

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

Coordinated Proceedings)
Special Title (Rule 1550(b))) JUDICIAL COUNCIL
) COORDINATION
THE CLERGY CASES I) 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.)

DEPOSITION OF SISTER [REDACTED], a
Witness, taken on behalf of Plaintiff, commencing at
1:06 p.m., Thursday, February 15, 2007, at 3850 State
Street, before MARIA G. RABATIN, CSR #6821, Certified
Shorthand Reporter in the County of Santa Barbara, State
of California.

---ooOoo---

1 APPEARANCES OF COUNSEL:


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10 For Defendants:

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17 Also Present:

18 Father 

19 --ooOoo--

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I N D E X

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WITNESS	EXAMINATION BY	PAGE
SISTER [REDACTED]	MR. HALE	5, 135
	MS. YOUNG	134

E X H I B I T S

PLAINTIFF'S	DESCRIPTION	PAGE
1	Deposition Notice (6 pages)	10

1 THURSDAY, FEBRUARY 15, 2007

2 SANTA BARBARA, CALIFORNIA

3 1:06 p.m.

4
5 THE VIDEOGRAPHER: Good afternoon. We are on
6 the record pursuant to the Code of Civil Procedure.
7 This is the videotaped deposition of Sister [REDACTED]
8 [REDACTED], taken by the plaintiff, in the matter
9 of Andrew Ruiz versus the Archdiocese of Los Angeles.
10 Case number is 01131929. We are videotaping the
11 deposition at the Pepper Tree Inn, located at 3850 State
12 Street in Santa Barbara, California. My name is Andy
13 Weed. I'm a notary public and certified legal video
14 specialist representing Telegenics, located in Ventura
15 California. This is the start of tape number 1. Today
16 is February 15, 2007. The time is approximately 13:06.

17 Would counsel and all parties, please, identify
18 themselves for the record and their affiliation.

19 MR. HALE: Tim Hale for the plaintiffs.

20 MS. YOUNG: Bless Young for Hennigan, Bennett
21 and Dorman for the Roman Catholic Archbishop of Los
22 Angeles.

23 THE VIDEOGRAPHER: Will the court reporter,
24 please, swear in the witness?

25 / / /

1 SISTER [REDACTED]

2 a Witness, having been duly administered an oath by the
3 Certified Shorthand Reporter, testified as follows:

4
5 EXAMINATION

6 BY MR. HALE:

7 Q. Good afternoon, Sister.

8 A. Good afternoon.

9 Q. My name is Tim Hale, and I represent the
10 plaintiffs in this matter.

11 Could you state and spell your full name for
12 the record? I just want to make sure I have the
13 spelling correct.

14 A. My last name?

15 Q. Your full name? Obviously, I know how [REDACTED] is
16 spelled.

17 A. Sister [REDACTED] [REDACTED] [REDACTED].

18 Q. Okay.

19 A. Because they misspelled my last name. [REDACTED]

20 [REDACTED] [REDACTED] [REDACTED]

21 [REDACTED]


22 Q. It's [REDACTED] with an [REDACTED]?

23 A. Yes.

24 Q. Not with a [REDACTED]?

25 A. No.

1 Q. Okay.

2 A. No with the .

3 Q. Okay. Thanks.

4 Have you ever had your deposition taken before?

5 A. No, it's the first experience.

6 Q. We will try to make this as pleasant as

7 possible for you.

8 Are you represented today by Ms. Young?

9 MS. YOUNG: Calls for a legal conclusion, but
10 the answer is no.

11 THE WITNESS: No.

12 Q. BY MR. HALE: Then, she may or may not have
13 explained the deposition process to you.

14 A. Yes, yes.

15 Q. Just to make sure you and I are on the same
16 page, I'm going to go over some of the ground rules a
17 little bit.

18 Do you understand -- we are in the relatively
19 informal setting of this hotel. But, do you understand
20 your testimony today has the same force and effect as if
21 we were sitting in a courtroom before a judge and a
22 jury?

23 A. Yes.

24 Q. Do you understand that you have been placed
25 under oath by the court reporter?

1 A. What do you mean by that?

2 Q. She asked you to tell the truth.

3 A. Yes.

4 Q. Have you consumed any alcohol in the last 12
5 hours?

6 A. No.

7 Q. Have you consumed any drugs in the last 24
8 hours?

9 A. No.

10 Q. Is there any reason you can't give your best
11 deposition testimony this afternoon? In other words, is
12 there anything impairing your memory or ability to
13 recall or anything like that?

14 A. I think I can.

15 Q. Okay. Great.

16 As you can see, the court reporter is typing
17 down everything I say and everything you say. In order
18 to make her job as easy as possible and in order for us
19 to have a clear record as possible, it's important that
20 you and I not talk over each other. So, when I ask a
21 question, try and wait - even though there are going to
22 be times where you correctly anticipate what I am going
23 to ask - try to wait until I finish my complete question
24 before you answer. And by the same token, I'll try and
25 wait until you finish your response before I ask you

1 another question.

2 Do you understand that?

3 A. Yes.

4 Q. Great.

5 We are going to be talking -- I'm going to be
6 asking you questions about events that took place a
7 considerable number of years ago. There are going to be
8 times where you are probably going to be unable to
9 recall the answers to some of the questions that I'm
10 going to ask you; however, I am entitled to your best
11 estimate. So, for instance, if you think an event took
12 place -- you know, you can say in approximately what
13 year, I'm entitled to that. But we don't want you to
14 guess to the answer to any question that I ask you.

15 Do you understand the difference between a
16 guess and an estimate?

17 A. Yes.

18 Q. Okay. When I ask you a question today and you
19 respond, I'm going to assume that you understood what I
20 meant by the question. So, if I ask a question and it
21 doesn't make sense to you or if you want to clarify a
22 certain point, please, make sure you speak up and you
23 tell me you didn't understand what I meant or ask me to
24 clarify what I meant.

25 Do you understand that?

1 A. Yes.

2 Q. You are also doing a very good job of speaking
3 audibly and avoiding answers that will make for a
4 difficult record. In other words, as you can see, Maria
5 is typing down everything we say. It's important for us
6 to have a clear record that, when I ask you a question,
7 you not respond with a "uh-huh" or "huh-uh" or by
8 nodding or shaking your head or that kind of thing.
9 Just keep doing what you are doing, which is giving
10 audible answers, and we will have a clear record; okay?

11 A. Okay.

12 Q. At the end of your deposition, your testimony
13 will be placed into a typed booklet form. You can
14 review the deposition and make any changes you think are
15 necessary, but you need to keep in mind, if you do make
16 any changes, either myself or any other attorney in this
17 matter will be free to comment on those at the time of
18 trial and that could impact your credibility. And so,
19 for that reason, it's important that you give your best
20 deposition today.

21 Do you understand that?

22 A. Yes, I do.

23 Q. We're not holding you here a prisoner. So, if
24 you need to take a break at anytime, just say the word,
25 and we'll probably take breaks on the hour. But if you

1 need something more frequent than that, just let me know
2 and that's fine.

3 Okay?

4 A. Okay.

5 Q. Do you have any questions?

6 A. No.

7 Q. Did you review any documents in preparation for
8 your deposition today.

9 A. I don't have any documents.

10 MR. HALE: Let's attach as Exhibit 1 the
11 deposition notice and the subpoena in this matter.

12 (Plaintiff's Exhibit 1 was
13 marked for identification.)

14 Q. BY MR. HALE: If you can take a look at that
15 real quick, and just tell me if you have seen that
16 before.

17 MS. YOUNG: This is the subpoena?

18 MR. HALE: Yes. It was -- it's in the middle.

19 THE WITNESS: You have to correct my last name.

20 MR. HALE: Yes. In fact, just for the record,
21 the document misspells Sister [REDACTED]' last name. The
22 correct spelling is [REDACTED] with an [REDACTED] not with a [REDACTED] --
23 or, [REDACTED].

24 MS. YOUNG: [REDACTED]. With an [REDACTED].

25 MR. HALE: Thanks.

1 THE WITNESS: This, I don't know.

2 MS. YOUNG: Just for the record, the witness is
3 indicating she's not sure about the deposition notice,
4 but she's seen the subpoena before.

5 Q. BY MR. HALE: If you could turn to page four
6 real quickly. This will just take a second. The page
7 that says "Exhibit A" at the top. Yes, right there.
8 There's two categories of documents. The first is, "Any
9 and all documents relating or referring to Father
10 Matthew Kelly including, but not limited to, notes,
11 correspondence, letters, journals, diaries, photographs
12 and publications."

13 Do you have any documents responsive to that
14 request?

15 A. No.

16 Q. Did you search for documents responsive to that
17 request?

18 A. No.

19 Q. You did not search for any documents?

20 A. No.

21 Q. Why did you not search for any documents
22 responsive to that request?

23 A. Because I don't have any of anything. I don't
24 have anybody -- anything about it.

25 Q. You don't have anything related to

1 Father Kelly?

2 A. No.

3 Q. So, in other words, you knew you didn't have
4 anything and because of that, you didn't look.

5 Then, paragraph two says, "Any and all
6 documents relating or referring to Our Lady of Guadalupe
7 Parish and Our Lady of Guadalupe School, including, but
8 not limited to, directories, programs, yearbooks, notes,
9 correspondence, letters, bulletins, journals, diaries,
10 publications, reports, books, memorandum, invoices and
11 statements."

12 Do you have any documents responsive to that
13 request?

14 A. No.

15 Q. Did you look for documents responsive to that
16 request?

17 A. No.

18 Q. And why not?

19 A. Because I didn't work at Our Lady of Guadalupe
20 at all.

21 Q. You never worked at Our Lady of Guadalupe?

22 A. The school.

23 Q. Okay.

24 A. I work at the Guadalupe later.

25 Q. Were you assigned in Santa Barbara at some

1 point, though?

2 A. Yes.

3 MR. HALE: We will attach that as Exhibit 1.

4 Q. Sister, I want to ask you some questions about
5 your background.

6 First of all, what is your date of birth?

7 A. 12-19-30.

8 Q. Where were you born?

9 A. El Salvador, Central America.

10 Q. When did you come to the United States?

11 A. July 16 -- in July 1951.

12 Q. So, you came to the United States in July of
13 1951?

14 A. 1951.

15 Q. And what was it that brought you to United
16 States?

17 A. Los Angeles.

18 Q. In other words, why did you come?

19 A. Because we had a house in Los Angeles, and they
20 needed me there to work at the boarding house helping
21 girls.

22 Q. When you say "we," you are referring to the
23 Sisters of Bethany?

24 A. Yes.

25 Q. The first place you lived in --

1 A. Los Angeles.

2 Q. Okay.

3 Since you came to Los Angeles in 1951, have you
4 always lived in the United States?

5 A. I live -- well, I live in Guatemala for three
6 years and Italy for two years.

7 Q. Okay. And other than those four years, you
8 have been in the United States?

9 A. United States.

10 Q. Okay.

11 Do you remember -- well, let me ask you this:
12 Since you have been in the United States, have you
13 attended any schools or colleges or universities of any
14 kind?

15 A. I went to Loretto High School in Los Angeles.

16 Q. How do you spell that?

17 A. L-o-r-e-t-t-o.

18 Q. Did you graduate from Loretto High School?

19 A. Yes.

20 Q. What year did you graduate?

21 A. 1955.

22 Q. So, you were attending Loretto High School
23 while you were already a sister of the Bethany?

24 A. Yes.

25 Q. After Loretto High School, any further

1 education beyond Loretto High School?

2 A. No.

3 Q. Where were you first -- when you came to the
4 United States in 1951, where were you first -- where did
5 you live?

6 A. Los Angeles.

7 Q. Where in Los Angeles, though?

8 A. 552 North Normandy Avenue.

9 Q. Was that a convent or a parish?

10 A. It was a residence. It was some houses there.
11 We bought some.

12 Q. So, you lived at residential houses owned by
13 the Sisters of Bethany?

14 A. Yes.

15 Q. How long did you live at that location, that
16 address?

17 A. They drafted me here to Santa Barbara in 1956.

18 Q. Okay. So, you were in Los Angeles from 1951
19 until the transfer to Santa Barbara in 1956?

20 A. That's right.

21 Q. In addition to, did you do anything other than
22 attend high school? Did you have any kind of
23 responsibilities as a member of the Sisters of Bethany?

24 MS. YOUNG: Vague and ambiguous.

25 You can answer.

1 THE WITNESS: We came here, you know, because
2 we work at the Catholic Charities, Social Services.
3 That's why we --

4 Q. BY MR. HALE: Let's back up for a second.

5 While you were in Los Angeles, though, what
6 kind of duties or daily obligations did you have?

7 A. I take care of the girls who had boarding house
8 for the girls there. They came from foreign countries
9 to study or to work here.

10 Q. When you say you had a boarding house for
11 girls, was that for women that wanted to become --

12 A. Yes. No, no, not to become nuns. You know, to
13 get a residence, the parents, most of the Latin American
14 ladies, they want a safe place for them to live. That's
15 why we had that house.

16 Q. Am I understanding you correctly to say that
17 it was -- you helped to just maintain and run the house?

18 A. Yes.

19 Q. Did you do any work at any parishes while you
20 were in Los Angeles?

21 A. No.

22 Q. Did you do any work at any seminaries while you
23 were in Los Angeles?

24 A. No.

25 Q. Did you do any work that brought you into

1 contact with Roman Catholic priests?

2 A. No.

3 Q. Where did you attend mass, while you were in
4 Los Angeles?

5 A. St. Kevin's.

6 Q. St. what?

7 A. Kevin's.

8 Q. St. Kevin's? Kevin's?

9 A. On Beverly Boulevard.

10 Q. When you were transferred to Santa Barbara in
11 1956, where were you transferred to in Santa Barbara?

12 A. Here, the community that we have here. Next
13 door to Our Lady of Guadalupe.

14 Q. To the convent?

15 A. Yes.

16 Q. Was there anyone transferred there with you or
17 were you transferred there by yourself?

18 A. The Mother General was the one who made -- the
19 Mother superiors made the transfers because they needed
20 sisters.

21 Q. But, in other words, did any other sisters from
22 Los Angeles transfer to Santa Barbara?

23 A. No, just me, because there are only sisters
24 over here.

25 Q. How long did your assignment in Santa Barbara

1 last?

2 A. Until 1960.

3 Q. Did the convent have a name?

4 A. Right now they have a name. Before we don't
5 have a name. It was Our Lady of Guadalupe, but before
6 it was Sisters of Bethany.

7 Q. It was just the convent?

8 A. Yes.

9 Q. And what's it called now?

10 A. Now it's Our -- now it's called Guadalupe
11 Feusacier -- sister [REDACTED]. Feusacier Convent. It's
12 a French name. I don't how to spell it.

13 Q. So, it is now called Sister Guadalupe
14 Feusacier?

15 A. F-e-u-s-a-c-i-e-r.

16 (Mr. Griffith joins the proceedings.)

17 MS. YOUNG: I think she stated earlier that
18 before that it was called just Sisters of Bethany.

19 THE WITNESS: Yes.

20 She passed away in 1981, they put the name on.

21 MR. HALE: Okay.

22 Q. Just to make sure I'm understanding you
23 correctly, you were at the convent in Santa Barbara only
24 from 1956 until 1960?

25 A. Yes.

1 Q. What was your next assignment? Were you
2 transferred somewhere then after -- in 1960?

3 A. I went back to Los Angeles.

4 Q. Same location?

5 A. Same location.

6 Q. How long were you there for?

7 A. I don't remember. Maybe, 15 years. I don't
8 remember.

9 Q. And then were you transferred somewhere else
10 again out of Los Angeles?

11 A. Because, at the time, we had just two houses,
12 Santa Barbara and Los Angeles.

13 Q. Okay.

14 A. I don't remember when we opened a house in
15 Ojai. I don't remember that, but we closed that. We
16 were there for seven years, but we never been in that
17 house.

18 MS. YOUNG: I don't think she understood your
19 question.

20 MR. HALE: Yeah, I know.

21 Q. Where are you assigned now, where do you live?

22 A. Oxnard.

23 Q. In Oxnard, okay.

24 And when were you -- were you transferred to
25 Oxnard?

1 A. I was -- before I went to Oxnard, I was working
2 here in Santa Barbara, 1984 to 1994, and then was
3 transferred to Oxnard.

4 Q. So, just to make sure I'm clear here, you have
5 been in Oxnard since 1994?

6 A. Yes, until now.

7 Q. Where are you assigned in Oxnard?

8 A. I'm the coordinator of the Spanish religious
9 education in [REDACTED] Chapel.

10 Q. So, you are the coordinator for religious
11 education at a chapel, not at a parish?

12 A. It's like a mission, because Santa Clara is a
13 big parish, but they have like a mission with the
14 Spanish-speaking.

15 Q. It's kind of a satellite from the parish?

16 A. Yes, yes.

17 Q. And is the name of the parish [REDACTED]?

18 A. The parish is [REDACTED] parish. And [REDACTED]
19 [REDACTED] Chapel is the little one.

20 Q. Do you think after you were transferred from
21 Santa Barbara that first time, when you were living near
22 Our Lady in the convent back to Los Angeles, do you
23 think you were back in Los Angeles until around 1975?
24 Does that sound about right to you, somewhere in that
25 time frame?

1 A. 1975?

2 Q. Yes.

3 A. Yes, because we opened a house in Tulare, San
4 Joaquin Valley. I stay there this time, and then they
5 gave me back to Los Angeles.

6 Q. How long were you in Tulare for?

7 A. Two years.

8 Q. So, around 1975 to 1977?

9 A. No, no. 1976.

10 The Bishop from Los Angeles has -- they have to
11 go back to El Salvador because her sister was sick.

12 Q. So, you were in Tulare from about 1976 --

13 A. We opened the house in 1975. Yes. Until
14 October 1981.

15 Q. So, you were in Tulare for only two years or am
16 I wrong?

17 A. No, no.

18 Q. More than that?

19 A. 1975 to 1981.

20 Q. Okay.

21 In Tulare?

22 A. Yes -- no, no, no. In Tulare, no. In Tulare,
23 I was there one year and half --

24 Q. Around '75 to '76?

25 A. Yes.

1 Q. And then, where were you from '76 to '81?
2 A. In Los Angeles.
3 Q. You went back to Los Angeles?
4 A. Yes.
5 Q. Same address?
6 A. Same address. No, it's another address,
7 because we bought another property, and the address is
8 850 North Hobart Boulevard.
9 Q. How do you spell that last word?
10 A. H-o-b-a-r-t. Boulevard.
11 Q. So, were you back in Los Angeles from '76 to
12 1981?
13 A. Yes.
14 Q. And then, what was your next assignment?
15 A. Went to Rome, went to Italy.
16 Q. Went to Rome for two years?
17 A. Yes.
18 Q. From 1981 to 1983.
19 A. No. '84. Because I went -- the end of year
20 1981, I went to Rome.
21 Q. Got it.
22 After Rome, where did you go next?
23 A. I came to Santa Barbara --
24 Q. So, you were back --
25 A. -- 1984.

1 I was there for 10 years until 1994.

2 Q. Okay. Were you back at the convent in Santa
3 Barbara?

4 A. Yes.

5 Q. When you were in Santa Barbara from 1956 to
6 1960, what was the nature of your work?

7 A. Catholic Charities.

8 Q. What did your work with Catholic Charities
9 involve?

10 A. Well, they send us, you know, to take people to
11 the clinic when they needed transportation or to -- even
12 food for the poor.

13 Q. Okay.

14 A. Or visit the families if they had a problem to
15 see.

16 Q. I'm going to come back to that in a little bit.
17 What about when you were in Los Angeles from
18 about 1960 until 1975, what kind of work did you do
19 there?

20 A. I was the Superior at that time.

21 Q. You were the Superior?

22 A. Yes. But the same, we take care of the girls,
23 boarding house.

24 Q. When you say you were the Superior, does that
25 mean you were the Mother General, or you were superior

1 for the house?

2 A. Superior for the house.

3 Q. What was your title in that regard? Was it
4 mother superior?

5 A. Sister superior.

6 Q. Sister superior, okay.

7 Was the house still being utilized for girls
8 who want --

9 A. Yes.

10 Q. Wanted to come and --

11 A. Yes.

12 Q. -- in the United States?

13 MS. YOUNG: Try to let him finish his question
14 before you answer just so the record will be clear.

15 Q. BY MR. HALE: And was that -- for those
16 15 years, was the total of your work, it was running the
17 house?

18 A. Yes, running the house.

19 Q. That was all you did?

20 A. Yes.

21 Q. Then, what about for the -- roughly a year in
22 Tulare, what was your work there?

23 A. We work in the parish.

24 Q. What parish?

25 A. Santa Rita.

1 Q. Was that in the Diocese of Fresno?

2 A. Yes.

3 Q. What kind of work did you do in the parish?

4 A. I was parish secretary.

5 Q. Anything else?

6 A. Religious classes.

7 Q. Catechism classes?

8 A. Catechism.

9 Q. Anything else?

10 A. No, that's all.

11 Q. Then from 19, roughly, '76 to 1981, you went
12 back to Los Angeles. What did you do for those,
13 approximately, five years? What kind of work did you
14 do?

15 A. I told you, I was a superior and take care of
16 the house.

17 Q. I thought that's what you did in Los Angeles
18 from 1960 through 1975?

19 A. The same.

20 Q. The same, okay.

21 Any other work that you did during that '76 to
22 '81 time frame in Los Angeles?

23 A. No.

24 Q. So, all of your responsibilities were related
25 to operating and running the house?

1 A. Yes.

2 Q. What did you do in Rome?

3 A. We had a house for take care of children that
4 the government send. They are to take care because the
5 parents are in jail or problems. They stay there just
6 for one year. And then they open another house in north
7 Italy, and then they close it and go back again to
8 Italy -- I mean, to Rome.

9 Q. Okay. I recall -- I think you said -- did you
10 say that you lived in Guatemala for two years as well?

11 A. Yes.

12 Q. What years were those?

13 A. 1972 to 1974.

14 Q. To '74?

15 A. Yes.

16 Q. And what did you do in Guatemala for those two
17 years?

18 A. I was in charge of the administration of the
19 school.

20 Q. Moving on to when you came back to Santa
21 Barbara from 1984 to 1994, what was your work at that
22 point? What did you do?

23 A. I was a part-time secretary of the parish.

24 Q. At Our Lady of Guadalupe?

25 A. Our Lady of Guadalupe. I was in charge of the

1 religious education program.

2 Q. So, you also taught catechism?

3 A. Yes.

4 Q. Any other assignments or work that you did
5 while you were in Santa Barbara from 1984 to 1994?

6 A. Nothing. No, sir.

7 Q. Now, you are currently the coordinator of the
8 religious education in the [REDACTED] Chapel?

9 A. Yes.

10 Q. Any other work that you have done in Oxnard
11 since 1994, other than hold that position?

12 A. Yes, that's it.

13 Q. That's it?

14 A. That's it.

15 Q. When you were at Our Lady of Guadalupe from
16 1984 to '94, was there a full-time secretary for the
17 parish?

18 A. No, part time.

19 Q. And you were the only one?

20 A. Um-hum. Father [REDACTED].

21 Q. Did any other Sisters of Bethany teach
22 catechism while you were there from 1984 to 1994?

23 A. It was just me. There were some voluntary
24 teachers to help.

25 Q. I've never spoken with a nun before, so I hope

1 you won't take offense at these questions. They are
2 probably very stupid questions, but I need to make sure
3 I understand.

4 Is a nun ordained?

5 A. No.

6 Q. How does a nun become a nun?

7 A. We have profession. Now, it's changed after so
8 many -- when I was there, six months of postulant and
9 then two years as novice, and after two years, we made
10 the profession. We made the vows, you know, temporary
11 vows for six years.

12 Q. Six years for temporary vows?

13 A. Temporary vows.

14 After six years, you make your choice. You
15 stay or you leave. That is why I have the ring. They
16 give us a ring when we make the final vows.

17 Q. Then, final vows?

18 A. Then, final vows, I have to do here in United
19 States in 1956 because I was here.

20 Q. You took your final vows in the United States?

21 A. In the United States.

22 Q. In Los Angeles?

23 A. In Los Angeles.

24 Q. And did you do that in the convent in Los
25 Angeles or in a parish --

1 A. No. In the convent, we have it.

2 Q. So, you took --

3 A. It was a long, long time ago. Now it's another
4 house. It's not there any more. We move to this place.

5 Q. So, you took your final vows within the
6 convent?

7 A. Yes.

8 Q. Was there a priest present to hear your final
9 vows?

10 A. Yes.

11 Q. Who was the priest? Aesculapian priest.
12 Father [REDACTED] (phonetically.)

13 Q. Was he a priest or was he a monsignor?

14 A. He was a priest.

15 Q. He wasn't a bishop?

16 A. No, no, no. No bishop.

17 Q. I think -- did you say he was a religious --

18 A. He belonged to the religious order.

19 Q. Which one?

20 A. Aesculapian.

21 Q. Was he assigned in Los Angeles, also?

22 A. It was -- it was in Our Lady of Perpetual --
23 (unintelligible) Maria Celia Dora is the name of the
24 parish. It's in East L.A.

25 Q. He was the pastor at that time?

1 A. He was the pastor at that time.

2 Q. Your six-month postulant, did you do it in El
3 Salvador?

4 A. Yes.

5 Q. And your two years of --

6 A. Yes.

7 Q. -- novitiate was in --

8 A. In El Salvador. I made my profession in El
9 Salvador, 1950. I was one year when we sing here. I
10 was one year, make my trips out, when they sing here.

11 Q. You are doing a great job of anticipating the
12 questions I'm going to ask, but try and wait until I
13 finish my question just so Maria's job isn't too
14 difficult before you answer. You are correctly
15 anticipating them, though.

16 If I understood you correctly, you did -- five
17 of your six years of temporary vow, you were in El
18 Salvador, and for your last year you were in Los
19 Angeles. Is that what you said?

20 A. No.

21 Q. Did I misunderstand you?

22 So, did you do all six years of your temporary
23 vows in Los Angeles?

24 A. Yes.

25 Q. So, when you came to Los Angeles in 1951, you

1 had just started your temporary vows?

2 A. Yes.

3 Q. And then, after you take your final vows, is
4 there anything left in the process before you become a
5 nun or is that the pinnacle?

6 A. That's it.

7 Q. Does a nun -- does a nun need faculties to
8 perform her work within a diocese or archdiocese?

9 MS. YOUNG: Objection. Lacks foundation.

10 Q. BY MR. HALE: You can answer.

11 A. What do you mean by that?

12 Q. If you don't know, that answers the question
13 right there. That's fine.

14 Have you ever heard of a priest receiving
15 faculties from a bishop?

16 A. When they ordain priests.

17 Q. Let me back up for a second.

18 You said you served as a sister superior for a
19 house within the order. Have you ever held any kind of
20 elected positions within the order, the Sisters of
21 Bethany?

22 A. No.

23 Q. Have you ever served on any committees or any
24 boards?

25 A. No.

1 Q. Within the order?

2 A. No.

3 Q. Have you ever held any other job titles or
4 titles within the order of the Sisters of Bethany, other
5 than what we already talked about?

6 A. I was altar last year. I don't know how many
7 years. I represented the Mother here, you know, with
8 the three houses we have here. That's all.

9 Q. I'm not sure -- you were a what, though?

10 A. I was -- like delegate with the Mother here for
11 the three houses we have here in the United States.

12 Q. And that was only within the last year?

13 A. Yes, yes, yes. Because they name another
14 sister now. I don't have any tie to them.

15 Q. Okay. Have you ever held any position within
16 the Archdiocese of Los Angeles?

17 A. No.

18 Q. Have you ever been on any committees or boards?

19 A. No.

20 Q. Have you ever -- well, strike that.

21 Were you ever aware of there being a fire at
22 Our Lady of Guadalupe parish?

23 A. No.

24 Q. There's going to be times during this
25 deposition where you are going to hear me refer to

1 childhood sexual abuse. And I want to make sure that
2 you and I are on the same page as far as what I mean by
3 childhood sexual abuse. When I refer to childhood
4 sexual abuse, do you understand that to mean the abuse
5 of a child under the age of 18?

6 A. Yes.

7 Q. And do you draw any distinction between sexual
8 abuse of an adolescent, in other words, like a teenager
9 versus the sexual abuse of a preadolescent or younger
10 child?

11 A. No.

12 Q. Do you know who Matthew Kelly was?

13 A. I know he was the pastor.

14 Q. Have you ever heard that he's been accused of
15 childhood sexual --

16 A. No.

17 Q. -- abuse?

18 So, as you sit here today, you have never heard
19 that before?

20 A. No.

21 Q. Okay. When was last time you were at Our Lady
22 of Guadalupe?

23 A. Since I left. I think I leave in 1984 [sic].

24 Q. 1994?

25 A. Because I were here from 1984 to 1994.

1 Q. That was the last time you were here?

2 A. Yes. I used to visit the sisters, you know.

3 Q. I understand.

4 Q. Have you been back to Santa Barbara for Fiesta
5 or for any kind of celebrations or anything like that?

6 A. Not lately. When Father [REDACTED] was here, I
7 came, you know, because I --

8 MS. YOUNG: [REDACTED]?

9 THE WITNESS: [REDACTED] hmm-um, yeah.

10 Some people ask me why you don't come to the
11 Fiesta, but I don't.

12 Q. BY MR. HALE: Okay. When was the first time
13 you met Father Kelly?

14 A. I never spoke to him, just to see him when he
15 say mass. That's it.

16 Q. Other than that you never --

17 A. No.

18 Q. -- had any contact with him?

19 A. Never had contact with him. Didn't even
20 confess with him.

21 Q. Who did you confess with?

22 A. Well, I went -- at that time, you know, they
23 assign - the Diocese - some priest to go to the convent
24 to hear the confessions for the sisters.

25 Q. And it wasn't Father Kelly?

1 A. No.

2 Q. Do you remember who it was?

3 A. A Franciscan father, but I don't remember the
4 name.

5 Q. From the Mission?

6 A. The Mission.

7 Q. You say they assigned a priest from the
8 mission. Who was "they"?

9 A. Well, you know, the vicar at that time was -- a
10 Monsignor was a vicar for religious orders. Now, it's a
11 (unintelligible.) Before it was a priest all the time,
12 monsignor.

13 Q. Do you remember what the name of that vicar for
14 religious orders was?

15 A. I don't. It was a long time ago.

16 Q. Was it your understanding that the vicar for
17 religious orders was an archdiocesean priest?

18 A. Yes.

19 Q. Do you know how it was that he asked a
20 Franciscan from the Mission to hear confessions from the
21 sisters?

22 A. No.

23 MS. YOUNG: Objection. Lacks foundation, calls
24 for speculation.

25 Q. BY MR. HALE: How did you hear that was the

1 case? How did you become aware of that?

2 A. Because the Superior told us, you know, that
3 that priest was assigned to hear the confession.

4 (Unintelligible) the Council, Vatican Council, they
5 change. Now we can choose, we can go wherever we want.

6 Q. And so, if I understood you correctly, the
7 house superior told you that the vicar had assigned the
8 Franciscan priest to hear confessions?

9 A. (Witness nods head.)

10 Q. Is that a "yes"?

11 A. Yes.

12 Q. Who was the house superior at the time?

13 A. I don't remember.

14 Q. Okay. You don't remember her name?

15 A. No.

16 Q. Is she still alive?

17 A. No. I think she passed away already.

18 Q. Okay. When you were first assigned to Santa
19 Barbara in 1956, how was the assignment described to
20 you?

21 MS. YOUNG: Objection. Vague and ambiguous.

22 THE WITNESS: I work at the Catholic Charities.

23 Q. BY MR. HALE: They told you you were going to
24 Santa Barbara to work at Catholic Charities?

25 A. Because we made a vow of obedience. Even if

1 you like it or not, you have to go.

2 Q. Okay. And is that vow of obedience one of
3 those final vows that we talked about?

4 A. Um-hum.

5 Q. Is that a "yes"?

6 A. Yes.

7 Q. What are the vows?

8 A. Chastity.

9 Q. Okay.

10 A. And poverty.

11 Q. Poverty?

12 A. Poverty.

13 Q. Who is the vow of obedience made to?

14 A. What do you --

15 Q. In other words, is the vow made to the Mother
16 General? Is it made to the Sisters of Bethany? Is it
17 made to the Pope? Is it made to the Archbishop?

18 A. We made the vow to -- because we had -- the
19 Mother General is the one who receives the vows, that
20 will make the -- you made the vow of obedience,
21 chastity, poverty for a period of time. Now it's
22 perpetual. It has to be until death. I pass away.

23 Q. But back then, when you made your vow, who did
24 you make your vow to? In other words, again --

25 A. We make it to God, you know, because we

1 dedicate our lives to God. The Mother is the one who
2 take the vows from us.

3 Q. So, the Mother General hears the vows?

4 A. Yes.

5 Q. And you said there was a priest present, as
6 well?

7 A. Yes.

8 Q. He heard the vows, as well?

9 A. Yes.

10 Q. Was there a vow made to him?

11 A. No.

12 Q. So, the only vow of obedience is to God?

13 A. To God and the Mother General, who was -- she
14 can call, you know, she's name is sister to be her
15 delegate.

16 Q. Just so I'm clear, the vow of obedience is to
17 God and to the Mother General?

18 A. No, no.

19 Q. Just to God?

20 A. Just to God.

21 Q. Just to God. Okay.

22 How were you notified that you were being
23 reassigned to Santa Barbara in 1956? Did someone -- did
24 you receive a written communication that you were being
25 reassigned? Did someone tell you in person?

1 A. In person.

2 Q. Okay.

3 A. As a matter of fact, at that time was the
4 Mother who founded the order, who came here to open the
5 house in the United States.

6 Q. Okay.

7 A. And she's the one to call me and say, "I need
8 you, because one sister is -- you know, she doesn't want
9 to stay in the order, and she wants to leave and I need
10 you to come."

11 Q. So, she told you that she needed you to come to
12 Santa Barbara?

13 A. Yes.

14 Q. Was she in Santa Barbara or was she in Los
15 Angeles?

16 A. She was in Los Angeles.

17 Q. Okay. And did she give you anything in writing
18 telling you about your new assignment?

19 A. No, no, no.

20 Q. Did she -- and did she tell you the assignment
21 was to do work for Catholic Charities?

22 A. Just to take her place.

23 Q. To take the place of the woman who was leaving?

24 A. Yes. She was working at the Catholic Charities
25 at that time.

1 Q. Was it called Catholic Charities at that time,
2 or was it called Catholic Welfare?

3 A. Catholic Welfare at that time.

4 Q. When did the name change to Catholic Charities,
5 do you know?

6 A. No, I don't remember that.

7 Q. So, did she also tell you where you were going
8 to be in residence in Santa Barbara?

9 MS. YOUNG: Objection. Vague and ambiguous.

10 Q. BY MR. HALE: In other words, where you were
11 going to be living?

12 A. We have to live in the convent.

13 Q. That was the only option; correct?

14 A. Yes.

15 Q. Did she tell you you would have any other job
16 duties, other than working for Catholic Welfare?

17 A. No.

18 Q. What did she tell you your duties would be with
19 Catholic Welfare?

20 MS. YOUNG: Objection. Assumes facts not in
21 evidence, lacks foundation.

22 Q. BY MR. HALE: Did she tell you what your duties
23 would be with Catholic Welfare?

24 A. No.

25 Q. Did Catholic Welfare have an office in Los

1 Angeles when you were assigned to Santa Barbara?

2 A. Just the main office.

3 Q. And had you ever done any work for Catholic
4 Welfare prior to being assigned in Santa Barbara?

5 A. No.

6 Q. When you arrived at the convent, how many
7 other -- were there other sisters living there?

8 A. Another four.

9 Q. Four?

10 A. (Witness nods head.)

11 Q. Who were they?

12 A. They all passed away.

13 Q. All of them?

14 Do you remember any of their names?

15 A. Sister [REDACTED].

16 Q. How do you spell that?

17 A. Sister [REDACTED] [REDACTED]
18 [REDACTED].

19 Q. Sister [REDACTED].

20 A. Sister [REDACTED]

21 Sister [REDACTED], Sister [REDACTED], Sister [REDACTED]
22 myself.

23 Who else was there?

24 I don't remember the others' names.

25 Q. But there was one more sister?

1 A. Now I don't remember the other one.

2 Q. But there was one more, though, you just don't
3 remember her name?

4 A. Yes.

5 Q. And all four of them are now deceased, to your
6 knowledge?

7 A. Yes.

8 Q. Who was the house superior?

9 A. When?

10 Q. When you first arrived in Santa Barbara.

11 A. Sister [REDACTED].

12 Q. Sister [REDACTED]. Okay.

13 And in your four years in Santa Barbara, were
14 there any other sisters who came and lived at the
15 convent?

16 A. No.

17 Q. Just those four?

18 A. Yes.

19 Q. Can you describe how the convent was set up
20 when you first moved in there in 1956? If you walked in
21 the front doors, for instance, where's the chapel?

22 A. In the back.

23 Q. Actually, where's the chapel, though? Is there
24 a chapel?

25 A. There's chapel in the convent.

1 Q. If you walked in the front doors, how would you
2 get to the chapel?

3 A. Inside the house.

4 Q. To the right of the house or to the left or
5 into the back?

6 A. In front.

7 Q. In front?

8 A. Yes.

9 Q. How big was the chapel?

10 A. Maybe half of this room.

11 Q. You think half of this room?

12 A. Yes.

13 Q. Was there -- were there seats in the chapel?

14 A. Yes.

15 Q. And did sometimes -- when you were in Santa
16 Barbara from 1956 until 1960, did any of the priests
17 from Our Lady come and perform mass for you at the
18 chapel?

19 A. No.

20 Q. Did any priests from anywhere else come and
21 perform mass for you at the chapel?

22 A. Only when we asked for a special mass, you
23 know, we find a priest, but no.

24 Q. Who would you ask to do that?

25 A. The Franciscans.

1 Q. You would ask the Franciscans?

2 A. Yes.

3 Q. Did anyone other than Franciscan priests come
4 and perform mass while you were there from 1956 to --

5 A. No.

6 Q. -- 1960?

7 Only Franciscan priests?

8 A. (Witness nods head.)

9 Q. Did you ever see any priests from Our Lady of
10 Guadalupe within the convent when you were there from
11 1956 to 1960?

12 A. No.

13 Q. Who did you work with -- where were the offices
14 of Catholic Welfare located when you were in Santa
15 Barbara from 1956 to 1960?

16 A. In the building. Still the building there.

17 Q. Same location?

18 A. Same location.

19 Q. And who did you work with in that building?

20 A. Miss [REDACTED] who passed away, who was the
21 caseworker.

22 Q. Okay.

23 A. There was some priests, but I don't remember
24 which priests was at the time, you know, who was the
25 director of the Catholic Charities.

1 Q. Do you remember, was he a religious order
2 priest?

3 A. He was a diocesan.

4 Q. Do you know if he's still alive?

5 A. I don't know.

6 Many passed away. The three that I know.

7 Q. Was it the same priests at Catholic Charities
8 for the entire four years you were in Santa Barbara?

9 A. No, because they change.

10 Q. How many times did they change?

11 A. I knew Father [REDACTED], [REDACTED]; Father
12 [REDACTED]; and the last one was Monsignor
13 [REDACTED].

14 Q. Okay. Hang on one second.

15 So, correct me if I am wrong, you don't
16 remember the name of the first priest, the very first
17 priest at Catholic --

18 A. [REDACTED].

19 Q. [REDACTED] was the first one?

20 A. The one I remember. I don't know what year
21 they stay, you know.

22 Q. Okay.

23 A. You can find out.

24 Father [REDACTED].

25 Q. How do you spell his last name?

1 A. [REDACTED] -- I don't know.

2 Q. [REDACTED]?

3 A. [REDACTED].

4 Q. Like [REDACTED], something like that?

5 A. Something like that, yes. I don't remember
6 (unintelligible.)

7 Q. All right. So, Father [REDACTED] Father [REDACTED].
8 And you had said there was another name?

9 A. Monsignor [REDACTED]. He just passed
10 away.

11 Q. And he was running Catholic Charities -- or,
12 Catholic Welfare while you were there?

13 A. Yes.

14 Q. Was he the last priest assigned to Catholic
15 Welfare before you left Santa Barbara?

16 A. No, because I left before, you know.

17 Q. But in other words -- let me ask you this, do
18 you remember the order in which these men ran
19 Catholic --

20 A. No.

21 Q. But you just remember these three?

22 A. Yes.

23 Q. Do you think it was only these three, or do you
24 think there was another one whose name that you forgot?

25 A. That is all I remember when I was here.

1 Q. And was it your understanding that these
2 priests, whichever one happened to be -- did they have a
3 title at Catholic Welfare?

4 MS. YOUNG: Objection. Lacks foundation.

5 Q. BY MR. HALE: If you know.

6 MS. YOUNG: Also vague and ambiguous.

7 Q. BY MR. HALE: In other words, a job title?

8 A. Well, director.

9 Q. Director of Catholic Welfare?

10 A. (Witness nods head.)

11 Q. So, was it your understanding that each one of
12 them held the position of Director of Catholic Welfare
13 for Santa Barbara?

14 A. Santa Barbara. And also they go to Ventura,
15 too.

16 Q. Do you know, did these men -- were they -- how
17 many days a week were you --

18 There was an office; correct?

19 A. Yes.

20 Q. How many days a week were you in the office for
21 Catholic Welfare?

22 A. We had to work from Monday through Friday.

23 Q. Monday through Friday. Was it a 9:00 to 5:00
24 job, Monday through Friday?

25 A. Yes, full time.

1 Q. And was -- whichever priest was serving as the
2 director of Catholic Welfare, was it a full-time job for
3 him, as well?

4 MS. YOUNG: Objection. Lacks foundation.

5 THE WITNESS: Yes.

6 Q. BY MR. HALE: "Yes"?

7 So, you would see whoever was serving as
8 director of Catholic Welfare from, approximately, 9:00
9 to 5:00 each day?

10 A. They are in charge, you know, at the time they
11 were in charge of Ventura -- I mean, the
12 (unintelligible) separation. They go to Ventura. Not
13 all the time they stay there because they had to go to
14 business in Los Angeles where they had the main office.

15 Q. The main office was in Santa Barbara?

16 A. No. Main office in Los Angeles.

17 Q. You mean the main office for Catholic Welfare?

18 A. Yes.

19 Q. So, when you would be at Catholic Welfare from
20 1956 to 1960, how often would you see the director of
21 Catholic Welfare, how often would you see that priest --

22 A. I never go --

23 (Interruption by the Reporter.)

24 Q. BY MR. HALE: How often would you see that
25 priest in the Santa Barbara office?

1 A. Only when he calls. He has some special thing
2 to tell us, you know, otherwise we don't go.

3 Q. Okay. But I don't mean go in to see him. But
4 how often, to your knowledge, would he actually be in
5 Santa Barbara working in the office?

6 A. I don't remember.

7 Q. Do you know -- did the director of Catholic
8 Welfare, when you were there from '56 to 60, was he
9 generally in residence at one of the parishes in Santa
10 Barbara?

11 MS. YOUNG: Objection. Calls for speculation.

12 THE WITNESS: I don't remember.

13 Q. BY MR. HALE: Do you know if Father [REDACTED]
14 lived at a parish in Santa Barbara?

15 A. He was living here in Guadalupe for a short
16 period of time.

17 Q. Father [REDACTED] did?

18 A. Yes.

19 Q. And do you know where he lived after that?

20 A. No, I don't.

21 Q. Do you know if he lived in Ventura?

22 A. No.

23 Q. What about Oxnard?

24 A. (Witness shakes head.)

25 Q. What about Father [REDACTED], was he in residence

1 in Santa Barbara?

2 A. I don't know.

3 Q. What about Monsignor [REDACTED] was he in
4 residence in Santa Barbara?

5 A. I don't remember.

6 Q. Were you aware of any of those three men --
7 Do you know what supply work is?

8 A. No.

9 Q. Were you aware of any of those three men
10 performing mass at any parishes in Santa Barbara?

11 A. No, I don't.

12 Q. Did you ever see them performing mass at any of
13 the parishes in Santa Barbara?

14 A. Maybe they -- I don't know.

15 Q. Don't speculate. We don't want you to
16 speculate.

17 A. No, no.

18 Q. So, you said there was one caseworker, and
19 she's passed away?

20 A. Yes.

21 Q. And then, you said there would be a director of
22 Catholic Welfare when you identified these three
23 priests?

24 A. Um-hum.

25 Q. Is that a "yes"?

1 A. Yes.

2 Q. Obviously, there was yourself; right?

3 A. Yes.

4 Q. Did anyone else work in the Catholic Welfare
5 office in Santa Barbara from 1956 to 1960 while you were
6 there?

7 A. What do you mean, sisters or layperson?

8 Q. Sisters or lay people.

9 A. The secretary was Mrs. [REDACTED] who worked for
10 many years.

11 Q. Can you spell that?

12 A. [REDACTED]

13 Her name was [REDACTED].

14 Q. [REDACTED]?

15 A. Um-hum.

16 Q. Do you know if she's still alive?

17 A. She passed away.

18 Q. Okay. Anyone else who worked in the Catholic
19 Welfare office while you were there?

20 A. That's it.

21 Q. Any other -- did any of your fellow sisters
22 work in the Catholic Welfare office while you were
23 there?

24 A. Only the -- Sister [REDACTED].

25 Q. Okay.

1 A. Myself. Sister [REDACTED] another sister
2 from El Salvador, but she's not here anymore.

3 Q. When you say she's not here anymore, do you
4 mean she's not in the United States?

5 A. In the United States.

6 Q. Is she back in El Salvador?

7 A. El Salvador, um-hum.

8 Q. When was the last time you spoke to her?

9 A. This year I went to see her, because I went on
10 vacation.

11 Q. What is her name?

12 A. [REDACTED].

13 Q. [REDACTED]?

14 A. Um-hum.

15 MS. YOUNG: They have some nice hotels there.

16 Q. BY MR. HALE: Was she in Santa Barbara the
17 entire time that you were here from '56 to 1960?

18 A. I don't remember.

19 Q. Is she the fourth sister whose name that you
20 weren't able to recall?

21 A. Yes.

22 Q. Do you know how old she is?

23 A. Eighty-something.

24 Q. She's in El Salvador?

25 A. Yes.

1 Q. Do you know where in El Salvador?

2 A. In the house. We have another house.

3 Q. Do you know if she's in good health or in poor
4 health?

5 A. She's in poor health now.

6 Q. Poor health?

7 A. Yes.

8 Q. Do you know what her health problems are?

9 A. I don't.

10 MR. HALE: How do you know there are nice
11 hotels in El Salvador?

12 MS. YOUNG: I was just kidding. I'm sure there
13 are. Some people go there on vacation. You went there
14 on vacation.

15 MR. HALE: Thought maybe you had some personal
16 knowledge of some sort.

17 MS. YOUNG: We'll Google it after the depo.

18 Q. BY MR. HALE: So, Sister [REDACTED] worked at
19 Catholic Welfare as well?

20 A. Okay.

21 Q. Do you know what -- so, Sister [REDACTED],
22 Sister [REDACTED] and yourself worked at Catholic Welfare;
23 correct?

24 A. Yes.

25 Q. Do you know what responsibilities Sister

1 [REDACTED] had, what kind of work she did?

2 A. She was in the Catholic Charities, too.

3 Q. She did, too.

4 So, all the sisters --

5 A. All the sisters. Only one stay at the house to
6 maintain, cook and clean.

7 Q. Was that Sister [REDACTED]?

8 A. Yes.

9 Q. Were there ever any sisters who simply came and
10 lived with you while were you in Santa Barbara from 1956
11 to 1960?

12 A. No.

13 Q. I want to focus on this time period from 1956
14 to 1960.

15 Did you know any of the parish staff for Our
16 Lady of Guadalupe?

17 A. No.

18 Q. Did you know [REDACTED]?

19 A. [REDACTED] was the cook.

20 Q. At the rectory?

21 A. Yes, many years. Because when I started
22 working, 1984, she was -- her mind was not too good.

23 Q. Did you know her in 1956 to '60, or did you not
24 meet her until --

25 A. I just met her just to say, "This is [REDACTED]"

1 [REDACTED]."

2 Q. Did you know a parish secretary named

3 [REDACTED]?

4 A. No.

5 Q. No.

6 Did you know any - again, focusing on 1956 to
7 1960 - did you know a janitor or a maintenance person
8 for the --

9 A. No.

10 Q. -- for the parish?

11 A. No.

12 Q. Did you know anyone who worked at the parish
13 during the 1956 to 1960 school year -- or, years?

14 A. No.

15 Q. Was there a director of religious education, do
16 you know, at the parish while you were there?

17 A. I don't know.

18 MR. HALE: We have been going a little over an
19 hour. Do you want to take a break for five minutes,
20 stretch your legs?

21 THE WITNESS: Okay.

22 THE VIDEOGRAPHER: The time is 14:12. We are
23 off the record.

24 (Recess.)

25 THE VIDEOGRAPHER: The time 14:21. We are back

1 on the record.

2 Q. BY MR. HALE: Sister, I just want to make sure,
3 are you understanding my English? Am I speaking in an
4 okay, clear way? Are you having any trouble
5 understanding what I am saying?

6 A. Slow.

7 Q. I'll try and speak more slowly for you. But
8 other than my speaking too quickly, am I understandable
9 to you?

10 A. Yes.

11 Q. Have you ever been aware of Father Kelly owning
12 a cabin?

13 A. No.

14 Q. Did you ever attend mass at Our Lady?

15 A. Yes.

16 Q. How often would you attend mass at Our Lady?

17 A. We have to go every day.

18 Q. Every day.

19 What time would you attend mass at Our Lady?

20 A. I don't remember what time they have the mass
21 at the time. Maybe 7:30. I don't remember.

22 Q. But you would attend the early morning mass?

23 A. Early morning.

24 Q. And do you remember who would generally --

25 A. I don't.

1 Q. -- perform the early morning mass?

2 A. I don't.

3 Q. Do you remember ever seeing Father Kelly
4 performing the early mass?

5 A. Yes.

6 Q. Was it usually Father Kelly?

7 A. No.

8 Q. Was it infrequent for it to be Father Kelly at
9 the early morning mass?

10 A. Yes.

11 Q. Would you, generally, attend the early morning
12 mass with the other sisters in Santa Barbara?

13 A. Yes.

14 Q. You would all go together?

15 A. Yes.

16 MS. YOUNG: Objection. Are you referring to
17 Sisters of Bethany also?

18 MR. HALE: Yes. I'm not talking about the
19 Sisters of Notre Dame.

20 Q. And I'm still in that 1956 to 1960 time period;
21 okay?

22 A. Because we live across --

23 (Interruption by the Reporter.)

24 THE WITNESS: We live across from the church.

25 (Interruption by the Reporter.)

1 Q. BY MR. HALE: Did you ever participate in any
2 mass at Our Lady of Guadalupe?

3 MS. YOUNG: Objection. Vague and ambiguous as
4 to participate.

5 THE WITNESS: No.

6 Q. BY MR. HALE: Did you ever help, for instance,
7 clean the church at our lady?

8 A. No.

9 Q. Again, still in that '56 to '60 time frame.
10 Did you ever spend any time in the rectory?

11 A. No.

12 Q. Were you ever aware of any other Sisters of
13 Bethany spending time in the rectory?

14 A. No.

15 Q. Were you ever aware of any other Sisters of
16 Bethany participating in a mass at Our Lady of
17 Guadalupe?

18 A. No.

19 Q. Just so I'm clear, from 1956 to '60, you never
20 stepped foot -- set foot in the rectory?

21 A. No.

22 Q. You understand when I say "the rectory," I'm
23 referring to where the priests live?

24 A. Yes.

25 Q. Were you aware, during that time frame, of

1 anybody living behind the rectory?

2 A. No.

3 Q. Were you aware of there being a building behind
4 the rectory, between the rectory and the parish hall?

5 A. Yes.

6 Q. How were you aware of that building?

7 A. Because I see the house.

8 Q. But you weren't aware of anyone living in that?

9 A. No.

10 Q. Have you ever heard of the Blue Jackets Club?

11 A. No.

12 Q. Have you heard of the St. Mary's Boys Club?

13 A. No.

14 Q. During that 1956 to 1960 period, did you ever
15 teach catechism?

16 A. No.

17 Q. Were you ever aware of any of your other
18 Sisters of Bethany teaching catechism during that time
19 period?

20 A. No.

21 Q. How was it, when you came back in the '80s,
22 that you came to be the parish part-time secretary?

23 MS. YOUNG: Objection. Vague and ambiguous,
24 lacks foundation.

25 THE WITNESS: Because my superiors call me to

1 come down here. And they needed a sister because the
2 priest at the time it was Father [REDACTED]. No one take
3 over. They left the -- the lay people (unintelligible)
4 you know, and they need someone to help.

5 Q. BY MR. HALE: I didn't catch the last part.
6 The lay people what?

7 A. Left the program.

8 Q. Just, in other words, quit?

9 A. Quit.

10 Q. Did they tell you -- did Father [REDACTED] call your
11 mother superior, or how was it communicated that he
12 needed assistance?

13 MS. YOUNG: Objection. Speculation.

14 THE WITNESS: I don't know.

15 Q. BY MR. HALE: When you served as the part-time
16 secretary, did you receive a paycheck?

17 A. Yes.

18 Q. Who was the paycheck from?

19 A. The church.

20 Q. From Our Lady of Guadalupe?

21 A. Yes.

22 Q. What about -- when you were working at Catholic
23 Welfare, did you receive a paycheck for your work there?

24 A. Yes, but they make it to all the sisters.

25 Q. Who was that paycheck from?

1 A. I don't know.

2 Q. Do you remember seeing if it said "Catholic
3 Welfare" on the check?

4 A. No.

5 Q. Do you remember seeing if it said "The
6 Archdiocese of Los Angeles" on the check?

7 A. No.

8 Q. Do you remember seeing if it said, "The
9 Archbishop of Los Angeles" on the check?

10 A. No.

11 Q. Do you remember seeing if it said, "The
12 Chancellory Office," on the check?

13 A. No.

14 Q. Do you remember who signed the check?

15 A. No. Maybe the Superior, because they had to
16 give it to the Superior.

17 Q. Don't guess. Don't guess. If you don't know,
18 you don't know.

19 Do you ever remember the director of Catholic
20 Welfare signing the check?

21 A. No.

22 Q. Still in that 1956 to 1960 period. Did you
23 know any of the faculty at the school?

24 A. No.

25 Q. Did you know any of the Sisters of Notre Dame?

1 A. No.

2 Q. Did you know any of the staff at the school,
3 for instance, the secretary.

4 A. No.

5 Q. Did you know anyone who worked at the school?

6 A. No.

7 Q. Did you have any responsibilities at the
8 school?

9 A. No, sir.

10 Q. Pardon me?

11 A. No.

12 Q. Were you aware of any Sisters of Bethany having
13 any responsibilities at the school?

14 A. No.

15 Q. Were you aware of any Sisters of Bethany
16 teaching catechism at the school?

17 A. No.

18 Q. Were you aware of any Sisters of Bethany
19 teaching catechism anywhere at Our Lady of Guadalupe?

20 A. No.

21 Q. Do you know who was teaching catechism?

22 A. No.

23 Q. I want to ask you some questions about your
24 order and about your training to become a nun. I know
25 we talked about that briefly somewhat.

1 While you were preparing to become a nun, did
2 you receive any training or education regarding the
3 history of the Sisters of Bethany, the order itself?

4 A. We received a religious certification. I mean,
5 about the spiritual life. That's all.

6 Q. In other words, did you receive any education
7 about when the Sisters of Bethany, when the order was
8 created or founded?

9 A. Yes, we -- in the beginning, you know, they
10 tell us, you know, what year and what the order --
11 because I was a study at the school, that is what I --

12 Q. Do you know what year the Sisters of Bethany
13 was founded?

14 A. 1928.

15 Q. 1928.

16 Do you know where it was founded?

17 A. El Salvador.

18 Q. Do you know when it first came to the United
19 States?

20 A. They came 1949.

21 Q. Do you know who founded the order?

22 A. It was in -- one sister from Guatemala and one
23 from El Salvador.

24 Q. Do you know who is the current mother general?

25 A. Right now?

1 Q. Yes.

2 A. Is in Guatemala.

3 Q. But what is her name?

4 A. [REDACTED].

5 Q. How do you spell that?

6 A. [REDACTED]. [REDACTED] [sic]. [REDACTED]. [REDACTED].

7 Q. And does the order have Proventil offices?

8 A. No.

9 Q. But the headquarters are in El Salvador or
10 Guatemala?

11 A. Guatemala.

12 Q. Is the main office -- main headquarters in the
13 United States, is that in Los Angeles or somewhere else?

14 A. Los Angeles.

15 Q. Who's in charge of the Los Angeles area for the
16 order?

17 A. Sister [REDACTED].

18 Q. How do you spell her name?

19 A. [REDACTED].

20 Q. Is there -- for instance, is there a California
21 province?

22 A. No.

23 Q. It's all part of one order?

24 A. One order.

25 Q. Okay. So, the main headquarters are in

1 Guatemala?

2 A. No.

3 Q. So, there aren't separate provinces around the
4 United States or around the world?

5 A. No.

6 Q. Do you know how many sisters there are in the
7 entire order?

8 A. No, I don't.

9 Q. Does the Mother General have any kind of
10 advisory board or something equivalent, for instance, to
11 a presidential cabinet working underneath her?

12 MS. YOUNG: Objection. Lacks foundation.

13 THE WITNESS: I don't --

14 Q. BY MR. HALE: For instance, the Franciscans
15 have what is called a divinorum. Do you know what --
16 does that sound familiar to you?

17 A. They have the council.

18 Q. What is the council called?

19 A. Council.

20 Q. Council.

21 How many sisters are on the council?

22 A. (Unintelligible.)

23 Q. Okay.

24 How many sisters are on the council?

25 A. Five. I don't know their names.

1 Q. Are they all in Guatemala, too, or are there
2 any from the United States?

3 A. No, not from here.

4 Q. Is the Mother Superior elected or appointed?

5 A. Elected.

6 Q. What is the term for the Mother Superior?

7 A. Six years.

8 Q. And is the general council elected or
9 appointed?

10 A. Elected.

11 Q. What are the terms for a general council
12 member?

13 A. The same.

14 Q. Are there any other elected positions within
15 the Sisters of Bethany other than the Mother General and
16 the general council?

17 MS. YOUNG: Objection. Lacks foundation.

18 THE WITNESS: I don't --

19 Q. BY MR. HALE: Does the order have a web site?

20 A. Not that I know.

21 Q. Do you know under whose authority the order was
22 created? In other words, was the order created under
23 the authority of the Pope or under the authority of a
24 bishop somewhere?

25 MS. YOUNG: Objection. Lacks foundation.

1 Assumes facts not in evidence. May call for expert
2 testimony.

3 Q. BY MR. HALE: You can answer, if you know.

4 A. I don't.

5 Q. You don't know?

6 A. Because now we are -- how do you call it? I
7 don't know what the name is. Because we are
8 not diocesan. We are the other, pontifical.

9 Q. Pontifical rights?

10 A. Yes.

11 Q. Has the order always been a pontifical order,
12 or was there a time when it was a diocesan institute?

13 A. It was pontifical until 1976.

14 Q. It became pontifical in 1976?

15 A. Yes.

16 Q. And prior to that it was diocesan?

17 A. Yes.

18 Q. How do you know?

19 A. Because they let us know.

20 Q. Do you know why the order became a
21 pontifical --

22 A. I don't. I don't.

23 Q. -- entity in 1976?

24 A. I don't.

25 Q. How do you know how it became a pontifical

1 entity in 1976?

2 MS. YOUNG: Objection. Calls for speculation.

3 THE WITNESS: I don't know.

4 MR. HALE: That's perfectly fine. I just want
5 to know what you know.

6 Is there someone within your order that you are
7 aware of who would have knowledge of why the order went
8 from a diocesan institute to one -- to a pontifical
9 institute?

10 MS. YOUNG: Objection. Calls on speculation.

11 THE WITNESS: The Mother General was at the
12 time. I don't know what.

13 Q. BY MR. HALE: Is there any kind of a written
14 history of the order that you are aware of?

15 A. Yes, but they are over at the Mother house.

16 Q. In Guatemala?

17 A. In El Salvador.

18 Q. In El Salvador, okay.

19 Are you ever aware of anyone writing a
20 book documenting the history of --

21 A. No.

22 Q. -- the order?

23 A. No.

24 Q. Are you aware of anyone planning to do anything
25 like that?

1 A. No.

2 MS. YOUNG: Objection. Calls for speculation.

3 Q. BY MR. HALE: Do you know, when the order
4 became pontifical, did that mean that it was subject to
5 less supervision from whatever bishop it was working
6 under at the time?

7 MS. YOUNG: Objection. Assumes facts not in
8 evidence. Misstates the testimony.

9 THE WITNESS: I don't know.

10 Q. BY MR. HALE: When you were in Santa Barbara -
11 again, I'm focusing on that '56-1960 time period - did
12 you ever attend any PTA meetings?

13 A. No.

14 Q. Were you ever aware of any Sisters of Bethany
15 attending any PTA meetings?

16 A. No.

17 Q. I've asked you about some specific things at
18 the parish.

19 Did you ever do any work around the parish at
20 Our Lady of Guadalupe from 1956 to 1960?

21 A. No.

22 Q. Did you ever do any volunteer work at Our Lady
23 of Guadalupe from 1956 to 1960?

24 A. No.

25 Q. Were you ever aware of any Sister of Bethany

1 doing any work at Our Lady of Guadalupe from 1956 to
2 1960?

3 A. No.

4 Q. Were you ever aware of any Sister of Bethany
5 doing volunteer work at Our Lady of Guadalupe from 1956
6 to '60?

7 A. No.

8 Q. Have you ever been aware at any time, other
9 than yourself, when you came back and served as the
10 part-time secretary at Our Lady of Guadalupe, have you
11 ever been aware of any time of any Sister of Bethany
12 doing any work for Our Lady of Guadalupe parish?

13 A. No.

14 Q. Were you the -- to your knowledge, were you the
15 first person --

16 A. The first.

17 Q. -- to be paid while still a member of the
18 Sisters of Bethany?

19 A. Yes.

20 Q. While you were in Santa Barbara from '56 to 60,
21 were you involved in the Legion of Mary?

22 A. No.

23 Q. Were you ever aware of any Sisters of Bethany
24 involved in the Legion of Mary?

25 A. No.

1 Q. What about when you came back to Santa Barbara
2 in the '80s?

3 A. No.

4 Q. Did you ever talk to Sister Guadalupe about
5 Father Kelly?

6 A. No.

7 Q. Did she ever tell you she received any
8 complaints about Father Kelly?

9 A. No.

10 Q. To your knowledge, are there any other Sisters
11 of Bethany, who are still alive, who were assigned to
12 our -- to the convent next to Our Lady of Guadalupe
13 before 1973?

14 MS. YOUNG: Objection. Vague and ambiguous.

15 THE WITNESS: I don't know.

16 Q. BY MR. HALE: You don't know?

17 A. No.

18 Q. Do you know who, within your --

19 Is there a historian within the Sisters of
20 Bethany?

21 A. I don't know.

22 Q. Is there an archivist for the Sisters of
23 Bethany?

24 A. Everything is in the Mother house.

25 Q. In El Salvador?

1 A. El Salvador.

2 Q. Does the -- is there something called a mother
3 house in Los Angeles?

4 A. We don't have any superior. They just delegate
5 only. Everything has to go down there.

6 MS. YOUNG: By "down there," you mean
7 Guatemala?

8 THE WITNESS: Guatemala. Because that's the
9 Mother area.

10 Q. BY MR. HALE: Have you ever received any
11 correspondence from the Archdiocese of Los Angeles?

12 MS. YOUNG: Objection. Vague and ambiguous.

13 THE WITNESS: No.

14 Q. BY MR. HALE: Have you ever received any
15 correspondence from the Archbishop of Los Angeles?

16 A. No.

17 Q. Have you ever received any correspondence from
18 the chancellory office for the Archdiocese of Los
19 Angeles?

20 A. No.

21 Q. Have you ever received any correspondence from
22 Our Lady of Guadalupe, the parish?

23 A. No.

24 Q. Have you ever received any correspondence from
25 any priest, any diocesan priests, within the

1 Archdioceses of Los Angeles?

2 A. No.

3 Q. Have you ever received any instruction or
4 orders from anyone within the Archdiocese of Los Angeles
5 regarding how to perform your ministry?

6 A. What do you mean by that?

7 Q. Let me back up for a second.

8 I know a priest has his ministry. Does a nun
9 have a ministry?

10 A. Not by the diocesan. You know, just by the
11 order, you know. Because I told you that we made the
12 vow of obedience.

13 Q. Right.

14 A. And any changes that we -- right now they send
15 another sister here in Oxnard. Because she wasn't here,
16 they tell her to come here because we needed another
17 sister. But, I mean -- we receive guidelines. You
18 know, like if a young church of the religious education,
19 we receive some -- I mean, some letters from the office
20 in charge in the diocese, like Sister (unintelligible)
21 in charge of religious education in English for the
22 whole diocesan. We receive the guidelines of some kind.

23 Q. What kind of guidelines?

24 A. How to -- what book we are going to use, you
25 know, for religion, like that.

1 Q. Is that from the Archdiocese?

2 A. (Witness nods head.)

3 Q. Is that a "yes"?

4 A. Yes.

5 Q. Have you received any guidelines regarding how
6 you should dress?

7 A. No. That depends.

8 Q. What do you mean?

9 A. Depends on the order, on the congregation.

10 Q. On what?

11 A. Congregation.

12 Q. On the congregation. You mean, it depends on
13 what parish you are assigned to --

14 MS. YOUNG: Objection --

15 Q. BY MR. HALE: -- or you are working?

16 THE WITNESS: No, no.

17 MS. YOUNG: -- misstates testimony.

18 Q. BY MR. HALE: What do you mean?

19 A. I mean the religious orders. They have
20 different. How to dress. So, the young, they don't
21 wear habit anymore, and we don't know what kind of
22 sister they are.

23 Q. What other guidelines have you received from
24 the archdiocese, if any?

25 A. That's it.

1 Q. When was the first time you recall receiving --
2 are these guidelines in a booklet form, or how are they
3 communicated to you?

4 A. Letters.

5 Q. In letters?

6 A. Yes.

7 Q. Who usually signs the letters?

8 A. Sister [REDACTED].

9 Q. Someone from within the order?

10 A. Yes. No, no, no. I mean --

11 What do you mean? By the diocesan or by our
12 orders?

13 Q. Well, maybe -- this is the way I should ask it:
14 Are you aware of someone within the order communicating
15 to you guidelines from the archdiocese?

16 A. No.

17 MS. YOUNG: Objection. Calls for speculation,
18 belatedly.

19 Q. BY MR. HALE: So, where do these guidelines
20 come from, to your knowledge, the ones that you
21 testified to?

22 A. They came from the diocesan director to me.

23 Q. From the diocesan director to you?

24 A. Religious Education that is in charge.

25 Q. From the director of religious education?

1 A. Yes.

2 Q. And who is that?

3 A. Sister [REDACTED].

4 Q. And is it your understanding she's employed by
5 the Archdiocese?

6 A. Yes.

7 Q. When was the first time you ever recall
8 receiving these guidelines from the Archdiocese?

9 A. I don't remember.

10 Q. Do you recall ever receiving any guidelines
11 while you were in Santa Barbara at Catholic Welfare
12 regarding how you should perform your work at Catholic
13 Welfare?

14 A. No.

15 Q. While you were in Santa Barbara in that '56 to
16 60 time period, did you ever receive any kind of
17 instructions from Father Kelly?

18 A. No.

19 Q. Any kind of guidelines from Father Kelly?

20 A. No.

21 Q. Any instructions or guidelines from the
22 Archbishop?

23 A. No.

24 Q. What about from the Archdiocese?

25 A. No.

1 Q. Did you ever receive any instructions or
2 guidelines communicated -- or, instructions or
3 guidelines from the Archdiocese or the Archbishop that
4 were communicated to you by your order?

5 A. No.

6 Q. Did you know of any Sisters of the Immaculate
7 Heart while you were in Santa Barbara?

8 A. No.

9 Q. Do you know who they are?

10 A. I know who they are. They are in Montecito.

11 Q. But you didn't know any of them?

12 A. No.

13 Q. Do you recall there being a dispute between the
14 sisters and the Archbishop while you were in Santa
15 Barbara?

16 MS. YOUNG: Objection. Assumes facts not in
17 evidence.

18 THE WITNESS: What do you mean by that?

19 Q. BY MR. HALE: Did you ever hear of there being
20 a dispute between the Sisters of the Immaculate Heart --

21 A. No.

22 Q. -- and the Archbishop?

23 A. No.

24 Q. Do you know any Sisters of Nazareth?

25 A. No.

1 Q. What about any Sisters of Notre Dame?

2 A. No.

3 Q. While you were in Santa Barbara from '56 to 60,
4 were you ever aware of Father Kelly spending the night
5 away from the parish?

6 A. I don't know.

7 Q. You don't know if you were aware of it, or you
8 don't recall, or you were aware of it?

9 A. I don't know. I don't know anything.

10 Q. So, you weren't aware of that happening?

11 A. No.

12 Q. Did you ever see Father Kelly with a camera
13 while you were --

14 A. No.

15 Q. -- at Our Lady of Guadalupe from '56 to 60?

16 A. No.

17 Q. Okay. Did anyone ever tell you that they saw
18 him with a camera?

19 A. No.

20 Q. During that 1956 to 1960 time period, did you
21 ever observe boys, who appeared to you to be under the
22 age 18, walking into the rectory?

23 A. No.

24 Q. Did you ever observe such boys hanging out or
25 congregating in front of the rectory?

1 A. No.

2 Q. What about hanging out or congregating in front
3 of the garage for the rectory?

4 A. No.

5 Q. What was your -- what hours did you generally
6 work at Catholic Welfare?

7 A. We worked from 9:00 to 12:00. Then we had
8 lunch. And then we work 2:00 to 5:00.

9 Q. Would you have lunch back at the convent?

10 A. Yes.

11 Q. When you finished your work at five o'clock,
12 would you return to the convent?

13 A. Yes.

14 Q. You would have dinner at the convent?

15 A. Pray first and then dinner.

16 Q. Did any parishioners from Our Lady ever join
17 you for dinner at the convent?

18 A. No.

19 Q. Did any priests from Our Lady ever join you for
20 dinner at the convent?

21 A. No.

22 Q. Did anyone -- did you ever have dinner at the
23 convent with anyone other than a Sister of Bethany?

24 A. Not that I recall.

25 Q. Do you ever recall seeing any lay people inside

1 the convent?

2 A. No.

3 Q. Any parishioners inside the convent?

4 A. No.

5 Q. That never happened during your four years,
6 from '56 to 60?

7 A. They came to visit, you know, just in the
8 living room, talk about some problems.

9 Q. You would see lay people in the living room of
10 the convent?

11 A. Yes.

12 MS. YOUNG: Not the convent-convent?

13 Q. BY MR. HALE: Let me ask you this, is the
14 entire house called the convent?

15 A. Convent. We have a living room for the
16 visitors, and we have the chapel and the dining room and
17 the rooms for the sisters.

18 Q. And the chapel is part of the convent; right?

19 A. Yes.

20 Q. And was the living room part of the convent?

21 A. Yes.

22 Q. How common was it for there to be visitors in
23 the living room of the convent?

24 MS. YOUNG: Objection. Vague and ambiguous.

25 Q. BY MR. HALE: During your four years from '56

1 to 60?

2 A. Not too often, because we want to have privacy,
3 you know, for -- because the work is the work, and they
4 can go and see us at the -- only in emergencies.

5 Q. So, it was only in emergencies where a
6 layperson would be in the living room of the convent?

7 A. Yes.

8 Q. When you say "emergencies," what do you mean by
9 "emergencies"?

10 A. In case they had something, like, somebody's --
11 they want us to walk to see the -- before we went to
12 visit the parents, you know, when they give us -- "Go to
13 visit this family to see what is going on" -- "what
14 problem is in there." Sometime they came to see the --
15 they complain about the husband or something like that.

16 MS. YOUNG: Complain about what?

17 THE WITNESS: The problem they have with the
18 husbands, the Spanish ones, but not too often.

19 Q. BY MR. HALE: Were you ever aware of -- let me
20 ask you this, from '56 to 60, were there certain
21 parishioners who you saw on a regular basis?

22 MS. YOUNG: Objection. Vague and ambiguous.

23 THE WITNESS: No.

24 Q. BY MR. HALE: Were there any parishioners --
25 Go ahead.

1 A. Just at the building of the Catholic Charities.

2 Q. Okay. Were there any parishioners from Our
3 Lady who you were friends with during that period?

4 A. No.

5 Q. During that same period, were you ever aware of
6 Father Kelly having a reputation of spending time with
7 troubled youth?

8 A. No.

9 Q. Or with youth that were considered juvenile
10 delinquents?

11 A. No.

12 Q. Do you remember being aware of any boys in the
13 neighborhood during that same time frame that you
14 considered to be juvenile delinquent?

15 A. No.

16 Q. Were you ever aware of Father Kelly having a
17 car?

18 A. Yes.

19 Q. How were you aware of Father Kelly having a
20 car?

21 A. Because when I saw him driving in the streets.

22 Q. Do you recall what kind of car he had?

23 A. No.

24 Q. Did you ever see anyone in his car?

25 A. No.

1 Q. Did you ever see Father Kelly riding bikes with
2 boys from the neighborhood?

3 A. No.

4 Q. During your time at Our Lady in the '56 to 60
5 period, did you ever spend any time in the parish hall?

6 A. No.

7 Q. Did you ever spend any time at the school?

8 A. No.

9 Q. Did you ever spend any time in the church,
10 other than to attend mass?

11 A. No.

12 Q. Did you ever spend any time anywhere on parish
13 grounds other than the church to attend mass?

14 A. No.

15 Q. Did you consider the convent to be part of the
16 parish?

17 A. No.

18 Q. Did you know who owned the convent?

19 A. Los Angeles Diocese.

20 Q. The Archdiocese of Los Angeles?

21 A. Yes.

22 Q. How did you know that?

23 A. Because when we came, you know, the one who was
24 in charge, you know, the Catholic Charities say they
25 lend us to live there.

1 Q. So, you could work in Catholic Charities?

2 A. Yes.

3 Q. Just so I'm clear, the Archdiocese -- your
4 understanding, the Archdiocese allowed you to live at
5 the convent because you would work in return at Catholic
6 Welfare?

7 A. Yes.

8 Q. Okay. Was it your understanding that the
9 Catholic Welfare was operated by the Archdiocese?

10 MS. YOUNG: Objection. Calls for speculation.

11 THE WITNESS: What do you mean?

12 Q. BY MR. HALE: Was Catholic Welfare an entity of
13 the Archdiocese?

14 MS. YOUNG: Objection. Calls for --
15 (Overlapping.)

16 Q. BY MR. HALE: And it was operated --

17 MS. YOUNG: -- belatedly.

18 Q. BY MR. HALE: And it was operated by the
19 Archdiocese?

20 MS. YOUNG: Same objection.

21 THE WITNESS: Yes.

22 Q. BY MR. HALE: While you were at Our Lady of
23 Guadalupe from 1956 to 1960, did you create any clubs?

24 A. No.

25 Q. Do you recall a club called - and I'm going to

1 completely butcher this pronunciation - Club de Jovenes?

2 MS. YOUNG: Jovenes.

3 THE WITNESS: Jovenes.

4 No.

5 Q. BY MR. HALE: Have you ever heard of that club?

6 A. No.

7 Q. Did you ever create any kind of young person's
8 club while you were in Santa Barbara?

9 A. No.

10 Q. Were you ever aware of any other Sisters of
11 Bethany creating a young person's club while you were in
12 Santa Barbara?

13 A. By the Catholic Charities, it was during the
14 day, most for girls to sew, to learn how to sew.

15 Q. What was the name of the club?

16 A. Girl's club only.

17 Q. Where would the club meet?

18 A. At the Catholic Charities.

19 Q. Was there a club for boys?

20 A. No.

21 Q. Just for girls?

22 A. Just girls.

23 Q. Were you ever aware of any other Sisters of
24 Bethany creating a club for boys?

25 A. No.

1 Q. Who was invited into the girls club?

2 MS. YOUNG: Objection. Vague and ambiguous.

3 THE WITNESS: I don't know.

4 Q. BY MR. HALE: Did you create the girl's club?

5 A. No.

6 Q. Who did?

7 A. She pass away. Sister [REDACTED]

8 Q. But one of the Sisters of Bethany did?

9 A. Yes. But it's no more, but since she left, it
10 was finished.

11 Q. Do you know how word got out about the club so
12 people would join?

13 A. I don't know.

14 Q. Who was the club for? Was it for neighborhood
15 children, parish children?

16 A. I don't.

17 Q. When you left the convent next to Our Lady of
18 Guadalupe, did another sister come and take your place?

19 A. Yes.

20 Q. Do you know who that was?

21 A. I don't remember.

22 Q. Does the order publish any kind of annual
23 directory that indicates where each sister is assigned?

24 A. No.

25 Q. Have you ever been aware of the order

1 publishing anything like that?

2 A. No.

3 Q. Do you know who in the order would have
4 knowledge about who was assigned in Santa Barbara from
5 1960 to 1973?

6 MS. YOUNG: Objection. Calls for speculation.

7 THE WITNESS: Just in the Mother's house.

8 Q. BY MR. HALE: In El Salvador?

9 A. In El Salvador.

10 Q. Would there be a written record in El Salvador
11 of that?

12 THE WITNESS: I don't know.

13 MS. YOUNG: Objection. Calls are speculation.

14 THE WITNESS: I think so, but I don't know.

15 Q. BY MR. HALE: Have you ever seen a written
16 record of assignments?

17 A. No.

18 Q. Has anyone ever talked to you about some kind
19 of written record of assignments?

20 A. No.

21 Q. Is there any kind of annual publication about
22 events in the order? Maybe a newsletter or something
23 like that?

24 A. No.

25 Q. Has there ever been?

1 MS. YOUNG: Objection. Calls for speculation.

2 THE WITNESS: Long time ago. No anymore.

3 Q. BY MR. HALE: When did it stop?

4 A. I don't remember.

5 Q. How often was it published when it was in
6 existence?

7 A. Maybe once a year.

8 Q. And was that something that -- did it have a
9 title?

10 A. No. They just put the names, you know, the
11 sisters were in this convent, were in this convent.
12 That's only once a year they say where the sisters being
13 changed to different convents.

14 Q. Was it in a bound book or was it a couple of
15 pieces of paper?

16 A. Just a piece of paper, maybe a letter type,
17 like this.

18 Q. Is there -- why did the -- do you know why the
19 order stopped --

20 MS. YOUNG: Objection. Calls for speculation.

21 THE WITNESS: I don't know.

22 Q. BY MR. HALE: Is there -- are there -- I don't
23 know if issues is the right word.

24 Are there old issues of that publication in Los
25 Angeles?

1 MS. YOUNG: Objection. Calls for speculation.

2 THE WITNESS: I don't know.

3 Q. BY MR. HALE: When was last time you saw one of
4 those?

5 A. I don't remember.

6 Q. And were those published in 1956 to 1960 period
7 when you were in Santa Barbara?

8 A. Maybe two. Maybe two.

9 Q. Do you remember what year they were stopped,
10 they were no longer published?

11 A. I don't. I don't.

12 Q. And you don't recall if there was a title, a
13 name for that document?

14 A. No, no, I don't.

15 Q. Did you ever become aware of or hear about
16 Father Kelly becoming sick and vomiting?

17 A. No.

18 Q. Is that a "no"?

19 A. No.

20 Q. Did you ever see Father Kelly drinking alcohol?

21 A. No.

22 Q. Ever hear about Father Kelly drinking alcohol?

23 A. No.

24 Q. Did you ever smell alcohol on his breath?

25 A. No.

1 Q. Did you ever become aware of or hear anyone say
2 they smelled alcohol on his breath?

3 A. No.

4 Q. Did you ever become aware or hear of anything
5 about anyone, including yourself, hearing Kelly slurring
6 his speech because he was intoxicated?

7 A. No.

8 Q. Did you ever become aware of or hear anything
9 about anyone, including yourself, observing Kelly so
10 intoxicated he stumbled?

11 A. No.

12 Q. Did you ever become aware of or hear anything
13 about anyone, including yourself, observing Kelly so
14 intoxicated he passed out?

15 A. No.

16 Q. Did you ever become aware of or hear of
17 anything about anyone, including yourself, observing
18 Father Kelly so intoxicated he was unable to make it up
19 the stairs?

20 A. No.

21 Q. Did you ever become aware of or hear of
22 anything about anyone, including yourself, observing
23 Kelly so intoxicated he had to sit down during mass?

24 A. No.

25 Q. Did you ever become aware of or hear anything

1 about Kelly giving wine to a boy or boys in the
2 sacristy?

3 A. No.

4 Q. If you had heard anything like that or become
5 aware of that happening while you were in the convent in
6 Santa Barbara from '56 to 60, would you have told
7 anyone?

8 A. No.

9 MS. YOUNG: Objection. Calls for speculation.

10 Q. BY MR. HALE: Did you ever become aware of or
11 hear anything about Kelly giving wine to a boy or boys
12 anywhere?

13 A. No.

14 Q. And if you heard about or become aware of that
15 happening while you were assigned to the convent in
16 Santa Barbara, would you have told anyone?

17 A. No.

18 MS. YOUNG: Objection. Calls for speculation.

19 Q. BY MR. HALE: Did you ever become aware of or
20 hear of anything about Father Kelly giving alcohol to a
21 boy or boys anywhere?

22 A. No.

23 Q. And if you heard about that happening while you
24 were at the convent from '56 to '60, would you have told
25 anyone?

1 MS. YOUNG: Objection. Calls for speculation.

2 THE WITNESS: I don't know.

3 Q. BY MR. HALE: Did you ever become aware of or
4 hear anything about Father Kelly playing Bible study
5 game with a boy or boys?

6 A. No.

7 Q. Did you ever become aware of or hear anything
8 about Father Kelly spending a day or even days alone in
9 his room drinking?

10 A. No.

11 Q. Do you recall Father Kelly having a silver
12 jubilee, a 25th anniversary?

13 A. No.

14 Q. Did you ever hear about that?

15 A. No.

16 Q. Do you remember there being a Legion of Mary
17 when you were in Santa Barbara?

18 A. No.

19 Q. Do you know what the Legion of Mary is?

20 A. Yes.

21 Q. What is it? What is your understanding?

22 A. The ladies who get together, you know, to pray
23 for lady. They make a command to visit the sick or do
24 some kind of charity.

25 Q. And when you were in Santa Barbara from '56 to

1 60, were you aware of any Sisters of Bethany
2 participating in the Legion of Mary?

3 A. No.

4 Q. Did you know anyone who was participating in
5 the Legion of Mary?

6 A. No.

7 Q. When you were at Our Lady of Guadalupe in '56
8 to '60, did you know a Father [REDACTED], [REDACTED]?

9 A. No.

10 Q. "No"?

11 A. No.

12 Q. How about [REDACTED]?

13 A. Father [REDACTED] yes.

14 Q. Do you know if he is still alive?

15 A. He passed away.

16 Q. What about [REDACTED]?

17 A. No.

18 Q. [REDACTED] was the gentleman that you
19 referred to at Catholic --

20 A. -- Charities.

21 Q. -- Catholic Welfare; correct?

22 Catholic Welfare and Catholic Charities are the
23 same thing; right?

24 A. Yes.

25 Q. Is he deceased as well?

1 A. He's deceased.

2 Q. How about -- did you know a [REDACTED]

3 [REDACTED]?

4 A. Yes, I know -- David used to say -- one time he
5 went to say mass at the convent. I see him. I don't
6 have any contact with the priests.

7 Q. Do you know if he is still alive?

8 A. I don't know.

9 Q. Do you know a [REDACTED], G-a --

10 A. No.

11 Q. Do you know [REDACTED]?

12 A. Yes, I met him when he came the first time
13 here, was newly ordained.

14 Q. Okay.

15 A. But after that I never see him.

16 Q. After that you never saw him again?

17 A. No.

18 Q. So, you only saw him when he was newly
19 ordained?

20 A. He was here, you know -- I think assistant
21 pastor.

22 Q. Did you ever talk to him while he was assigned
23 to Our Lady?

24 A. No.

25 Q. Were you ever aware of any of the Sisters of

1 Bethany talking to him while he was at Our Lady?

2 A. No. Just to say, "Good morning."

3 Q. Did you ever talk to him about Father Kelly?

4 A. No.

5 Q. Did anyone -- has anyone ever told you that
6 they have gone to a cabin with Father Kelly?

7 A. No.

8 Q. Did you know [REDACTED]?

9 A. No.

10 Q. Do you know Bishop Curry?

11 A. Yes.

12 Q. Has he ever spoken to you or written to you
13 about Father Kelly?

14 A. No.

15 Q. How do you know Bishop Curry?

16 A. Because I was here in Santa Barbara, and we had
17 some meetings, you know, with the bishops, and that's
18 it.

19 Q. Where were the meetings?

20 A. He came the same -- 1994, I think he came to
21 become -- I think it was 1994 he became bishop here in
22 Santa Barbara that -- the year that I left.

23 Q. Did you ever talk to Monsignor -- well, strike
24 that.

25 Did Monsignor [REDACTED] ever talk to you or write

1 to you about Father Kelly?

2 A. No.

3 Q. Do you know [REDACTED]?

4 A. He was pastor but he never --

5 Q. He's what?

6 A. I work with him.

7 Q. You work with him?

8 A. Right now.

9 Q. Has he ever talked to you --

10 A. No.

11 Q. -- or written to you about Father Kelly?

12 A. No.

13 MS. YOUNG: Let him finish his question before
14 you answer.

15 Q. BY MR. HALE: Did you talk to him about the
16 fact that you were being deposed today?

17 A. No.

18 Q. Did you tell him -- has he ever told you that
19 he's been deposed in these cases?

20 A. No.

21 Q. Were you ever aware of him being deposed in
22 these cases?

23 A. No.

24 Q. Are you -- do you work at the parish where he
25 is assigned in Oxnard?

1 A. In the chapel.

2 Q. In the chapel.

3 Are you in residence there, as well?

4 MS. YOUNG: Objection. Vague and ambiguous.

5 Q. BY MR. HALE: In other words, do you live
6 there? Is there a --

7 A. No.

8 Q. No.

9 Has anyone from the Archdiocese in Los Angeles
10 ever contacted you about Father Kelly?

11 A. No.

12 Q. Has any investigator from the Archdiocese of
13 the Los Angeles ever contacted you about Father Kelly?

14 A. No.

15 Q. Has anyone ever asked you questions about what
16 your time with Father Kelly was like?

17 A. No.

18 Q. Has anyone ever spoken to you or written to you
19 about Father Kelly?

20 A. No.

21 Q. Did you ever hear [REDACTED] complain about
22 Father Kelly?

23 A. No.

24 Q. Anyone ever tell you that [REDACTED]
25 complained about Father Kelly?

1 A. No.

2 Q. Did you ever hear [REDACTED] say she did not
3 like Father Kelly?

4 A. No.

5 Q. Do you remember a boy named [REDACTED]?

6 A. No.

7 Q. How about a priest named [REDACTED]?

8 A. [REDACTED] I remember him just when he say
9 mass.

10 Q. Okay. In Santa Barbara?

11 A. In Santa Barbara.

12 Q. Did you ever talk to him about Father --

13 A. No.

14 Q. -- Kelly?

15 MS. YOUNG: Let him finish the question before
16 you answer.

17 MR. HALE: Why don't we take a break here to
18 change tapes.

19 THE VIDEOGRAPHER: Time is 15:11. We are off
20 the record.

21 (Recess.)

22 THE VIDEOGRAPHER: Time is 15:24. This is the
23 beginning of tape number 2, and we are on the record.

24 Q. BY MR. HALE: Sister, did you ever know

25 a student from -- or, someone named [REDACTED] or [REDACTED]

1 [REDACTED]?

2 A. No.

3 Q. Do you remember there ever being a student from
4 St. John's --

5 Do you know where St. John's Seminary is?

6 A. No -- yes. I know behind the Mission.

7 Q. I think you are thinking of St. Anthony's
8 Seminary.

9 A. That's before St. Anthony's. Now, I think,
10 it's a school there.

11 Q. Right, right.

12 But do you know St. John's Seminary in
13 Camarillo?

14 A. Yes, I know.

15 Q. While you were in Santa Barbara from '56 to
16 '60, do you recall there ever being a student from
17 St. John's who would come and live at the rectory in
18 the summertime or on holidays?

19 A. No.

20 Q. And you don't know [REDACTED] or [REDACTED] [REDACTED]?

21 A. No.

22 Q. What about -- did you know a boy named [REDACTED]
23 [REDACTED]?

24 A. No.

25 Q. Have you ever been aware of any priests

1 testifying on behalf of a teenager at a juvenile court
2 or criminal hearing?

3 A. No.

4 Q. Did you ever know a Father [REDACTED]?

5 A. No.

6 Q. Do you ever recall any priests from outside the
7 Archdiocese of Los Angeles coming to Our Lady of
8 Guadalupe to perform missions?

9 A. No.

10 Q. Did you know a boy named [REDACTED]?

11 A. [REDACTED] I know the Mother.

12 Q. What was her name?

13 A. [REDACTED].

14 Q. Did you know [REDACTED]?

15 A. It was a boy.

16 Q. How did you meet [REDACTED]?

17 A. Because I meet the family.

18 Q. Because you knew [REDACTED]?

19 A. Yes.

20 Q. Did you ever discuss [REDACTED] with Father
21 [REDACTED]?

22 A. No.

23 Q. When you were at the convent, did you have
24 access to a car?

25 A. We had the car for the Catholic Charities.

1 Q. So, there was one car?

2 A. Two cars. One for each -- two sisters in one
3 car and two in the other one.

4 Q. Did you have a driver's license when you were
5 in Santa Barbara?

6 A. Yes. I get it here because I didn't have it.

7 Q. So, the car was kept with Catholic Charities?

8 A. Yes.

9 Q. Both of those cars were owned, to your
10 knowledge, by Catholic Charities?

11 A. Um-hum.

12 Q. Did you have insurance for the car?

13 A. All were by the diocese --

14 Q. By Catholic Charities?

15 I'm sorry. Go ahead.

16 A. By the diocesan.

17 Q. Did the Archdiocese provide you --

18 A. Yes.

19 Q. -- with insurance?

20 A. Yes.

21 Q. Make sure you let me finish -- I know you are
22 anticipating my questions correctly, but just try and
23 make sure you let me finish before you answer even
24 though --

25 MS. YOUNG: Belatedly, objection, calls for

1 speculation.

2 Q. BY MR. HALE: How do you know that the
3 Archdiocese was providing the insurance for the car?

4 A. Because we don't pay it.

5 Q. Okay. When you say "we," you mean the Sisters
6 of Bethany?

7 A. Yes.

8 Q. Did Sister [REDACTED] sometimes drive the cars?

9 A. Yes.

10 Q. Did anyone, other than you or Sister [REDACTED],
11 from the Sisters of Bethany, drive the cars?

12 A. Yes.

13 Q. Who else? Did all the sisters?

14 A. All the --

15 Q. Okay. When did you first meet [REDACTED]
16 [REDACTED]?

17 A. I don't remember.

18 Q. ~~Did you meet her, though, when you were here~~
19 from 1956 to 1960, sometime in that time frame?

20 A. Yes.

21 Q. How did you meet her?

22 A. Because she had problem with her husband.

23 Q. So, she came in to you for some sort of
24 counseling?

25 A. Yes.

1 Q. Did she come to the convent?

2 A. To the office.

3 Q. To the Catholic Charities or Catholic Welfare?

4 A. Yes.

5 Q. What did she tell you about the problems?

6 A. Her husband drink, was with another woman.

7 Q. Okay. Did she tell you she was having any
8 problems with any of her children?

9 A. No.

10 Q. So, all of her problems related to her husband?

11 A. Yes, um-hum.

12 Q. Did you ever give [REDACTED] a ride
13 anywhere?

14 A. No.

15 Q. Did she ever tell you she told any of her sons
16 to wash their mouths out with soap?

17 A. No.

18 Q. Did you ever discuss Father Kelly with [REDACTED]
19 [REDACTED]?

20 A. No.

21 Q. Did you ever tell [REDACTED] that
22 Father Kelly had inherited the cabin or a cabin?

23 A. No.

24 Q. Did you ever become aware of or hear anyone
25 saying that Father Kelly had inherited a cabin?

1 A. No.

2 Q. Did you ever become aware of or hear anyone say
3 that Father Kelly had paid for a cabin with money that
4 he had inherited?

5 A. No.

6 Q. Did [REDACTED] ever tell you that
7 Father Kelly was calling and asking for her son [REDACTED]
8 [REDACTED] to go to the cabin?

9 A. No.

10 Q. Did she ever tell you that Father Kelly was
11 calling and asking for her son [REDACTED] to go to the cabin?

12 A. No.

13 Q. Did Sister [REDACTED] ever tell you that
14 [REDACTED] had told her either of these things?

15 A. No.

16 Q. Did anyone ever tell you that [REDACTED]
17 had ever told them either of those things?

18 A. No.

19 Q. Did [REDACTED] ever tell you that she
20 was concerned about Father Kelly taking [REDACTED] to a
21 cabin?

22 A. No.

23 Q. Did she ever tell you that she was concerned
24 about Father Kelly taking [REDACTED] anywhere?

25 A. No.

1 Q. Did she ever tell you she was concerned about
2 Father Kelly taking her other son, [REDACTED] to a cabin?

3 A. No.

4 Q. Do you recall ever seeing [REDACTED] in
5 the living area -- in the living room of the convent?

6 A. No.

7 Q. Do you recall ever speaking to her there?

8 A. No.

9 Q. Did you ever hear of anyone speaking to her in
10 the living room of the convent?

11 A. No.

12 Q. Did [REDACTED] ever tell you she was
13 aware of other mothers within the community talking
14 about the fact that Father Kelly was taking other boys
15 to the cabin?

16 A. No.

17 Q. Did you ever become aware of or hear of anyone
18 expressing concern about Father Kelly taking a boy or
19 boys to the cabin?

20 A. No.

21 Q. Did you ever become aware of or hear the
22 parents of any boys or boy discussing Father Kelly
23 taking a boy or boys to the cabin -- or, to a cabin?

24 A. No.

25 Q. Did you ever become aware of or hear anyone

1 discussing Father Kelly taking a boy or boys to a cabin?

2 A. No.

3 Q. Did [REDACTED] ever tell you she was
4 concerned about how much interest Father Kelly was
5 showing in [REDACTED]?

6 A. No.

7 Q. Did she ever tell you she was concerned about
8 how much interest Father Kelly was showing in her other
9 son [REDACTED]?

10 A. No.

11 Q. Did she ever tell you that she was concerned
12 that Father Kelly was focusing too much on her son
13 [REDACTED]?

14 A. No.

15 Q. Did [REDACTED] ever tell you that she
16 did not agree with [REDACTED] taking trips to the cabin with
17 Father Kelly?

18 A. No.

19 Q. Did she ever tell you she didn't agree with her
20 son [REDACTED] taking trips to the cabin with Father Kelly?

21 A. No.

22 Q. Did you ever tell [REDACTED] that she
23 should not worry about Father Kelly taking [REDACTED] to a
24 cabin?

25 A. No.

1 Q. Did you ever tell [REDACTED] she should
2 not worry about Father Kelly taking her son [REDACTED] to a
3 cabin?

4 A. No.

5 Q. Did you ever tell [REDACTED] she should
6 not worry about Father Kelly taking any boys or a boy to
7 a cabin?

8 A. No.

9 Q. Did you ever hear Sister [REDACTED] say any of
10 these kinds of things to [REDACTED]?

11 A. No.

12 Q. Did you ever hear anyone say these kinds of
13 things to [REDACTED]?

14 A. No.

15 Q. Did you ever tell [REDACTED] not to
16 worry about Father Kelly because he was a priest?

17 A. No.

18 Q. Did you ever hear [REDACTED] tell
19 [REDACTED] not to worry about Father Kelly
20 because he was priest?

21 A. No.

22 Q. Did you ever hear anyone tell [REDACTED]
23 not to worry about Father Kelly because he was a priest?

24 A. No.

25 Q. Did [REDACTED] ever tell you that Father

1 Kelly was having [REDACTED] swim or bathe naked?

2 A. No.

3 Q. Did you ever hear her tell that to Sister

4 [REDACTED]?

5 A. No.

6 Q. Did you ever hear say that to anyone?

7 A. No.

8 Q. Did [REDACTED] ever tell you she had
9 spoken with anyone else about her sons [REDACTED] or [REDACTED]
10 taking trips to the cabin with Father Kelly?

11 A. No.

12 Q. Did anyone ever tell you that they had spoken
13 with Mrs. [REDACTED] about her sons [REDACTED] or [REDACTED] taking
14 trips to the cabin with Father Kelly?

15 A. No.

16 Q. Did anyone ever tell you they had spoken with
17 [REDACTED] about anything related to
18 Father Kelly?

19 A. No.

20 Q. Did you ever help run any festivals held at Our
21 Lady of Guadalupe parish?

22 A. At that time, no.

23 Q. At any time have you?

24 A. After Father [REDACTED].

25 Q. After what?

1 A. When I was here with the -- when I was working
2 with Father [REDACTED].

3 Q. Oh, with Father [REDACTED].

4 Sometime in the '80s or '90s you helped?

5 A. Yes.

6 Q. What festivals did you help with?

7 A. When they had the fiesta for the -- you know
8 Spanish fiesta here for Santa Barbara, they had the
9 festival there.

10 Q. Okay. Any others?

11 A. No.

12 Q. And you never helped with any festivals in the
13 1956 --

14 A. No.

15 Q. -- to 1960 time frame?

16 A. No.

17 Q. Do you ever recall [REDACTED] saying
18 she no longer wanted to attend Our Lady of Guadalupe?

19 A. No.

20 Q. Do you ever recall [REDACTED]
21 stopping -- no longer attending mass at Our Lady of
22 Guadalupe?

23 A. No.

24 Q. Did you ever tell [REDACTED] she should
25 forgive Father Kelly?

1 A. No.

2 Q. Did you ever hear of or become aware of anyone
3 telling [REDACTED] she should forgive
4 Father Kelly?

5 A. No.

6 Q. Did you ever tell [REDACTED] there was
7 such a thing as forgiveness?

8 A. No.

9 Q. Did you ever hear anyone or become aware of
10 anyone telling [REDACTED] there was such a thing
11 as forgiveness?

12 A. No.

13 Q. Did you know any altar boys at Our Lady of
14 Guadalupe when you were here from '56 to '60?

15 A. No.

16 Q. Are you familiar with the Bishops Committee for
17 the Spanish-speaking?

18 A. No.

19 Q. Have you ever heard or become aware of
20 Father Kelly having played Bible study trivia games with
21 parish children?

22 A. No.

23 MS. YOUNG: Asked and answered.

24 MR. HALE: I think you are right about that.

25 Q. Over the course of your career as a Sister of

1 Bethany, have you ever received any training or
2 education regarding identifying warning signs of
3 childhood sexual abuse taking place?

4 A. No.

5 Q. Have you ever received any kind of
6 communications from the Archdiocese or the Archbishop or
7 the chancellory office regarding identifying warning
8 signs of childhood sexual abuse taking place?

9 A. Yes.

10 Q. When was the first time you received something
11 like that?

12 A. Maybe two months ago when they have the
13 training, you know, for the ones who work at the parish.

14 Q. That was two months ago?

15 A. Yes.

16 Q. That was the first time you received anything
17 from the Archdiocese or the Archbishop or chancellory's
18 office about training related to childhood sexual abuse?

19 A. Yes.

20 Q. Have you ever known a priest who was accused of
21 childhood sexual abuse?

22 A. No.

23 Q. Have you ever heard about a priest being
24 accused, aside from today, of childhood sexual abuse?

25 A. No.

1 Q. Have you ever been aware of any member or
2 employee of the Archdiocese of Los Angeles warning a
3 member or members of a parish or a community that a
4 priest who had been accused of childhood sexual abuse
5 was assigned or was in residence at that location?

6 MS. YOUNG: Objection. Compound. Vague and
7 ambiguous.

8 THE WITNESS: No.

9 Q. BY MR. HALE: When you were the part-time
10 secretary for the parish, did the parish have a
11 bookkeeper or an accountant of some sort?

12 A. No.

13 Q. Did you handle those duties or did the pastor
14 handle those duties?

15 A. The pastor.

16 Q. Did you ever help that pastor prepare something
17 to the Archbishop called an annual report?

18 A. No.

19 Q. Have you heard of something called an annual
20 report from parishes to the Archdiocese or Archbishop?

21 A. Yes.

22 Q. How did you first hear about that?

23 A. Because I hear that -- I -- I heard that they
24 had to prepare that thing, but I didn't do it.

25 Q. Did you ever see such a report?

1 A. No, no.

2 Q. When did you first become aware of the
3 existence of an annual report?

4 A. With Father [REDACTED].

5 Q. Have you ever discussed the fact that you were
6 going to be deposed with any priest from the Archdiocese
7 of Los Angeles?

8 A. No.

9 Q. Have you ever discussed it with any other
10 Sisters of Bethany?

11 A. No.

12 Q. Have you ever heard of something called the
13 doctrine of mental reservation?

14 A. No.

15 Q. When was the last time that you spoke to
16 [REDACTED]?

17 A. I left here 10 years ago and never see her
18 anymore.

19 Q. You haven't seen her since you left?

20 A. Yes. Twelve. I leave in 19- -- yeah.

21 Q. Did you consider yourself friends with her?

22 A. Well, we lost contact.

23 Q. Has she ever told you that [REDACTED] was abused by
24 Father Kelly?

25 A. No.

1 Q. Are you still in touch with anyone from Our
2 Lady of Guadalupe, priest, parishioner or employee?

3 A. There are no parishioners here at Our Lady of
4 Guadalupe.

5 Q. I'm sorry. I didn't understand.

6 A. The two people that I know belong to Our Lady
7 of Guadalupe, they belong to Our Lady of Sorrows.

8 Q. Were they ever parishioners at Our Lady of
9 Guadalupe?

10 A. Before when I was assigned here, they were my
11 teachers for the kids.

12 Q. When you say, before when you were assigned
13 here, are you referring to the time from 1956 to 60?

14 A. No.

15 Q. From the time in the '80s --

16 A. '80s.

17 Q. -- and '90s?

18 You say they were their teachers?

19 A. Yes. You know, to teach catechism.

20 Q. Okay. Did you know them when you were here
21 from '56 to '60?

22 A. No.

23 Q. You did not meet those people until you were
24 here in the '80s?

25 A. Yes.

1 Q. Did you ever receive any kind of notice when
2 Father Kelly died?

3 A. No.

4 Q. Did you ever hear Father Kelly passing away?

5 A. No.

6 Q. Did you ever hear about a funeral announcement
7 for Father Kelly?

8 A. Nuh-uh.

9 Q. Is that "no"?

10 A. No.

11 Q. Do you know anyone who attended Father Kelly's
12 funeral?

13 A. I don't know.

14 MR. HALE: We are almost done. We will
15 definitely be done by 4:00.

16 MS. YOUNG: Good.

17 Q. BY MR. HALE: I've got a long string of
18 questions I'm going to ask here. It's going to get a
19 bit monotonous, so just bear with me. Listen to the
20 question, and answer it the best you can, and we should,
21 hopefully, be done in the next 15 minutes; okay?

22 A. Okay.

23 Q. Did you ever hear about or become aware of
24 Father Kelly taking or inviting a boy or boys into the
25 rectory at Our Lady of Guadalupe?

1 A. No.

2 Q. Now, if you had heard about that or become
3 aware of that happening while you were assigned to Our
4 Lady, would you have told anyone?

5 MS. YOUNG: Objection. Calls for speculation.

6 THE WITNESS: No.

7 Q. BY MR. HALE: Did you ever hear about or become
8 aware of Father Kelly taking a boy or boys on an
9 overnight trip anywhere?

10 A. No.

11 Q. If you'd heard about that or become aware of
12 that happening while you were assigned to Our Lady at
13 any time, would you have told anyone?

14 MS. YOUNG: Objection. Calls for speculation.

15 THE WITNESS: No.

16 Q. BY MR. HALE: Did you ever hear about or become
17 aware of Father Kelly taking a boy or boys to
18 Father Kelly's living quarters in the rectory?

19 A. No.

20 Q. If you heard about that or become aware of that
21 happening while you were assigned to Our Lady, would you
22 have told anyone?

23 MS. YOUNG: Objection. Calls for speculation.

24 THE WITNESS: No.

25 Q. BY MR. HALE: Did you ever hear about or become

1 aware of Father Kelly taking a boy or boys to a cabin?

2 A. No.

3 MS. YOUNG: Same objection.

4 Q. BY MR. HALE: If you had heard about or become
5 aware of that happening while you were assigned to Our
6 Lady, would you have told anyone?

7 MS. YOUNG: Same objection. Calls for
8 speculation.

9 MR. HALE: I should -- I should. Strike that.

10 Q. When I say assigned to Our Lady, what I'm
11 referencing is when you were assigned to the convent
12 next to Our Lady, from 1956 to 60; okay?

13 A. Yeah.

14 Q. Did you ever hear about or become aware of
15 anyone saying a boy or boys should not be going to a
16 cabin with Father Kelly?

17 A. No.

18 Q. And if you heard about that or become aware of
19 that happening while you were assigned to the convent
20 next to Our Lady, would you have told anyone?

21 A. No.

22 MS. YOUNG: Same objection. Calls for
23 speculation, belatedly.

24 Q. BY MR. HALE: Did you ever hear about or become
25 aware of Father Kelly taking a boy or boys to the beach?

1 A. No.

2 Q. And if you heard about that or become aware of
3 that happening while you were assigned to Catholic
4 Welfare or to Our Lady of Guadalupe, would you have told
5 anyone?

6 A. No.

7 MS. YOUNG: Same objection.

8 I have a standing objection --

9 MR. HALE: Sure.

10 MS. YOUNG: -- to all of those --

11 MR. HALE: Sure.

12 MS. YOUNG: -- questions what she would have
13 done --

14 MR. HALE: That's fine.

15 MS. YOUNG: -- after years later.

16 MR. HALE: That's fine.

17 Q. BY MR. HALE: Did you ever hear about or become
18 aware of Father Kelly taking a boy or boys to Mexico?

19 A. No.

20 Q. What about to so San Simeon?

21 A. No.

22 Q. What about any other trips outside of Santa
23 Barbara?

24 A. No.

25 Q. If you heard about that happening or you become

1 aware of that happening while you were assigned to
2 Catholic Welfare or to Our Lady of Guadalupe, would you
3 have told anyone?

4 MS. YOUNG: Same objection, and compound.

5 THE WITNESS: No.

6 Q. BY MR. HALE: I can split it up. It will just
7 take longer.

8 MS. YOUNG: It's fine. I have my objection --

9 MR. HALE: Well, no -- you are right, I mean,
10 it is compound. And if are going to raise the
11 objection, I'll split it up, so we don't -- eliminate
12 that objection. So, you tell me. It is. I'm saying
13 "Our Lady" and "Catholic Welfare." So, technically,
14 it's compound.

15 MS. YOUNG: Well, I think her answers to all of
16 them -- so, I think it's fine.

17 Q. BY MR. HALE: Did you ever hear about or become
18 aware of Father Kelly taking a boy or boys out to
19 dinner?

20 A. No.

21 Q. What about taking a boy or boys out to a movie?

22 A. No.

23 Q. If you heard about or become aware of that
24 happening while you were assigned to Catholic Welfare or
25 Our Lady, would you have told anyone?

1 A. No.

2 MS. YOUNG: Same objection.

3 MR. HALE: I'm going to -- just because I'm
4 paranoid there will be some sort of problem at trial,
5 I'm going to break it up just so there's no problem with
6 the compound nature of the question.

7 Q. So, if you heard about or become aware of this
8 happening while you were assigned to Our Lady of
9 Guadalupe, would you have told anyone?

10 MS. YOUNG: Same objection --

11 THE WITNESS: No.

12 MS. YOUNG: -- speculation.

13 Q. BY MR. HALE: And if you heard about or become
14 aware of this happening while you were assigned to
15 Catholic Welfare, would you have told anyone?

16 MS. YOUNG: Same objection. Calls for
17 speculation.

18 THE WITNESS: No.

19 Q. BY MR. HALE: Did you hear about or become
20 aware of Father Kelly giving a boy or boys money?

21 A. No.

22 Q. If you heard about or become aware of this
23 happening while you were assigned to Catholic Welfare or
24 Catholic Charities, whatever you want to call it, would
25 you have told anyone?

1 MS. YOUNG: Same objection.

2 THE WITNESS: No.

3 Q. BY MR. HALE: And if you heard about it or
4 become aware of this happening while you were assigned
5 to Our Lady of Guadalupe, would you have told anyone?

6 A. No.

7 MS. YOUNG: Same objection.

8 Q. BY MR. HALE: Did you ever hear about or become
9 aware of Father Kelly paying a boy or boys that he took
10 to the cabin money?

11 MS. YOUNG: Same objection.

12 THE WITNESS: No.

13 Q. BY MR. HALE: If you heard about it or become
14 aware of this happening while you were working at
15 Catholic Charities or Catholic Welfare, would you have
16 told anyone?

17 MS. YOUNG: Same objection. Calls for
18 speculation.

19 THE WITNESS: No.

20 Q. BY MR. HALE: And if you heard about that
21 happening or become aware of that happening while you
22 were assigned or while you working at Our Lady of
23 Guadalupe, would you have told anyone?

24 MS. YOUNG: Same objection. Calls for
25 speculation.

1 THE WITNESS: No.

2 Q. BY MR. HALE: Did you ever hear about or become
3 aware of Father Kelly doing something to a boy or to
4 boys that they did not like?

5 A. No.

6 Q. If you heard about that happening or become
7 aware of that happening while you were working at
8 Catholic Welfare or Catholic Charities, would you have
9 told anyone?

10 THE WITNESS: No.

11 MS. YOUNG: Objection. Calls for speculation.

12 Q. BY MR. HALE: If you heard about that happening
13 or become aware of that happening while you were working
14 at Our Lady of Guadalupe, would you have told anyone?

15 MS. YOUNG: Calls for speculation.

16 THE WITNESS: No.

17 Q. BY MR. HALE: Did you ever hear about or become
18 aware of Father Kelly making a boy or boys sleep with
19 him?

20 A. No.

21 Q. And if you had heard about that or become aware
22 of that happening while you were working at Catholic
23 Charities or Catholic Welfare, would you have told
24 anyone?

25 MS. YOUNG: Objection. Calls for speculation.

1 Q. BY MR. HALE: If you heard about that or become
2 aware of that happening while you were working at Our
3 Lady of Guadalupe, would you have told anyone?

4 MS. YOUNG: Same objection.

5 THE WITNESS: No.

6 Q. BY MR. HALE: Did you ever hear about or become
7 aware of Father Kelly asking a boy or boys to wear only
8 their underwear?

9 A. No.

10 Q. What about him asking a boy or boys to be naked
11 around him?

12 A. No.

13 Q. What about asking a boy or boys to be
14 photographed in either of those two conditions?

15 A. No.

16 Q. If you heard about this or become aware of this
17 happening while you were working at Catholic Charities
18 or Catholic Welfare, would you have told anyone?

19 MS. YOUNG: Objection. Calls for speculation.

20 THE WITNESS: No.

21 Q. BY MR. HALE: And if you heard about or become
22 aware of this happening while you were working at Our
23 Lady of Guadalupe, would you have told anyone?

24 MS. YOUNG: Same objection.

25 THE WITNESS: No.

1 Q. BY MR. HALE: Did you ever hear about or become
2 aware of Father Kelly behaving inappropriately with a
3 boy or boys?

4 A. No.

5 Q. If you heard about or become aware of this
6 happening while you were working at Catholic Charities
7 or Catholic Welfare, would you have told anyone?

8 MS. YOUNG: Objection. Calls for speculation.

9 THE WITNESS: No.

10 Q. BY MR. HALE: What if you heard about this or
11 become aware of this happening while you were working at
12 Our Lady of Guadalupe, would you have told anyone then?

13 MS. YOUNG: Same objection.

14 THE WITNESS: No.

15 Q. BY MR. HALE: Did you ever hear about or become
16 aware of anyone saying they suspected Kelly was behaving
17 inappropriately with a boy or with boys?

18 A. No.

19 Q. Did you ever hear about or become aware of
20 Father Kelly sexually abusing a boy or boys?

21 A. No.

22 Q. If you heard about or become aware of that
23 happening while you were assigned to -- while you
24 working at Catholic Welfare or Catholic Charities, would
25 you have told anyone?

1 MS. YOUNG: Objection. Calls for speculation.

2 THE WITNESS: No.

3 Q. BY MR. HALE: If you heard about that or become
4 aware of that happening while you were working at Our
5 Lady of Guadalupe, would you have told anyone?

6 MS. YOUNG: Same objection.

7 THE WITNESS: No.

8 Q. BY MR. HALE: Did you ever hear about or become
9 aware of anyone saying that they suspected that Kelly --
10 Father Kelly was sexually abusing a boy or boys?

11 A. No.

12 Q. Did you ever hear about or become aware of
13 Father Kelly paying a boy or boys he took to the cabin
14 money after sexually assaulting them?

15 A. No.

16 MS. YOUNG: Objection, belatedly. Lacks
17 foundation.

18 Go ahead.

19 Q. BY MR. HALE: If you had heard about or become
20 aware of this happening while you were working at
21 Catholic Charities or Catholic Welfare, would you have
22 told anyone?

23 MS. YOUNG: Objection. Calls for speculation.

24 THE WITNESS: No.

25 Q. BY MR. HALE: If you had heard about or become

1 aware of this happening while working at Our Lady of
2 Guadalupe, would you have told anyone?

3 MS. YOUNG: Same objection.

4 THE WITNESS: No.

5 Q. BY MR. HALE: Have you heard about or become
6 aware of Father Kelly being arrested?

7 A. No.

8 Q. Have you ever heard about or become aware of
9 Father Kelly being investigated by anyone?

10 A. No.

11 Q. Have you heard about or become aware of anyone
12 saying they had stopped attending church because of
13 Father Kelly?

14 A. No.

15 Q. Have you ever heard about or become aware of
16 anyone saying they had stopped serving as an altar boy
17 because of Father Kelly?

18 A. No.

19 Q. Did you know any of the altar boys at Our Lady
20 of Guadalupe during any of the time period you served
21 from '56 to '60 or in the '80s and the '90s?

22 A. No.

23 Q. Did you ever hear about or become aware of
24 any -- of Father Kelly -- well, strike that. You've
25 already answered that question.

1 Did you ever hear about - I'm almost done -
2 ever hear about or become aware of anyone saying they
3 were leaving the parish or the school at Our Lady
4 because of Father Kelly?

5 A. No.

6 Q. Did you ever tell anyone that -- strike that.

7 Did you ever hear about or become aware of
8 anyone saying that they were leaving Our Lady because
9 they had problems with Father Kelly?

10 A. No.

11 Q. Did you ever hear about or become aware of
12 anyone saying Our Lady of Guadalupe was a difficult
13 place to work because of Father Kelly?

14 A. No.

15 Q. Did you ever hear about or become aware of
16 anyone complaining to Timothy Manning about
17 Father Kelly?

18 A. No.

19 Q. Did you ever hear about or become aware of
20 anyone complaining to anyone in the Archdiocese about
21 Father Kelly?

22 A. No.

23 Q. Did you ever hear about or become aware of a
24 parishioner or parishioners complaining about
25 Father Kelly?

1 A. No.

2 Q. Did you ever hear about or become aware of
3 parishioners signing a petition to have Father Kelly
4 removed as pastor from Our Lady of Guadalupe.

5 A. No.

6 Q. Did you ever hear about or become aware of
7 anyone saying Father Kelly was not normal?

8 A. No.

9 Q. Did you ever hear about or become aware of
10 anyone saying they were being transferred from Our Lady
11 because they were not getting along with Father Kelly?

12 A. No.

13 Q. Did you ever hear anyone say -- did you ever
14 hear about or become aware of anyone being assigned to
15 Our Lady to replace someone who was not getting along
16 with Father Kelly?

17 A. No.

18 Q. Did you ever hear about or become aware of
19 anyone arguing or disagreeing with Father Kelly?

20 A. No.

21 Q. Did you ever hear about or become aware of any
22 priests who didn't get along with Father Kelly?

23 A. No.

24 Q. What about any nuns who didn't get along with
25 Father Kelly?

1 A. No.

2 Q. What about any parishioners who didn't get
3 along with Father Kelly?

4 A. No.

5 Q. Did you ever hear or become aware of
6 Father Kelly ever complaining about any priests?

7 A. No.

8 Q. What about any nuns?

9 A. No.

10 Q. What about any parishioners?

11 A. No.

12 Q. Did you ever hear about or become aware of
13 anyone describing Father Kelly as strange?

14 A. No.

15 Q. Did you ever think Father Kelly was strange?

16 A. Yes.

17 Q. Why?

18 A. Because he was serious, barely say hello, good
19 morning, that's all. (unintelligible) by himself.

20 Q. Did you ever talk to anybody about that?

21 A. No.

22 Q. No one else ever told you that they thought
23 Father Kelly was strange?

24 A. No.

25 Q. Any other reason that you thought he was

1 strange?

2 A. I don't know.

3 Q. Did you ever think Father Kelly was mentally
4 ill?

5 A. No.

6 Q. Did you ever hear about or become aware of
7 anyone describing Father Kelly as mentally ill?

8 A. No.

9 Q. Did you ever tell anyone that you had problems
10 with Father Kelly's drinking?

11 A. No.

12 Q. Or that Father Kelly had a drinking problem?

13 A. No.

14 Q. Did you ever become aware of or hear about
15 someone saying that Father Kelly had a drinking problem?

16 A. No.

17 Q. Did you ever ask anyone if they were aware of
18 or suspected any inappropriate behavior by Father Kelly?

19 A. No.

20 Q. Ever become aware of or hear about anyone
21 asking if there were any suspicions of inappropriate
22 behavior by Father Kelly?

23 A. No.

24 MS. YOUNG: Objection. Vague and ambiguous.

25 Q. BY MR. HALE: I'm sorry?

1 A. No.

2 Q. Thanks.

3 Did you ever tell anyone that Father Kelly had
4 problems?

5 A. No.

6 Q. Did you ever hear about or become aware of
7 anyone saying that Father Kelly had problems?

8 A. No.

9 Q. Did you ever tell anyone that you personally
10 had problems with Father Kelly?

11 A. No.

12 Q. Did you ever hear about or become aware of
13 anyone saying that they personally had problems with
14 Father Kelly?

15 A. No.

16 MR. HALE: We are almost there. Three more and
17 we are done.

18 Q. Did you ever hear about or become aware of
19 anyone saying they did not like Father Kelly?

20 A. No.

21 Q. That they did not trust Father Kelly?

22 A. No.

23 Q. Did you ever tell anyone that you did not like
24 Father Kelly?

25 A. No.

1 Q. Did you ever tell anyone that you did not trust
2 Father Kelly?

3 A. No.

4 Q. Did you ever hear about or become aware of
5 anyone complaining about Father Kelly about anything?

6 A. No.

7 Q. Did you ever hear about or become aware of
8 anyone saying something to the effect of that if the
9 Archdiocese removed every priest with a drinking problem
10 or a psychological problems, there wouldn't be enough
11 priests to run all the parishes in the Archdiocese?

12 A. No.

13 Q. Have you ever spoken to Ms. Young before today?

14 A. When I came here, because I don't know how the
15 deposition will be. That's it.

16 Q. So, today was the first time?

17 A. Yes.

18 Q. Did you ever speak to Ms. Young over the
19 telephone?

20 A. No.

21 Q. Did you ever exchange any emails or written
22 correspondence with Ms. Young?

23 A. No.

24 Q. When you talked to her today, what did the two
25 of you talk about?

1 A. About what deposition is because I don't know
2 what it is.

3 Q. Did you talk about your time with Father Kelly?

4 A. No, because I don't -- when I was here, you
5 know, that's years. We talk how this going to be,
6 because they told me about the video, because it was my
7 first time. I don't know anything about. Say not to be
8 nervous.

9 Q. But she didn't talk about Father Kelly?

10 A. No.

11 Q. Aside from here today, have you ever discussed
12 any kind of inappropriate behavior by Father Kelly with
13 anyone?

14 A. No.

15 MR. HALE: I am done.
16 Do you have questions?

17 MS. YOUNG: Yes, let's go off the record for a
18 minute.

19 THE VIDEOGRAPHER: The time is 16:00. We are
20 off the record.

21 (Recess.)

22 THE VIDEOGRAPHER: The time is 16:03. We are
23 back on the record.

24 / / /

25 / / /

EXAMINATION

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BY MS. YOUNG:

Q. I have just one question for you, Sister

[REDACTED]

A few minutes ago Mr. Hale here was asking you some questions, and he said, "Did you ever hear that Father Kelly had abused boys," and then he asked you, "If you had heard that, would you have told anyone," and you said, "No." Why did you say "no"?

A. Because it's hear so many things about priests, you know. It's the first time I know that he had been doing those kind of things. I didn't know anything before.

Q. Okay. When you say it's the first time you know, you mean you don't know, it's because he's asking you those questions?

A. Yes, because I don't know, because I don't know anything about --

Q. You've never heard anything --

(Overlapping.)

THE WITNESS: When I was here, I never know anything what it was wrong.

Q. BY MS. YOUNG: You never knew anything was wrong --

A. No.

1 Q. -- about Father Kelly; is that correct?

2 MS. YOUNG: I have no further questions.

3 MR. HALE: Let me ask one follow-up.

4

5 FURTHER EXAMINATION

6 BY MR. HALE:

7 Q. Sister, when you stepped outside with
8 Ms. Young, what did she ask you?

9 A. The same thing.

10 Q. The same thing here?

11 A. Yeah.

12 MS. YOUNG: I'll testify to that, that is
13 exactly what I asked her.

14 MR. HALE: I'm not going to ask you to testify.

15 Q. What did you tell her?

16 A. The same thing.

17 MR. HALE: Okay. That's all I have.

18 Same stipulation.

19 Is that fine?

20 MS. YOUNG: Yeah, that's fine. You want me to
21 get her the transcript.

22 MR. HALE: I don't care, whatever. We will do
23 it if you want to. But if you don't want to, that's
24 fine.

25 THE WITNESS: How about this?

1 MS. YOUNG: You can give that back to him.

2 That's fine.

3 If you want to stipulate that you could send
4 the transcript to me, and I'll make sure that she reads
5 it and signs it; makes any necessary corrections. That
6 would be fine.

7 MR. HALE: I think 30 days was the time frame.

8 MS. YOUNG: Thirty days is fine.

9 You are not going anywhere in the next 30 days,
10 out of the country, out of town?

11 THE WITNESS: Only I'm going to the Congress.

12 MS. YOUNG: Where is that?

13 THE WITNESS: In Anaheim, the end of the month.
14 1st, 2nd, 3rd of March.

15 MS. YOUNG: Oh, okay. Just for a few days. If
16 it's going --

17 MR. HALE: Are you okay reading English?

18 THE WITNESS: Yes.

19 MR. HALE: So, you won't have any problem
20 reading the transcript by yourself?

21 THE WITNESS: Yes, I am. In case I have some
22 problems, I will ask.

23 MR. HALE: Okay.

24 THE WITNESS: Thank you very much.

25 MR. HALE: Thanks.

1 THE WITNESS: This is my first time.

2 THE VIDEOGRAPHER: This concludes today's
3 deposition of Sister [REDACTED]. The time
4 is now 16:05. This is the end of tape II, volume I. We
5 are off the record.

6 (The deposition concluded at 4:05 p.m.)

7
8
9
10
11 --oo0oo--

12
13 I hereby declare, under penalty of perjury,
14 that the foregoing is true and correct.

15 Dated this _____ day of _____, 2007,
16 at _____, California.

17
18
19
20 _____
21 Sister [REDACTED]

22
23
24 --oo0oo--
25

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA,)
) ss
COUNTY OF SANTA BARBARA.)

I, MARIA G. RABATIN, CSR #6821, Certified Shorthand Reporter, in the County of Santa Barbara, State of California, hereby certify:

That, prior to being examined, the witness named in the foregoing deposition, to wit, Sister [REDACTED], was by me duly sworn to testify 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 herein named and thereafter reduced to typewriting by computer-aided transcription under my direction.

I further certify that I am not interested in the event of the action.

WITNESS my hand this _____ day of _____ 2007, at Santa Barbara, California.

Certified Shorthand Reporter
State of California
CSR No. 6821