

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES

3
4 Coordinated Proceeding Special)
Title (Rule 1550(b))
5)
6 THE CLERGY CASES I)

7 This Document Relates to Santa)
Barbara Superior Court Case)
No. 1132380)

8 JOHN ROE I, an individual,)
9)
Plaintiff,)

10 vs.) Proceeding No. 4286

11)
12 ARCHDIOCESE OF LOS ANGELES)
EDUCATION AND WELFARE CORPORATION;))
13 ROMAN CATHOLIC ARCHBISHOP OF LOS)
ANGELES; and DOES 3-100,)
14 inclusive,)

15)
16 Defendants.)

17
18 VIDEOTAPED DEPOSITION OF [REDACTED]
19 SANTA BARBARA, CALIFORNIA
20 THURSDAY, FEBRUARY 1, 2007

21
22 REPORTED BY:
24 Elizabeth Borrelli
CSR No. 7844
25 JOB No. 070201EL

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24 Also Present:
25 [REDACTED]

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16 Defendants.)

17
18 Videotaped Deposition of [REDACTED],
19 taken on behalf of the Defendants, at 3850
20 State Street, Santa Barbara, California,
21 commencing at 10:11 a.m., Thursday, February
22 1, 2007, before Elizabeth Borrelli, a
23 Certified Shorthand Reporter for the State of
24 California, License No. 7844.
25 ***

1 I N D E X

2	WITNESS	PAGE
3	[REDACTED]	
4	BY MS. YOUNG	6
5	BY MR. HALE	47

8 EXHIBITS

9	(None.)
10	INFORMATION REQUESTED
11	(None.)
12	UNANSWERED QUESTIONS
13	(None.)
14	REFERENCE REQUESTED
15	(None.)

1 SANTA BARBARA, CALIFORNIA; THURSDAY, FEBRUARY 1, 2007
 2 10:11 A.M.
 3 THE VIDEOGRAPHER: This is the videotaped
 4 deposition of [REDACTED] in the matter of the
 5 clergy cases I, John Roe 1 versus Archdiocese of
 6 Los Angeles Education and Welfare Corporation, et al. in
 7 the Superior Court of the state of California for the
 8 county of Los Angeles. The case number is 1132380.
 9 Today's date is February 1st, 2007. The time
 10 is 10:12 a.m.
 11 The video operator is Lee Bosset, an associate
 12 of Gradillas Court Reporting, located at 345 North Maple
 13 Drive, Beverly Hills, California.
 14 This recording is taking place at 3850 State
 15 Street, Santa Barbara, California and was noticed by the
 16 law offices of Hennigan, Bennett & Dorman.
 17 Counsel, please voice identify yourselves and
 18 state your appearance for the record.
 19 MS. YOUNG: Bless Young, Hennigan, Bennett &
 20 Dorman for the Roman Catholic Archbishop of Los Angeles,
 21 defendant.
 22 MR. HALE: Tim Hale for Plaintiffs.
 23 MR. GRIFFITH: R. Thomas Griffith for
 24 plaintiffs.
 25 THE VIDEOGRAPHER: We are on the record.

1 the deposition.
 2 I'm going to ask -- be asking you some
 3 questions on behalf of the Roman Catholic Archbishop of
 4 Los Angeles. And if you don't understand something that
 5 I ask, please tell me, and I will try to rephrase it so
 6 that you understand it.
 7 Is that agreeable?
 8 A Very good.
 9 Q And if you need to take a break at any time,
 10 just let me know and we can take a break.
 11 A Very well, thank you.
 12 Q Okay.
 13 And we're entitled to your estimate today and
 14 to your best recollection. But we don't want you to
 15 guess. So do you understand the difference between your
 16 best estimate and a guess?
 17 A I'd say it wouldn't be fair.
 18 Q Okay. Let me explain a little bit.
 19 If I were to ask you how big your dining room
 20 table is, you would probably be able to give me an
 21 estimate. But if I were to ask you how big my dining
 22 room table is, you could only guess.
 23 A That's right.
 24 Q Do you understand the difference between a
 25 guess and an estimate?

1 Would the reporter swear in the interpreter and the
 2 witness.
 3 CAL NORMAN,
 4 was administered an oath to translate
 5 the testimony from English into Spanish
 6 and from Spanish into English to the
 7 best of his/her ability.
 8 [REDACTED]
 9 having been duly administered an oath in
 10 accordance with CCP 2094, was examined
 11 and testified as follows:
 12 EXAMINATION
 13 BY MS. YOUNG:
 14 Q Good morning, Mrs. [REDACTED].
 15 A Good morning.
 16 Q My name is Bless Young, and I represent the
 17 Roman Catholic Archbishop of Los Angeles. And your son
 18 has named the Roman Catholic Archbishop of Los Angeles
 19 as a defendant in this case and is suing the Roman
 20 Catholic Archbishop of Los Angeles for money damages
 21 because of what he says happened to him by Father Kelly.
 22 And have you ever had your deposition taken
 23 before?
 24 A No, never.
 25 Q Okay. Let me explain a few of the rules of

1 A That's fine.
 2 Q Okay.
 3 The court reporter here is taking down --
 4 typing everything that we say. So in order that she be
 5 able to do that, we're going to ask that you answer all
 6 questions verbally with a "yes" or "no" rather than a
 7 shaking of your head or nodding.
 8 A Very well.
 9 Q And also, I will ask that you wait until I
 10 finish my question before you answer, and I'll try to
 11 wait until you finish your answer before I ask another
 12 question.
 13 Is that fair?
 14 A Yes.
 15 Q Good. Okay.
 16 Have -- why don't you state your full name for
 17 the record.
 18 A My name is [REDACTED].
 19 Q And have you ever gone by any other name, say
 20 your maiden name?
 21 A I use my father's name, [REDACTED].
 22 THE INTERPRETER: [REDACTED].
 23 BY MS. YOUNG:
 24 Q And Ms. [REDACTED], have you taken any
 25 medication within the last 24 hours?

1 A Not now. Because I take pills for pressure,
 2 but I didn't today.
 3 Q Okay.
 4 So you're not taking any medication that would
 5 affect your ability to tell the truth and give your best
 6 testimony here today, correct?
 7 A I agree.
 8 Q So there's -- do you know of any reason why
 9 the deposition should not go forward?
 10 A Only if I have problems with my asthma.
 11 Q Okay.
 12 Well, let us know if you need to take a break
 13 or if you need water or hot -- hot water -- more hot
 14 water.
 15 A Very well.
 16 Q Okay.
 17 How old are you, Mrs. [REDACTED]?
 18 A I'm going on 85.
 19 Q Where were you born?
 20 A And [REDACTED].
 21 Q In Mexico?
 22 A In Mexico.
 23 Q And how old were you when you came to the
 24 United States to live?
 25 A I don't remember because I was very small.

1 Q You were very young?
 2 A Very young.
 3 Q When you came to the United States to live,
 4 was your son [REDACTED] already born?
 5 A When I came to live here -- when I came to
 6 live here, I came here to stay, I had already had seven
 7 children in Mexico.
 8 Q And was [REDACTED] one of those children?
 9 A He was the [REDACTED] son.
 10 Q And how old was [REDACTED] when you came to the
 11 United States to live?
 12 A They remained in Mexico for a while.
 13 Q How old was he when you came to the United
 14 States and he stayed in Mexico?
 15 A I was 32.
 16 Q And how old was [REDACTED]?
 17 A [REDACTED] was small.
 18 Q How old; do you remember?
 19 A No more than about eight or 10 years, more or
 20 less.
 21 Q And how long were you in the United States
 22 before [REDACTED] came to the United States?
 23 A Well, they brought me here when I was very
 24 small.
 25 Q Who brought you here?

1 A Well, my parents.
 2 Q When you came to the United States and [REDACTED]
 3 stayed in Mexico, who did [REDACTED] stay with?
 4 A With his grandma.
 5 Q Was that your mother or your husband's mother?
 6 A My husband's.
 7 Q And how long did you live in the United States
 8 before [REDACTED] came?
 9 A More or less five years.
 10 Q During those five years did you travel back to
 11 Mexico to see your children?
 12 A Not after I brought them.
 13 Q No, before you brought them, while you were in
 14 the United States and they were in Mexico, did you go
 15 back and forth to visit them?
 16 A Yes.
 17 Q How often?
 18 A Every year.
 19 Q Once a year?
 20 A Yes.
 21 Q When was the last time -- no, strike that.
 22 Have you met with Mr. Hale before this
 23 deposition?
 24 A I don't understand.
 25 Q Did you meet with [REDACTED] lawyer, Mr. Hale,

1 before the deposition?
 2 A No.
 3 Q When was the last time you met with Mr. Hale?
 4 A It would have been about two weeks ago.
 5 Q And how many times have you met with Mr. Hale?
 6 A Twice.
 7 Q When you came to the United States, did you
 8 work?
 9 A Yes.
 10 Q And where did you work when you first came to
 11 the United States?
 12 A In a Golita packing house, Golita Lemon
 13 Association.
 14 Q Was that the name of the employer, Goleta
 15 Lemon Association?
 16 A Yes.
 17 Q How long did you work there, how many years?
 18 A Until work ran out at the packing house.
 19 Q And how -- how long was that?
 20 A I don't remember.
 21 Q Was it years or months after you came that you
 22 worked there?
 23 A It was quite some time. From there I moved to
 24 Johnson's Packing House.
 25 Q When you brought your children, [REDACTED] and

1 your other children, to the United States, were you
 2 still working at a lemon packing house?
 3 A Yes, at Johnson Company.
 4 Q And how long did you work at Johnson company?
 5 A Until the packing house closed down.
 6 Q Do you remember what year that was?
 7 A No.
 8 Q When the packing house closed down, did you
 9 get another job?
 10 A I was working at Mission Linen.
 11 Q When you worked at Johnson Packing House, did
 12 you work full time during the day?
 13 A The hours that they gave us because
 14 sometimes --
 15 Q What hours did you work? Was it during the
 16 day?
 17 A In the morning.
 18 Q Just in the morning, not in the afternoon?
 19 A They only gave us a few hours.
 20 Q And when you worked for the linen -- the
 21 linen -- Mission Linen Company, how many hours a day did
 22 you work for the linen company?
 23 MR. HALE: Vague and ambiguous as to what
 24 years.
 25 THE WITNESS: Could be four, five, six,

1 depending on what work was available.
 2 BY MS. YOUNG:
 3 Q Four or five or six hours a day?
 4 A Yes.
 5 MR. HALE: Same objection.
 6 BY MS. YOUNG:
 7 Q Did you ever work weekends at the linen
 8 company?
 9 A No.
 10 Q Just -- did you work every day, Monday,
 11 Tuesday, Wednesday, Thursday and Friday?
 12 A Yes.
 13 Q And when you worked for the lemon packing
 14 house, Johnson, did you ever have to work Saturdays or
 15 Sundays?
 16 MR. HALE: Same objection.
 17 THE WITNESS: Maybe Saturdays.
 18 BY MS. YOUNG:
 19 Q And when you would have to work on Saturdays
 20 at Johnson Packing, what hours would you work? Was it
 21 during the day?
 22 MR. HALE: Same objection.
 23 THE WITNESS: From 7:30 in the morning, it
 24 could be 6:00, 7:00, 8:00, sometimes we worked up until
 25 10:00 at night.

1 BY MS. YOUNG:
 2 Q At Johnson Packing?
 3 A (Inaudible response.)
 4 Q And did you sometimes work from the morning
 5 until up to 10:00 at night during the week at Johnson
 6 Packing also?
 7 MR. HALE: Same objection.
 8 THE WITNESS: It would depend on what orders
 9 they had.
 10 BY MS. YOUNG:
 11 Q Who would take care of the children when you
 12 had to work long hours?
 13 A Well, after school my daughter [REDACTED]
 14 would take care of them.
 15 Q Was your daughter [REDACTED] older than [REDACTED]?
 16 A She's my second daughter.
 17 Q So she's older than [REDACTED]?
 18 A Yes.
 19 Q How much older?
 20 A Well, she's going on 67.
 21 Q And how old is [REDACTED]?
 22 A [REDACTED] I believe has had his 32nd birthday.
 23 Q This [REDACTED] sitting here, how old is he?
 24 A I don't know what year he was born, but he has
 25 had his 62nd birthday. Sometimes I'm a little

1 forgetful.
 2 Q That's okay.
 3 Me, too.
 4 Now, [REDACTED], this [REDACTED] sitting here, got
 5 married the first time to [REDACTED], did he get married at
 6 Our Lady of Guadalupe church?
 7 A Yes, there he got -- he wed there.
 8 Q Who was the pastor that married him at Our
 9 Lady of Guadalupe?
 10 A I don't remember.
 11 Q Was it Father Kelly?
 12 A I don't remember.
 13 Q Do you remember whether any of [REDACTED] other
 14 marriages were at Our Lady of Guadalupe or just that
 15 one?
 16 A Just that one.
 17 Q Do you remember what year [REDACTED] got married
 18 to [REDACTED] at our Lady of Guadalupe?
 19 A No, nothing.
 20 Q Do you remember how --
 21 A Not the year, I don't remember.
 22 Q Do you remember how old [REDACTED] was when he
 23 married [REDACTED]?
 24 A No, I don't remember.
 25 Q Was he pretty young?

1 MR. HALE: Vague and ambiguous as to "pretty
 2 young."
 3 THE WITNESS: I don't remember how old he was.
 4 BY MS. YOUNG:
 5 Q Do you remember whether Father Kelly was still
 6 a pastor at Our Lady of Guadalupe when [redacted] got
 7 married to [redacted] there?
 8 A I don't know.
 9 Q Now, you know Father Kelly; is that correct?
 10 A Yes.
 11 Q When did you first meet Father Kelly?
 12 A I met him because I would go to that church,
 13 and my children were in the school, in the Guadalupe
 14 school.
 15 Q And did you first meet Father Kelly when you
 16 went to the church?
 17 A Yes.
 18 Q Did you used to go to mass at the church?
 19 A Yes.
 20 Q When did you go to mass? What days; do you
 21 remember?
 22 A Well, normally on Sunday or on holidays.
 23 Q Did Father Kelly ever come to dinner at your
 24 house?
 25 A No, I never invited him to dinner.

1 Q Did he ever invite himself to dinner?
 2 A No, he would go to pick up my son.
 3 Q Okay.
 4 But he never came to dinner at your house?
 5 A Not to dinner.
 6 Q And when he would come to pick up your son,
 7 was it at night or during the day or when -- when would
 8 he come to pick up your son?
 9 A It could be in the afternoon, well, around
 10 3:30 or 4:00 p.m.
 11 Q Was it on a weekday or a weekend?
 12 MR. HALE: Same objection.
 13 THE WITNESS: That I don't remember, what days
 14 exactly.
 15 BY MS. YOUNG:
 16 Q When Father Kelly would come pick up your son,
 17 would he come in his car?
 18 A Yes.
 19 Q And what kind of car was it; do you remember?
 20 A No, I don't remember.
 21 Q When he would come to pick up your son, would
 22 he get out of the car and -- and knock on your door or
 23 ring your bell or would he honk the horn? How -- what
 24 would he do?
 25 A Beep the horn.

1 Q So he would honk the horn -- and when you say
 2 your son, you're referring to [redacted]?
 3 A Yes.
 4 Q So Father Kelly would honk the horn and [redacted]
 5 would go outside?
 6 A He would go out to where he was, yes.
 7 Q Did [redacted] tell you where he was going?
 8 A They always told me the truth.
 9 Q Where did [redacted] tell you he was going when
 10 Father Kelly came and honked the horn?
 11 A Well, sometimes they would be going to the
 12 cabana or they would be going to Los Angeles or San
 13 Clemente.
 14 Q Did he tell you -- did [redacted] tell you why he
 15 was going to Los Angeles or to San Clemente?
 16 A Well, when -- sometimes when he mentioned
 17 something, I couldn't believe -- I couldn't believe him.
 18 Q What did he tell you that you didn't believe?
 19 A Well, I started to have my doubts.
 20 Q But where did [redacted] tell you -- strike that.
 21 Why did Carlos tell you he was going to
 22 Los Angeles or San Clemente with Father Kelly?
 23 MR. HALE: Speculation.
 24 THE WITNESS: Well, he was just going to
 25 accompany him.

1 BY MS. YOUNG:
 2 Q And did [redacted] tell you what he and Father
 3 Kelly were going to do in Los Angeles or in San Clemente
 4 when they got there?
 5 A No, they never told me.
 6 Q And you never asked him?
 7 A Well, no. That's why I said I became to have
 8 my doubts why it was such an interest.
 9 Q And how many times do you think [redacted] went to
 10 Los Angeles and San Clemente with Father Kelly?
 11 A I couldn't tell you exactly how many.
 12 Q Do you know whether it was 10 times or more
 13 than 10 times?
 14 A Well, yes, give and take, I think so.
 15 Q You think about 10 times?
 16 A (Inaudible response.)
 17 Q Now, when [redacted] went to Los Angeles or told
 18 you he was going to Los Angeles or San Clemente with
 19 Father Kelly, was it just for the day or would they stay
 20 overnight?
 21 A They started staying overnight.
 22 Q And when did they start staying overnight?
 23 A No, no, I don't remember exactly.
 24 Q Do you know how old [redacted] was when Father
 25 Kelly would -- first came to pick him up to take him to

1 Los Angeles or San Clemente?
 2 A Well, he already had finished the Guadalupe
 3 school and was in --
 4 Q Bishop.
 5 A -- Bishop.
 6 Q Bishop Diego Garcia High School?
 7 A Yes.
 8 Q You also mentioned that Father Kelly would
 9 sometimes come and pick [REDACTED] up and take him to the
 10 cabin?
 11 A Yes.
 12 Q Do you know whose cabin it was?
 13 A Well, from what I heard, it was something that
 14 the father had inherited.
 15 Q And who told you that?
 16 A Sister -- Sister [REDACTED] and Sister
 17 [REDACTED].
 18 Q When Father Kelly would come pick [REDACTED] up to
 19 take him to the cabin, how did you know that they were
 20 going to the cabin? Did [REDACTED] tell you that?
 21 A Well, yes, they would ask for my permission.
 22 Q When you say "they would ask for my
 23 permission," who is "they"?
 24 A Well, they would say that they were gonna go
 25 with the father.

1 Q And you say "they." Was [REDACTED] with other
 2 boys when they went to the cabin?
 3 A Well, I'm not sure of that because he would
 4 come and just pick him up.
 5 Q So you don't know whether he then picked up
 6 other boys also?
 7 A No.
 8 Q Did Father Kelly ever ask you if he could take
 9 [REDACTED] to his cabin?
 10 A He would call me on the phone.
 11 Q And --
 12 A And he would ask if they were there. Then
 13 when I no longer trusted him, I would refuse.
 14 Q Do you know how many times [REDACTED] went to the
 15 cabin with Father Kelly --
 16 MR. HALE: Speculation.
 17 BY MS. YOUNG:
 18 Q -- approximately?
 19 A Well, it was several times.
 20 Q Was it more than 10 or less than 10?
 21 MR. HALE: Same objection.
 22 THE WITNESS: I think more than 10.
 23 BY MS. YOUNG:
 24 Q When you say you no longer trusted Father
 25 Kelly, what made you not trust him?

1 A Because I could see strange things in my son
 2 and a lot of interest.
 3 Q What do you mean "a lot of interest"?
 4 A Because I could see -- I was very mistrustful.
 5 Q And you said you could see strange things
 6 through your son -- in [REDACTED] What -- what types of
 7 strange things?
 8 A They started to change. His -- their way of
 9 being changed.
 10 Q You keep saying "their way of being." Was --
 11 were any of your other sons also involved or just
 12 [REDACTED]?
 13 MR. HALE: Vague and ambiguous as to "also
 14 involved."
 15 THE WITNESS: Yes, I -- I have another son who
 16 went, but only once. He said he didn't like it.
 17 BY MS. YOUNG:
 18 Q Which son was that?
 19 A [REDACTED]
 20 Q Did [REDACTED] ever tell you that Father Kelly was
 21 sexually molesting him? Back then did he ever tell you?
 22 A Well, the day that he told me I couldn't
 23 believe it. So then I made him wash out his mouth with
 24 soap.
 25 Q Was that after the first time he went?

1 MR. HALE: Speculation.
 2 THE WITNESS: After -- because I couldn't
 3 believe that Father Kelly.
 4 BY MS. YOUNG:
 5 Q After -- what exactly did [REDACTED] tell you that
 6 made you to tell him to wash his mouth out with soap?
 7 What did [REDACTED] say to you?
 8 A That the father was touching him.
 9 Q Did he tell you where the father was touching
 10 him?
 11 A Well, I don't know.
 12 Q And you told him to go wash his mouth out with
 13 soap?
 14 A Because I couldn't believe; I couldn't.
 15 Q After [REDACTED] told you that, did he continue to
 16 go to the cabin with Father Kelly?
 17 A No. I didn't -- I didn't voluntarily want him
 18 to go anymore.
 19 Q And do you know whether he continued to go?
 20 MR. HALE: Speculation.
 21 THE WITNESS: No, no, I don't know. I don't
 22 remember.
 23 BY MS. YOUNG:
 24 Q You don't remember whether he continued to go?
 25 A No.

1 MR. HALE: Same objection.
 2 THE WITNESS: After I refused his going.
 3 BY MS. YOUNG:
 4 Q So after he told you that Father Kelly had
 5 touched him inappropriately, you refused to let him go?
 6 MR. HALE: Misstates testimony.
 7 THE WITNESS: I was no longer in agreement
 8 that he should go.
 9 BY MS. YOUNG:
 10 Q When you were no longer in agreement that he
 11 should go, did [redacted] still want to go?
 12 MR. HALE: Speculation.
 13 THE WITNESS: No, he -- he didn't again tell
 14 me that he wanted to go.
 15 BY MS. YOUNG:
 16 Q When [redacted] went to the cabin, before he told
 17 you about Father Kelly touching him, do you know what
 18 grade or what school he was in when he went to the cabin
 19 with Father Kelly?
 20 A I don't remember.
 21 Q Do you remember whether he was in Our Lady of
 22 Guadalupe school or whether he was already in high
 23 school?
 24 MR. HALE: Asked and answered.
 25 THE WITNESS: No.

1 I have my doubts.
 2 Q What exactly -- let's start with Sister
 3 [redacted]. What did you say to Sister [redacted]?
 4 A That I did not agree with those trips. And
 5 they would say to me that I shouldn't worry about it.
 6 Q Why did you tell them that you didn't agree
 7 with the trips? Did -- did you tell them that [redacted]
 8 had told you that something bad had happened?
 9 A Not exactly that. I just said that I had my
 10 concerns.
 11 Q Did you tell Sister [redacted] what the concerns
 12 were?
 13 A Not precisely.
 14 Q And what exactly did you tell her?
 15 A That I was no longer happy with those trips to
 16 the cabin.
 17 Q And did you tell her that you weren't going to
 18 let [redacted] go anymore?
 19 A Well, I no longer agreed that he should go.
 20 Q What did you tell Sister [redacted] about the
 21 trips? Did you tell her the same thing you told Sister
 22 [redacted]?
 23 A Yes.
 24 Q Did you ever tell either Sister [redacted] or
 25 Sister [redacted] that [redacted] had told you that Father

1 BY MS. YOUNG:
 2 Q After you didn't want [redacted] to go to the
 3 cabin anymore, did [redacted] continue to go on trips with
 4 Father Kelly?
 5 MR. HALE: Vague and ambiguous as to "trips."
 6 THE WITNESS: No, I don't remember.
 7 MR. HALE: Belated speculation, too.
 8 BY MS. YOUNG:
 9 Q After you told [redacted] to wash his mouth out
 10 with soap, did you tell anybody what [redacted] had told you
 11 about Father Kelly touching him?
 12 A I never commented on that.
 13 Q You never told anybody?
 14 A No.
 15 MR. HALE: Vague and ambiguous as to what she
 16 told.
 17 BY MS. YOUNG:
 18 Q Did you ever tell anybody that [redacted] had told
 19 you that Father Kelly was touching him inappropriately?
 20 A I have never discussed it, and up to this date
 21 I never discussed it.
 22 Q Did you ever tell Sister [redacted] or Sister
 23 [redacted] anything about [redacted] mentioning to you that
 24 Father Kelly had touched him inappropriately?
 25 A I did tell them -- I discussed with them that

1 Kelly had touched him sexually or inappropriately?
 2 MR. HALE: Asked and answered.
 3 THE WITNESS: No, no, I didn't discuss that
 4 with him.
 5 MS. YOUNG: Are you okay?
 6 BY MS. YOUNG:
 7 Q After you told [redacted] that you didn't want him
 8 to go to the cabin, do you remember whether Father Kelly
 9 came in his car to your house to pick [redacted] up again?
 10 A He would call me on the phone.
 11 Q And what would you say? What -- strike that.
 12 What would he say to you?
 13 A That they weren't home or --
 14 Q When you say "they," are you referring to
 15 [redacted] and [redacted]?
 16 A Well, rather, he was the one that -- he was
 17 seeking more, [redacted].
 18 Q And you -- and so when Father Kelly called,
 19 you would tell Father Kelly that [redacted] wasn't home?
 20 A I would deny it. I would say he's not home.
 21 Q And do you remember whether Father Kelly --
 22 after [redacted] told you that Father Kelly touched him
 23 inappropriately, do you remember whether Father Kelly
 24 ever came to the house after that to look for [redacted]?
 25 MR. HALE: Speculation.

1 THE WITNESS: No. He would just call on the
 2 phone.
 3 BY MS. YOUNG:
 4 Q After [redacted] told you that Father Kelly had
 5 touched him inappropriately, do you know whether [redacted]
 6 ever stayed overnight with Father Kelly?
 7 MR. HALE: Same objection.
 8 THE WITNESS: No, I don't remember.
 9 BY MS. YOUNG:
 10 Q Did [redacted] need your permission at that time
 11 to stay overnight anywhere?
 12 A After I found out and I refused it, then no.
 13 Q After you found out and refused it, he
 14 never -- [redacted] never went overnight with Father
 15 Kelly --
 16 MR. HALE: Misstates testimony.
 17 BY MS. YOUNG:
 18 Q -- to your knowledge?
 19 MR. HALE: Misstates testimony. Calls for
 20 speculation.
 21 THE WITNESS: No. As far as I can remember,
 22 no.
 23 BY MS. YOUNG:
 24 Q When [redacted] told you that Father Kelly had
 25 touched him inappropriately, were you at home when he

1 Q In Mexico?
 2 A Mexico.
 3 Q And when did you discuss it with Father
 4 [redacted]?
 5 A He came -- we invited him to our home, and he
 6 came to stay with us for a week, and he stayed at my
 7 house.
 8 Q And was that shortly after [redacted] had told you
 9 that Father Kelly had touched him inappropriately?
 10 A I don't remember if it was.
 11 Q So you don't remember how long after [redacted]
 12 told you that that Father [redacted] came to stay with you?
 13 A No, I don't remember exactly.
 14 Q Could it have been more than a year after?
 15 A No, I told him about my concerns.
 16 Q Do you remember how long after [redacted] told you
 17 about Father Kelly that you told Father [redacted]?
 18 THE INTERPRETER: What was the name of the
 19 priest?
 20 MS. YOUNG: [redacted]
 21 THE WITNESS: No, I don't remember the date or
 22 the year.
 23 BY MS. YOUNG:
 24 Q Do you remember if it was just a short time
 25 after [redacted] told you or could it have been a year or

1 told you that?
 2 A Yes. Yes, when we lived on [redacted].
 3 Q So when you lived on [redacted] is when [redacted] told
 4 you that Father Kelly had touched him?
 5 A Yes, yes, we lived there.
 6 Q And do you remember, was it after -- was it in
 7 the morning when he told you or at night or in the
 8 afternoon?
 9 A I don't remember.
 10 Q Was it right after he had come home from a
 11 trip with Father Kelly?
 12 MR. HALE: Speculation.
 13 THE WITNESS: I don't know.
 14 BY MS. YOUNG:
 15 Q Was anyone else there when [redacted] told you
 16 that Father Kelly touched him inappropriately?
 17 A I don't know. I don't remember exactly.
 18 Q Do you think it was just you and [redacted]?
 19 A Yes, because afterwards I discussed it with
 20 priests.
 21 Q Who did you discuss it with?
 22 A With Father [redacted].
 23 Q And who was Father [redacted]?
 24 A He was the pastor of the [redacted]
 25 parish.

1 two after [redacted] told you before you talked to Father
 2 [redacted]?
 3 A No, I don't remember.
 4 Q What did you tell Father [redacted]?
 5 A He came to my home and then since he was
 6 coming for some missions at the -- Our Lady of Guadalupe
 7 temple.
 8 Q And what did you tell Father -- Father [redacted]
 9 about Father Kelly?
 10 A I told him that I didn't confess the concerns
 11 that I had.
 12 Q So you didn't tell Father [redacted] your
 13 concerns?
 14 MR. HALE: Misstates testimony.
 15 THE WITNESS: Yes, I did tell him.
 16 BY MS. YOUNG:
 17 Q What did you tell him?
 18 A That they were men and to forgive. Whenever I
 19 confess, they told me that.
 20 Q Did you tell Father [redacted] that [redacted] had
 21 told you Father Kelly had touched him sexually
 22 inappropriately?
 23 A I don't remember if I told him. I just told
 24 him that I didn't want to confess.
 25 Q Did you tell him what you didn't want to

1 confess?
 2 A Well, the concerns that I had about Father
 3 Kelly.
 4 Q Did you tell Father [REDACTED] specifically what
 5 your concerns about Father Kelly were?
 6 A Because of what I saw and knew.
 7 Q And what are you referring to when you say
 8 what you saw and what you knew?
 9 A Well, he said to me that there was forgiving,
 10 but...
 11 Q What did you tell Father [REDACTED] that caused
 12 him to say that to you?
 13 A That you -- what he did.
 14 Q I'm sorry, could you repeat that. I didn't
 15 understand.
 16 (Record read.)
 17 BY MS. YOUNG:
 18 Q Did you tell Father [REDACTED] what you thought
 19 Father Kelly did?
 20 A Yes.
 21 Q What did you tell him? Pretend that I'm
 22 Father [REDACTED]. What did you say to him?
 23 A That I had my concerns about the priest
 24 because of what I already knew.
 25 Q And did you tell him what you already knew?

1 A I mean that they can be sinners.
 2 Q When you talked to Father [REDACTED] did you
 3 ever tell him that anything sexually inappropriate had
 4 happened between your son [REDACTED] and Father Kelly?
 5 A No. I said about my concerns, as I have
 6 always said.
 7 MR. HALE: Bless, can we take a break? We've
 8 been going for an hour.
 9 MS. YOUNG: Okay.
 10 THE VIDEOGRAPHER: We're going off the record.
 11 The time is 11:04 a.m.
 12 (Recess.)
 13 (Whereupon [REDACTED] left the
 14 deposition proceedings at this point in
 15 time.)
 16 THE VIDEOGRAPHER: We're going back on the
 17 record. The time is 11:12 a.m. Please continue.
 18 BY MS. YOUNG:
 19 Q Okay.
 20 Now, Ms. [REDACTED] after [REDACTED] told you about
 21 what he said Father Kelly did to him that first time,
 22 did he ever complain to you about Father Kelly again
 23 when he was young?
 24 A Well, his way of being started to change.
 25 Q What do you mean by that?

1 A I suspected. I was not sure.
 2 Q And did you tell Father [REDACTED] what you
 3 suspected?
 4 A Well, yes. I mean, about his behavior as a
 5 priest.
 6 Q What did you tell Father [REDACTED] about Father
 7 Kelly's behavior as a priest?
 8 A Well, I would say to him what my son had said
 9 to me.
 10 Q So you told Father [REDACTED] that [REDACTED] had
 11 told you that Father Kelly had touched him
 12 inappropriately?
 13 A No, to him I don't think I said that exactly.
 14 I would say that I had my concerns.
 15 Q So you told Father [REDACTED] your concerns about
 16 Father Kelly?
 17 A Yes.
 18 Q And did Father [REDACTED] ask you what your
 19 concerns were?
 20 A Well, about his behavior.
 21 Q Father [REDACTED] asked you about Father Kelly's
 22 behavior?
 23 A No. He answered me that they were -- that
 24 they were men.
 25 Q That who were men?

1 A The change that occurred in my son from that
 2 time on.
 3 Q What type of change?
 4 A Well, his character changed.
 5 Q Can you explain what you mean. In what way
 6 did his character change?
 7 A Because they were a family of -- very close
 8 family of brothers. They were very close to Sister
 9 [REDACTED] and Sister [REDACTED]. They had a club.
 10 Q Who had a club?
 11 A Sister [REDACTED] and Sister [REDACTED].
 12 Q Okay. We'll get to that in a minute.
 13 But how did your son's character start to
 14 change?
 15 A Then he started going out without permission.
 16 Q Going where without permission; do you know?
 17 MR. HALE: Speculation.
 18 THE WITNESS: He got to go all the way to
 19 Tijuana without permission.
 20 BY MS. YOUNG:
 21 Q Who did he go to Tijuana with?
 22 You don't know?
 23 A I found out because I got a letter from
 24 immigration.
 25 Q You got a letter from immigration that your

1 son had gone to Tijuana?
 2 A Yes. So -- and he was still a minor.
 3 Q Do you remember how old he was?
 4 A He would have been about 17.
 5 Q What did the immigration -- what did the
 6 letter from immigration say?
 7 A It asked whether I -- whether I had given him
 8 permission that he leave the country to go to Mexico
 9 without my permission. That's how I found out.
 10 Q Do you know how long he was gone?
 11 No?
 12 MR. HALE: Same objection.
 13 THE WITNESS: Well, he went one day and came
 14 back the next.
 15 BY MS. YOUNG:
 16 Q Did you ask him about where he went or why he
 17 went there after you got the letter?
 18 A He would deny it until I told him, "Look,
 19 here's this letter that came from immigration."
 20 Q And after you showed him the letter, did he
 21 tell you why he went?
 22 A (Inaudible response.)
 23 Q No?
 24 A He never told me.
 25 Q Did he tell you who he went with?

1 it.
 2 Q Now, do you understand that I don't represent
 3 Father Kelly? Actually, Father Kelly is dead. I
 4 represent the Roman Catholic Archbishop of Los Angeles.
 5 Do you understand that?
 6 A Yes.
 7 Q Did you ever tell anybody at the Roman
 8 Catholic Archdiocese that your son [REDACTED] had told you
 9 that Father Kelly had touched him inappropriately?
 10 MR. HALE: Vague and ambiguous as to any
 11 Archdiocese. Overbroad. Also may call for a legal
 12 conclusion as well.
 13 THE WITNESS: I never said so.
 14 BY MS. YOUNG:
 15 Q So the answer is no, you never told him?
 16 MR. HALE: Same objection.
 17 THE WITNESS: No, I never did say anything.
 18 BY MS. YOUNG:
 19 Q Before we took our break, you told me that you
 20 had a discussion with [REDACTED]
 21 When you discussed Father Kelly with [REDACTED]
 22 [REDACTED] did [REDACTED] ever tell you that he would go
 23 tell somebody about Father Kelly's conduct?
 24 A No.
 25 Q After your conversation with [REDACTED], the

1 A A friend had gone with him, that's all.
 2 Q Do you know whether he went with Father Kelly
 3 to Tijuana?
 4 MR. HALE: Speculation.
 5 THE WITNESS: No, he never told me. Just that
 6 he had gone with a friend.
 7 BY MS. YOUNG:
 8 Q How did he get to Mexico; do you know?
 9 MR. HALE: Same objection.
 10 THE WITNESS: I never found out.
 11 BY MS. YOUNG:
 12 Q Did he have his driver's license then?
 13 A Yes, he had a driver license. We had to sign
 14 for it. His parents had to sign for it.
 15 Q Did he have his own car when he was 17?
 16 A No.
 17 Q Did you ever find out what friend he went with
 18 or did he ever tell you what friend he went with?
 19 A No.
 20 Q After the first time that you and [REDACTED]
 21 discussed what Father Kelly had done to him, did you
 22 ever have another conversation with [REDACTED] -- and I'm
 23 talking about while [REDACTED] was a teenager -- where he
 24 complained about Father Kelly?
 25 A Since I refused to believe it, I forgot about

1 time that [REDACTED] stayed in your house for the
 2 week, did you ever have any other discussions with [REDACTED]
 3 [REDACTED] about Father Kelly?
 4 A No.
 5 Q Do you still keep in touch with [REDACTED]?
 6 A When I go to Mexico, I would always visit him.
 7 Q When was the last time you saw him?
 8 A It's been many years.
 9 Q Oh. Do you know whether he's still alive?
 10 A He's still alive.
 11 Q He's still in [REDACTED]?
 12 A I think they told me last time that he is now
 13 in [REDACTED].
 14 Q Have you told me everything you remember about
 15 your conversation with Father [REDACTED] pertaining to
 16 Father Kelly?
 17 MR. HALE: Vague and ambiguous.
 18 THE WITNESS: I believe so.
 19 BY MS. YOUNG:
 20 Q And have you told me everything you remember
 21 about your conversation with [REDACTED] about how Father
 22 Kelly touched him inappropriately?
 23 MR. HALE: Same objection.
 24 THE WITNESS: I didn't understand your
 25 question.

1 BY MS. YOUNG:
 2 Q Have you told me everything you remember about
 3 what [REDACTED] told you about how Father Kelly touched him
 4 inappropriately?
 5 A Yes.
 6 Q And have you told me everything that you
 7 remember about your conversations with Sisters [REDACTED]
 8 and [REDACTED] and what you told them about your
 9 suspicions about Father Kelly?
 10 MR. HALE: Vague and ambiguous.
 11 THE WITNESS: Yes, I did tell them, but they
 12 were just my concerns.
 13 BY MS. YOUNG:
 14 Q But have you told me everything about what you
 15 told them?
 16 MR. HALE: Same objection.
 17 THE WITNESS: Yes.
 18 BY MS. YOUNG:
 19 Q And when you told them about your concerns,
 20 you never told them that Father Kelly had touched your
 21 son inappropriately?
 22 A No.
 23 Q You said that [REDACTED] character changed after
 24 he went on a trip with Father Kelly; is that true?
 25 A Yes.

1 [REDACTED]
 2 A My daughter, she had a sister -- my sister --
 3 THE INTERPRETER: Counsel, I may have
 4 mistranslated. Maybe -- you might want to ask the
 5 question again.
 6 BY MS. YOUNG:
 7 Q Does your sister have a son named [REDACTED]
 8 [REDACTED]?
 9 A [REDACTED] yes.
 10 Q Okay.
 11 And did anyone ever tell you that [REDACTED]
 12 [REDACTED]
 13 [REDACTED]?
 14 A No, I never heard about that.
 15 Q Where does [REDACTED] live today?
 16 A He lives in [REDACTED].
 17 Q Do you know how old he is?
 18 (Whereupon Mr. Griffith left the
 19 deposition proceedings at this point in
 20 time.)
 21 THE WITNESS: He's --
 22 BY MS. YOUNG:
 23 Q [REDACTED]?
 24 A -- a year and a half younger than [REDACTED]
 25 [REDACTED].

1 Q Did he start getting in trouble at school?
 2 A Yes, when he was at Bishop school.
 3 Q When he was at Bishop High School?
 4 A (Inaudible response.)
 5 Q Yes?
 6 A What I don't remember is how he ended up at
 7 Bishop school, because I never paid for him to go to
 8 that school.
 9 Q Do you think he got a scholarship?
 10 A (Inaudible response.)
 11 Q You don't know?
 12 A I don't know.
 13 Q Do you ever remember your son getting in
 14 trouble at Our Lady of Guadalupe school?
 15 A No, because he left there with very good
 16 honors.
 17 Q Do you ever remember being told either by
 18 [REDACTED] or by anybody else that [REDACTED]
 19 [REDACTED]?
 20 A I didn't understand.
 21 Q Did your son [REDACTED] or anyone else ever tell
 22 you that [REDACTED]
 23 [REDACTED]
 24 A No.
 25 Q Does your sister have a son named [REDACTED]

1 Q Oh, than [REDACTED].
 2 Is he older or younger than [REDACTED]?
 3 A He's younger.
 4 Q Do you know how many years younger?
 5 A It would be about 10 years.
 6 Q Do you remember the names of any of [REDACTED]
 7 friends from grade school at Our Lady of Guadalupe?
 8 A Well, some of them.
 9 Q Can you tell me the names you remember?
 10 A Well, they were the [REDACTED] boys.
 11 Q Any others?
 12 A This other boy, I don't remember the surname.
 13 Q Do you remember a boy named [REDACTED]?
 14 A [REDACTED] no.
 15 Q [REDACTED]?
 16 A Well, I knew the whole group, but I didn't
 17 really know their surnames.
 18 Q Do you ever remember your son [REDACTED] going to
 19 the cabin -- Father Kelly's cabin with [REDACTED]
 20 A I don't know for sure, but I did know he went
 21 to talk to that boy, but the boy didn't want to have
 22 anything to do with it.
 23 (Whereupon Mr. Griffith entered the
 24 deposition proceedings at this point in
 25 time.)

1 BY MS. YOUNG:
 2 Q You mean he went to talk to that boy after he
 3 filed the lawsuit?
 4 A Yes.
 5 Q Did [REDACTED] -- no, strike that.
 6 How long did [REDACTED] attend Bishop Garcia Diego
 7 High School?
 8 A I think it was for two years.
 9 Q Where -- do you know if he went to a different
 10 high school after that?
 11 A He didn't want to continue.
 12 Q Did he tell you why?
 13 A Well, he would say that he just didn't want to
 14 go anymore.
 15 Q Did you know the friend of [REDACTED] daughter
 16 who drowned in the flood, her last name was [REDACTED]
 17 [REDACTED]?
 18 A Yes, perfectly.
 19 Q Were you aware of the fact that she filed a --
 20 that her family filed a lawsuit against the church
 21 because of that accident?
 22 A I think so.
 23 Q When was the last time you talked to Sister
 24 [REDACTED]?
 25 A Two times, when I went to mass at Guadalupe.

1 Q Recently?
 2 A It must have been about six months ago, more
 3 or less.
 4 Q And now you go to mass at another church?
 5 A Right now I go to mass sometimes to Dolores
 6 and sometimes San Rafael.
 7 Q Do you live in a different place now? No
 8 longer near Our Lady of Guadalupe?
 9 A No, I live in Goleta.
 10 Q And why did you stop going to mass at Our Lady
 11 of Guadalupe? Was it because you moved?
 12 MR. HALE: Assumes facts.
 13 THE WITNESS: It would be too far.
 14 BY MS. YOUNG:
 15 Q Did you know -- when [REDACTED] was growing up and
 16 he went to Our Lady of Guadalupe school, did you know
 17 father [REDACTED]?
 18 A Well, maybe I do, but I didn't focus too much
 19 on that.
 20 MS. YOUNG: You know, I have no further
 21 questions now. I'll reserve my right to re- -- to ask
 22 some more after Mr. Hale.
 23 MR. HALE: Why don't we go off record and
 24 flip.
 25 MS. YOUNG: Yeah.

1 THE VIDEOGRAPHER: We're going -- we're going
 2 off the record. The time is 11:35 a.m.
 3 (Recess.)
 4 THE VIDEOGRAPHER: We're going back on the
 5 record. The time is 11:42 -- 11:43 a.m. Please
 6 continue.
 7 EXAMINATION
 8 BY MR. HALE:
 9 Q Good morning, Mrs. [REDACTED].
 10 Do you remember there ever being a fi- -- a
 11 fire at Our Lady of Guadalupe?
 12 A Yes.
 13 Q Do you recall what year that was?
 14 A No.
 15 Q Do you know how the fire started?
 16 A No.
 17 Q What -- what do you remember about the fire?
 18 A No, just that the church caught on fire.
 19 Q Did you ever hear from anyone how the fire was
 20 started?
 21 A No.
 22 Q Do you remember if -- after the fire if there
 23 was ever a mass held in the rectory where the priests
 24 lived?
 25 A No, I don't remember.

1 Q Okay.
 2 When -- when Father Kelly died, do you
 3 remember there being any announcement about -- about his
 4 death?
 5 A I found out from the paper.
 6 Q Okay.
 7 I want to ask you some questions about the
 8 cabin.
 9 Were you aware of Father Kelly owning a cabin
 10 before [REDACTED] went to the cabin?
 11 A Yes.
 12 Q How were you aware of Father Kelly owning a
 13 cabin before [REDACTED] went to the cabin?
 14 A Because many people at the Guadalupe parish
 15 would discuss it.
 16 Q Do you recall who would discuss it?
 17 A The mothers of the other kids would discuss
 18 it.
 19 Q Okay.
 20 And -- and did you -- did you hear them
 21 discussing it?
 22 A About the cabin.
 23 Q But did you hear them talking about the cabin?
 24 A Yes, when I asked Sister [REDACTED], she told me
 25 that, yes.

1 Q Did she tell you that she had already heard
 2 about Father Kelly having a cabin?
 3 A He had a cabin that he had inherited from his
 4 parents.
 5 Q Okay.
 6 Did -- did she tell you if she knew that
 7 Father Kelly was taking boys up to the cabin?
 8 A Well, I think that they did know.
 9 Q Why do you think that?
 10 A Because I would discuss with the mothers.
 11 Q The mothers of other boys?
 12 A Of other boys.
 13 Q And did Sister [redacted] or Sister [redacted]
 14 ever tell you that they had discussed with these mothers
 15 that Father Kelly was taking their sons to the cabin?
 16 MS. YOUNG: Objection. Assumes facts not in
 17 evidence.
 18 THE WITNESS: Yes, I did discuss that with
 19 them.
 20 BY MR. HALE:
 21 Q Okay.
 22 And what did they say when you talked about
 23 Father Kelly taking other boys to the cabin?
 24 MS. YOUNG: Objection. Misstates testimony.
 25 THE WITNESS: That I shouldn't be worried.

1 Sister [redacted] that Father Kelly was calling for
 2 [redacted] to go to the cabin?
 3 A Yes, and to Sister [redacted] yes.
 4 Q Okay. But -- but I want to go back to when
 5 Father -- when Father Kelly would call about [redacted]
 6 going to the cabin. Would he call once a day? Would he
 7 call once a week? How -- how frequent were these calls?
 8 MS. YOUNG: Objection. Assumes facts not in
 9 evidence.
 10 THE WITNESS: When -- when he was home I would
 11 call [redacted].
 12 BY MR. HALE:
 13 Q But -- but I'm asking how many times did
 14 Father Kelly call the home asking for [redacted], to your
 15 recollection?
 16 A Once or twice.
 17 Q Okay.
 18 Only once or twice?
 19 A When he wasn't home, once or twice.
 20 Q Okay.
 21 And what about when [redacted] was home, did he --
 22 did he call -- did he call sometimes then?
 23 A Yes, and I would call [redacted].
 24 Q Okay. Did -- did -- did Father Kelly ever
 25 call for [redacted] more than once in one day?

1 BY MR. HALE:
 2 Q Did they tell you why you shouldn't be
 3 worried?
 4 A Yes. Because they also couldn't doubt --
 5 couldn't have doubts about a priest.
 6 Q Okay.
 7 When -- when -- when Father Kelly first
 8 invited [redacted] to the cabin, how did you feel about
 9 that?
 10 MS. YOUNG: Objection. Assumes facts not in
 11 evidence.
 12 THE WITNESS: Well, I trusted him. I say he's
 13 a priest.
 14 BY MR. HALE:
 15 Q Okay.
 16 And were you happy or sad about that or upset
 17 at first?
 18 A No, because I said I can't doubt a priest's
 19 conduct.
 20 Q Okay.
 21 And you talked about Father Kelly sometimes
 22 would call you and ask for [redacted] to go to the cabin; is
 23 that correct?
 24 A Only the sisters found out because --
 25 Q Did you tell the sisters, Sister [redacted] and

1 A Yes.
 2 Q Did that happen frequently or rarely?
 3 A Well, when he was there, as I said, my house
 4 was two stories.
 5 Q Okay.
 6 Did you -- did you speak with Sister [redacted]
 7 and Sister [redacted] more than once about your concerns
 8 about Father Kelly taking [redacted] to the cabin?
 9 MS. YOUNG: Objection. Compound.
 10 THE WITNESS: Yes.
 11 BY MR. HALE:
 12 Q Okay.
 13 And when you -- when you spoke with Sister
 14 [redacted] or Sister [redacted] about Father Kelly taking
 15 [redacted] to the cabin, where did these conversations take
 16 place?
 17 A Sometimes I'll join the rides that they gave
 18 me.
 19 Q Okay.
 20 And where would they give you rides to?
 21 A To doctors. I had a daughter who was in the
 22 hospital and they would take me and bring me back.
 23 Q Okay.
 24 Did you ever have any conversations with
 25 Sister [redacted] or Sister [redacted] about Father Kelly

1 taking [redacted] to the cabin in the convent?
 2 A At the convent, yes.
 3 Q Okay.
 4 And -- and do you have any idea how many times
 5 you talked with Sister [redacted] or Sister [redacted]
 6 about Father Kelly while you were in the convent?
 7 A At the convent, about twice.
 8 Q Okay.
 9 And do you remember where you were in the
 10 convent when you had these conversations with Sister
 11 [redacted] or Sister [redacted]?
 12 A In the little chapel they have for their own
 13 prayers.
 14 Q Okay.
 15 What -- when you -- when you went into the
 16 convent, why did you go to the convent? Why -- why --
 17 why were you in the convent?
 18 MS. YOUNG: Objection. Vague.
 19 Objection. Vague and ambiguous.
 20 THE WITNESS: Because at that time I had a lot
 21 of problems in my marriage.
 22 BY MR. HALE:
 23 Q Okay.
 24 A And they helped me very much.
 25 Q So you went and sought counseling from the

1 nuns in the convent?
 2 A Yes.
 3 Q Okay.
 4 Was there ever any other reason that you went
 5 in the convent to see the nuns?
 6 A Well, they -- I had a nervous shock.
 7 Q What -- what do you mean?
 8 A I had a lot of problems in my marriage. So
 9 they helped me to come out of it.
 10 Q Okay.
 11 Did you ever attend mass in the convent?
 12 A Yes.
 13 Q Okay.
 14 Did you ever have any meals in the convent?
 15 A They don't allow that there.
 16 Q Okay.
 17 When was the last time you were in the
 18 convent?
 19 A I don't remember.
 20 Q Has it been a long time?
 21 A A long time.
 22 Q Okay.
 23 Did [redacted] ever tell you that Father Kelly was
 24 giving him or any other boys alcohol while they were at
 25 the cabin?

1 A Yes, I did find out that they had alcohol
 2 with --
 3 THE INTERPRETER: I cannot remember, Counsel,
 4 the name of this word in English. It's a little brown
 5 stick that you put in rice pudding.
 6 MR. GRIFFITH: Cinnamon.
 7 MR. HALE: Cinnamon.
 8 THE WITNESS: -- cinnamon.
 9 THE INTERPRETER: There it is. I just forgot.
 10 BY MR. HALE:
 11 Q How did you find that out?
 12 A Because once [redacted] took me and his friends to
 13 eat, and I always take care of his friends.
 14 And there I heard them say that they drank.
 15 Q And did that happen while [redacted], to your
 16 knowledge, was still taking trips to the cabin?
 17 A Yes.
 18 Q Okay.
 19 Did you ever smell alcohol on [redacted] breath
 20 when he returned from a trip to the cabin with Father
 21 Kelly?
 22 A Yes.
 23 Q Okay.
 24 Did you ever tell the sisters, either Sister
 25 [redacted] -- well, did you ever tell Sister [redacted] that

1 you would smell alcohol on [redacted] breath?
 2 A No, I never told them.
 3 Q Okay.
 4 Did you ever tell Sister [redacted] that you
 5 were somehow aware that Father Kelly was giving boys at
 6 the cabin alcohol?
 7 A No, I never told them.
 8 Q What about Sister [redacted], did you ever tell
 9 Sister [redacted] about your concerns about alcohol being
 10 given to boys at the cabin?
 11 A I never talked to them about alcohol.
 12 Q Okay.
 13 Did [redacted] ever tell you that when he went to
 14 the cabin Father Kelly was having him either wear his
 15 underwear or be naked?
 16 A That they had a -- they had a big swimming
 17 pool and they would bathe naked.
 18 Q Okay.
 19 And when did he tell you that? Was that while
 20 he was still going to the cabin?
 21 A No, I had refused and not given permission
 22 again.
 23 Q Okay.
 24 But when did you first learn about [redacted]
 25 being naked in this pool at the cabin?

1 A All the boys would talk about it among
 2 themselves.
 3 Q Okay.
 4 And when did you first hear that?
 5 A When they'd go to dine at my -- when they
 6 would come to dine at my home.
 7 Q Okay.
 8 And was that while [redacted] was still taking
 9 trips to the cabin?
 10 A Yes, they were still going.
 11 Q And you would hear them talk about being naked
 12 at the swimming area at the cabin?
 13 A Yes.
 14 Q And did you ever tell Sister [redacted] or
 15 Sister [redacted] about these boys swimming naked at the
 16 cabin?
 17 A No, I never told them.
 18 Q Did you ever tell Father [redacted] about that?
 19 A What they did, no, just that I had my
 20 concerns.
 21 Q Okay.
 22 Did you ever tell Father [redacted] about Father
 23 Kelly giving boys alcohol at the cabin?
 24 A No.
 25 Q Okay.

1 A Yes.
 2 Q Okay.
 3 Did you ever tell Sister [redacted] or Sister
 4 [redacted] that Father Kelly would give [redacted] money
 5 after -- after going to the cabin?
 6 A No.
 7 Q Did you ever tell Father [redacted] that?
 8 A Father [redacted] I don't remember having told
 9 him anything.
 10 Q Okay.
 11 When you -- when you spoke to Sister [redacted]
 12 and Sister [redacted] about -- and you told them you had
 13 concerns about [redacted] going to the cabin, did they ask
 14 you what kind of concerns you had?
 15 MS. YOUNG: Objection. Misstates testimony.
 16 MR. HALE: Well, strike that.
 17 BY MR. HALE:
 18 Q Did you -- did you -- did you tell Sister
 19 [redacted] and Sister [redacted] that you were concerned
 20 about [redacted] going to the cabin with Father Kelly?
 21 A Yes, I did discuss that with them, but they
 22 would always say that I shouldn't worry about it.
 23 Q Okay.
 24 Did they ask you what your concerns were?
 25 A Well, from what I had heard them discuss among

1 Did you -- did you tell Sister [redacted] or
 2 Sister [redacted] that [redacted] was spending the night at
 3 the cabin or had spent the night at the cabin?
 4 A No.
 5 Q Did you tell Father [redacted] about [redacted]
 6 spending the night at the cabin?
 7 A I did tell the priest.
 8 Q Okay.
 9 And when -- when do you think that was?
 10 A When he was staying at my home.
 11 Q And do you think that was while [redacted] was
 12 still going to the cabin?
 13 MS. YOUNG: Objection. Speculation.
 14 THE WITNESS: I don't remember.
 15 BY MR. HALE:
 16 Q Okay.
 17 Do you remember how -- where -- whether --
 18 whether [redacted] was going to school at Our Lady at the
 19 time or Bishop Diego when you told Father [redacted] ?
 20 A [redacted] was already at Bishop.
 21 Q Okay.
 22 Did [redacted] ever tell you that Father Kelly
 23 would give him money after he went to the cabin?
 24 A That he gave him money?
 25 Q Yes.

1 themselves.
 2 Q When you say "them," who do you mean?
 3 A The kids who would come to dine at my house.
 4 Q Okay.
 5 And what did you -- did you tell Sister
 6 [redacted] and Sister [redacted] what you heard the boys
 7 talk amongst themselves about the cabin?
 8 A No.
 9 Q Okay.
 10 But did you tell -- did you tell them that you
 11 had heard the boys talking about things going on in the
 12 cabin?
 13 MS. YOUNG: Objection. Asked and answered.
 14 THE WITNESS: Yes, I told them about my
 15 concerns. They were always just doubts. I couldn't
 16 know for sure.
 17 BY MR. HALE:
 18 Q Okay.
 19 But did they ever ask you what your concerns
 20 were?
 21 A Well, because of what I heard that was being
 22 said.
 23 Q What -- what do you mean? What had you heard?
 24 A I would hear them discussing that they had a
 25 good time; that they swam in the pool.

1 Q Okay.
 2 Anything else?
 3 A No.
 4 Q Okay.
 5 And -- and -- and did Sister [REDACTED] or
 6 Sister [REDACTED] ever ask you, "What are you concerned
 7 about?"
 8 A Well, about how much interest Father Kelly had
 9 with -- for my son.
 10 Q Okay.
 11 And what did you -- is that what you told them
 12 when they asked? Is that what you -- is that what --
 13 the reason you gave them for being concerned?
 14 A Yes.
 15 Q Okay.
 16 And did they ask you what you meant by -- by
 17 Father Kelly's interest in your son?
 18 A Well, yes.
 19 Q And what did you say?
 20 A The sisters would tell me that I shouldn't
 21 worry, that I shouldn't worry.
 22 Q Okay.
 23 Did they ask you why you were worried about
 24 Father Kelly having an interest in your son, [REDACTED],
 25 that is?

1 Q Okay.
 2 A And then he didn't go there again.
 3 Q Okay.
 4 Do you -- do you know, after you talked to --
 5 after the first time you talked to Sister [REDACTED] and
 6 Sister [REDACTED] about your concerns about Father Kelly,
 7 do you know if [REDACTED] continued to go to the cabin?
 8 MS. YOUNG: Objection. Asked and answered.
 9 THE WITNESS: No, I didn't know.
 10 BY MR. HALE:
 11 Q Okay.
 12 THE REPORTER: "I didn't" what?
 13 THE INTERPRETER: "Know."
 14 BY MR. HALE:
 15 Q "Know" what?
 16 THE INTERPRETER: "I didn't know." That was
 17 the whole sentence.
 18 BY MR. HALE:
 19 Q Okay.
 20 Did you ever overhear [REDACTED] talking to Father
 21 [REDACTED] about his trips to the cabin with Father Kelly?
 22 MS. YOUNG: Objection. Assumes facts not in
 23 evidence.
 24 THE WITNESS: Yes.
 25 BY MR. HALE:

1 MS. YOUNG: Objection. Asked and answered.
 2 THE WITNESS: Well, it's because of what I
 3 just said: Why did he just focus on him?
 4 BY MR. HALE:
 5 Q So that's -- is that what you told them?
 6 A Yes.
 7 Q Okay.
 8 Did -- did [REDACTED] ever tell you he did not -- he
 9 did not want to go to the cabin?
 10 A He told me that he had gone once and he didn't
 11 like it --
 12 Q Okay.
 13 A -- for him to give him money for nothing.
 14 Q Okay.
 15 And -- and did you tell anybody about [REDACTED]
 16 telling you that?
 17 A No.
 18 Q Did [REDACTED] tell you why Father Kelly gave him
 19 money?
 20 A I asked him, and he said, "I don't want to go
 21 there anymore." He said that he had had them outside
 22 and he was very scared of snakes.
 23 Q Okay.
 24 A And he said to me, "I don't want to go there."
 25 I said, "Nobody is forcing you to go there."

1 Q And -- and -- and when was that?
 2 A While he was visiting my home.
 3 Q Okay.
 4 And do you remember whether [REDACTED] was still
 5 attending Our Lady or was he at Bishop Diego when you --
 6 when you overheard that conversation?
 7 A He was going to Bishop [REDACTED].
 8 Q Okay.
 9 Where -- where did that conversation take
 10 place?
 11 A At my home.
 12 Q Okay.
 13 But could you see where [REDACTED] and -- and
 14 Father [REDACTED] were?
 15 A They went up to the second floor.
 16 Q Okay.
 17 But could you hear their voices?
 18 A Yes.
 19 Q And what did you hear [REDACTED] say to Father
 20 [REDACTED]?
 21 A He said to the priest that he had been touched
 22 by Father Kelly.
 23 Q Okay.
 24 Did he say anything else to Father [REDACTED]?
 25 A That was everything that I heard.

1 Q Okay.
 2 Did -- did you hear Father [REDACTED] saying
 3 anything in response to [REDACTED] saying that?
 4 A No, I don't know what he asked.
 5 Q Okay.
 6 Do you recall Father [REDACTED] coming to Our
 7 Lady for missions on more than one occasion or just one
 8 occasion?
 9 MS. YOUNG: Objection. Vague and ambiguous.
 10 THE WITNESS: He came other times.
 11 BY MR. HALE:
 12 Q Okay.
 13 And when he would come for a mission, how long
 14 would he stay? Would it be a day? A week? A month?
 15 A A day or two.
 16 Q Okay.
 17 And where would he give the missions? Where
 18 would they -- where would he put them on?
 19 A At the Guadalupe church.
 20 Q And did you go to those missions?
 21 A Yes.
 22 Q Okay.
 23 And would any of the other priests from Our
 24 Lady participate? Father Kelly or Father [REDACTED] or
 25 any other priests?

1 A Just him.
 2 Q Just Father [REDACTED]?
 3 A (Inaudible response.)
 4 Q Okay.
 5 What about any of the nuns, would any of the
 6 nuns from -- Sisters of Bethany or from the Sisters of
 7 Notre Dame, would they participate?
 8 MS. YOUNG: Objection. Assumes facts not in
 9 evidence.
 10 THE WITNESS: They would go to mass at 7:00 in
 11 the morning.
 12 BY MR. HALE:
 13 Q The Sisters of Bethany?
 14 A Yes.
 15 Q Did you ever see the Sisters of Notre Dame
 16 there?
 17 MS. YOUNG: Objection. Lacks foundation.
 18 THE WITNESS: Yes.
 19 BY MR. HALE:
 20 Q Okay.
 21 And do you -- was it your understanding that
 22 the Sisters of Notre Dame taught at the school at Our
 23 Lady?
 24 A Yes, they would go to meetings there.
 25 Q The sisters would?

1 A The sisters would.
 2 Q Did the Sisters of Notre Dame attend any of
 3 the missions put on by Father [REDACTED]?
 4 A Just to mass.
 5 Q Okay.
 6 And when Father [REDACTED] came and put on these
 7 missions, were there ever any meetings in the parish
 8 hall?
 9 MS. YOUNG: Objection. Vague and ambiguous.
 10 THE WITNESS: No.
 11 BY MR. HALE:
 12 Q They were all in the church?
 13 A Everything was in the church.
 14 Q Okay.
 15 And -- and would -- would Father [REDACTED]
 16 perform a mass during one of these missions or some of
 17 these missions?
 18 A Yes.
 19 Q Do you ever remember an instance where Father
 20 [REDACTED] came to Our Lady to perform one of these
 21 missions and did not perform a mass?
 22 Strike that. Let me ask it -- ask it in a
 23 better way.
 24 When Father [REDACTED] came to Our Lady, to your
 25 knowledge, did he always perform a mass?

1 A Yes.
 2 Q Okay.
 3 Do you recall what year was the first time you
 4 remember Father [REDACTED] coming to Our Lady of Guadalupe?
 5 A No, I don't remember the dates.
 6 Q Do you remember if it was in the '50s?
 7 A No, I'm not sure.
 8 Q Okay.
 9 And -- and did you know Father [REDACTED] before
 10 you moved to Santa Barbara with [REDACTED]?
 11 A He had a boys' school in [REDACTED].
 12 Q Okay.
 13 A And they went to that school.
 14 Q [REDACTED] attended that school?
 15 A Yes.
 16 Q Okay.
 17 And when you moved to Santa Barbara and began
 18 attending Our Lady, do you know how Father [REDACTED] came
 19 to perform missions at Our Lady?
 20 MS. YOUNG: Objection. Calls for speculation.
 21 THE WITNESS: Because we invited him. We gave
 22 him an invitation and he came.
 23 BY MR. HALE:
 24 Q When you say "we invited him," who do you
 25 mean?

1 A Well, my -- my family and -- my husband, my
 2 children, my family.
 3 Q Okay.
 4 So your -- the [redacted] family invited Father
 5 [redacted] ?
 6 A Yes.
 7 Q Before you invited Father [redacted] to come and
 8 perform these missions, did you discuss that fact with
 9 Father Kelly, that you wanted to invite him to do this,
 10 Father [redacted] that is?
 11 MS. YOUNG: Objection. Vague and ambiguous.
 12 THE WITNESS: Yes, I did.
 13 BY MR. HALE:
 14 Q Did you have to get permission from Father
 15 Kelly in order to make that invitation?
 16 A I don't know.
 17 Q Do you remember if you or your husband
 18 discussed with Father Kelly inviting Father [redacted] to
 19 perform missions at Our Lady?
 20 MS. YOUNG: Objection. Calls for speculation.
 21 THE WITNESS: We asked permission.
 22 BY MR. HALE:
 23 Q Okay.
 24 Do you remember, was it -- did you ask
 25 permission or do you know if your husband asked

1 permission?
 2 MS. YOUNG: Objection. Misstates testimony.
 3 THE WITNESS: I don't know.
 4 BY MR. HALE:
 5 Q Okay.
 6 But -- but it was your family that invited
 7 Father [redacted] first?
 8 MS. YOUNG: Objection. Vague and ambiguous.
 9 THE WITNESS: Yes.
 10 BY MR. HALE:
 11 Q Okay.
 12 And do you recall there being any discussions
 13 with Father Kelly or any other priest about the fact
 14 that Father [redacted] was coming on a certain date?
 15 (Whereupon Mr. Griffith entered the
 16 deposition proceedings at this point in
 17 time.)
 18 THE WITNESS: No.
 19 BY MR. HALE:
 20 Q Did you have to -- did you have any
 21 discussions with the parish secretary that Father
 22 [redacted] was coming on a certain date?
 23 A No.
 24 Q Do you know -- were you ever aware of anyone
 25 having any discussions with the parish secretary that

1 permission?
 2 A Both of us.
 3 Q Okay.
 4 So did you actually go and meet with Father
 5 Kelly and ask for his permission for Father [redacted] to
 6 come and perform these missions?
 7 (Whereupon Mr. Griffith left the
 8 deposition proceedings at this point in
 9 time.)
 10 MS. YOUNG: Asked and answered.
 11 THE WITNESS: No.
 12 BY MR. HALE:
 13 Q How did you ask for permission?
 14 A They made the arrangements. I just invited
 15 him.
 16 Q When you say "they," who is they?
 17 A Well, the priest was the one who asked for
 18 permission.
 19 Q Father [redacted] asked?
 20 A Yes.
 21 Q Did he -- did Father [redacted] tell you that he
 22 asked Father Kelly for permission?
 23 A No, he never told me that.
 24 Q Okay.
 25 How do you know that Father [redacted] asked for

1 Father [redacted] was coming on a certain date?
 2 MS. YOUNG: Objection. Calls for speculation.
 3 THE WITNESS: No.
 4 BY MR. HALE:
 5 Q Okay.
 6 Did you have to ask to reserve the church so
 7 that Father -- Father [redacted] could perform these
 8 missions in the church?
 9 MS. YOUNG: Objection. Vague and ambiguous.
 10 THE WITNESS: No.
 11 BY MR. HALE:
 12 Q Okay.
 13 Do you know if Father [redacted] asked for the
 14 church to be reserved so that he could perform these
 15 missions?
 16 (Whereupon Mr. Griffith left the
 17 deposition proceedings at this point in
 18 time.)
 19 MS. YOUNG: Speculation.
 20 THE WITNESS: Yes.
 21 BY MR. HALE:
 22 Q How do you know that?
 23 A Because he told us that he had asked for
 24 permission.
 25 Q Okay.

1 Did he tell you -- did he tell you that he
 2 asked Father Kelly for permission?
 3 A No.
 4 Q Did he tell you who he asked for permission?
 5 A Well, I don't know. He did the arrangements
 6 with the church.
 7 Q Okay.
 8 A All I did was invite him.
 9 Q Okay.
 10 Did he ever mention talking to anyone from the
 11 chancellor office from the Archdiocese about performing
 12 missions at Our Lady of Guadalupe?
 13 A No.
 14 Q Did he ever mention getting permission from
 15 the Archbishop to perform missions at the -- at Our Lady
 16 of Guadalupe?
 17 A No.
 18 Q Okay.
 19 MS. YOUNG: Let's go to Mexico.
 20 MR. HALE: Maybe. We'll see.
 21 MS. YOUNG: Aged and infirm.
 22 MR. HALE: Yeah, he definitely is. Never been
 23 to that part of Mexico. Do you know anything about it?
 24 MS. YOUNG: Yep.
 25 MR. HALE: Is it good?

1 that or do you mean the nuns or who are you talking
 2 about?
 3 A No, the mothers.
 4 Q The mothers. Okay.
 5 And so -- and so what would they say?
 6 A That they were men from away.
 7 Q Did -- did you talk with Mrs. [REDACTED] about
 8 her son spending the night at the cabin with Father
 9 Kelly?
 10 MS. YOUNG: Objection. Assumes facts not in
 11 evidence.
 12 THE WITNESS: Yes.
 13 BY MR. HALE:
 14 Q Did you talk with Mrs. [REDACTED] about her son
 15 being given alcohol by Father Kelly?
 16 A No.
 17 Q Did she ever tell you that she had smelled
 18 alcohol on her son's breath after he came back from the
 19 cabin?
 20 A I never discussed that with them.
 21 Q Okay.
 22 Did any of them ever tell you that they
 23 complained to anyone about their concerns regarding
 24 Father Kelly?
 25 MS. YOUNG: Objection. Vague and ambiguous.

1 MS. YOUNG: Parts.
 2 MR. HALE: Parts.
 3 Well, I don't know if we want to be taking
 4 [REDACTED] across the border right now, but maybe. We'll
 5 see. Let the immune system get a little stronger first.
 6 BY MR. HALE:
 7 Q Do you remember ever hearing any -- any
 8 mothers of other boys express concerns about their sons
 9 going to the cabin with Father Kelly?
 10 A Yes.
 11 Q Do you remember who expressed those concerns?
 12 A As I said, the [REDACTED] boys and another
 13 family.
 14 Q Do you remember what the [REDACTED] boys'
 15 mother's name was?
 16 A [REDACTED].
 17 Q Okay.
 18 And -- and what did she say to you about
 19 concerns about the cabin?
 20 A Well, the same thing: That they would always
 21 answer that they were men from outside the parish.
 22 Q When -- when you say "they would always
 23 answer," who do you -- who do you mean?
 24 A The ladies.
 25 Q Do you mean the mo- -- the mothers would say

1 THE WITNESS: No.
 2 BY MR. HALE:
 3 Q Did you ever tell them that you had spoken
 4 with Sister [REDACTED] or Sister [REDACTED] about your
 5 concerns about Father Kelly?
 6 A Yes.
 7 Q And what did they say when they heard that?
 8 A Well, that I shouldn't worry.
 9 Q Did they tell you why you shouldn't worry?
 10 A I don't know if it is that they just never
 11 believed it or thought about it.
 12 Q Okay.
 13 Did -- while [REDACTED] was attending Our Lady of
 14 Guadalupe, did you attend PTA meetings?
 15 A Sometimes.
 16 Q Okay.
 17 And where were the PTA meetings held?
 18 A At school hall.
 19 Q Okay.
 20 And who would -- who would -- I don't know --
 21 for lack of a better word -- supervise or lead the PTA
 22 meetings?
 23 A I don't remember if it was the principal or
 24 not.
 25 Q Do you remember if any of the Sisters of Notre

1 Dame attended the PTA meetings?
 2 A I don't remember.
 3 Q Do you remember if any of the -- did the
 4 Sisters of Bethany ever serve as translators for you?
 5 A No.
 6 Q Do you remember if any of the Sisters of
 7 Bethany ever attended PTA meetings with you?
 8 A They spoke Spanish.
 9 Q Okay.
 10 But did they ever attend any of the PTA
 11 meetings?
 12 A Yes.
 13 Q Okay.
 14 Who attended a PTA meeting with you from
 15 Sisters of Bethany?
 16 A When they -- they asked us to be there.
 17 Q Did Sister [REDACTED] ever attend a PTA meeting
 18 with you?
 19 A I don't remember.
 20 Q What about Sister [REDACTED]?
 21 A No, I don't remember either.
 22 Q Do you remember any other Sisters of
 23 Bethany -- the names of any other Sisters of Bethany who
 24 attended PTA meetings?
 25 A No.

1 MS. YOUNG: Assumes facts not in evidence.
 2 BY MR. HALE:
 3 Q Do you -- do you remember what -- what they
 4 would do at these meetings, what would be discussed?
 5 MS. YOUNG: Objection. Vague and ambiguous.
 6 THE WITNESS: I never discussed it with them.
 7 BY MR. HALE:
 8 Q Okay.
 9 Did you ever say anything at any of these
 10 meetings about either of your sons going to the cabin
 11 with Father Kelly?
 12 A No.
 13 Q Okay.
 14 MR. HALE: I'm sorry. Let's go off the record
 15 and change the tape.
 16 THE VIDEOGRAPHER: We're going off the record.
 17 The time is 12:23 p.m. This is the end of media No. 1.
 18 (Recess.)
 19 THE VIDEOGRAPHER: We're going back on the
 20 record. The time is 12:25 p.m. This is the beginning
 21 of media No. 2. Please continue.
 22 BY MR. HALE:
 23 Q Going back to that conversation you had -- or
 24 I'm sorry, strike that.
 25 Going back to that conversation you overheard

1 between Father [REDACTED] and [REDACTED] did Father [REDACTED]
 2 ever tell you after that conversation that you and
 3 [REDACTED] should go to confession to confess what -- what
 4 [REDACTED] had told him?
 5 MS. YOUNG: Objection. Vague.
 6 THE WITNESS: No.
 7 BY MR. HALE:
 8 Q Did he ever tell you you should go to
 9 confession to confess anything related to Father Kelly
 10 in the cabin?
 11 A I told him that I didn't want to confess, but
 12 I didn't tell him why.
 13 Q But -- but did he tell you he thought you
 14 should go to confession to talk about Father Kelly in
 15 the cabin?
 16 A No.
 17 Q Why -- why didn't you -- why did you tell him
 18 you didn't want to confess?
 19 A Because I had a motive for not doing it.
 20 Q What was your motive?
 21 A Rather, I didn't want to state something like
 22 that.
 23 Q Okay.
 24 Do you mean you didn't want to talk about a
 25 priest that way?

1 MS. YOUNG: Objection. Misstates --
 2 THE WITNESS: Yes.
 3 MS. YOUNG: -- testimony.
 4 BY MR. HALE:
 5 Q Were you -- did you separate from your husband
 6 at some point for -- temporarily?
 7 A We were separated for three years.
 8 Q Do you remember what years you were separated?
 9 A It was when I have been 25 years married he
 10 was away.
 11 THE INTERPRETER: Counsel, that would
 12 separate -- in Spanish it's -- it's so ambiguous, it
 13 could mean that you were legally separated, it could
 14 mean that he was somewhere else.
 15 MR. HALE: Oh. Okay.
 16 BY MR. HALE:
 17 Q Was there a point where Mr. [REDACTED] when you
 18 were here in Santa Barbara was not living in the same
 19 home as you?
 20 A No.
 21 Q Okay.
 22 Did [REDACTED] ever tell you that Father Kelly had
 23 a camera?
 24 A No.
 25 Q Did you ever see Father Kelly with a camera?

1 A No, because I saw him very rarely at my home.
 2 Q Did you ever hear about Father Kelly having a
 3 camera?
 4 A That has been discussed now, later, but before
 5 I didn't know.
 6 Q Okay.
 7 Did you know a -- a woman named Mrs. [REDACTED]
 8 who was the secretary for the -- the parish?
 9 A [REDACTED]?
 10 Q (Inaudible response.)
 11 A No.
 12 Q What about [REDACTED], did you know a [REDACTED]
 13 [REDACTED]?
 14 A [REDACTED], I think so.
 15 Q Do you know if she's still alive?
 16 A [REDACTED]. I have a relative. I don't
 17 know if it's that one.
 18 Q Do you know if this relative ever worked at
 19 the rectory?
 20 A No.
 21 Q Okay.
 22 Did you know any of the janitors or the cooks
 23 at Our Lady of Guadalupe while you were --
 24 THE REPORTER: Or the what?
 25 BY MR. HALE:

1 Q -- janitors or the cooks at Our Lady of
 2 Guadalupe?
 3 A I don't think they had cooks because they
 4 didn't have food.
 5 Q Okay.
 6 Do you remember who the principal was at Our
 7 Lady of Guadalupe while Carlos attended there?
 8 A No.
 9 Q Did the -- do you remember if the -- the
 10 sisters -- if any of the Sisters of Bethany taught CCD
 11 classes at Our Lady of Guadalupe?
 12 THE INTERPRETER: Counsel, what's CCD?
 13 MR. HALE: Catechism.
 14 THE WITNESS: Yes, they did do catechism.
 15 BY MR. HALE:
 16 Q And -- and do you remember who -- which --
 17 which -- which nuns taught catechism at Our Lady of
 18 Guadalupe?
 19 A Well, it was Sister [REDACTED] and Sister
 20 [REDACTED] because the others were in the convent.
 21 Q Okay.
 22 And how do you know Sister [REDACTED] and Sister
 23 [REDACTED] taught catechism?
 24 A Because my kids went there.
 25 Q Okay.

1 And did they ever tell -- did [REDACTED] or -- or
 2 [REDACTED] or anyone -- any of your kids ever tell you that
 3 Sister [REDACTED] or Sister [REDACTED] had taught them
 4 catechism?
 5 A No, I don't remember.
 6 Q Do you know where the catechism classes were,
 7 were taught at Our Lady of Guadalupe?
 8 MS. YOUNG: Objection. Vague and ambiguous.
 9 THE WITNESS: [REDACTED] did his first communion
 10 in Mexico.
 11 BY MR. HALE:
 12 Q Okay.
 13 But let's back up for a second.
 14 Do you know where the catechism classes were
 15 taught at Our Lady of Guadalupe? Were they taught at
 16 the school?
 17 A In one of the -- one of the classrooms at the
 18 school.
 19 Q Did -- did Sister [REDACTED] ever tell you she
 20 had to go teach a catechism class for Our Lady?
 21 A No.
 22 Q Did Sister [REDACTED] ever tell you that?
 23 A They would go check -- Sister [REDACTED] would
 24 go check.
 25 Q What do you mean "go check"?

1 A They were volunteers. They were volunteers
 2 who gave catechism classes.
 3 Q Okay.
 4 And how do you know that?
 5 A Because they would discuss that with me.
 6 Q Okay.
 7 And that was -- they were volunteers at our
 8 Lady of Guadalupe?
 9 A They would be volunteer ladies or girls.
 10 Q Okay.
 11 And did you ever see them -- any Sisters of
 12 Bethany participate in mass at our Lady of Guadalupe?
 13 MS. YOUNG: Objection. Vague and ambiguous as
 14 to "participate."
 15 THE WITNESS: The 7:00 a.m. mass.
 16 BY MR. HALE:
 17 Q Okay. Okay.
 18 But did you ever -- I understand they attended
 19 the 7:00 a.m. mass. Did you ever see them participate
 20 in any way?
 21 MS. YOUNG: Same objection.
 22 THE WITNESS: No.
 23 BY MR. HALE:
 24 Q Okay.
 25 Did you ever see them do any work around Our

1 Lady of Guadalupe, the church, any Sisters of Bethany?
 2 MS. YOUNG: Objection. Objection. Vague and
 3 ambiguous.
 4 THE WITNESS: When there was a -- when there
 5 was a festival, they would go and check there, but
 6 that's all.
 7 BY MR. HALE:
 8 Q The Sisters of Bethany would?
 9 A They just didn't participate. They just
 10 checked.
 11 Q What kind of festival?
 12 A The festival that they do every year to -- to
 13 gather funds for the Guadalupe temple.
 14 Q And when you say "they would go and check,"
 15 what do you mean by "go and check"?
 16 A To make sure that everything was in order.
 17 Q Okay.
 18 And what -- what -- was there a name for the
 19 festival?
 20 A Just Festival of Our Lady of Guadalupe.
 21 Q And that would take place once a year?
 22 A Once a year.
 23 Q And do you recall what time of year that
 24 would -- that would take place?
 25 A When it started, I don't know what year.

1 MS. YOUNG: Objection. Lacks foundation.
 2 BY MR. HALE:
 3 Q What kind of activities did the group
 4 participate in?
 5 MS. YOUNG: Lacks foundation.
 6 THE WITNESS: Counseling and trying to help
 7 the group.
 8 BY MR. HALE:
 9 Q Okay.
 10 A It was done at the welfare place, at a hall
 11 there.
 12 Q At a what there?
 13 A There's a welfare that's next to -- across
 14 from the Tolteca.
 15 Q Okay.
 16 Did -- did this -- did this group ever have
 17 any activities at Our Lady of Guadalupe?
 18 A Yes.
 19 Q And what kind of activities would it have at
 20 Our Lady of Guadalupe?
 21 A They would go to mass.
 22 Q Okay.
 23 A They would help at festivals.
 24 Q Okay.
 25 And do you know, was this group created by the

1 Q Okay.
 2 But -- but do you recall if -- was there a
 3 certain time of year? A month? Is it in August or
 4 September? Or when would this festival take place?
 5 A I don't -- I don't remember the date.
 6 Q Okay.
 7 When was the last time you went to this
 8 festival?
 9 MS. YOUNG: Objection. Assumes facts.
 10 THE WITNESS: This last year.
 11 BY MR. HALE:
 12 Q Okay.
 13 And did you see any Sisters of Bethany then?
 14 A Not this year.
 15 Q Okay.
 16 And you talked about a youth group that the
 17 Sisters of Bethany ran while [redacted] was a student at Our
 18 Lady of Guadalupe; is that correct?
 19 A Yes.
 20 Q What was the name of that group?
 21 A I don't remember the name. I didn't know the
 22 name.
 23 Q And were the Sisters of Bethany in charge of
 24 that group?
 25 A Yes.

1 Sisters of Bethany?
 2 A That I don't know.
 3 Q Okay.
 4 How did you first hear about this youth group?
 5 A Because the kids started talking to me about
 6 the club.
 7 Q Okay.
 8 Did you ever hear any announcements about the
 9 youth group during mass at Our Lady or after mass at Our
 10 Lady?
 11 A No, I don't remember hearing anything.
 12 Q Were there ever any bulletins posted at Our
 13 Lady about the youth group that you know of?
 14 MS. YOUNG: Speculation.
 15 THE WITNESS: Yes.
 16 BY MR. HALE:
 17 Q How -- how often would you see that happen?
 18 A Well, the sisters would let me know because we
 19 communicated by phone.
 20 Q Okay.
 21 But did you ever see any kind of bulletin, a
 22 posting at our Lady of Guadalupe about the youth group?
 23 A No.
 24 Q Okay.
 25 Did the youth group ever have any meetings at

1 the convent, to your knowledge?
 2 A No, I don't remember it being at the convent.
 3 Q Did the youth group ever have any meetings, to
 4 your knowledge, at the parish hall?
 5 A No, not there.
 6 Q Were you ever aware of any priests being
 7 involved in the youth group?
 8 A No.
 9 Q Did one of the nuns run the group?
 10 A Both Sister [redacted] and Sister [redacted].
 11 Q Okay.
 12 Did you ever spend any time in the rectory
 13 while you were attending Our Lady of Guadalupe?
 14 MS. YOUNG: Vague and ambiguous.
 15 THE WITNESS: Yes, sometimes.
 16 BY MR. HALE:
 17 Q Why would you go into the rectory?
 18 A Because the sisters would invite me in with
 19 their permission.
 20 Q Into the rectory or into the convent?
 21 A Sometimes right outside there or sometimes
 22 inside.
 23 Q When I say "rectory," you understand me to be
 24 discussing the -- the house where the priests live?
 25 A When I went to see Padre [redacted] on matters

1 having to do with the church.
 2 Q Okay.
 3 A I mean the school.
 4 Q And so did you understand the rectory was
 5 where the priests lived?
 6 A Yes.
 7 Q Okay.
 8 So I just want to make sure we're on the same
 9 page.
 10 A Yes.
 11 Q When -- when would you go to the rectory?
 12 What would bring you into the rectory?
 13 A Once I went to ask Padre [redacted], he had told
 14 us in mass that the bus that picked up the children for
 15 school was going to go by -- it was going to go and pick
 16 me up --
 17 Q Okay.
 18 A -- on [redacted], on [redacted]
 19 And two times the bus did not show up. So I
 20 went to ask him -- I went to speak with Father [redacted]
 21 Q Okay.
 22 Did you ever --
 23 A I asked why wasn't the bus going by there.
 24 THE REPORTER: "Was" or "wasn't"?
 25 THE INTERPRETER: "Why the bus wasn't going by

1 there."
 2 THE WITNESS: And he got angry.
 3 He said, "Do you want me to put -- come and
 4 take them out of the home?" And I said, "No, not --
 5 well, not all that. I just want you to tell me if the
 6 bus is gonna come by or not."
 7 BY MR. HALE:
 8 Q Okay.
 9 Did you ever see any of the Sisters of Bethany
 10 in the rectory?
 11 A Yes.
 12 Q And when would you see Sisters of Bethany in
 13 the rectory?
 14 A They -- Sister [redacted] for a while was in
 15 charge of that place.
 16 Q Of the rectory?
 17 A Yes.
 18 Q What do you mean she was in charge?
 19 A Well, some paperwork matters.
 20 Q Did she serve as a secretary of some sort for
 21 the rectory at some point?
 22 A I don't know if she was a secretary.
 23 Q Do you remember if she had a desk inside the
 24 rectory?
 25 A No.

1 Q And when I say "rectory," do you understand me
 2 to be referring to the place where the priests lived?
 3 A Yes.
 4 Q Okay.
 5 But -- and you have a recollection of Sister
 6 [redacted] helping out with paperwork in the rectory at
 7 some point?
 8 MS. YOUNG: Objection. Lacks foundation.
 9 THE WITNESS: Yes.
 10 BY MR. HALE:
 11 Q Okay.
 12 Do you remember if she was helping any
 13 particular priest out with paperwork?
 14 A It was when Pad- -- Father [redacted] was there.
 15 Q Father [redacted]?
 16 A I don't know his surname.
 17 Q Was it -- was it --
 18 A I just know him as Father [redacted].
 19 Q Okay.
 20 Was it while [redacted] was still attending school
 21 at Our Lady of Guadalupe?
 22 A Yes.
 23 Q Okay.
 24 And did you actually walk into the rectory and
 25 see Sister [redacted] performing work inside the rectory?

1 THE REPORTER: "Performing"?

2 MR. HALE: "Performing work."

3 MS. YOUNG: Vague and ambiguous.

4 THE WITNESS: Yes, because sometimes I worked

5 at the packing house, and they would take me to see my

6 daughter on Wednesdays.

7 BY MR. HALE:

8 Q Okay.

9 A And -- and from there they would take me to

10 General Hospital.

11 Q So did you have to meet Sister [REDACTED] at the

12 rectory to get a ride from her?

13 A Yes, because sometimes she'd pick me up at the

14 door of the packing house --

15 Q Okay.

16 A -- and sometimes she would pick me up there.

17 Q But did you ever go to the rectory for a ride

18 from Sister [REDACTED]?

19 A Yes.

20 Q Okay.

21 Do you remember if she had a specific

22 workspace in the area where she worked within the

23 rectory?

24 A No.

25 Q Okay.

1 A Yes.

2 Q And did you ever hear them say that Father

3 Kelly appeared drunk to them?

4 A The ones who came to my home. I didn't know

5 them all.

6 Q And you heard these boys talking about

7 drinking alcohol at the cabin with Father Kelly?

8 MS. YOUNG: Objection. Asked and answered.

9 THE WITNESS: Yes. With the cinnamon, with

10 alcohol.

11 BY MR. HALE:

12 Q Right.

13 Did -- did you attend a -- a celebration for

14 Father Kelly, his -- his 25th anniversary?

15 A No.

16 Q Did you ever hear about that?

17 A I heard, but I never went there.

18 Q Okay.

19 Did you -- you know what the Legion of Mary

20 is?

21 A Yes.

22 Q And what do you -- what is your understanding

23 of what the Legion of Mary is?

24 A You're speaking about the virgin?

25 Q Yes.

1 A I don't remember.

2 Q Did you see any other Sisters of Bethany ever

3 working inside the rectory?

4 MS. YOUNG: Vague and ambiguous.

5 THE WITNESS: Sister Ines.

6 BY MR. HALE:

7 Q Okay.

8 What did you see her doing inside the rectory?

9 A I don't know, but she was left in charge after

10 Sister [REDACTED] passed away.

11 Q Okay.

12 But -- but did you ever see Sister [REDACTED] in the

13 rectory where the priests live?

14 A No.

15 Q Okay.

16 Do you ever remember Father Kelly appearing to

17 be intoxicated to you, in other words, to be drunk?

18 A No, because I never came near to him.

19 Q Did you ever hear anyone say that they believe

20 Father Kelly had appeared intoxicated?

21 A Well, the kids themselves said that they

22 drank.

23 Q Okay.

24 Are you talking about the kids who went to the

25 cabin?

1 What is your understanding of the purpose of

2 that group?

3 A Well, to help needy persons.

4 Q Okay.

5 Was there ever a point before you moved to

6 Goleta where you were living near Our Lady of Guadalupe

7 but you stopped attending Our Lady of Guadalupe?

8 A Well, not exactly, but what -- well, the --

9 that father was there, I withdrew somewhat.

10 Q When you say "that father," do you mean Father

11 Kelly?

12 A Father Kelly.

13 Q And what do you mean when you say you withdrew

14 somewhat?

15 A Well, I was no longer happy --

16 Q And why not?

17 A -- with the place. I didn't like to listen to

18 him.

19 Q Okay.

20 Why didn't you like to listen to him?

21 A Because of what I was suspecting.

22 Q You mean related to [REDACTED]?

23 A Yes.

24 Q Okay.

25 Did anyone from the Legion of Mary ever come

1 and talk to you and try to get you to start attending
 2 mass again at Our Lady?
 3 A The sisters would say to me that there's such
 4 a thing as forgiveness.
 5 Q Which sisters? Sister -- Sister [REDACTED]?
 6 A Sisters; Sister [REDACTED] Sister [REDACTED]
 7 Sister [REDACTED]
 8 Q When -- when -- do you remember when was it
 9 that Sister [REDACTED] -- did Sister [REDACTED] say to you
 10 "there's such a thing as forgiveness"?
 11 A Yes.
 12 Q And do you know who she was saying you should
 13 forgive?
 14 MS. YOUNG: Objection. Calls for speculation.
 15 THE WITNESS: He, the father.
 16 I have forgiven him. God has already judged
 17 him. I wouldn't have wanted to do this.
 18 BY MR. HALE:
 19 Q When you say "the father," do you mean Father
 20 Kelly?
 21 A (In English.) Yes.
 22 Q When did Sister [REDACTED] first say to you
 23 "there's such a thing as forgiveness" with regard to
 24 Father Kelly?
 25 MS. YOUNG: Objection. Misstates testimony.

1 A That I no longer felt -- that I didn't want to
 2 go to the mass that he performed.
 3 Q Okay.
 4 When you say "he," you're referring to Father
 5 Kelly?
 6 A Yes.
 7 Q And did you tell them you did not want to go
 8 to a mass performed by Father Kelly?
 9 A No.
 10 Q Okay.
 11 THE INTERPRETER: Counsel, that came out
 12 backwards.
 13 BY MR. HALE:
 14 Q Okay. Let me -- let me rephrase that
 15 question.
 16 Did you ever tell the sisters that you no
 17 longer wished to attend any mass that was performed by
 18 Father Kelly?
 19 A No.
 20 Q Did you ever tell them that you refused to
 21 attend a mass performed by Father Kelly?
 22 A Yes.
 23 Q Okay.
 24 Sorry for my poor phrasing.
 25 And -- and did they ask you why you were

1 THE WITNESS: When I told her about my
 2 concerns.
 3 BY MR. HALE:
 4 Q Okay.
 5 And did she ever -- did she say you should
 6 forgive Father Kelly?
 7 A Yes.
 8 Q Okay.
 9 And did that conversation take place in the
 10 convent or in -- in the car? Do you remember where that
 11 took place?
 12 A I remember that they were taking me to the
 13 hospital.
 14 Q Okay.
 15 And -- and how was it -- how did it -- how did
 16 it come up in the conversation that she said you should
 17 forgive Father Kelly?
 18 MS. YOUNG: Asked and answered.
 19 THE WITNESS: Because I would tell them that I
 20 no longer felt a desire to go to the Guadalupe church.
 21 BY MR. HALE:
 22 Q Okay.
 23 And did they ask you why?
 24 A Yes.
 25 Q And what did you tell them?

1 refusing to attend a mass performed by Father Kelly?
 2 A Because of the concerns I discussed with them.
 3 Q Okay.
 4 And do you recall if you voiced -- you told
 5 them of this while [REDACTED] was still attending Our Lady
 6 of Guadalupe school or Bishop Diego?
 7 MS. YOUNG: Asked and answered.
 8 THE WITNESS: Well, I discussed it with them
 9 when they asked me why I didn't want -- why [REDACTED]
 10 didn't want to go and finish his school at Bishop.
 11 BY MR. HALE:
 12 Q Okay.
 13 And what did they say in response?
 14 MS. YOUNG: Asked and answered.
 15 THE WITNESS: Well, they and the priest would
 16 call me to convince him to finish his schooling.
 17 BY MR. HALE:
 18 Q Who -- what priest?
 19 A Father Kelly.
 20 Q Father Kelly would call?
 21 A Yes.
 22 Q And what would you say when Father Kelly
 23 called?
 24 A I said if he didn't want to, I couldn't force
 25 him to.

1 Q Okay.
 2 Did Father Kelly ever ask you why you weren't
 3 attending mass?
 4 A He never asked me about that.
 5 Q Okay.
 6 Did anyone else other than the sisters ask you
 7 why you weren't attending mass at Our Lady?
 8 MS. YOUNG: Lacks --
 9 THE WITNESS: No.
 10 MS. YOUNG: Lacks foundation.
 11 THE WITNESS: No, because I never discussed it
 12 with anyone.
 13 BY MR. HALE:
 14 Q Okay.
 15 Have you ever heard anyone talking about
 16 Father Kelly having a problem with alcoholism?
 17 MS. YOUNG: Objection. Asked and answered.
 18 THE WITNESS: No, no.
 19 MR. HALE: I think I'm done. Let's see.
 20 Yeah, I think that's all I have. Do you want to go off
 21 the record and flip with me real quick or do you just
 22 want to stay there and ask questions?
 23 MS. YOUNG: Wait a second. I want to see if I
 24 even have anything.
 25 I'll flip with you quick.

1 transcript to me and a copy to Mr. Hale;
 2 and he can arrange for his client to
 3 sign that copy and make any corrections
 4 necessary and sign the copy as if it
 5 were an original.
 6 "And if for some reason the signed
 7 copy is lost, the original or any other
 8 copy can be used for purposes of trial
 9 if, and when, necessary; and that his
 10 client will have 30 days after receipt
 11 to sign and make any corrections.
 12 "Is that --
 13 "MR. HALE: That's fine.
 14 "MS. YOUNG: -- stipulatable?..."
 15 MR. GRIFFITH: Thank you.
 16 MR. HALE: You're all done.
 17 THE VIDEOGRAPHER: This concludes today's
 18 testimony in the deposition of [REDACTED]. The
 19 total number of media used today was two. We're going
 20 off the record. The time is 12:59 p.m.
 21 (Whereupon, the deposition adjourned at 12:59 p.m.)
 22 -oOo-
 23
 24
 25

1 MR. HALE: Okay. Let's just go off the record
 2 real fast.
 3 THE VIDEOGRAPHER: We're going off the record.
 4 The time is 12:55 p.m.
 5 (Discussion off the record.)
 6 THE VIDEOGRAPHER: We're going back on the
 7 record. The time is 12:58 p.m. Please continue.
 8 MS. YOUNG: Thank you very much for your time,
 9 Mrs. [REDACTED]. I have no further questions. And we're
 10 going to stipulate -- we're going to have the same
 11 stipulation that we had before. Tim, I trust that you
 12 will get her the transcript.
 13 MR. HALE: Sure.
 14 MS. YOUNG: You will have the opportunity to
 15 read it, sign it, correct it, if necessary, and that's
 16 it.
 17 (Whereupon, the previous stipulation was
 18 agreed to as follows:)
 19
 20 "MS. YOUNG: ... And what I'd like
 21 to do, as we did in the Ruiz deposition,
 22 is to enter into a stipulation that the
 23 court reporter will be relieved of her
 24 responsibilities under the rules; and
 25 that she will send the original

1 CERTIFICATE OF PERSON READING
 2 DEPOSITION TO WITNESS
 3
 4 I, _____, whose
 5 address is _____,
 6 a person who speaks the language of the witness, namely,
 7 _____, do hereby certify
 8 that on the _____ day of _____,
 9 _____, I did translate the within deposition from
 10 English into the _____ language,
 11 reading same to the witness in his/her native tongue to
 12 the best of my ability;
 13 That all corrections and changes requested by the
 14 witness were made and initialed by the witness;
 15 That upon completion of said reading the witness
 16 did confirm to me that he/she had understood the
 17 reading.
 18
 19 Executed at _____ on
 20 (Place)
 21 _____
 22 (Date)
 23
 24 _____
 25 (Signature of Reader/Interpreter)

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

4
5 Executed at _____ on _____
6 (Place) (Date)

7
8
9 _____
10

1 ERRATA SHEET FOR THE DEPOSITION OF _____

DATE TAKEN: FEBRUARY 1, 2007

2 PAGE LINE CORRECTION

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24 SIGNATURE OF DEPONENT: _____

25 DATE: _____

1
2
3
4 I, the undersigned, a Certified Shorthand
5 Reporter of the State of California, do hereby certify:

6 That the foregoing proceedings were taken
7 before me at the time and place herein set forth; that
8 any witnesses in the foregoing proceedings, prior to
9 testifying, were placed under oath; that a verbatim
10 record of the proceedings was made by me using machine
11 shorthand which was thereafter transcribed under my
12 direction; further, that the foregoing is an accurate
13 transcription thereof.

14 I further certify that I am neither
15 financially interested in the action nor a relative or
16 employee of any attorney of any of the parties.

17 IN WITNESS WHEREOF, I have this date
18 subscribed my name.

19
20 Dated: _____

21
22
23 _____
24 ELIZABETH BORRELLI
25 CSR No. 7844