: Okay.  
 16 A. Let me remind you again, I was a kid.  
 17 Q. I know.  
 18 A. Who, what kid pays attention to something like  
 19 that?  
 20 Q. I understand that.  
 21 A. Maybe now if I saw something like that, then  
 22 I'd be aware of it. But at that age, come on.  
 23 MS. YOUNG: Second grade.  
 24 Q. BY MR. HALE: But you continued attending mass  
 25 and being a member of the Blue Jackets up until junior

1 high; right?  
 2 A. Uh-huh.  
 3 Q. Is that a yes?  
 4 A. Yes.  
 5 Q. Okay. What time of day would the Blue Jackets  
 6 Club meet; would that be in the afternoon after school?  
 7 A. I know it was nighttime.  
 8 Q. It was at nighttime?  
 9 A. Yes.  
 10 Q. Okay.  
 11 A. Maybe 7:00, 8:00 o'clock at night.  
 12 MR. HALE: All right, let's take a little  
 13 break.  
 14 THE WITNESS: Yes. I need to go to the  
 15 bathroom.  
 16 MR. HALE: Sure.  
 17 THE VIDEOGRAPHER: We're going off the record  
 18 at 11:21.  
 19 (A recess was taken.)  
 20 THE VIDEOGRAPHER: We are back on the record at  
 21 11:29.  
 22 Q. BY MR. HALE: Mr. [REDACTED], you understand you're  
 23 still under oath?  
 24 A. Yes.  
 25 Q. Okay. You talked earlier about sometimes you

1 would go see Father [REDACTED] for counseling or you --  
 2 MS. YOUNG: Objection.  
 3 Q. BY MR. HALE: You would meet with Father  
 4 [REDACTED] sometimes?  
 5 A. I didn't hear that.  
 6 Q. Correct me if I'm wrong, but didn't you say  
 7 earlier that there were points, there were times, where  
 8 you went into the rectory and you met with Father  
 9 [REDACTED]?  
 10 A. Yes.  
 11 Q. In his office?  
 12 A. Yes.  
 13 Q. What kinds of things would you discuss in his  
 14 office?  
 15 A. Like I said, I went over there to borrow some  
 16 money.  
 17 Q. Okay. Anything else?  
 18 A. That's it.  
 19 Q. How was it you came to understand that he would  
 20 lend you money?  
 21 A. What's that?  
 22 Q. How did that happen? How was it that he came  
 23 to lend you money?  
 24 A. Because I told him because I was living in a  
 25 foster parent and the foster parent wasn't treating me

1 like a normal other kid. I didn't have a real mother to  
 2 where I could reach out to.  
 3 Q. So you talked to him about what your life was  
 4 like at home?  
 5 A. Yeah.  
 6 Q. Did you talk to him about Mrs. [REDACTED]?  
 7 A. Yes.  
 8 Q. Did you talk to him about the [REDACTED]?  
 9 A. The what?  
 10 Q. The [REDACTED], Mr. and Mrs. [REDACTED], the new  
 11 family.  
 12 A. Not there.  
 13 Q. Somewhere else?  
 14 A. Yeah. When I ran away from [REDACTED].  
 15 Q. Okay. Where did you talk to him about the  
 16 [REDACTED]?  
 17 A. As a matter of fact, when I ran away from that  
 18 foster home I went straight up to where Channel 3 is  
 19 now.  
 20 Q. Okay.  
 21 A. Up on top of that hill in Santa Barbara. There  
 22 was an old farming thing and I stood up there all night  
 23 long.  
 24 Q. Okay. And then did they arrest you there  
 25 eventually?

1 A. No, I came back down that hill and went over to  
 2 my friend, [REDACTED], the other [REDACTED].  
 3 Q. Got it.  
 4 A. I think you got the wrong person in here for  
 5 that. That's the person you need to talk to because he  
 6 was in the Blue Jackets, he went to those camping  
 7 grounds.  
 8 Q. He went to the cabin with Father Kelly?  
 9 A. Yes.  
 10 Q. How do you know that; did he tell you that?  
 11 A. Yes, he did.  
 12 Q. Okay. Did you talk to Father [REDACTED], or,  
 13 sorry, Father [REDACTED] somewhere other than the rectory  
 14 and his office?  
 15 A. Yeah.  
 16 Q. Where?  
 17 A. When I ran away from home I went over to  
 18 Anthony Romero's house and him and his brother hid me in  
 19 a little house that was behind the regular house that  
 20 they live in with their parents. And I stayed in there  
 21 for about two weeks without coming out of that little  
 22 house because I was afraid.  
 23 Q. What were you afraid of?  
 24 A. What was I afraid of?  
 25 Q. Yes.

1 A. Going back to that [REDACTED] house.  
 2 Q. Because of what the foster father had tried to  
 3 do to you?  
 4 A. And the foster mother.  
 5 Q. Okay.  
 6 A. A guy named [REDACTED], I forget his last name, but  
 7 he came to visit me there.  
 8 Q. Okay. Now, this is eighth grade you said;  
 9 right?  
 10 A. Yes.  
 11 Q. Okay. So, [REDACTED] comes and visits you.  
 12 A. And he -- I told him everything about what was  
 13 going on, why I was there, why I ran away from the  
 14 [REDACTED]. So, he said for me to talk to Father  
 15 [REDACTED].  
 16 Q. [REDACTED] told you that?  
 17 A. He told me that.  
 18 Q. So, did you talk --  
 19 A. Because he was involved with the Catholic  
 20 parish.  
 21 Q. Okay. And did you talk to Father [REDACTED]?  
 22 A. He brought him over.  
 23 Q. Oh, he brought Father [REDACTED] to you?  
 24 A. Yes.  
 25 Q. Okay. And so did you talk to Father [REDACTED]

1 when he brought him over?

2 A. Yeah, and I told Father [REDACTED] everything  
3 about the [REDACTED].

4 Q. So, did you tell Father [REDACTED] about the  
5 foster father trying to sexually assault you?

6 A. Yes.

7 Q. And did you tell Father [REDACTED] about the  
8 foster mother physically abusing you?

9 A. Yes.

10 Q. And what did Father [REDACTED] say?

11 A. Well, he wanted me to go -- he was going to  
12 help me out.

13 Q. How was he going to help you out?

14 A. Go and go, I was going to go, went to Juvenile  
15 Hall and he was going to go and talk to the judge about  
16 my situation. But the [REDACTED] said that if I,  
17 whoever ran away from his house, ends up going to either  
18 boys camp or youth authority. So, I end up going back  
19 to my mother's house after Father [REDACTED] talked to a  
20 judge I guess.

21 Q. Okay. But let's back up for a second. At some  
22 point were you caught and did you end up in Juvenile  
23 Hall?

24 A. Yeah.

25 Q. Okay. And then, was there some sort of --

1 A. I got out of Juvenile Hall within two days.

2 Q. Was there some kind of hearing where Father  
3 [REDACTED] talked to the judge or testified?

4 A. I'm pretty sure he did because I got to go  
5 home.

6 Q. But did he ever tell you that he went and  
7 talked to the judge?

8 A. Yeah.

9 Q. What did he say he told the judge?

10 A. What I had talked to him about.

11 Q. So, he told you that he told the judge about  
12 how the Jakamottis were treating you?

13 A. He didn't tell me that. I think he did tell  
14 him that.

15 Q. Okay. Why do you think that; are you just  
16 guessing?

17 A. Because I didn't go, I didn't go back to  
18 [REDACTED]. The Court ordered to go back to my original  
19 foster mother.

20 Q. Okay. So, it's safe to say you were pretty  
21 grateful to Father [REDACTED] for helping you?

22 A. Yeah.

23 Q. And you trusted Father [REDACTED]?

24 A. Yeah.

25 Q. Okay. All right. And so what happened next;

1 you went back to Mrs. [REDACTED]'s house?

2 A. Yeah.

3 Q. And you didn't live with the [REDACTED] any  
4 longer?

5 A. No.

6 Q. Do you remember there being any kind of court  
7 hearing though where you were released from Juvenile  
8 Hall?

9 A. Yes.

10 Q. And did Father [REDACTED] come and testify at  
11 that hearing?

12 A. No. Not like a regular court.

13 Q. Did you ever see Father [REDACTED] come and talk  
14 to the judge?

15 A. No.

16 Q. Okay.

17 A. But I'm pretty sure he did. That's how I got  
18 back home.

19 Q. Why are you pretty sure he did? I'm not  
20 questioning, I'm not doubting, I want to know what the  
21 basis is.

22 A. By the simple fact that I was able to go back  
23 to my original, the judge said you're released to your  
24 original foster parent.

25 Q. And did the judge say that he had spoken to

1 Father [REDACTED]?

2 A. No.

3 Q. Now, before you went to Juvenile Hall did  
4 Father [REDACTED] tell you he would go speak to the judge?

5 A. Yeah.

6 Q. And did he tell you he was going to tell the  
7 judge what you had told him about the [REDACTED]?

8 A. Yes.

9 Q. Okay. Did you ever talk to Father [REDACTED]  
10 about Father Kelly?

11 A. When he came to see me, yes.

12 Q. You mean when you had run away?

13 A. Yes.

14 Q. What did you tell him about Father Kelly?

15 A. I told him that, that I think that Father  
16 Landreau was taking kids --

17 Q. That Father Kelly or Father --

18 A. Father Kelly was taking kids to camping ground  
19 and doing funny things and Father [REDACTED] said do you  
20 have any proof, I said no.

21 Q. So, you told Father [REDACTED] that Father Kelly  
22 was taking kids camping?

23 A. Yeah.

24 Q. Yes?

25 A. Because he asked me how come I didn't want to

1 go to camping grounds and I said because I've been  
 2 hearing a lot of weird things about that, Father, and I  
 3 don't want nothing to do with it.  
 4 Q. Okay. And did you tell him that you heard that  
 5 Father Kelly was taking kids to the cabin?  
 6 A. Yeah.  
 7 Q. Okay. And you said, you said, you told him  
 8 that Father Kelly had been doing weird things to kids?  
 9 A. Yeah.  
 10 Q. Did you tell him what kind of weird things?  
 11 A. I just, I don't know what kind of weird things,  
 12 just weird things.  
 13 Q. Did you talk to, did you tell Father [REDACTED]  
 14 that Father Kelly had been touching boys  
 15 inappropriately?  
 16 A. Yeah.  
 17 Q. Okay. Did you tell Father [REDACTED] that Father  
 18 Kelly had been sexually assaulting boys?  
 19 A. I didn't say that.  
 20 Q. You didn't say "sexual assault"?  
 21 A. No. Just touching them, doing things to them,  
 22 that's it.  
 23 Q. Okay. Did you tell him what kind of things?  
 24 A. No.  
 25 Q. Did you ever tell Father [REDACTED] that Father

1 Kelly had been paying the boys money?  
 2 A. I just made Father [REDACTED] aware of what that  
 3 Father was doing. That's it.  
 4 Q. Okay.  
 5 A. No more.  
 6 Q. Did you tell Father [REDACTED] that Father Kelly  
 7 had been paying the boys money?  
 8 A. I did not know that.  
 9 Q. Okay.  
 10 A. No.  
 11 Q. Okay. How did you hear about Father Kelly  
 12 touching the boys inappropriately?  
 13 A. From other kids, and I still don't remember.  
 14 I've been trying, ever since I was talked to about this  
 15 case, I've been trying to remember who, who told me  
 16 that.  
 17 Q. Okay.  
 18 A. But someone did.  
 19 Q. Do you think it was [REDACTED], the other  
 20 [REDACTED]?  
 21 A. No. I would have remembered that because he  
 22 was one of my best friends.  
 23 Q. Okay. Where were you when you talked to Father  
 24 [REDACTED] about Father Kelly?  
 25 A. In that little cabin.

1 Q. You mean in the little house behind the house?  
 2 A. Yeah, yeah, where I ran away.  
 3 Q. Was there anyone else there?  
 4 A. No, just me and him.  
 5 Q. Was it daytime or nighttime?  
 6 A. It, I believe it was in the evening, sometime  
 7 during the evening.  
 8 Q. Okay. And when you told Father [REDACTED] about  
 9 the camping trips to the cabin, did he say that he had  
 10 heard about the cabin or did he act surprised?  
 11 A. No.  
 12 Q. What did he say in response?  
 13 A. He didn't say anything.  
 14 Q. Did he tell you he'd look into it?  
 15 A. He didn't respond to it, didn't say anything  
 16 about it.  
 17 Q. Okay. And what did you guys talk about next?  
 18 A. That it was.  
 19 Q. That was it.  
 20 A. That's the last conversation I had with him  
 21 about Father Kelly. But in the beginning it was a  
 22 conversation about me telling him about the foster home.  
 23 That's the reason why I was there at that house.  
 24 Q. So, your conversation with him started off  
 25 about the [REDACTED]?

1 A. Yes.  
 2 Q. And then it moved on to Father Kelly?  
 3 A. Yeah.  
 4 Q. Why did you tell him about Father Kelly?  
 5 A. Because I wanted him to be aware of it.  
 6 Q. Okay.  
 7 A. But I don't, in that part, I don't think he, in  
 8 my mind I didn't think he believed it. A priest would  
 9 do something like that.  
 10 Q. Move to strike.  
 11 A. Wouldn't dream it. Even if I told my mother,  
 12 she wouldn't have believed it.  
 13 Q. Okay. Move to strike that as nonresponsive and  
 14 calling for speculation.  
 15 And this conversation with Father [REDACTED], it  
 16 took place you think when you were in eighth grade?  
 17 A. Beg your pardon?  
 18 Q. The conversation with [REDACTED] you just  
 19 described, you think it took place when you were in  
 20 eighth grade?  
 21 A. Yeah.  
 22 Q. Okay.  
 23 A. I know I was still in junior high when I was  
 24 living in that house.  
 25 Q. What year do you think that was, if it was --

1 do you think that was the '56/'57 school year?  
 2 A. Something like that.  
 3 Q. Maybe the '57/'58 school year?  
 4 A. Could be. Possible.  
 5 Q. You think it was definitely not though in the  
 6 1960s?  
 7 A. No.  
 8 Q. It was before 1960?  
 9 A. Before 1960 because I remember going to Boys  
 10 Camp in '59.  
 11 Q. Okay. So, it was before you went to Boys Camp  
 12 in '59?  
 13 A. Yeah. So, it had to be in between '56 and '58  
 14 or '57 or '58, one of those three years.  
 15 Q. What about this: Do you remember how close you  
 16 had that conversation to when you remember Father  
 17 [REDACTED] first joining the parish? Was it right after  
 18 or was it a while, had he already been there a while?  
 19 A. Before that.  
 20 Q. Do you understand my question? Let me ask it  
 21 again.  
 22 A. Okay.  
 23 Q. So, when you had this conversation with Father  
 24 [REDACTED] where you talked about Father Kelly, do you  
 25 think he had already been at the parish for a while?

1 A. Who?  
 2 Q. Father [REDACTED].  
 3 A. Yes.  
 4 Q. Okay. So, he'd been there for a while?  
 5 A. Yeah.  
 6 Q. Do you think he had already been there for a  
 7 year?  
 8 A. Yeah, yeah.  
 9 Q. Okay. But you're not sure exactly what year  
 10 though?  
 11 A. No.  
 12 Q. You just know it was before '59?  
 13 A. No. Yes. I don't remember, but.  
 14 Q. So, you think it was either 1957 or 1958?  
 15 A. One of those two years.  
 16 Q. Okay. Do you remember what time of year it  
 17 was? Was it cold? Was it hot?  
 18 A. I don't remember what time of the year.  
 19 Q. Do you remember how you were dressed?  
 20 A. Dressed warm. So, it must have been cold  
 21 because I grabbed a jacket when I ran out of that house.  
 22 Because I had to run through the kitchen, through the  
 23 garage, and down an alley.  
 24 Q. Okay. At some point did you stop being a  
 25 member of the Blue Jackets?

1 A. Did I what?  
 2 Q. Stop being a member of the Blue Jackets?  
 3 A. Yeah.  
 4 Q. Why?  
 5 A. Why?  
 6 Q. Yeah.  
 7 A. Because, because I met some new friends and I  
 8 was on the outlaw trail.  
 9 MS. YOUNG: On the alcohol trail; is that what  
 10 you said?  
 11 THE WITNESS: Huh?  
 12 MS. YOUNG: On the alcohol trail; is that what  
 13 you said?  
 14 THE WITNESS: Outlaw trail. Doing wrong  
 15 things.  
 16 MS. YOUNG: Right.  
 17 THE WITNESS: I decided I wanted to become a  
 18 hoodlum, a gang, so I could get attention from my foster  
 19 mother. Didn't get it.  
 20 Q. BY MR. HALE: Have you ever told anyone that  
 21 one of the reasons you left the Blue Jackets Club was  
 22 because you knew what Father Kelly was doing and you  
 23 didn't want to be around that anymore?  
 24 A. That was part of it.  
 25 Q. Okay. And you personally, you never went to

1 the cabin; right?  
 2 A. No.  
 3 Q. Did you ever talk to [REDACTED] about Father  
 4 Kelly?  
 5 A. No.  
 6 Q. Anyone ever tell you that --  
 7 A. Why would I want to talk him because he was  
 8 already gay. My own cousin, he was gay. I didn't want  
 9 to -- turned out to be gay. I didn't want nothing to do  
 10 with him.  
 11 Q. Did you ever talk to anyone about the fact that  
 12 Eddie was spending time at the cabin with Father Kelly?  
 13 A. No.  
 14 Q. Okay.  
 15 A. I wasn't aware that he was going there too.  
 16 All I know that [REDACTED] and [REDACTED] and a couple  
 17 of the other guys were going there. Didn't know my  
 18 cousin was going there too.  
 19 Q. You didn't know [REDACTED] was going there?  
 20 A. No.  
 21 Q. Have you ever heard [REDACTED] was going there?  
 22 A. No, I never heard.  
 23 Q. Okay. When, after you talked with Father  
 24 [REDACTED] and then you went to Juvy and then you got out,  
 25 did you go back to eighth grade?

1 A. What was that again?  
 2 Q. When you talked to Father [REDACTED] about Father  
 3 Kelly --  
 4 A. Yes.  
 5 Q. -- and then you went to Juvenile Hall --  
 6 A. Yes.  
 7 Q. -- did he have you turn yourself in or how was  
 8 it that you went to Juvenile Hall; did they catch you?  
 9 A. They took me there.  
 10 Q. Father [REDACTED] did?  
 11 A. The County did.  
 12 Q. Okay. Did Father [REDACTED] go with you?  
 13 A. No.  
 14 Q. Okay. But then you got out of Juvenile Hall;  
 15 right?  
 16 A. Yeah, two days later.  
 17 Q. And did you go back to eighth grade?  
 18 A. Yeah.  
 19 Q. Okay. And you were living with Mrs. [REDACTED]  
 20 again?  
 21 A. Yeah.  
 22 Q. When Father [REDACTED] came to talk to you, were  
 23 you surprised to see him? Did you know he was going to  
 24 come and talk to you?  
 25 A. No, I knew he was going to come because that

1 guy [REDACTED] told me he was going to bring him over.  
 2 Q. Okay. And were you worried about Father  
 3 [REDACTED] coming at all?  
 4 A. No.  
 5 Q. Why not?  
 6 A. Was I worried about him coming over?  
 7 Q. Right.  
 8 A. No.  
 9 Q. Were you worried about him turning you in?  
 10 A. No.  
 11 Q. You trusted Father [REDACTED]?  
 12 A. Yes.  
 13 Q. Why did you trust Father [REDACTED]? And I'm not  
 14 questioning --  
 15 MS. YOUNG: Objection; calls for speculation.  
 16 THE WITNESS: Why did I trust him?  
 17 MR. HALE: Right.  
 18 THE WITNESS: I felt comfortable talking to  
 19 him.  
 20 MR. HALE: Okay.  
 21 THE WITNESS: That's the only reason. There  
 22 was no other reason why I trusted him.  
 23 Q. BY MR. HALE: Okay. And do you think this  
 24 conversation took place during the eighth grade school  
 25 year?

1 MS. YOUNG: Objection; asked and answered.  
 2 THE WITNESS: What year?  
 3 Q. BY MR. HALE: During the school year. In other  
 4 words, the eighth grade school year. You weren't on  
 5 Christmas break or something or it wasn't summer break  
 6 or anything like that?  
 7 A. No.  
 8 Q. It was during the school year?  
 9 A. Yeah.  
 10 Q. Okay. Did you ever ask Father [REDACTED] if he  
 11 had gone and talked to the judge for you?  
 12 MS. YOUNG: Objection; asked and answered.  
 13 THE WITNESS: No.  
 14 Q. BY MR. HALE: Did you ever thank him?  
 15 A. Yeah.  
 16 Q. And what did he say when you thanked him? And  
 17 let me make sure I've got my question done. Did you  
 18 ever thank him for going and talking to the judge for  
 19 you?  
 20 A. No.  
 21 Q. But you thanked him for something else?  
 22 A. Yeah. For letting me come back to my parent.  
 23 Q. And what did he say when you said that?  
 24 A. He said -- as a matter of fact he took me home.  
 25 Q. He took you to Mrs. [REDACTED]?

1 A. Yes.  
 2 Q. Okay.  
 3 A. My foster mother thanked him. When she turned  
 4 me in, she wasn't aware what she was doing, that they  
 5 were going to take me away from her.  
 6 Q. Okay. And what did he say when she thanked  
 7 him?  
 8 A. They talked in Spanish.  
 9 Q. Okay. He spoke Spanish?  
 10 A. A little bit.  
 11 Q. Okay. Do you remember what he said?  
 12 A. No.  
 13 Q. When was the last time --  
 14 A. I was just happy to be home. I don't remember  
 15 what he said.  
 16 Q. Okay. When you stopped attending the Blue  
 17 Jackets Club, did Father [REDACTED] ever ask you why you  
 18 stopped?  
 19 A. No.  
 20 Q. Did you ever talk to him again after you quit?  
 21 A. No, I never -- after I got back home, I never,  
 22 after he brought me home, I never saw him again. Didn't  
 23 even go visit him. Didn't even go back to that church.  
 24 Q. Okay. So, you never went back to the church  
 25 again?

1 A. No. Period.  
 2 Q. Okay. Do you remember anybody else, when you  
 3 quit the Blue Jackets, do you remember anyone else  
 4 quitting?  
 5 A. No.  
 6 Q. Did you ever tell anyone you were quitting?  
 7 A. No.  
 8 Q. You just stopped going?  
 9 A. I just stopped going. Started a new life,  
 10 different life, abusing alcohol, pills and drugs.  
 11 Q. Where are you currently employed?  
 12 A. Huh?  
 13 Q. Where are you currently employed?  
 14 A. Where am I currently employed?  
 15 Q. Yeah.  
 16 A. [REDACTED]  
 17 Q. In Oxnard?  
 18 A. I was in Camarillo, Oxnard, now I'm here in  
 19 Ventura.  
 20 Q. Okay. And is your phone number still  
 21 [REDACTED]?  
 22 A. Yes.  
 23 Q. And are you still living at [REDACTED]?  
 24 A. No, I'm not.  
 25 Q. Have you ever lived there before?

1 A. Yes. I was a house manager of a drug and  
 2 alcohol recovery house.  
 3 Q. Okay. When did you stop living there?  
 4 A. Three weeks ago.  
 5 Q. Okay. What's your current address?  
 6 A. I'm not sure. I still don't -- even right now  
 7 I don't know what the address is but it's on Ventura  
 8 Boulevard. I got moved up. I'm now working for the  
 9 [REDACTED].  
 10 Q. You work for the [REDACTED]?  
 11 A. Yes. I'm a house manager of a bunch of sex  
 12 offenders.  
 13 Q. Okay. So, you live on Ventura Boulevard?  
 14 A. Yeah.  
 15 Q. Is that in --  
 16 A. Right off of [REDACTED].  
 17 Q. Oh, so, here in [REDACTED]?  
 18 A. Yeah.  
 19 Q. Okay.  
 20 A. Do you believe that? Sex offenders. Fourteen  
 21 of them.  
 22 Q. It's got to be a little bit disturbing.  
 23 Now, is that phone number I just gave you, is  
 24 that your cell phone number?  
 25 A. That's my cell phone number. We don't have a

1 house number yet. That's where I can be reached at all  
 2 time.  
 3 Q. Okay. All right, let me, I want to attach as  
 4 Exhibit 1 the deposition subpoena that we served on Mr.  
 5 [REDACTED]. I'll give you a copy of this. If you could  
 6 just take a quick look at it. I just need to know if  
 7 you've seen that before.  
 8 A. Yeah, yeah, I have one. I got the wrong date,  
 9 went straight to --  
 10 Q. No, no, no. You did fine. You're here. Can  
 11 you turn to the second page. And this is, the document  
 12 is titled "Deposition Subpoena."  
 13 A. Exhibit A?  
 14 Q. Yeah, Exhibit A. Did you, do you have any  
 15 documents related to or referring to Father Kelly?  
 16 A. No.  
 17 Q. Okay. And do you have any documents relating  
 18 to or referring to Our Lady of Guadalupe Parish?  
 19 A. No.  
 20 Q. Or Our Lady of Guadalupe School?  
 21 A. No, none of that.  
 22 MR. HALE: All right.  
 23 Could you mark that -- let's mark that as  
 24 Exhibit 1.  
 25 (Deposition Exhibit No. 1

1 was marked for identification.)  
 2 MR. HALE: And, Bless, if you want to go ahead  
 3 and switch places with me?  
 4 MS. YOUNG: Sure.  
 5 MR. HALE: I may have a few follow-up  
 6 questions, but for all intents and purposes, I'm done.  
 7 EXAMINATION  
 8 BY MS. YOUNG:  
 9 Q. Good morning, almost afternoon, Mr. [REDACTED].  
 10 I'm going to ask you some questions now, okay?  
 11 A. You. I thought I answered.  
 12 Q. I represent the Roman Catholic Archbishop of  
 13 Los Angeles.  
 14 A. You represent who?  
 15 Q. The Roman Catholic Archbishop of Los Angeles.  
 16 A. Okay.  
 17 Q. And I'm going to ask you some questions, okay?  
 18 A. Okay.  
 19 Q. How did you come to get involved in this  
 20 lawsuit?  
 21 A. I don't not know. I do not know.  
 22 Q. Did somebody contact you?  
 23 A. Yeah.  
 24 Q. Who contacted you?  
 25 A. Who contacted me?

1 Q. Was it Mr. Griffith, Tom Griffith?  
 2 A. Yeah.  
 3 Q. Was he the first one to contact you about the  
 4 lawsuit?  
 5 A. Yes.  
 6 Q. How do you know Mr. Griffith?  
 7 A. Through his client.  
 8 Q. Through his client?  
 9 A. Yes.  
 10 Q. And that would be who?  
 11 A. [REDACTED].  
 12 Q. [REDACTED]?  
 13 A. Yeah.  
 14 Q. And you have known [REDACTED] since you went to  
 15 school together?  
 16 MR. HALE: Misstates testimony.  
 17 THE WITNESS: We didn't go to school together.  
 18 Q. BY MS. YOUNG: How do you know [REDACTED]?  
 19 A. I've known his mother.  
 20 Q. Were you in the --  
 21 A. I met him through his mother.  
 22 Q. Was he in the Blue Jackets Club with you?  
 23 A. Yeah.  
 24 MR. HALE: Misstates testimony, assumes facts  
 25 not in evidence.

1 Q. BY MS. YOUNG: So, he was in the Blue Jackets  
 2 Club with you?  
 3 A. Yeah.  
 4 Q. Yes. And have you maintained contact with him  
 5 over the years?  
 6 MR. HALE: Vague and ambiguous.  
 7 THE WITNESS: Not until about '93 or '4. 1994.  
 8 Q. BY MS. YOUNG: And what was it that caused you  
 9 to come back into contact with [REDACTED] in --  
 10 A. Because we're in the same world. The drug  
 11 world.  
 12 Q. You were both in the drug world together?  
 13 A. Not together.  
 14 Q. Not together?  
 15 A. Because I knew him in the past, and then, I was  
 16 selling drugs, he was coming and buying drugs from me.  
 17 Q. I see. And when was the last time he bought  
 18 drugs from you?  
 19 A. 1994.  
 20 Q. And between 1994 and now you still kept in  
 21 touch with him?  
 22 A. No.  
 23 Q. Okay.  
 24 A. The only reason I keep touch with him is when I  
 25 go to Santa Barbara for a meeting he's involved with,

1 the AA 12-step meeting.  
 2 Q. The 12-step AA meetings?  
 3 A. Yeah.  
 4 Q. And you're in the same -- you see him at those  
 5 meetings?  
 6 A. Yeah.  
 7 Q. So, you go to the same meetings he goes to?  
 8 A. Once in awhile, yes. Not all the time. I see  
 9 him there all the time.  
 10 Q. How often do you go?  
 11 A. When I go visit my daughter. Not every Sunday  
 12 but I try to go there, you know, most the time I can.  
 13 And as a matter of fact, I do go every Sunday to see my  
 14 daughter in Santa Barbara and when I decide I want to  
 15 stay there I catch a meeting there and that's where I  
 16 see him at. He is sober and clean now. He had more  
 17 years than I do.  
 18 Q. And how many years do you have?  
 19 A. March 20th I will have eight years.  
 20 Q. That's good. And did, at some point in time  
 21 did [REDACTED] tell you that he was filing a lawsuit?  
 22 A. Yes.  
 23 Q. When did he tell you that?  
 24 A. Can't recall what day it was.  
 25 Q. Not the day but do you recall the year?

1 A. Oh, during this year.  
 2 Q. This year?  
 3 A. No, 2006. We're in 2007 now.  
 4 Q. Right. So, during 2006. And what did he tell  
 5 you --  
 6 A. As a matter of fact, he did not tell me,  
 7 another person told me that. The name [REDACTED] told  
 8 me.  
 9 Q. So you know [REDACTED] also?  
 10 A. That's where I heard from it. When I came down  
 11 to Santa Barbara during, when they had Old Spanish Days.  
 12 Q. And so you've known [REDACTED] from the days  
 13 of the Blue Jackets Club also?  
 14 A. Yeah.  
 15 Q. And did you maintain contact with [REDACTED] over  
 16 the years?  
 17 A. Yeah, he saw me walking down State Street in  
 18 Santa Barbara doing the Old Spanish jig and he stopped  
 19 me and talked to me that somebody will be contacting me  
 20 about the case.  
 21 Q. Did you know [REDACTED] when he was selling drugs?  
 22 A. Yes.  
 23 Q. Did you buy drugs from each other, you and  
 24 [REDACTED]?  
 25 A. No.

1 Q. No. Were you ever in prison with either [REDACTED]  
 2 or [REDACTED]?  
 3 A. No.  
 4 Q. So, [REDACTED] stopped you on State Street and told  
 5 you that somebody would be contacting you?  
 6 A. Yeah, because he told me about he got molested  
 7 by Father Kelly.  
 8 Q. You didn't know that back when you were in the  
 9 Blue Jackets Club, did you?  
 10 A. No.  
 11 Q. He never told you back then?  
 12 A. No.  
 13 Q. And --  
 14 A. Now that, I mean, now he tells me. It sounds  
 15 like he's not ashamed of it either.  
 16 Q. Did Father Kelly ever molest you?  
 17 A. No. I never give him that chance. I didn't  
 18 have too much contact with Father Kelly because I lived  
 19 in a foster home and my mother wouldn't let me go places  
 20 on weekends because of my prior staying overnight at  
 21 friends' houses.  
 22 Q. So, she didn't like when you went places on  
 23 weekends because you would get yourself in trouble when  
 24 you stayed with your friends?  
 25 A. Yeah. Actually, I wasn't getting in trouble,

1 I'd just stay there, you know.  
 2 Q. You're staying there and not telling her where  
 3 you were?  
 4 A. Yeah, exactly. Being out of control.  
 5 Q. Out of control meaning out of control of your  
 6 foster parents?  
 7 A. Yeah. Me being out of control. I didn't, I  
 8 never thought of it as being out of control. I never  
 9 did nothing wrong. I go over friend's house to watch TV  
 10 and I fall asleep. And their parents wake me up and say  
 11 go home. That's out of control.  
 12 Q. Right. Out of control of -- out of the control  
 13 of your foster parents overnight?  
 14 A. Yes.  
 15 Q. Now, when Mrs. [REDACTED], who you were living  
 16 with at the time, made you go to mass, you mentioned it  
 17 was, I think what you said was 5:00 a.m. on Sunday  
 18 mornings?  
 19 A. Yes.  
 20 Q. Is that when you went?  
 21 A. That's the first mass.  
 22 Q. And you went with your foster mother, Mrs.  
 23 [REDACTED], every Sunday to mass at 5:00 a.m.?  
 24 A. Yes.  
 25 Q. And do you remember who performed the mass

1 then; did you say it was Father --  
 2 A. Father [REDACTED].  
 3 Q. Consec. And you mentioned that you attended  
 4 mass every Sunday until your first year in junior high  
 5 school?  
 6 A. Junior, no.  
 7 Q. Until when? When did you stop?  
 8 MR. HALE: Asked and answered.  
 9 THE WITNESS: I don't, I can't recall that  
 10 because I don't remember what, when, what grade I was in  
 11 school when I stopped going there. All I know I stopped  
 12 going there, going to mass.  
 13 Q. BY MS. YOUNG: And you stopped going to mass  
 14 because you were running off with a different crowd or  
 15 what?  
 16 MR. HALE: Misstates testimony.  
 17 Q. BY MS. YOUNG: Why did you stop going to mass?  
 18 MR. HALE: Misstates testimony.  
 19 Q. BY MS. YOUNG: Why did you stop going to mass?  
 20 A. Just, because people were going to communion  
 21 and I didn't like going to that church no more because  
 22 the people going to communion confessing, I mean  
 23 confession, on Saturday, and going to communion,  
 24 receiving the holy bread, and then, as soon as they  
 25 leave there they commit the same thing over and over and

1 over and over. So that's why I stopped going to church.  
 2 I did not mention that to him.  
 3 I did not mention that to you.  
 4 Q. So, you stopped going to church because people  
 5 you knew would go to confession to confess their sins,  
 6 confess their sins, get communion, and then go right  
 7 back out and do the same stuff all over again?  
 8 A. Yeah, and hoping God will forgive them.  
 9 Q. So, you stopped going because some of the  
 10 people you knew, you thought they were hypocrites?  
 11 A. Yeah. So, I'm not, even today I'm not a  
 12 Catholic anymore, I'm now a Christian.  
 13 Q. You're a Christian but you're not a Catholic;  
 14 is that what you just said?  
 15 A. Yes.  
 16 Q. Because of those hypocritical people that you  
 17 used to see?  
 18 A. Yeah.  
 19 Q. Okay. Are you and [REDACTED] related?  
 20 A. What's that?  
 21 Q. Are you and [REDACTED] related to one another?  
 22 A. No.  
 23 Q. You mentioned a few minutes ago that you met  
 24 him through his mother?  
 25 A. Yes. His mother, we worked together.

1 Q. You and [REDACTED]'s mother?  
 2 A. Yeah.  
 3 Q. When was that?  
 4 A. Well, I knew [REDACTED] when he was going to Blue  
 5 Jackets but I got to know -- I didn't know him, you  
 6 know, to hang around with him, but I knew he was in the  
 7 Blue Jacket Club because I remember the name. I did not  
 8 talk to him.  
 9 Q. I see.  
 10 A. Okay. Until later on in the year I started  
 11 working while I was -- as a matter of fact it was ninth  
 12 grade, junior high. Because my mother didn't give me no  
 13 money, I started working part time after school and I  
 14 was working in the laundry.  
 15 Q. At which school?  
 16 A. Junior high.  
 17 Q. And you were working --  
 18 A. I was in the ninth grade.  
 19 Q. And you were working in a laundry?  
 20 A. Yeah.  
 21 Q. A laundromat?  
 22 A. No. A regular Mission Linen, part of Mission  
 23 Linen, called Ambassador Laundry. And [REDACTED]'s mother  
 24 worked there and that's how I got to know him much more  
 25 better.

1 Q. And that was in ninth grade?  
 2 A. Yeah.  
 3 Q. When you were in the Blue Jackets Club, were  
 4 you, was part of the Blue Jackets Club training for  
 5 catechism?  
 6 A. Yes. No, I went to no catechism, it's actually  
 7 doing fun things. Doing things that could keep us out  
 8 of trouble, you know. That was the whole purpose of  
 9 that Blue Jacket Club, to do things, have outings and,  
 10 you know, just where we could meet.  
 11 Q. And you mentioned -- now, who was running the  
 12 Blue Jackets Club when you were in it?  
 13 MR. HALE: Asked and answered.  
 14 THE WITNESS: In the beginning it was Father  
 15 [REDACTED] and Father Kelly after a while.  
 16 Q. BY MS. YOUNG: So, both of them?  
 17 A. Yeah. They take turns.  
 18 MR. HALE: Misstates testimony.  
 19 MS. YOUNG: It's his testimony.  
 20 Q. Were there ever times at the Blue Jackets Club  
 21 when both of them would be at the meeting together, both  
 22 Father [REDACTED] and Father Kelly?  
 23 A. In the beginning it was like that but after a  
 24 while they started switching over. One would be one  
 25 week and the other. It wasn't always the same. It was

1 only for a while because I, I dropped out.  
 2 Q. You weren't there that long?  
 3 A. No.  
 4 Q. Less than a year?  
 5 A. Yeah.  
 6 Q. Do you think less than six months?  
 7 MR. HALE: Asked and answered.  
 8 THE WITNESS: No, I can't tell you that.  
 9 Q. BY MS. YOUNG: You don't know exactly how long  
 10 you were there?  
 11 MR. HALE: Objection.  
 12 THE WITNESS: But it wasn't over a year. Not  
 13 even close to a year.  
 14 Q. BY MS. YOUNG: So, it might have been less than  
 15 six months?  
 16 MR. HALE: Same objection.  
 17 THE WITNESS: Possible.  
 18 Q. BY MS. YOUNG: Might have been less than three  
 19 months.  
 20 MR. HALE: Same objections.  
 21 THE WITNESS: No.  
 22 MR. HALE: Misstates testimony, assumes facts  
 23 not in evidence.  
 24 Q. BY MS. YOUNG: Longer than three months?  
 25 MR. HALE: Same objections.

1 Q. BY MS. YOUNG: How long did you live with the  
 2 [REDACTED] before you ran away and were hidden in the  
 3 back of your friend's house?  
 4 A. It was less than six months, that's for sure.  
 5 Q. Could that have been less than three months  
 6 also?  
 7 A. Yes.  
 8 Q. You mentioned that when you were living with  
 9 the [REDACTED], Mrs. [REDACTED] used to hit you with a TV  
 10 antenna?  
 11 A. No, radio antenna.  
 12 Q. A radio antenna. And that Mr. [REDACTED] tried  
 13 to get you to play with yourself in the shower; is that  
 14 what you said?  
 15 A. Yeah.  
 16 Q. How many times did he do that to you?  
 17 A. Once. And that was enough.  
 18 Q. Just once and that was enough. And you left  
 19 right after that?  
 20 A. Two days later.  
 21 Q. Two days later.  
 22 A. After that lady hit me again.  
 23 Q. So, she hit you more than one time?  
 24 A. Oh, all the time. If I come home from school  
 25 late and she make me have, make me do lunch for all the

1 other kids, and if I, especially when I made juice, and  
 2 if I didn't do it right she'd smack me right across the  
 3 mouth. Knock me up against the refrigerator.  
 4 Q. So, she hit you a bunch of times?  
 5 A. Oh, yes.  
 6 Q. A lot of times?  
 7 A. Yes.  
 8 Q. But your stepfather only tried his funny  
 9 business one time?  
 10 A. Yeah.  
 11 Q. And that was enough?  
 12 A. That was enough.  
 13 Q. But he never, he never touched you?  
 14 A. He tried to.  
 15 Q. He tried to but you didn't let him?  
 16 A. No.  
 17 Q. What did you do, push him away?  
 18 A. Yeah.  
 19 Q. Now, you said that you remember when you were  
 20 little you used to watch kids play basketball at Our  
 21 Lady of Guadalupe?  
 22 A. Yes. In the yard there. In the school  
 23 grounds.  
 24 Q. In the concrete yard where the basketball hoop  
 25 was?

1 A. Yes.  
 2 Q. Do you know whether that was a team, whether it  
 3 was an organized team?  
 4 A. No, no, it wasn't a team. It was just kids  
 5 getting together.  
 6 Q. So, not necessarily a team, just kids shooting  
 7 hoops?  
 8 A. Yeah.  
 9 MR. HALE: Speculation.  
 10 Q. BY MS. YOUNG: And you said, in response to  
 11 questions from Counsel, that, that you thought that  
 12 Father Kelly was coaching; is that what you said?  
 13 A. Yeah. He was there. I don't know if he was  
 14 coaching or not, but he was there supervising it.  
 15 Q. Were there ever any other people that  
 16 supervised basketball?  
 17 A. Ma'am, you got to understand, I was a kid. I  
 18 didn't know what a coach was of basketball. As I  
 19 already mentioned to him, I hated basketball.  
 20 Q. Right.  
 21 A. I was there because my friends were there. I  
 22 wouldn't pay attention to the game. I hate basketball.  
 23 That's not my sport.  
 24 Q. So, you don't remember whether there was any  
 25 other adults?

1 A. Yes, I do.  
 2 MR. HALE: Asked and answered.  
 3 THE WITNESS: I told you Father Kelly was  
 4 there.  
 5 Q. BY MS. YOUNG: Any other adults besides Father  
 6 Kelly ever there?  
 7 MR. HALE: Same objection.  
 8 THE WITNESS: I didn't pay attention. I  
 9 mentioned to you already I did not pay attention.  
 10 Q. BY MS. YOUNG: Okay. So, there could have been  
 11 other adults there --  
 12 MR. HALE: Speculation. Same objections.  
 13 THE WITNESS: Could have.  
 14 MS. YOUNG: Thank you.  
 15 Q. Now, you mentioned when you went, when you ran  
 16 away from the [REDACTED] and you were --  
 17 A. Let me phrase that. [REDACTED], not [REDACTED].  
 18 Q. [REDACTED]?  
 19 A. [REDACTED].  
 20 Q. [REDACTED].  
 21 A. An Italian name.  
 22 Q. Okay. When you ran away from the [REDACTED]  
 23 you went to your friend [REDACTED]'s house?  
 24 A. Yeah.  
 25 Q. And he hid you in a house behind his house?

1 A. Yes.  
 2 Q. Was it a garage?  
 3 A. It was a little, like, a shack.  
 4 Q. A shack?  
 5 A. Yeah.  
 6 Q. Like, a little shed?  
 7 A. No. It had a bed in there and everything.  
 8 Q. And so you --  
 9 A. I guess, I guess it was a playhouse where they  
 10 go in there and play.  
 11 Q. And did they bring you food during the two  
 12 weeks you were there?  
 13 A. Yeah, at nighttime.  
 14 Q. At night they would bring you food?  
 15 A. Yeah. I would be there all day long and they  
 16 would, when they come back from school, they would bring  
 17 me a plate there. Sneak it back there without their  
 18 parents, mother, knowing about it.  
 19 Q. So, [REDACTED]'s mother didn't know that  
 20 you were back there?  
 21 MR. HALE: Speculation.  
 22 THE WITNESS: Not until after. She got mad at  
 23 her son for not telling her but I ended up going back,  
 24 going into that house, after she found out that I was  
 25 there.

1 Q. BY MS. YOUNG: Did, you mentioned that somebody  
2 then named [REDACTED] came to you and said he would bring  
3 Father [REDACTED]. Who is [REDACTED]?  
4 A. [REDACTED] is -- his son was a good friend of mine.  
5 That's how he came.  
6 Q. What was [REDACTED]'s last name?  
7 A. I can't remember his name. He's still alive  
8 today.  
9 Q. Is he, was he an adult when he came to see you?  
10 A. Yeah, yeah, he's an adult.  
11 Q. He was an adult --  
12 A. He's a person that was married to that lady's  
13 daughter.  
14 Q. Which lady's daughter?  
15 A. Where I was staying at.  
16 Q. I see. So --  
17 A. [REDACTED].  
18 Q. So, [REDACTED] was married to [REDACTED]'s  
19 mother's daughter?  
20 A. Yeah. Which would have been --  
21 Q. His sister.  
22 A. Yeah.  
23 Q. [REDACTED] was married to [REDACTED]'s sister?  
24 A. Yeah. No, as a matter of fact, he's the one  
25 that brought me there. The one, my friend that lives

1 there, his name was [REDACTED]. That was the  
2 [REDACTED] family.  
3 Q. Oh, not the [REDACTED] family?  
4 A. He's the one that brought me there. I had gone  
5 to his house, he took me over there.  
6 Q. So, I'm not sure I understand you. So, were  
7 you living in a little shack behind [REDACTED]'s  
8 house?  
9 A. No.  
10 Q. Behind [REDACTED]'s house?  
11 A. [REDACTED].  
12 Q. And [REDACTED] was married to [REDACTED]'s  
13 sister?  
14 A. Yeah. Name was [REDACTED].  
15 Q. And you knew [REDACTED]'s son?  
16 A. Yeah. His name was [REDACTED]. As a  
17 matter of fact, his last name is [REDACTED].  
18 Q. Okay. [REDACTED]'s son is [REDACTED] and  
19 [REDACTED] was a friend of yours?  
20 A. Yeah.  
21 Q. At that time?  
22 A. Yeah.  
23 Q. And was [REDACTED] in the Blue Jackets too?  
24 A. No.  
25 Q. How did you know [REDACTED]?

1 A. How did I know [REDACTED]?  
2 Q. Did you go to school together?  
3 A. No, because he had a cousin that lived there  
4 too at that house named [REDACTED].  
5 Q. And you knew [REDACTED]?  
6 A. Yeah. That's who I hung around with.  
7 Q. Was [REDACTED] in the Blue Jackets?  
8 A. No. He's the one I got involved with later on  
9 with being an outlaw, taking pills and drugs.  
10 Q. And he got you involved in that?  
11 A. That's what, that when I met him. I met him  
12 there. Because right after I went back to my foster  
13 mother's house from the court, from Juvenile Hall, later  
14 on, maybe a year later, I started hanging around with  
15 that guy more.  
16 Q. Now, who told you way back then that Father  
17 Kelly was doing strange things with kids?  
18 MR. HALE: Asked and answered.  
19 THE WITNESS: I don't remember. I already  
20 mentioned to him but I don't remember who told me that  
21 and ever since someone told me that, who that was.  
22 Q. BY MS. YOUNG: And you say you told Father  
23 [REDACTED] that?  
24 A. Yeah.  
25 Q. That night, the same night that you told him

1 that your stepfather tried to sexually --  
2 A. Yeah.  
3 Q. -- touch you?  
4 A. Yeah.  
5 Q. And when you told Father [REDACTED] that, you  
6 said he asked you for more specifics, like, how do you  
7 know?  
8 A. Yeah.  
9 MR. HALE: Vague and ambiguous as to which  
10 incident you're talking about.  
11 THE WITNESS: I just told him what I heard,  
12 made him aware what was going on, what I heard.  
13 Q. BY MS. YOUNG: And did he ask you how you knew  
14 that?  
15 A. No, he never asked me. Never said anything.  
16 Q. And --  
17 A. He looked at me like he ignored me. He never  
18 responded to it.  
19 Q. And that was right after you told him that your  
20 stepfather had tried to touch you sexually?  
21 A. Yeah.  
22 Q. What did you tell him your stepfather had tried  
23 to do to you?  
24 A. Tried to touch me while I'm taking a shower.  
25 Q. And --

1 A. Mostly because he didn't do nothing, I didn't  
 2 let him do nothing, he was more concerned the abuse of  
 3 his wife doing to me. I have scars right here even  
 4 today, when she hit me with that radio antenna.  
 5 Q. You say Father [REDACTED] was concerned with  
 6 that?  
 7 A. Yeah.  
 8 Q. And what exactly, or, to the best of your  
 9 recollection did you tell Father [REDACTED] that Father  
 10 Kelly was doing?  
 11 MR. HALE: Asked and answered.  
 12 THE WITNESS: What?  
 13 Q. BY MS. YOUNG: What exactly did you tell Father  
 14 [REDACTED] that night that Father Kelly was doing?  
 15 MR. HALE: Same objection.  
 16 THE WITNESS: I told him about the [REDACTED]  
 17 thing. I told him that Father Kelly was doing funny  
 18 thing to people, the kids, while he was taking them  
 19 camping. That's it.  
 20 Q. BY MS. YOUNG: Did you tell him how you knew  
 21 that?  
 22 A. No. He never asked.  
 23 MR. HALE: Asked and answered.  
 24 THE WITNESS: If he would have asked I probably  
 25 would have told him because I would have remembered

1 then, right there and then, who told me that. My whole  
 2 point was to Father [REDACTED] was to make him aware of  
 3 what Father Kelly was doing; true or not true.  
 4 Q. BY MS. YOUNG: And you didn't know at the time  
 5 whether it was true or not true?  
 6 A. I did not know if it was true or not.  
 7 Q. You never saw him doing anything; right?  
 8 A. Just what I, like I said, just like what I  
 9 heard.  
 10 Q. I'm sorry, what?  
 11 A. Just what I heard.  
 12 Q. Just what you heard, you never saw anything?  
 13 A. No.  
 14 Q. And do you remember what year that was when you  
 15 talked to Father Kelly?  
 16 A. No.  
 17 MR. HALE: Asked and answered.  
 18 Q. BY MS. YOUNG: I mean Father [REDACTED].  
 19 MR. HALE: Asked and answered.  
 20 THE WITNESS: No.  
 21 Q. BY MS. YOUNG: You don't remember whether --  
 22 could it have been 1956?  
 23 MR. HALE: Same objection.  
 24 THE WITNESS: I don't remember. I told him.  
 25 Q. BY MS. YOUNG: You don't remember.

1 MR. HALE: Same objection.  
 2 THE WITNESS: No. I can't recollect.  
 3 Q. BY MS. YOUNG: Could have been 1956?  
 4 MR. HALE: Same objection.  
 5 THE WITNESS: I don't remember.  
 6 Q. BY MS. YOUNG: Could have been 1957?  
 7 MR. HALE: Same objection.  
 8 THE WITNESS: I don't remember. That's going  
 9 to be my answer. I don't remember.  
 10 Q. BY MS. YOUNG: When was the last time you spoke  
 11 to [REDACTED]?  
 12 A. When is the last time I what?  
 13 Q. Spoke to [REDACTED].  
 14 A. A month or so.  
 15 Q. A few months ago?  
 16 A. Not three months, a month ago.  
 17 Q. A month ago. Did you talk about this case?  
 18 A. No.  
 19 Q. When was the last time you spoke to [REDACTED]  
 20 [REDACTED]?  
 21 A. I didn't talk to him about this case.  
 22 Q. [REDACTED]?  
 23 A. No. We asked each other how we were doing in  
 24 the program. That was it.  
 25 Q. When was the last time you spoke to [REDACTED]

1 [REDACTED]?  
 2 A. [REDACTED]?  
 3 Q. Yes.  
 4 A. Like I told you, during last year, in August.  
 5 Q. On State Street?  
 6 A. Yeah.  
 7 Q. That was the last time?  
 8 A. Yeah, that was the last time. I haven't seen  
 9 him since then.  
 10 THE VIDEOGRAPHER: We're going off the record  
 11 at 12:23 p.m. This is the end of Tape No. 1 in the  
 12 continuing deposition.  
 13 (A recess was taken.)  
 14 THE VIDEOGRAPHER: We are back on the record at  
 15 12:25 p.m. This is the beginning of Tape No. 2 in the  
 16 continuing deposition of [REDACTED].  
 17 MS. YOUNG: Thank you.  
 18 Q. Before this deposition today, did anybody ever  
 19 try to get you to say something --  
 20 A. No.  
 21 Q. -- about the case that wasn't true?  
 22 MR. HALE: Vague and ambiguous.  
 23 THE WITNESS: No.  
 24 Q. BY MS. YOUNG: Have you ever been convicted of  
 25 a felony?

1 A. Yeah.  
 2 Q. How many felonies?  
 3 A. Quite a few.  
 4 Q. More than ten?  
 5 A. Huh?  
 6 Q. More than ten?  
 7 A. No.  
 8 Q. More than five?  
 9 A. No.  
 10 Q. How many, do you remember?  
 11 A. Had a possession of marijuana, had a possession  
 12 of heroin, attempted murder; those three.  
 13 Q. Three. What was the attempted murder all  
 14 about?  
 15 A. Actually, I didn't -- that's what I was charged  
 16 with but the attempted murder was charged because my  
 17 nextdoor neighbor, which is a woman that had a daughter  
 18 that got, her boyfriend got her and had her naked,  
 19 handcuffed to a bed, and he hit her with a whip. So, I  
 20 ran in -- I took her to the liquor store one day and we  
 21 ran into the guy, and we had been drinking, so, I got in  
 22 a fight with the guy and she stabbed him.  
 23 Q. She stabbed him?  
 24 A. Without me knowing about it. When I hit him in  
 25 the jaw she stabbed him at the same time I hit him and

1 he fell on the ground. I thought he fell on the ground  
 2 from hitting him. That's how I got attempted murder.  
 3 Q. And do you think that over the years the drugs,  
 4 all the drugs and alcohol that you've consumed have  
 5 affected your memory?  
 6 A. Definitely it did.  
 7 MR. HALE: Speculation, calls for expert  
 8 testimony, assumes facts not in evidence.  
 9 Q. BY MS. YOUNG: Go ahead. You can answer.  
 10 Definitely, was that your answer?  
 11 A. Definitely it did.  
 12 MS. YOUNG: I have no further questions.  
 13 MR. HALE: We're almost done. Hang in there.  
 14 MS. YOUNG: We may not be.  
 15 MR. HALE: Okay, there may be a few more but  
 16 we're close.  
 17 FURTHER EXAMINATION  
 18 BY MR. HALE:  
 19 Q. Mr. [REDACTED], as you sit here today is there any  
 20 question or doubt in your mind that you told Father  
 21 [REDACTED] the things about Father Kelly that you've  
 22 already described for us?  
 23 A. What's that?  
 24 Q. As you sit here today is there any question in  
 25 your mind, do you recall telling Father [REDACTED] about

1 Father Kelly as you've previously testified to?  
 2 A. Yes, I do.  
 3 Q. Okay. Did, do you know a [REDACTED]?  
 4 A. Who?  
 5 Q. [REDACTED]?  
 6 A. Yeah, that's me.  
 7 Q. That's you?  
 8 A. Yes.  
 9 Q. Is that a name you've gone by?  
 10 A. My mother changed my name.  
 11 Q. Oh, okay. So, what's your legal name right  
 12 now; [REDACTED] or [REDACTED]?  
 13 A. Well, my mother changed my name because she had  
 14 a son named [REDACTED] that got killed in the war. Foster  
 15 mother.  
 16 Q. Okay.  
 17 A. My birth name is what you said, [REDACTED]  
 18 [REDACTED] That's my birth name.  
 19 Q. Okay.  
 20 A. She changed it without going through the court  
 21 system and I grew up all these years with that name.  
 22 Q. Was that Mrs. [REDACTED] who changed it?  
 23 A. Yeah.  
 24 Q. Okay. That's a yes?  
 25 A. Yes.

1 Q. Okay. And I think you already described this,  
 2 who is [REDACTED]?  
 3 A. That's my brother.  
 4 Q. Did he ever --  
 5 A. His name actually is [REDACTED] but he changed it to  
 6 [REDACTED] because that's his father's name.  
 7 Q. But is [REDACTED] his birth name?  
 8 A. Yeah.  
 9 Q. And how old is he; same age as you?  
 10 A. I'm 63, he's 62.  
 11 Q. Does he live in Santa Barbara?  
 12 A. Yeah.  
 13 Q. Do you know where he lives?  
 14 A. He lives in a transition house on Milpas.  
 15 Q. On Milpas?  
 16 A. Yeah.  
 17 Q. Do you know what the address is?  
 18 A. Huh?  
 19 Q. Do you know what the address is?  
 20 A. No, I don't.  
 21 Q. Does he have a cell phone number?  
 22 A. No.  
 23 Q. Do you know if [REDACTED] ever hung out with Father  
 24 Kelly?  
 25 A. My brother?

1 Q. Yes.  
 2 A. Yeah.  
 3 Q. Have you talked to him about Father Kelly?  
 4 A. No.  
 5 Q. Do you know if he went to the cabin with Father  
 6 Kelly?  
 7 A. No.  
 8 Q. How do you know he hung out with Father Kelly?  
 9 A. Because -- how do I know he knows him; because  
 10 he was in the Blue Jacket Club too.  
 11 Q. Okay.  
 12 A. We both were.  
 13 Q. Okay. Were the trips to the cabin planned or  
 14 discussed at the Blue Jackets Club meeting?  
 15 A. Were they planned?  
 16 Q. Yeah, were they discussed at the meetings?  
 17 A. Yeah.  
 18 Q. Okay. And do you recall Father [REDACTED] ever  
 19 being present during discussions of those trips to the  
 20 cabin at the Blue Jackets Club meetings?  
 21 A. I don't think he ever went there.  
 22 Q. But do you recall him present during any of  
 23 those discussions?  
 24 A. No.  
 25 Q. Okay. Do you remember there ever being trips

1 to the cabin that were simply day trips but weren't  
 2 overnight trips, just for the afternoon for instance?  
 3 A. It was overnight trip. Going Friday and coming  
 4 back Saturday.  
 5 Q. Okay. And do you recall, the boys who did go  
 6 to the cabin for these camping trips, do you recall they  
 7 were excited about going?  
 8 A. No.  
 9 Q. Okay. Do you recall any of the boys who went  
 10 to the cabin bragging about going to the cabin after  
 11 they came back?  
 12 A. No.  
 13 Q. Do you recall them talking about going to the  
 14 cabin after they came back?  
 15 A. No.  
 16 Q. Okay. Did what you knew about Father Kelly  
 17 have anything to do with your decision to stop going to  
 18 mass?  
 19 MS. YOUNG: Objection; asked and answered.  
 20 THE WITNESS: What was that?  
 21 Q. BY MR. HALE: Did what you knew about Father  
 22 Kelly related to these boys have anything to do with  
 23 your decision to stop going to mass?  
 24 A. That was part of it but the main part of it was  
 25 because I didn't want to go to that church anymore.

1 MR. HALE: Okay. I don't have any further  
 2 questions.  
 3 THE WITNESS: Other reason, like I was telling  
 4 her, because I didn't like the way that people were  
 5 doing things.  
 6 MR. HALE: Bless?  
 7 MS. YOUNG: No, we're done.  
 8 MR. HALE: Same stipulation?  
 9 MS. YOUNG: Same stipulation.  
 10 MR. HALE: So, Mr. [REDACTED], what's going to  
 11 happen is, as you can see the court reporter is taking  
 12 down everything you said and I said. She's going to put  
 13 that into a typed booklet form. They're going to send  
 14 that to me, and then I'm going to send that to you so  
 15 you can review it. Is 30 days enough time for you to  
 16 review it and make sure it's accurate?  
 17 THE WITNESS: Uh-huh.  
 18 MR. HALE: Is that a yes?  
 19 THE WITNESS: Yes.  
 20 MR. HALE: Okay. Where should I send it to  
 21 you?  
 22 THE WITNESS: Send it to [REDACTED].  
 23 MR. HALE: To [REDACTED]?  
 24 THE WITNESS: Yeah.  
 25 MR. HALE: You still get mail?

1 THE WITNESS: I can't give you the address  
 2 there because the mailing thing is all messed up. I  
 3 still get mail at [REDACTED]. Then I got to watch -- I  
 4 go check up on those guys anyway.  
 5 MR. HALE: Okay. That's all we need. We're  
 6 off the record.  
 7 THE VIDEOGRAPHER: This concludes the  
 8 deposition. We are going off the record at 12:33 p.m.  
 9 (The deposition was adjourned at 12:33 p.m.)  
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I, [REDACTED], hereby declare:

I have read the foregoing deposition transcript and identify it as my own and approve same.

I declare under penalty of perjury under the laws of the State of California that the foregoing testimony is true and correct.

Dated this \_\_\_\_\_ day of

\_\_\_\_\_, 2007 at \_\_\_\_\_,

California.

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[REDACTED]

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STATE OF CALIFORNIA )

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COUNTY OF VENTURA )

I, SUSAN E. LANSING, C.S.R. No. 6355, a Certified Shorthand Reporter for the State of California, do hereby certify:

That, prior to being examined, [REDACTED] was by me duly administered an oath to tell the truth, the whole truth, and nothing but the truth;

That the deposition of the witness in this proceeding was taken down by me in stenotype at the time and place therein named and thereafter reduced to typewriting by computer-aided transcription under my direction.

I further certify that I am neither counsel for nor related to any party to said action nor in any way interested in the outcome thereof.

WITNESS my hand this twelfth day of February, 2007, at Ventura, California.

\_\_\_\_\_  
Certified Shorthand Reporter  
State of California  
C.S.R. No. 6355