

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA, ANACAPA DIVISION

COORDINATION PROCEEDING SPECIAL)
TITLE (RULE 1550(b)))

THE CLERGY CASES I)

This Document Relates to:)
[REDACTED], an individual,)
Plaintiff,)

vs.)

Proceeding No. 4286

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

Defendants.)

Superior Court of Santa Barbara,)
Case No. [REDACTED])

VIDEOTAPED DEPOSITION OF [REDACTED]

LOS ANGELES, CALIFORNIA

THURSDAY, JANUARY 4, 2007

VOLUME 1

REPORTED BY:
Elizabeth Borrelli
CSR No. 7844
JOB No. 070104EL

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 2 FOR THE COUNTY OF SANTA BARBARA, ANACAPA DIVISION
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 8)
 vs.) Case No. 4286
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 10 ARCHDIOCESE OF LOS ANGELES)
 EDUCATION AND WELFARE CORPORATION;))
 11 ROMAN CATHOLIC ARCHBISHOP OF LOS)
 ANGELES; and DOES 3-100,)
 inclusive,)
 12)
 Defendants.)
 13)
 14 Superior Court of Santa Barbara,)
 Case No. [REDACTED])
 15)
 16)
 17)
 18 Videotaped Deposition of [REDACTED]
 19 Volume 1, taken on behalf of the Defendants,
 20 at 865 South Figueroa Street, Suite 2900, Los
 21 Angeles, California, commencing at 10:11 a.m.,
 22 Thursday, January 4, 2007, before Elizabeth
 23 Borrelli, a Certified Shorthand Reporter for
 24 the State of California, License No. 7844.
 25 ***

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 22
 23
 24
 25

1 INFORMATION REQUESTED
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1 LOS ANGELES, CALIFORNIA; THURSDAY, JANUARY 4, 2007
 2 10:11 A.M.
 10:02:36 3 THE VIDEOGRAPHER: This is the videotaped
 10:11:18 4 deposition of [REDACTED] in the matter of the
 10:11:22 5 Clergy Cases I, Andrew Ruiz versus Archdiocese of
 10:11:28 6 Los Angeles Education and Welfare Corporation, et al.,
 10:11:32 7 in the Superior Court of the State of California for the
 10:11:35 8 County of Santa Barbara, Anacapa Division. The case
 10:11:39 9 number is [REDACTED]
 10:11:43 10 Today's date is December 4th, 2007. The time
 10:11:47 11 is 10:11 a.m. The video operator is Lee Bosset, an
 10:11:53 12 associate of Gradillas Court Reporting, located at 345
 10:11:57 13 North Maple Drive, Beverly Hills, California. This
 10:12:00 14 recording is taking place at 865 South Figueroa Street,
 10:12:05 15 Los Angeles, California, and was noticed by the law
 10:12:07 16 offices of Hennigan, Bennett & Dorman, LLP.
 10:12:11 17 Counsel, please voice identify yourselves for
 10:12:15 18 the record.
 10:12:16 19 MR. HALE: Tim Hale, for Plaintiff [REDACTED]
 10:12:18 20 [REDACTED]
 10:12:20 21 MR. GRIFFITH: R. Thomas Griffith, for [REDACTED]
 10:12:22 22 [REDACTED]
 10:12:24 23 MS. YOUNG: Bless Young, for defendant
 10:12:27 24 Archbishop Corporation sole.
 10:12:35 25 THE VIDEOGRAPHER: We are on the record.

10:13:32 1 Q And do you understand that your testimony
 10:13:33 2 today has the same force and effect as if you were in a
 10:13:38 3 court of law?
 10:13:39 4 A Yes.
 10:13:39 5 Q And that you're under oath?
 10:13:41 6 A Yes.
 10:13:44 7 Q I'm entitled to your best estimate of things
 10:13:49 8 today, or your best recollection, but I don't want you
 10:13:52 9 to guess.
 10:13:54 10 Do you understand that?
 10:13:54 11 A Yes.
 10:13:55 12 Q And I guess the traditional definition of an
 10:14:00 13 estimate versus a guess is if I asked you how large your
 10:14:03 14 dining room table is, you could probably give me an
 10:14:06 15 estimate. But if I asked you how large my dining room
 10:14:09 16 table is, that would be a guess.
 10:14:11 17 A Okay.
 10:14:12 18 Q Okay.
 10:14:12 19 Do you understand the difference?
 10:14:13 20 A Yes.
 10:14:14 21 Q If you need to take a break at any time, let
 10:14:17 22 me know and we'll take a break, but I appreciate it if
 10:14:21 23 you would only -- not take a break when a question is
 10:14:24 24 pending.
 10:14:24 25 A I understand.

10:12:36 1 Would the reporter please swear in the witness.
 2 [REDACTED]
 3 having been duly administered an oath in
 4 accordance with CCP 2094, was examined
 5 and testified as follows:
 6 EXAMINATION
 10:12:54 7 BY MS. YOUNG:
 10:12:56 8 Q Good morning, Mr. [REDACTED]
 10:12:57 9 A Good morning.
 10:12:58 10 Q Could you please state your name for the
 10:13:00 11 record, your full name.
 10:13:01 12 A [REDACTED]
 10:13:07 13 Q Have you ever been deposed before?
 10:13:09 14 A Never.
 10:13:10 15 Q Okay.
 10:13:12 16 Then I'm sure your attorney has given you some
 10:13:14 17 instructions, but let's just go over them for the
 10:13:17 18 record.
 10:13:18 19 As you can see, the court reporter is taking
 10:13:20 20 down everything that each of us says, and at the end of
 10:13:24 21 the deposition, it will be bound into a booklet and you
 10:13:29 22 will have the opportunity to read it and make any
 10:13:30 23 corrections.
 10:13:31 24 Do you understand that?
 10:13:32 25 A Yes, I do.

10:14:25 1 Q After you've answered a question, we can take
 10:14:28 2 a break anytime you need to.
 10:14:32 3 If we speak over one another, the court
 10:14:37 4 reporter is going to have a hard time taking down what
 10:14:40 5 we're saying, so wait for me to finish my question and
 10:14:42 6 I'll try to wait for you to finish your answer.
 10:14:45 7 Okay? Is that fair?
 10:14:47 8 A That's fair.
 10:14:48 9 Q If you don't understand a question, let me
 10:14:49 10 know, and I will try to rephrase it for you. Okay?
 10:14:53 11 A Okay.
 10:14:54 12 Q If you answer a question, I'll presume you
 10:14:57 13 understood it. Okay?
 10:14:59 14 A Okay.
 10:14:59 15 Q Also, if I ask you a question and you don't
 10:15:01 16 know the answer, just tell me that you don't know and
 10:15:03 17 we'll move on.
 10:15:03 18 How old are you, Mr. [REDACTED]?
 10:15:04 19 A I am 51 years old.
 10:15:05 20 Q And your date of birth is what?
 10:15:06 21 A April 4 -- no, I'm sorry. [REDACTED]
 10:15:07 22 Q What is your current address?
 10:15:08 23 A [REDACTED] Street, Santa Barbara,
 10:15:09 24 California.
 10:15:10 25 Q How long have you lived there?

10:15:46 1 A I've been there approximately six years,
 10:15:49 2 maybe. Around six years.
 10:15:52 3 Q Do you live with anybody currently?
 10:15:54 4 A I live with a few people.
 10:15:58 5 Q And who are those people?
 10:16:00 6 A I live on the same property, there's two
 10:16:05 7 dwellings. My [REDACTED] lives in the front house. I have
 10:16:09 8 a [REDACTED] that lives in the front house. I live in the
 10:16:13 9 back house and I share a space with my [REDACTED], and
 10:16:20 10 my [REDACTED] lives with me and my
 10:16:23 11 [REDACTED] also.
 10:16:26 12 Q And what is the name of your older sister?
 10:16:31 13 A [REDACTED]
 10:16:31 14 Q And your [REDACTED]..
 10:16:35 15 A [REDACTED]
 10:16:41 16 Q Anyone else live with you?
 10:16:42 17 A There is another fella that rents a room in
 10:16:44 18 the front house; his name is [REDACTED]. He's an
 10:16:48 19 acquaintance.
 10:16:48 20 Q And what's his last name?
 10:16:52 21 A I'm not sure what [REDACTED]'s last name is.
 10:16:54 22 Q Do you own the property?
 10:16:55 23 A Yes, I do.
 10:16:56 24 Q You own both the front house and the back
 10:16:58 25 house?

10:18:13 1 Q Do you have your [REDACTED] ?
 10:18:17 2 A Yes.
 10:18:18 3 Q Do you have any other hobbies besides [REDACTED]
 10:18:22 4 [REDACTED] ?
 10:18:24 5 A No, not at the moment. [REDACTED] is pretty
 10:18:27 6 much my recreational kind of getaway, no-cell-phone kind
 10:18:31 7 of relaxation.
 10:18:33 8 Q Are you going with somebody else?
 10:18:35 9 A Yes, I'm going with a group of people from
 10:18:37 10 my [REDACTED] in Santa Barbara.
 10:18:41 11 Q When did you get your [REDACTED] your
 10:18:42 12 [REDACTED] ?
 10:18:45 13 A I think it was probably around in -- I got my
 10:18:51 14 [REDACTED] Would you like me to show it to
 10:18:54 15 you?
 10:18:54 16 Q Sure. You don't have to show it to me. Just
 10:18:58 17 tell me when.
 10:19:00 18 A Probably about maybe 2003, 2002 -- about 2002,
 10:19:04 19 I believe.
 10:19:06 20 Q Had you ever [REDACTED] before that?
 10:19:08 21 A No.
 10:19:15 22 Q Have you ever been known by any other name
 10:19:17 23 other than [REDACTED] ?
 10:19:18 24 A No.
 10:19:22 25 Q Have you ever been named -- known by [REDACTED]

10:16:58 1 A Yes.
 10:17:01 2 Q And you don't know what [REDACTED]'s last name is?
 10:17:04 3 A He's a friend. We don't even have a rental
 10:17:07 4 agreement, but he's a friend that I've known for a
 10:17:10 5 while. I don't know his last name.
 10:17:13 6 Q How long has he been renting the room there?
 10:17:16 7 A Probably for approximately a year.
 10:17:24 8 Q How long have you known him?
 10:17:25 9 A I've known [REDACTED] for probably about a year and
 10:17:29 10 a half.
 10:17:33 11 Q Mr. [REDACTED], have you taken any medications
 10:17:36 12 within the last 24 hours? . . .
 10:17:37 13 A No.
 10:17:38 14 Q Do you regularly take any prescription
 10:17:42 15 medications?
 10:17:43 16 A No.
 10:17:49 17 Q I understand you're leaving for vacation
 10:17:51 18 tomorrow. Is that still true?
 10:17:53 19 A Yes, it is.
 10:17:54 20 Q Where are you going?
 10:17:55 21 A I'm going to [REDACTED]
 10:17:59 22 and go [REDACTED] for about six days.
 10:18:02 23 Q That's nice.
 10:18:06 24 How long have you been [REDACTED] ?
 10:18:09 25 A For maybe about four years, maybe.

10:19:25 1 [REDACTED] ?
 10:19:27 2 A No.
 10:19:31 3 Q No.
 10:19:31 4 A That's funny.
 10:19:31 5 Q What?
 10:19:32 6 A That's funny.
 10:19:33 7 Q Oh. I'm asking it for a reason, but I'll show
 10:19:39 8 you a document later. It's probably a mistake.
 10:19:39 9 Could you give me your Social Security number?
 10:19:41 10 A 551 --
 10:19:42 11 MR. HALE: Wait. Hang on. I think there's a
 10:19:44 12 privacy interest in a Social Security number. It's not
 10:19:47 13 provided in any other cases so far. If you have got
 10:19:50 14 authority that says we have got to provide it, I'll read
 10:19:53 15 it, I'll listen to it.
 10:19:54 16 MS. YOUNG: Well, the problem is we're
 10:19:56 17 having -- we have trouble getting documents in some
 10:19:58 18 cases without the Social Security number.
 10:20:00 19 MR. HALE: You know what --
 10:20:00 20 MS. YOUNG: I understand that.
 10:20:01 21 If -- if you don't want to provide it on the
 10:20:03 22 transcript, maybe we can make some other arrangements.
 10:20:05 23 MR. HALE: Ever, with the date of birth,
 10:20:06 24 they're still hassling you?
 10:20:08 25 MS. YOUNG: Even with the date of birth,

10:20:09 1 people are still asking for it. And I don't know
 10:20:12 2 whether they're supposed to be or not. I never --
 10:20:14 3 but maybe we --
 10:20:15 4 MR. HALE: What if we -- what if we give you
 10:20:17 5 an authorization? Are they still going to give you a
 10:20:20 6 hard time, you think, with that?
 10:20:21 7 MS. YOUNG: They have, yeah.
 10:20:22 8 MR. HALE: All right.
 10:20:22 9 MS. YOUNG: So that's the only reason I need
 10:20:24 10 it. If you don't want to provide it on the record,
 10:20:26 11 maybe you could provide it afterwards or --
 10:20:29 12 MR. HALE: Let's keep it off the record, and
 10:20:31 13 you and I can talk about --
 10:20:32 14 MS. YOUNG: Okay.
 10:20:32 15 MR. HALE: Certainly, obviously, you gotta --
 10:20:33 16 you gotta get the records, so...
 10:20:36 17 MS. YOUNG: Okay. I appreciate it.
 10:20:37 18 BY MS. YOUNG:
 10:20:45 19 Q When did you purchase the property in which
 10:20:47 20 you now live?
 10:21:10 21 A Approximately 1998.
 10:21:17 22 Q Where did you live prior to that?
 10:21:21 23 A Prior to that I lived on [REDACTED] Street, on [REDACTED]
 10:21:29 24 [REDACTED]
 10:21:30 25 Q In Santa Barbara?

10:21:31 1 A Correct.
 10:21:31 2 Q And did you own that property or rent it?
 10:21:33 3 A No, it was my friend's. I was living in his
 10:21:36 4 garage for a while.
 10:21:38 5 Q His garage had been converted to an apartment?
 10:21:41 6 A Just a little space on the side.
 10:21:51 7 Q Now, I understand that you've been convicted
 10:21:55 8 of a number of crimes in the past; is that correct?
 10:21:59 9 A That's true.
 10:22:01 10 Q And is it your testimony that all of those
 10:22:07 11 crimes were somehow related to the abuse that you're
 10:22:12 12 alleging by Father Kelly?
 10:22:16 13 MR. HALE: Calls for expert testimony. Calls
 10:22:18 14 for a legal conclusion. This is a lay witness, and, as
 10:22:22 15 you know from the discovery responses, certainly has no
 10:22:24 16 medical training whatsoever.
 10:22:25 17 MS. YOUNG: I understand that.
 10:22:27 18 MR. HALE: So I'm going to let him answer
 10:22:28 19 this, but I don't know how far down this road you're
 10:22:31 20 going to take --
 10:22:32 21 MS. YOUNG: I understand that. This -- I'm
 10:22:33 22 just asking for his lay opinion.
 10:22:38 23 BY MS. YOUNG:
 10:22:38 24 Q Do you attribute all of the crimes for which
 10:22:41 25 you've been arrested and convicted to stem from the

10:22:46 1 abuse that you're alleging against Father Kelly?
 10:22:51 2 A I would be willing to say yes on that.
 10:23:03 3 Q Now, one of those crimes, as I understand it,
 10:23:07 4 in 1990, I believe it was early 1990, was a theft from
 10:23:12 5 Victoria's Secret; is that correct?
 10:23:15 6 A Uh-huh.
 10:23:16 7 Q Is that a "yes"?
 10:23:17 8 One thing I forgot to instruct you, you'll
 10:23:19 9 have to say yes or no, not shake your head, otherwise
 10:23:22 10 the court reporter can't take it down, okay.
 10:23:25 11 A Okay.
 10:23:25 12 Q So my question was, one of those crimes was
 10:23:28 13 theft from Victoria's Secret store; is that correct?
 10:23:31 14 A Yes.
 10:23:32 15 Q What did you steal from Victoria's Secret?
 10:23:37 16 A I can't actually recall what type of garment
 10:23:40 17 it was or --
 10:23:42 18 Q A lady's garment?
 10:23:43 19 A It was either -- I can't actually recall what
 10:23:45 20 it was, but it was something of value that I could sell.
 10:23:49 21 Q A lady's garment?
 10:23:51 22 MR. HALE: Asked and answered.
 10:23:54 23 BY MS. YOUNG:
 10:23:54 24 Q As opposed to a man's garment, do you remember
 10:23:58 25 that?

10:23:58 1 A I've been in there with my daughter. I don't
 10:24:00 2 think they sell men's garments in there.
 10:24:02 3 Q I think you're right. That's why I'm asking.
 10:24:05 4 So it was a lady's garment?
 10:24:06 5 A I would imagine, yes, yeah.
 10:24:10 6 Q And you say something that you -- something
 10:24:12 7 that you could sell?
 10:24:13 8 A Correct.
 10:24:14 9 Q So you were planning on selling it for drug
 10:24:17 10 money?
 10:24:18 11 A For drug money, yes.
 10:24:19 12 Q And where did you sell these -- the garment
 10:24:24 13 that you stole from Victoria's Secret?
 10:24:26 14 MR. HALE: Assumes facts not in evidence.
 10:24:28 15 BY MS. YOUNG:
 10:24:28 16 Q Did you sell it?
 10:24:29 17 A Yes.
 10:24:31 18 Q Where did you sell it or to whom did you sell
 10:24:34 19 it? Do you recall?
 10:24:43 20 A In that lifestyle there's people that you come
 10:24:46 21 to know -- sometimes you know their name, sometimes you
 10:24:50 22 don't -- that are willing to buy stolen items for less,
 10:24:55 23 half the value of the items, and that's who I ended up
 10:24:59 24 selling it to, people like that.
 10:25:01 25 Q Are you sure you didn't give it to someone as

10:25:03 1 a gift?
 10:25:05 2 A No, I never gave anything away.
 10:25:12 3 Q And you were also -- other thefts that you
 10:25:16 4 were charged with were stealing things from J.C. Penney;
 10:25:24 5 is that correct?
 10:25:24 6 A Yes.
 10:25:25 7 Q And do you remember what you stole from J.C.
 10:25:27 8 Penney?
 10:25:31 9 A What time? On that conviction, on that one
 10:25:34 10 right there?
 10:25:35 11 Q So there was more than one time from J.C.
 10:25:37 12 Penney?
 10:25:39 13 A More times than I got caught for.
 10:25:41 14 Q Okay.
 10:25:43 15 And what did you steal?
 10:25:44 16 A I think that particular time right there, I
 10:25:47 17 attempted to steal a boom box, a big radio, I think. I
 10:25:55 18 think I even had a skateboard also that I grabbed on the
 10:26:01 19 way out the door.
 10:26:02 20 Q And when you say you "attempted to steal," so
 10:26:04 21 that time you were caught before you --
 10:26:07 22 A I got it out the door.
 10:26:09 23 Q But that's as far as you got?
 10:26:11 24 A Well; they chased me a little ways and they
 10:26:13 25 finally ended up catching me.

10:27:51 1 guess, what you would -- might agree with me was a life
 10:27:54 2 of crime, is that correct, for that period of time?
 10:27:58 3 A Yes.
 10:27:59 4 Q At some point you decided to get clean and
 10:28:04 5 sober, correct?
 10:28:06 6 A Yes.
 10:28:08 7 Q And when was that? What year did you start
 10:28:11 8 that process?
 10:28:15 9 A August 7th, 1995.
 10:28:17 10 Q And what was it -- was there some particular
 10:28:21 11 event or something that motivated you at that point in
 10:28:25 12 time to get clean and sober?
 10:28:37 13 A I don't know exactly how it all came together.
 10:28:43 14 What happened was I got out of jail one more time, swore
 10:28:50 15 I wasn't going to drink or get loaded anymore, got out
 10:28:55 16 of the county jail, opened up the door and I went
 10:28:59 17 straight down to the liquor store. Got me a beer.
 10:29:04 18 A little while later I was with a family
 10:29:06 19 member, my oldest daughter [REDACTED] and I went over to
 10:29:13 20 her house looking to continue drinking, getting loaded,
 10:29:18 21 and she looked at me and started crying and just -- and
 10:29:22 22 told me, "Dad, is this the way it's gonna be for the
 10:29:25 23 rest of your life, in and out of jail?"
 10:29:28 24 And, you know, she was crying and I got choked
 10:29:32 25 up and -- and I don't know, I just knew that I couldn't

10:26:15 1 Q How old were you then?
 10:26:16 2 A I was maybe early 30s, maybe, late 20s, early
 10:26:25 3 30s. I can't recall approximately when it was, but I
 10:26:32 4 remember the actual crime.
 10:26:34 5 Q And you're alleging that you stole all these
 10:26:43 6 things to get money for drugs, to sell and get money for
 10:26:48 7 drugs --
 10:26:48 8 A Yes.
 10:26:49 9 Q -- would that be fair?
 10:26:50 10 A Yes.
 10:26:55 11 Q And for some of these crimes, you went to
 10:26:59 12 prison; is that correct?
 10:27:00 13 A Yes.
 10:27:04 14 Q Did you ever suffer any physical or sexual
 10:27:08 15 abuse in prison?
 10:27:13 16 A Not that I recall, no.
 10:27:18 17 Q When was the last time that you were in
 10:27:20 18 prison?
 10:27:22 19 A The last time I was released from prison was
 10:27:25 20 April 2nd, 1995.
 10:27:30 21 Q And after doing drugs, as I understand it,
 10:27:45 22 you're also -- you also had alcohol abuse problems; is
 10:27:47 23 that correct?
 10:27:48 24 A Yes.
 10:27:48 25 Q And your alcohol abuse problems and leading, I

10:29:38 1 do it anymore.
 10:29:44 2 Q When did you -- at some point you joined or
 10:29:48 3 you started going to [REDACTED]
 10:29:51 4 A The next day. There had been a friend that
 10:29:53 5 had been going to [REDACTED] and the last time I
 10:29:58 6 was in prison, he was writing to me. He was telling me
 10:30:01 7 about this place he found. He was just like me. And so
 10:30:06 8 I went looking for him the next day, and he started
 10:30:09 9 taking me [REDACTED]
 10:30:11 10 Q And what was his name?
 10:30:13 11 A His name was [REDACTED]
 10:30:14 12 Q [REDACTED] what?
 10:30:14 13 A [REDACTED]
 10:30:19 14 Q And how long had you known [REDACTED]
 10:30:22 15 A I have known [REDACTED] for quite a few years.
 10:30:26 16 Q Do you recall since when?
 10:30:32 17 A Maybe since around the mid-'70s, '75, '74,
 10:30:41 18 '75.
 10:30:59 19 Q Prior to this case, have you ever been a party
 10:31:02 20 to any legal proceeding at all?
 10:31:04 21 A No.
 10:31:04 22 MR. HALE: Well, aside from your criminal --
 10:31:07 23 THE WITNESS: The court, yeah.
 10:31:07 24 MR. HALE: -- proceedings.
 10:31:08 25 THE WITNESS: The courts, yeah.

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10:31:09 1 BY MS. YOUNG:
 10:31:09 2 Q Aside from your criminal proceedings, correct?
 10:31:12 3 A Yeah.
 10:31:15 4 Q I understand from the information that your
 10:31:18 5 lawyers provided to me that on January 1st, 2001, you
 10:31:21 6 were involved in a motorcycle accident; is that correct?
 10:31:24 7 A Yes.
 10:31:26 8 Q Can you describe what happened?
 10:31:31 9 A I had been driving with my friend [redacted] up in
 10:31:34 10 the mountains in Santa Barbara.
 10:31:37 11 Q And [redacted] is your supervisor, your boss --
 10:31:39 12 A Yes, he is.
 10:31:40 13 Q -- at [redacted] --
 10:31:41 14 A Yeah, he is.
 10:31:42 15 Q -- [redacted] ?
 10:31:43 16 A Correct. Yeah [redacted]
 10:31:44 17 Q Were you each on your own motorcycle?
 10:31:47 18 A Yes.
 10:31:47 19 Q Okay.
 10:31:47 20 A And he's ahead of me, and we're finishing our
 10:31:50 21 ride. I'm coming down an offramp and I'm -- 40 miles an
 10:31:55 22 hour and my front tire blew for some reason I don't
 10:31:58 23 know, and I went flying and ended up on the shoulder of
 10:32:03 24 the road and sustained some pretty good injuries.
 10:32:10 25 Q And the motorcycle that you were riding, that

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10:32:15 1 belongs to you?
 10:32:15 2 A No, that was [redacted]'s motorcycle.
 10:32:17 3 Q Do you have a motorcycle as well?
 10:32:19 4 A No.
 10:32:20 5 Q Do you ride often?
 10:32:22 6 A Not since then.
 10:32:23 7 Q Before then?
 10:32:25 8 A A little bit, not often, no. Maybe -- not
 10:32:31 9 often, no.
 10:32:33 10 Q Have you ever had a motorcycle?
 10:32:35 11 A I had one when I was young, mid teens maybe, I
 10:32:41 12 think; I had a motorcycle for a short period.
 10:32:48 13 Q Was that the one you stole?
 10:32:50 14 A Yes.
 10:32:50 15 Q So you had it for a short period of time?
 10:32:53 16 A Yes.
 10:32:53 17 Q And then it was repossessed?
 10:32:55 18 A Yes.
 10:32:59 19 Q And you said mid teens. How old were you
 10:33:01 20 then? Fifteen?
 10:33:04 21 A Maybe. I'm sorry. I believe I was around 14,
 10:33:25 22 15, around there, sometime around that period.
 10:33:28 23 Q Who did you steal the motorcycle from; do you
 10:33:30 24 know?
 10:33:31 25 A I do not even recall.

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10:33:45 1 Q What injuries did you suffer as a result of
 10:33:47 2 the motorcycle accident in 2001?
 10:33:53 3 A I ruptured my spleen. I believe I fractured
 10:34:00 4 nine ribs, fractured my spleen -- I mean my scapula,
 10:34:05 5 shoulder. I fractured also my pelvis or hip, one of the
 10:34:09 6 two. One of my kidneys got split in half. They
 10:34:15 7 repaired it. And a couple scrapes here and there.
 10:34:20 8 Q And who were the doctor or doctors who treated
 10:34:25 9 you for those injuries?
 10:34:31 10 A Dr. [redacted] was one.
 10:34:33 11 Q And what did he treat you for, he or she?
 10:34:36 12 A It was a male. I don't know exactly what he
 10:34:46 13 treated me for, but they did emergency surgery, so it
 10:34:50 14 was Dr. [redacted]; Dr. [redacted], he was a bone doctor; and I
 10:34:56 15 think Dr. [redacted] also, I believe. I think that's who
 10:35:04 16 was --
 10:35:04 17 Q Do you know --
 10:35:04 18 A -- involved in it.
 10:35:05 19 Q -- who treated you for your kidney problems?
 10:35:11 20 A It was either [redacted] or [redacted].
 10:35:13 21 Q And for your spleen problems also?
 10:35:15 22 A I would imagine, yeah.
 10:35:17 23 Q And for your ribs, it was...
 10:35:18 24 A [redacted] Dr. [redacted].
 10:35:24 25 Q And are you completely recovered from those

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10:35:28 1 injuries?
 10:35:35 2 A It would seem, but I don't know if there's any
 10:35:38 3 lasting bone damage or anything like that. I know I
 10:35:44 4 have to take a -- some special injection every five
 10:35:51 5 years because I don't have my spleen anymore, for immune
 10:35:54 6 or something like that.
 10:35:55 7 Q Any other medication that you still have to
 10:35:59 8 take?
 10:35:59 9 A No.
 10:36:00 10 Q And back then in 2001, do you recall what
 10:36:05 11 medications were prescribed for you as a result of the
 10:36:09 12 motorcycle accident?
 10:36:12 13 A When I was in the hospital, I'm pret-- I was
 10:36:15 14 on a -- some type of heavy painkiller.
 10:36:19 15 Q Like morphine?
 10:36:20 16 A Something like that. I had a little --
 10:36:22 17 Q -- push --
 10:36:22 18 A -- thing.
 10:36:24 19 And then when I left the hospital, they had me
 10:36:26 20 on Darvocet, I believe. They gave me a prescription of
 10:36:31 21 Darvocet.
 10:36:32 22 Q How long did you take that?
 10:36:34 23 A Maybe for -- maybe for a couple weeks, maybe.
 10:36:41 24 And then I started working, and I was having a
 10:36:45 25 hard time with work, so I went back to one of the

10:36:48 1 doctors and they gave me Vicodin. They gave me two
 10:36:52 2 bottles of Vicodin, and I took the first bottle as
 10:36:56 3 prescribed, and it enabled me to work.
 10:37:01 4 And then I got -- I started on the second
 10:37:06 5 bottle and my head started talking to me a little bit,
 10:37:08 6 so I got rid of the pills.
 10:37:10 7 Q What do you mean your head started talking to
 10:37:12 8 you?
 10:37:12 9 A Well --
 10:37:1310 Q Thought you were going to be addicted to it?
 10:37:1611 A Well, I just kind of got this thought, you
 10:37:1712 know, you don't have to wait for four hours; you can
 10:37:2113 take it maybe every three hours, maybe every two hours,
 10:37:2414 and I've been to enough 12-step meetings to know what
 10:37:2815 that means; so I got rid of them.
 10:37:3516 Q Now, the -- you mentioned that you go to
 10:37:4017 [REDACTED] Are they
 10:37:4318 every week? Do you go every week?
 10:37:4519 A I go Monday, Wednesdays, Fridays, and
 10:37:4920 Saturdays, Sunday, I go five times a week.
 10:37:5221 Q Five times a week?
 10:37:5322 A Yes.
 10:37:5523 Q Pardon my ignorance, but does that -- do those
 10:37:5924 [REDACTED]
 10:38:0425 [REDACTED]

10:38:10 1 A When you first come in, [REDACTED]
 10:38:16 2 [REDACTED]
 10:38:22 3 [REDACTED]
 10:38:27 4 [REDACTED]
 10:38:29 5 Q But I guess my question is, you don't have to
 10:38:31 6 go to a [REDACTED] for -- to help with [REDACTED]
 10:38:37 7 [REDACTED]?
 10:38:38 8 A No.
 10:38:41 9 Q So the [REDACTED]
 10:38:4310 A The whole -- whole package, correct.
 10:38:4811 Q Who is your current [REDACTED]? Is it
 10:38:5012 [REDACTED]?
 10:38:5113 A Yes, [REDACTED]
 10:38:5914 Q Where did you first meet Mr. [REDACTED]?
 10:39:0115 A I first met [REDACTED] personally at [REDACTED]
 10:39:0916 [REDACTED] in Santa Barbara, where we have [REDACTED]
 10:39:1217 Q And when was that? What year? Do you --
 10:39:1618 A That was in around the end of 1995.
 10:39:2619 Q Other than the motorcycle accident in 2001,
 10:39:2920 have you ever been involved in any other vehicle
 10:39:3121 accidents? Cars?
 10:39:3722 A Fender bender, a little fender-bender maybe.
 10:39:4223 Q Fender-benders?
 10:39:4324 A Yeah.
 10:39:4425 Q When was the last fender-bender?

10:39:52 1 A Maybe around six months ago, on the highway, a
 10:39:56 2 lady hit me from behind.
 10:39:57 3 Q So a lady rear-ended you?
 10:39:59 4 A Yeah, we were going probably, I don't know,
 10:40:01 5 about 8 miles an hour or something.
 10:40:04 6 Q So you were in traffic on the highway?
 10:40:06 7 A Yes, yeah, we were in bad traffic, yeah.
 10:40:10 8 Q Did you make a claim against her insurance?
 10:40:13 9 A No, it was --
 10:40:1610 Q Were you injured?
 10:40:1711 A No.
 10:40:1812 Q Was she injured, if you know?
 10:40:2013 A Her ego maybe. She was very apologetic and
 10:40:2914 she told me just to find out how much it cost to repair
 10:40:2915 it, and she paid it right away.
 10:40:3116 Q So your car was damaged somewhat?
 10:40:3417 A Yeah, it had a little bumper damage, yeah.
 10:40:3718 Q And so no insurance claims were ever filed?
 10:40:4119 A No.
 10:40:4120 Q Any -- were you ever in a motor vehicle or
 10:40:4721 other vehicle accident where you were injured, bodily
 10:40:5422 injury?
 10:40:5423 A No.
 10:40:5924 Q Did you ever file any kind of workers'
 10:41:0125 compensation claims?

10:41:02 1 A No.
 10:41:14 2 Q What did you do to prepare for your deposition
 10:41:18 3 today, if anything?
 10:41:24 4 A Tried not to think about it. Had a couple
 10:41:34 5 sit-down meetings with my attorneys.
 10:41:38 6 Q Was anyone else present at those sit-down
 10:41:42 7 meetings?
 10:41:42 8 A No.
 10:41:46 9 Q When were the sit-down meetings?
 10:41:5110 A We had three, possibly four throughout the
 10:41:5511 last two-, three-week period.
 10:41:5712 Q And how long in total did you meet with your
 10:42:0213 lawyers?
 10:42:0914 A Maybe around eight hours total throughout the
 10:42:1215 three, four meetings.
 10:42:1416 Q Did you review any documents?
 10:42:2117 A Yes.
 10:42:2218 Q Were these documents that your lawyer showed
 10:42:2519 to you?
 10:42:2720 A Yes, they were.
 10:42:2821 Q Did you review any documents on your own?
 10:42:3322 A Yes, I did.
 10:42:3423 Q What documents did you review on your own?
 10:42:4324 A Some of the responses about how I feel today
 10:42:4725 about the damages, about --

10:42:51 1 Q When you say "some of the responses," are you
 10:42:53 2 referring to responses to the defendant's
 10:42:58 3 interrogatories?
 10:42:59 4 A I believe so.
 10:43:00 5 Q Written responses?
 10:43:02 6 A Yes, a list, yeah.
 10:43:03 7 Q And you signed -- you recall for those written
 10:43:08 8 responses you signed a verification?
 10:43:11 9 A Yes, I do.
 10:43:1210 Q Verifying that all the information in those
 10:43:1411 responses was true to the best of your knowledge; is
 10:43:1612 that correct?
 10:43:1713 A Yes.
 10:43:2014 Q So you had read those responses before you
 10:43:2615 signed that verification; is that correct?
 10:43:3116 A Yes.
 10:43:3617 Q Anything else that you reviewed on your own in
 10:43:3918 preparation for today's deposition?
 10:43:4219 A No.
 10:44:0020 Q Have you ever applied for any type of
 10:44:0221 disability benefits before?
 10:44:1022 A When I had the motorcycle crash, I got
 10:44:1523 unemployment. I got some unemployment benefits while
 10:44:2024 I -- for the period that I couldn't work.
 10:44:2325 Q So in order to get unemployment benefits, you

10:45:53 1 type of police report filed in connection with that
 10:45:55 2 motorcycle accident?
 10:45:58 3 A I don't think so.
 10:46:00 4 Q Were any police on the scene, or did any
 10:46:02 5 police come to the scene after the accident?
 10:46:06 6 A No. The paramedics got there fast. They
 10:46:09 7 were -- they were the ones that came and picked me up
 10:46:12 8 and took me to the hospital.
 10:46:14 9 Q What hospital?
 10:46:1410 A They took me to Cottage Emergency.
 10:46:1711 Q So you don't remember any police there?
 10:46:2012 A No, I don't.
 10:46:2213 Q When you had that accident, was Mr. [REDACTED]
 10:46:2514 riding in front of you or behind you?
 10:46:2715 A He was in front of me.
 10:46:2816 Q So he didn't see it?
 10:46:3017 A From the stop sign, he looked in the mirror to
 10:46:3518 see if I was behind him, and the only thing he seen was
 10:46:3919 the motorcycle in the street. So he came back around.
 10:46:4320 Q So he saw it after it happened?
 10:46:4521 A Yes.
 10:46:4622 Q After you were down?
 10:46:4723 A Yes.
 10:46:4724 Q Have you ever met [REDACTED]?
 10:46:5525 A Yes.

10:44:28 1 have to be unemployed. So did your employer,
 10:44:30 2 Mr. [REDACTED] lay you off during that period of time, or
 10:44:39 3 was it a disability benefit --
 10:44:41 4 A That's what it was.
 10:44:41 5 Q -- or unemployment benefit?
 10:44:43 6 A It wasn't unemployment because I wasn't fired
 10:44:44 7 or I wasn't -- I was still an employee. So --
 10:44:52 8 Q So it was disability?
 10:44:52 9 A -- maybe it was disability, yeah. Thank you
 10:44:5210 for clarifying that.
 10:44:5711 Q Do you have any papers relating to the
 10:45:0112 disability benefits that you received?
 10:45:0913 A I don't believe so.
 10:45:1014 Q Did you file any applications for disability?
 10:45:1415 A During that period?
 10:45:1516 Q Yes.
 10:45:2217 A I don't -- I don't recall. I was in the
 10:45:2518 hospital. So...
 10:45:2619 Q How long were you in the hospital?
 10:45:2720 A I was in there for nine days.
 10:45:2821 Q And how long were you unable to work because
 10:45:3322 of the motorcycle accident?
 10:45:4023 A I think I was out of work for maybe,
 10:45:4224 approximately, a month and a half maybe, two months.
 10:45:4725 Q I forgot to ask you this earlier, but was any

10:46:55 1 Q When was the first time you met [REDACTED]?
 10:47:06 2 A I'd say early '70s, maybe, around there.
 10:47:19 3 Q Under what circumstances did you meet [REDACTED]
 10:47:22 4 [REDACTED]?
 10:47:28 5 A I used to buy drugs from either him or another
 10:47:35 6 one of his family members, brother.
 10:47:40 7 Q And what's his brother's name that you bought
 10:47:43 8 drugs from?
 10:47:44 9 A [REDACTED]
 10:47:4510 Q Was [REDACTED] older or younger than [REDACTED]?
 10:47:4911 A I'm not exactly sure.
 10:47:5512 Q Did you know [REDACTED] before you knew [REDACTED]?
 10:48:0713 A I -- gosh, that's been a while ago. I'm not
 10:48:1214 exactly sure if I, you know, if I knew one before I met
 10:48:1615 the other. I mean, I would arrive at their house and I
 10:48:2216 just buy drugs from one of them.
 10:48:2417 Q So you bought the drugs at their house?
 10:48:2618 A Correct.
 10:48:2619 Q And where were they -- they both lived
 10:48:2920 together?
 10:48:3421 A Yes.
 10:48:3422 Q Where were they living at the time where you
 10:48:3423 bought those drugs?
 10:48:3424 A On [REDACTED] Avenue in Santa Barbara.
 10:48:3725 Q Did you know [REDACTED] -- now you said early

10:48:41 1 '70s --
 10:48:42 2 A Yes.
 10:48:42 3 Q -- the first time you bought drugs from him?
 10:48:45 4 A Uh-huh, yes.
 10:48:46 5 Q How did you know to go to his house to buy
 10:48:48 6 drugs that first time? Did somebody tell you that [REDACTED]
 10:48:52 7 is selling drugs?
 10:48:54 8 A Street information; it was kind of common
 10:48:56 9 knowledge that -- that [REDACTED] sold drugs.
 10:49:02 10 Q And by [REDACTED] and his
 10:49:05 11 [REDACTED] Anyone else?
 10:49:06 12 A There was [REDACTED] closer to my age;
 10:49:08 13 his name was [REDACTED]
 10:49:10 14 Q So [REDACTED]
 10:49:13 15 [REDACTED] and you bought drugs from all of them. Did they
 10:49:16 16 all live in the same house?
 10:49:18 17 A They all lived on the same property, correct.
 10:49:22 18 Q Do you know how long they've been selling
 10:49:24 19 drugs?
 10:49:25 20 A No.
 10:49:26 21 Q But they were selling them before the first
 10:49:27 22 time you bought them?
 10:49:30 23 MR. HALE: Speculation.
 10:49:30 24 BY MS. YOUNG:
 10:49:31 25 Q To the best of your knowledge.

10:50:33 1 [REDACTED] you bought it from or was it anybody who was
 10:50:35 2 there or...
 10:50:37 3 MR. HALE: Calls for speculation.
 10:50:40 4 BY MS. YOUNG:
 10:50:40 5 Q When you went into the house, you bought it
 10:50:42 6 from anybody -- any one of [REDACTED]?
 10:50:44 7 A Pretty much, yeah.
 10:50:46 8 Q So sometimes you buy it from [REDACTED] and
 10:50:47 9 sometimes you buy it from [REDACTED]; is
 10:50:49 10 that correct?
 10:50:50 11 A Yes.
 10:50:55 12 Q Anybody else in [REDACTED] selling drugs
 10:50:58 13 from that [REDACTED]?
 10:51:00 14 MR. HALE: Same objection.
 10:51:03 15 THE WITNESS: Not that I recall, no.
 10:51:05 16 BY MS. YOUNG:
 10:51:07 17 Q And you don't know how long they were selling
 10:51:09 18 the drugs?
 10:51:10 19 MR. HALE: Same objection.
 10:51:12 20 THE WITNESS: No, I don't.
 10:51:13 21 BY MS. YOUNG:
 10:51:19 22 Q You say you started buying drugs from [REDACTED]
 10:51:23 23 [REDACTED] in the early '70s. Can you tell
 10:51:27 24 me more specifically what year?
 10:51:40 25 A I'm sorry, that was over 35 years ago. That's

10:49:32 1 A I would imagine.
 10:49:33 2 Q Or somebody told you that, anyway?
 10:49:34 3 A Yeah, somebody told me.
 10:49:36 4 Q Do you remember who told you that, the [REDACTED]
 10:49:39 5 [REDACTED] were selling drugs?
 10:49:41 6 A No, I don't remember.
 10:49:43 7 MR. HALE: Asked and answered.
 10:49:43 8 BY MS. YOUNG:
 10:49:44 9 Q You don't remember?
 10:49:44 10 A No.
 10:49:47 11 Q And that first time you bought drugs from
 10:49:49 12 [REDACTED], that was the first time you ever met him?
 10:49:53 13 A I believe so.
 10:49:55 14 Q What drugs did you buy from him; do you
 10:49:57 15 remember?
 10:49:58 16 A Heroin.
 10:49:59 17 Q Was it always heroin?
 10:50:00 18 A Yes.
 10:50:01 19 Q How long did you buy drugs from [REDACTED]?
 10:50:05 20 How many year -- was it years?
 10:50:13 21 A I maybe bought drugs from [REDACTED] maybe --
 10:50:21 22 maybe 10 times.
 10:50:22 23 Q And did [REDACTED] do this as a
 10:50:26 24 [REDACTED]? And I guess what I'm asking is, when you went
 10:50:29 25 in to buy drugs, did it matter [REDACTED]

10:51:46 1 a long --
 10:51:50 2 Q I understand that, but unfortunately all of
 10:51:51 3 these events, or maybe fortunately, all of these events
 10:51:54 4 that have occurred that you're -- that are the subject
 10:51:56 5 of your lawsuit --
 10:51:57 6 A Uh-huh.
 10:51:57 7 Q -- were even longer ago than that.
 10:52:01 8 A Uh-huh.
 10:52:01 9 Q And so, as I said before, I'm entitled to your
 10:52:04 10 best recollection. Obviously, if you're gonna say you
 10:52:06 11 were assaulted by Father Kelly and give me some details
 10:52:09 12 of that, hopefully you'll be able to remember other
 10:52:12 13 things --
 10:52:13 14 A Uh-huh.
 10:52:14 15 Q -- that happened more recently as well.
 10:52:16 16 A Okay, I'll do my best. Give me the question
 10:52:19 17 again.
 10:52:21 18 Q What year did you start buying heroin from
 10:52:26 19 [REDACTED]?
 10:52:32 20 A I would say approximately 1973.
 10:52:38 21 Q And you were how old -- was it before your
 10:52:40 22 birthday? Birthday is in April. So was it -- do you
 10:52:44 23 recall whether it was early in the year or after your
 10:52:47 24 birthday?
 10:52:53 25 A I don't want to guess on that one.

10:52:54 1 Q No, don't guess.
 10:52:56 2 A I don't want to guess.
 10:52:57 3 Q If you don't remember, that's fine.
 10:52:59 4 A You asked me not to guess.
 10:53:00 5 Q But you were -- you were born in [redacted] right?
 10:53:02 6 A Correct.
 10:53:04 7 Q So, '65...
 10:53:05 8 A I was around 18.
 10:53:06 9 Q Around 18.
 10:53:1410 Do you know whether [redacted] sold
 10:53:1811 illegal drugs other than heroin?
 10:53:2112 MR. HALE: Same objection.
 10:53:2313 THE WITNESS: I don't know. I don't know if
 10:53:2514 they did.
 10:53:2615 BY MS. YOUNG:
 10:53:3016 Q When was the last time you talked to [redacted]
 10:53:3217 [redacted]?
 10:53:4618 A I'm trying to remember the last time I was in
 10:53:4819 jail with him, because I think that was the last time
 10:53:5120 I -- I've talked to him, I believe.
 10:53:5221 Q So you were in jail with him at one point in
 10:53:5522 time?
 10:53:5623 A At one point in time, yeah.
 10:53:5824 Q And can you remember when that was, what year
 10:54:0125 that was?

10:55:27 1 is I'd get your money, go get it and then take it back
 10:55:33 2 to them, and then I'd get a little something for doing
 10:55:38 3 the deal, for doing the transaction.
 10:55:39 4 Q I see.
 10:55:42 5 So when you and [redacted] were arrested this time
 10:55:45 6 that you think was 1980, were you involved, you and
 10:55:54 7 [redacted], in the same drug transaction?
 10:55:58 8 A No.
 10:56:00 9 Q So it was just an informant that had a lot of
 10:56:0210 information on different --
 10:56:0411 A Different people.
 10:56:0412 Q -- people?
 10:56:0713 MR. HALE: Speculation.
 10:56:0714 THE WITNESS: Oh, yeah.
 10:56:0815 BY MS. YOUNG:
 10:56:0916 Q That's your understanding.
 10:56:1217 Did you and [redacted] ever commit any crimes
 10:56:1618 together?
 10:56:1819 A No.
 10:56:1920 Q Did you ever commit any crimes with either of
 10:56:2221 [redacted] and [redacted]?
 10:56:2722 A No crimes other than dealing in illegal
 10:56:3023 drugs -- I mean doing drugs, and that's illegal, but I
 10:56:3424 mean, actually, say, for like me and you, let's go break
 10:56:3925 into a house together, no, we never did anything like

10:54:19 1 A I'm having a hard time remembering what year
 10:54:21 2 that was.
 10:54:22 3 Q Well, let's try to narrow it down.
 10:54:25 4 Was it after you used to buy the heroin from
 10:54:29 5 him --
 10:54:30 6 A Yes.
 10:54:30 7 Q -- it was obviously after this?
 10:54:31 8 A Yes.
 10:54:32 9 Q So when was the last time you remember buying
 10:54:3410 heroin from [redacted]?
 10:54:3611 A I believe that was around 1980.
 10:54:4312 Q So sometime after 1980, you and [redacted] were in
 10:54:4713 jail together?
 10:54:4814 A I think we might have been in jail in the
 10:54:5215 middle of that year, 1980, because a bunch of us got
 10:54:5616 arrested.
 10:54:5617 Q So you were all -- you and [redacted] were arrested
 10:54:5918 at the same time for the same crime or...
 10:55:0219 A No, not for the same crime. For -- there was
 10:55:0820 an informant that set up a bunch of people, drug buys
 10:55:1521 and stuff like that, and I'm pretty sure that we were
 10:55:1922 involved in that.
 10:55:2023 Q So you were both in -- involved in -- did you
 10:55:2324 sell drugs also or just buy drugs?
 10:55:2525 A Well, they said I sold drugs, but what I'd do

10:56:41 1 that together.
 10:56:42 2 Q Did you socialize with either of [redacted]
 10:56:45 3 [redacted] during this period of time from the '70s
 10:56:48 4 onward?
 10:56:53 5 A No socializing, just strictly --
 10:56:55 6 Q Drugs?
 10:56:56 7 A -- drugs.
 10:56:59 8 Q You said one of [redacted] was closer to
 10:57:02 9 your age. What was his name? Remind me.
 10:57:0510 A [redacted]
 10:57:0611 Q [redacted]
 10:57:0612 A Yeah.
 10:57:0713 Q Same as yours.
 10:57:0814 A Yeah.
 10:57:0815 Q So you never socialized with [redacted]
 10:57:1016 A Not really.
 10:57:1717 Q And the last time you say you spoke to [redacted]
 10:57:2018 [redacted] was when you were in jail together in 1980,
 10:57:2419 approximately?
 10:57:2520 A Approximately, yeah.
 10:57:2621 Q Haven't spoken to him since then?
 10:57:3022 MR. HALE: Asked and answered.
 10:57:3123 BY MS. YOUNG:
 10:57:3224 Q Have you ever spoken to him in connection with
 10:57:3425 this lawsuit?

10:57:35 1 A No.
 10:57:38 2 Q Did you ever at any time discuss Father Kelly
 10:57:45 3 with [REDACTED]?
 10:57:46 4 A No.
 10:57:49 5 Q Did he ever tell you anything that he's
 10:57:54 6 alleging happened to him with Father Kelly?
 10:58:02 7 A I can't imagine any of us ever talking to each
 10:58:05 8 other about stuff like that.
 10:58:06 9 Q So would it be fair to say you have no
 10:58:0810 personal knowledge of what happened, if anything,
 10:58:1211 between Father Kelly and [REDACTED]?
 10:58:1712 A That's fair to say.
 10:58:1913 Q Now, you remember when you read over your
 10:58:2314 interrogatory responses, the ones that you verified?
 10:58:2715 A Yes.
 10:58:2816 Q There was a lot of information in there about
 10:58:3017 what happened to [REDACTED]. Do you remember that?
 10:58:3418 A Vaguely, yeah.
 10:58:3919 Q But you have no personal knowledge of any of
 10:58:3920 that; is that correct?
 10:58:4121 A Yes, any personal happenings with him, yeah, I
 10:58:4422 don't --
 10:58:5523 Q Anyone else in [REDACTED]'s family other than [REDACTED]
 10:58:5724 and [REDACTED] that you know personally?
 10:59:0425 A I know [REDACTED], the mother.

11:00:00 1 mom, if she knew, and my mom -- you know, "That's my
 11:00:04 2 son, he's not doing nothing wrong."
 11:00:10 3 Q Who else lived in [REDACTED] home, other than his
 11:00:13 4 [REDACTED], if you know, during that
 11:00:16 5 period of time when you were buying the drugs from them?
 11:00:21 6 A I don't recall seeing anyone else.
 11:00:24 7 Q Did [REDACTED] have a father; do you know?
 11:00:28 8 A He did have a father, I believe, yeah.
 11:00:29 9 Q And did the father live in the home during
 11:00:3610 this period of time?
 11:00:4011 A He did for a short period before he died, I
 11:00:4212 believe.
 11:00:4413 Q Do you remember when he died?
 11:00:4614 A No, I don't.
 11:00:4815 Q But when you first started going to [REDACTED]
 11:00:5016 home, his father was living there, is that correct, in
 11:00:5417 the '70s?
 11:00:5418 A Yes.
 11:01:1519 Q Have you ever met [REDACTED]?
 11:01:2020 A Yes, I have.
 11:01:2021 Q When was the first time you met Mr. [REDACTED]?
 11:01:3322 A I went to school with his brother.
 11:01:3623 Q [REDACTED]?
 11:01:3824 A No.
 11:01:3825 Q Which brother?

10:59:08 1 Q How long have you known [REDACTED]?
 10:59:11 2 A Same amount of time that I have known her
 10:59:12 3 sons.
 10:59:13 4 Q Was she involved in drugs also?
 10:59:14 5 MR. HALE: Speculation.
 10:59:15 6 THE WITNESS: Not that I know of.
 10:59:17 7 BY MS. YOUNG:
 10:59:18 8 Q So how did you first meet her?
 10:59:19 9 A It was her home. So when I would go over
 10:59:2310 there, she would be cordial to all of us, and we were
 10:59:2711 all boys.
 10:59:3212 Q Do you have any reason to believe that she
 10:59:3413 knew [REDACTED]?
 10:59:3714 MR. HALE: Same objection.
 10:59:4015 THE WITNESS: I -- I wouldn't know.
 10:59:4216 BY MS. YOUNG:
 10:59:4317 Q Do you know whether she was ever involved in
 10:59:4518 [REDACTED]?
 10:59:4819 MR. HALE: Same objection. Asked and
 10:59:4920 answered.
 10:59:5321 THE WITNESS: I don't believe -- I really
 10:59:5422 don't know, to tell you the truth.
 10:59:5623 BY MS. YOUNG:
 10:59:5724 Q Okay.
 10:59:5725 A It would be kind of like asking me about my

11:01:39 1 A [REDACTED]. I think it's [REDACTED]. I didn't hang out
 11:01:42 2 with [REDACTED]. I went -- we were in the same grade, I
 11:01:45 3 believe.
 11:01:45 4 Q And what school was it?
 11:01:50 5 A Santa Barbara Junior High.
 11:01:52 6 Q So you were in what grade at that point in
 11:01:55 7 time?
 11:01:56 8 A Seventh grade.
 11:01:57 9 Q The junior high went from seventh to ninth?
 11:02:0210 A It did.
 11:02:0611 Q And you say you didn't hang out with his
 11:02:0812 brother, but you were in the same grade --
 11:02:1013 A Yes.
 11:02:1114 Q -- right?
 11:02:1615 A He's in my yearbook.
 11:02:1616 Q And so, I guess my original question was, how
 11:02:1617 did you meet [REDACTED]?
 11:02:2218 A I'm pretty positive I met [REDACTED] on a job
 11:02:2519 site, because he's [REDACTED]. I'm an [REDACTED].
 11:02:3020 Q So it had nothing to do with his brother, with
 11:02:3321 your --
 11:02:3322 A No.
 11:02:3423 Q -- going to school --
 11:02:3524 A No.
 11:02:3525 Q -- with his brother?

11:02:36 1 A No.
 11:02:41 2 Q Do you recall when the first time you met him,
 11:02:43 3 [REDACTED] was?
 11:02:44 4 A I would say it's been in the last -- within
 11:03:00 5 the last two years, I believe.
 11:03:02 6 Q So 2004?
 11:03:08 7 A '4, possibly, yeah.
 11:03:10 8 Q And you met him on a job site --
 11:03:12 9 A Yes.
 11:03:12 10 Q -- in 2004?
 11:03:14 11 That was after you filed the complaint in this
 11:03:16 12 case that we're -- that you're being deposed on today?
 11:03:19 13 A Yes.
 11:03:19 14 Q Did you and [REDACTED] talk about the case?
 11:03:26 15 A Not in the beginning.
 11:03:29 16 Q Well, my question is, did you talk about the
 11:03:32 17 case -- okay. Did you talk about the case ever?
 11:03:39 18 A On one occasion [REDACTED] did start talking
 11:03:45 19 about the case.
 11:03:45 20 Q And when was that; do you recall?
 11:03:52 21 A Maybe seven months ago, maybe.
 11:03:58 22 Q Seven months ago.
 11:03:59 23 And where were you when the two of you were
 11:04:02 24 talking about the case, or when [REDACTED] started talking
 11:04:05 25 about the case?

11:05:38 1 there was one article in one of the local newspapers
 11:05:42 2 about me talking about Father Kelly and what happened.
 11:05:49 3 BY MS. YOUNG:
 11:05:50 4 Q What else did Mr. [REDACTED] say to you at that
 11:05:53 5 job site after he told you there wasn't enough money in
 11:05:56 6 the world?
 11:05:57 7 MR. HALE: Assumes facts.
 11:05:59 8 BY MS. YOUNG:
 11:05:59 9 Q Did he say anything else to you?
 11:06:02 10 A Not much else. I mean, once again, I mean he
 11:06:07 11 was, you know, he was fairly angry about -- about the
 11:06:09 12 whole situation, and --
 11:06:12 13 Q Did he --
 11:06:12 14 A -- I --
 11:06:13 15 Q -- tell you what Father Kelly did to him?
 11:06:15 16 A No, he did not.
 11:06:16 17 Q So he didn't go into any specifics at all?
 11:06:19 18 A No specifics, ma'am.
 11:06:20 19 Q Did you know at that point in time that he had
 11:06:23 20 also filed a lawsuit against Father Kelly?
 11:06:30 21 A I believe I -- yes, I did.
 11:06:32 22 Q How did you know that?
 11:06:34 23 MR. HALE: Excluding anything you heard from
 11:06:35 24 your attorneys.
 11:06:36 25 BY MS. YOUNG:

11:04:06 1 A We were at a job site at the corner of [REDACTED]
 11:04:10 2 Street and [REDACTED]
 11:04:12 3 Q And [REDACTED]
 11:04:14 4 correct, [REDACTED]
 11:04:18 5 A I think he does, yeah.
 11:04:20 6 Q [REDACTED]?
 11:04:21 7 A Yes.
 11:04:21 8 Q And on this job site, what did he say to you
 11:04:25 9 when he started talking to you about the case?
 11:04:28 10 A It was kind of a one-sided conversation.
 11:04:30 11 Q What did he say?
 11:04:35 12 A He said that for what Father Kelly did to him
 11:04:42 13 there was not enough money in the world for them to make
 11:04:46 14 it right, and he was -- he was very angry.
 11:04:57 15 Q Did he just say that out of the blue?
 11:05:08 16 A Out of the blue. He --
 11:05:17 17 Q And that was the first time he ever said
 11:05:19 18 anything about this?
 11:05:20 19 A It's the first time we had any actual
 11:05:23 20 conversation about it.
 11:05:25 21 Q How did he know that you had filed a lawsuit?
 11:05:26 22 Do you know how he knew that you had?
 11:05:31 23 MR. HALE: Speculation.
 11:05:31 24 THE WITNESS: I don't know how he knew. I
 11:05:33 25 imagine because there was a couple articles. I think

11:06:38 1 Q Excluding anything you heard from your
 11:06:39 2 attorneys, how did you know that?
 11:06:41 3 A I didn't know.
 11:06:42 4 Q So you knew because your lawyers told you?
 11:06:44 5 A Yes.
 11:06:45 6 Q Did you --
 11:06:45 7 MR. HALE: Any communications between you and
 11:06:47 8 your counsel are completely forbidden. She's not
 11:06:50 9 entitled to that information.
 11:06:52 10 BY MS. YOUNG:
 11:06:54 11 Q After Mr. [REDACTED] told you that -- on that day
 11:06:59 12 during that conversation, what did you say to him?
 11:07:14 13 A Because of his anger, I kind of just really
 11:07:16 14 didn't say much.
 11:07:23 15 Q So you didn't tell him anything about your --
 11:07:25 16 the allegations of your lawsuit?
 11:07:30 17 MR. HALE: Asked and answered.
 11:07:31 18 THE WITNESS: No.
 11:07:31 19 BY MS. YOUNG:
 11:07:32 20 Q You didn't say anything to him about Father
 11:07:33 21 Kelly?
 11:07:34 22 MR. HALE: Same objection.
 11:07:35 23 THE WITNESS: No, I did not.
 11:07:36 24 BY MS. YOUNG:
 11:07:40 25 Q Did you ever socialize with [REDACTED]

11:07:43 1 A No.
 11:07:44 2 Q What about with his brother, the one you went
 11:07:46 3 to school with?
 11:07:48 4 A No.
 11:07:53 5 Q Do you know [REDACTED]?
 11:07:55 6 A No.
 11:07:59 7 Q Have you ever seen the complaint that was
 11:08:01 8 filed by [REDACTED]?
 11:08:03 9 A No.
 11:08:1210 Q So the first time, if I recall your testimony
 11:08:1411 correctly, the first time you met [REDACTED] was
 11:08:1812 on a job site a few years ago?
 11:08:2413 A Yes.
 11:08:2514 Q And how many times have you seen him since
 11:08:2815 then?
 11:08:3416 A Maybe three times, maybe.
 11:08:3717 Q And can you tell me what each of those
 11:08:3918 occasions were?
 11:08:4219 A On the job.
 11:08:4220 Q Were they all --
 11:08:4421 A On the job --
 11:08:4422 Q -- on the job site?
 11:08:4623 A -- site, yeah.
 11:08:4724 Q And after that first conversation, or his
 11:08:5025 first talking to you on the job site about Father Kelly,

11:10:10 1 up?
 11:10:11 2 A Somehow he got my number and called me up.
 11:10:13 3 Q And what did he say to you -- you say right
 11:10:15 4 after -- let me back up a minute.
 11:10:16 5 You say right after the newspaper articles
 11:10:18 6 came out, so that would have been the end of 2003 or was
 11:10:24 7 it 2000 -- the beginning of 2004; do you recall?
 11:10:28 8 A I think it was maybe the beginning of 2004,
 11:10:33 9 maybe.
 11:10:3510 Q Okay.
 11:10:3511 So he called you up at your home?
 11:10:3912 A On my cellular phone.
 11:10:4213 Q So somehow he got your cellular phone number?
 11:10:4514 A Yes.
 11:10:4615 Q Where is your cellular phone number listed, if
 11:10:4916 you know?
 11:10:4917 A It's -- you can get it by calling [REDACTED]
 11:10:5218 [REDACTED]
 11:10:5519 Q Is this a business cellular phone?
 11:10:5720 A Yes.
 11:10:5821 Q What's the -- do you still have the same
 11:11:0022 cellular number?
 11:11:0123 A Yes.
 11:11:0124 Q What's the number?
 11:11:0425 A It's (805) 886-0470.

11:08:53 1 did he ever talk to you again about Father Kelly after
 11:08:57 2 that?
 11:08:58 3 A No.
 11:09:00 4 Q Have you told me everything you remember about
 11:09:02 5 your discussion, such as it was, with [REDACTED] involving
 11:09:07 6 Father Kelly?
 11:09:08 7 A Yes.
 11:09:16 8 Q Do you know [REDACTED]?
 11:09:21 9 A Not personally, no.
 11:09:2210 Q When you say "not personally," what do you
 11:09:2411 mean by that?
 11:09:2512 A Well, I've never seen his -- I don't know what
 11:09:2713 he looks like or anything like that.
 11:09:3014 Q Have you ever talked to him on the phone?
 11:09:3215 A I talked to him on the phone one time.
 11:09:3716 Q What was that occasion that -- when was it
 11:09:3717 that you talked to him on the phone?
 11:09:4318 A It was right after -- right after an article
 11:09:4819 came out in the newspaper about the abuse by Father
 11:09:5420 Kelly, and we talked for a short period, maybe --
 11:10:0321 Q Who called who?
 11:10:0422 A He called me.
 11:10:0623 Q But you didn't know him before then?
 11:10:0824 A No.
 11:10:0825 Q So somehow he got your number and called you

11:11:10 1 Q And that's a [REDACTED] phone that they
 11:11:14 2 give --
 11:11:15 3 A Correct.
 11:11:18 4 Q -- you?
 11:11:18 5 So Mr. [REDACTED] sometime, maybe early 2004,
 11:11:22 6 calls you on your cellular phone, and what does he say
 11:11:25 7 to you?
 11:11:26 8 A He told me that he had read the article and
 11:11:34 9 that the same thing had happened to him with Father
 11:11:3710 Kelly and --
 11:11:4011 Q Did he tell you what he meant by "the same
 11:11:4212 thing"?
 11:11:4313 A Well, my assumption was that he read the
 11:11:4714 article, which talked about the abuse by Father Kelly.
 11:11:5215 Q Do you recall -- because there were a few
 11:11:5316 articles. Do you recall what the particular article
 11:11:5717 you're referring to --
 11:11:5918 A It was the one in the "Independent," Santa
 11:12:0319 Barbara.
 11:12:0420 Q Did somebody from the "Independent" interview
 11:12:0721 you prior to the article coming out?
 11:12:0922 A Yes.
 11:12:1223 Q Who was that person, if you remember?
 11:12:1324 A I cannot remember his name.
 11:12:1725 Q It was a him?

11:12:18 1 A Yes, it was a him, correct.
 11:12:19 2 Q Male?
 11:12:20 3 A Yes.
 11:12:22 4 Q And you said a minute ago that you presumed
 11:12:24 5 that [REDACTED] when you talked about the same
 11:12:27 6 thing that happened to him by Father Kelly, was talking
 11:12:30 7 about the abuse --
 11:12:32 8 A Abuse, correct.
 11:12:33 9 Q -- that was referred to in the article?
 11:12:3510 A Correct.
 11:12:3511 Q Do you remember specifically what the article
 11:12:4112 said about what happened to you?
 11:12:4513 A I don't recall it saying anything other than
 11:12:4814 sexual abuse by a priest.
 11:12:5315 Q When the person at the "Independent," the
 11:12:5616 reporter interviewed you, were you specific with that
 11:13:0117 reporter about what the abuse -- what the sexual abuse
 11:13:0518 was?
 11:13:1019 A I don't believe I was.
 11:13:1320 Q Do you recall telling the reporter that you
 11:13:2121 were -- that Father Kelly never actually had sex with
 11:13:2622 you?
 11:13:3423 A I wouldn't tell him that because that is not
 11:13:3624 the truth, so no, I don't recall telling him that.
 11:13:4225 Q Did you read each of the newspaper articles

11:15:25 1 A -- that's what he said, yes.
 11:15:27 2 Q But he didn't elaborate on what that was?
 11:15:29 3 A No.
 11:15:30 4 Q What else did he say to you in the
 11:15:32 5 conversation on the phone?
 11:15:38 6 A I believe he expressed just some shame and
 11:15:44 7 fear of saying something about it, and I feel that he
 11:15:51 8 called me maybe feeling that, you know, if I had
 11:15:59 9 strength, maybe he would have the strength to do it also
 11:16:0210 possibly.
 11:16:0711 Q So this call took place, you think, in January
 11:16:0912 of 2004?
 11:16:1213 A I think so.
 11:16:1314 Q Do you know whether that was before or after
 11:16:1615 he filed his lawsuit?
 11:16:1816 A I have no idea.
 11:16:1917 Q Did he indicate to you that he had filed a
 11:16:2118 lawsuit during your telephone conversation?
 11:16:2319 A He said nothing about it.
 11:16:2520 Q Do you remember what time of day it was when
 11:16:2721 he called you?
 11:16:3422 A I think it was late afternoon, I believe.
 11:16:3723 Q Was it a weekday?
 11:16:3824 A It was.
 11:16:3925 Q And were you at work?

11:13:45 1 that came out in Santa Barbara about your lawsuit?
 11:14:01 2 A I -- I think the one in the "Independent" is
 11:14:03 3 the only one that mentioned my name, I believe.
 11:14:15 4 Q And you -- do you recall telling -- well, let
 11:14:19 5 me back up a minute.
 11:14:19 6 How many reporters were you interviewed by?
 11:14:22 7 A One only.
 11:14:23 8 Q Only one?
 11:14:24 9 A Correct.
 11:14:2610 Q And you don't recall telling him that you
 11:14:2811 never had actual sex with Father Kelly --
 11:14:3412 A No, I don't.
 11:14:3413 Q -- it was just fondling and masturbation; you
 11:14:3714 don't remember telling anybody that, any reporter that?
 11:14:4815 A I don't recall telling them that.
 11:14:5416 Q And you don't recall reading any newspaper
 11:14:5717 article regarding your allegations against Father Kelly
 11:15:0118 that said that?
 11:15:0619 A No.
 11:15:1020 Q Let's go back to Mr. [REDACTED]. We'll come
 11:15:1221 back to the newspaper articles later.
 11:15:1522 So Mr. [REDACTED] called you, he told you the
 11:15:1923 same thing happened to him; is that what you said?
 11:15:2224 A Yes, I'm pretty sure --
 11:15:2425 Q With Father Kelly?

11:16:44 1 A I'm pretty sure, yeah.
 11:16:45 2 Q So you were on a job site?
 11:16:48 3 A I would say yeah.
 11:16:49 4 Q Was anybody else there when he called you, on
 11:16:52 5 your end?
 11:16:55 6 A On my end? Oh, like other workers around?
 11:17:01 7 Q At the job, yeah.
 11:17:01 8 A Oh, I would think so. I can't really recall,
 11:17:01 9 you know, what job I was on, but...
 11:17:0410 Q How long did your conversation with
 11:17:0611 Mr. [REDACTED] last?
 11:17:0712 A It was pretty brief. Maybe three minutes,
 11:17:1013 maybe.
 11:17:1314 Q And you say he expressed -- you thought he was
 11:17:2415 expressing shame and that maybe if you had filed a
 11:17:2816 lawsuit, maybe he would do something, he would have the
 11:17:3217 nerve, the courage to do something also; is that what
 11:17:3418 you said?
 11:17:3619 MR. HALE: Misstates testimony.
 11:17:3720 BY MS. YOUNG:
 11:17:3821 Q What specifically did he say to you?
 11:17:3922 Pretend I'm you and you're him. What did he
 11:17:4523 say? I'm on the phone.
 11:17:5224 A [REDACTED], you don't know me, but I read about the
 11:17:5625 article and the same thing happened to me. And I'm

11:18:05 1 just" -- what did he -- exactly did he say? He said
 11:18:08 2 that -- I can't remember his exact words, but his
 11:18:14 3 expression was the same thing happened to him, and he
 11:18:21 4 was wondering if he should also say something about it.
 11:18:26 5 Q So did you gather from that conversation that
 11:18:28 6 at that point in time when you had the conversation, he
 11:18:32 7 had not yet gone public?
 11:18:37 8 A I would be willing to say that, yes. I mean
 11:18:40 9 why would he call me if -- if he had already said
 11:18:44 10 something?
 11:18:49 11 Q And what did you say -- did he say anything
 11:18:52 12 else to you besides what you've just told me?
 11:18:55 13 A No, it was a fairly short phone call.
 11:18:58 14 Q Did you say anything to him during the phone
 11:19:00 15 call? What did you say in response?
 11:19:04 16 A I think what I said to him in a nutshell was
 11:19:09 17 that I had been carrying around Father Kelly for a lot
 11:19:12 18 of years and that I -- I've gotten some sense of freedom
 11:19:17 19 by finally saying something about it, was the message
 11:19:22 20 that I tried to convey to him.
 11:19:24 21 Q And then what did he say in response to that?
 11:19:41 22 A I can't really recall what his response was.
 11:19:49 23 Q Have you told me everything that you remember
 11:19:52 24 about that telephone conversation with --
 11:19:54 25 A Yes.

11:20:41 1 Q Okay.
 11:20:42 2 When?
 11:20:43 3 A I spoke to him maybe two months ago.
 11:20:51 4 Q Did he call you or did you call him?
 11:20:54 5 A I was talking to [REDACTED]
 11:20:59 6 [REDACTED]
 11:21:01 7 Q On [REDACTED]
 11:21:01 8 A Correct. And they had just had an inspection,
 11:21:05 9 a city inspector, and there was a couple items that I
 11:21:08 10 needed to correct, and so the [REDACTED] really couldn't
 11:21:12 11 tell me so he put [REDACTED] on the phone, and [REDACTED] --
 11:21:17 12 that's what we talked about.
 11:21:18 13 Q I see.
 11:21:19 14 But you didn't talk about Father Kelly --
 11:21:21 15 A No.
 11:21:21 16 Q -- during that telephone conversation at all?
 11:21:24 17 And have you ever spoken to [REDACTED]
 11:21:27 18 since -- on the telephone since 1990?
 11:21:35 19 A On the telephone?
 11:21:36 20 Q On the telephone.
 11:21:36 21 A No.
 11:21:38 22 Q Because you told me about your meetings with
 11:21:40 23 him. So now I'm talking about the telephone.
 11:21:44 24 A No.
 11:21:45 25 MS. YOUNG: Okay. Counsel, if you want to

11:19:55 1 Q -- [REDACTED]?
 11:19:56 2 A Uh-huh.
 11:19:59 3 Q And that was the first time you ever spoke to
 11:20:01 4 him and you didn't know him before then, correct?
 11:20:04 5 A Correct.
 11:20:04 6 Q Did you know him at all by, not know him
 11:20:07 7 personally, but by reputation? Did --
 11:20:11 8 A I don't --
 11:20:12 9 Q You didn't even know who he was?
 11:20:13 10 A I didn't even know who he is.
 11:20:18 11 Q When was the next time you spoke to [REDACTED]
 11:20:21 12 [REDACTED]?
 11:20:21 13 MR. HALE: Assumes facts.
 11:20:22 14 THE WITNESS: I never --
 11:20:23 15 BY MS. YOUNG:
 11:20:23 16 Q If --
 11:20:24 17 A I never have.
 11:20:25 18 Q You never spoke to him again?
 11:20:27 19 A No.
 11:20:31 20 Q Going back a minute to [REDACTED], I
 11:20:36 21 didn't ask you this, but did you ever speak to
 11:20:36 22 Mr. [REDACTED] on the telephone?
 11:20:38 23 A No.
 11:20:39 24 Q Have you ever spoken --
 11:20:40 25 A Wait. Yes, I have.

11:21:48 1 take a --
 11:21:50 2 MR. HALE: Sure.
 11:21:51 3 MS. YOUNG: -- break, now would be a good
 11:21:52 4 time.
 11:21:52 5 MR. HALE: Yeah, that would be fine.
 11:21:53 6 MS. YOUNG: A short break.
 11:21:53 7 MR. HALE: Five minutes? Ten minutes? What
 11:21:53 8 do you want?
 11:21:53 9 MS. YOUNG: Five minutes is fine with me.
 11:21:53 10 MR. HALE: Great.
 11:21:53 11 MS. YOUNG: I just thought we've been going
 11:21:53 12 for a while.
 11:21:53 13 MR. HALE: Yes, I agree. I was actually about
 11:21:53 14 to --
 11:22:00 15 THE VIDEOGRAPHER: We're going off the record.
 11:22:01 16 The time is 11:22 a.m.
 11:31:23 17 (Recess.)
 11:34:34 18 THE VIDEOGRAPHER: We're going back on the
 11:34:36 19 record. The time is 11:34. Please continue.
 11:34:40 20 BY MS. YOUNG:
 11:34:44 21 Q Mr. [REDACTED] how did you first come to file this
 11:34:47 22 lawsuit?
 11:34:50 23 MR. HALE: Vague and ambiguous.
 11:34:53 24 BY MS. YOUNG:
 11:34:54 25 Q Well, let me see if I can -- I mean you can

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11:34:56 1 answer that question, but let me see if I can ask a
 11:34:58 2 better one.
 11:35:04 3 What made you -- no, strike that.
 11:35:15 4 When did you first decide to sue?
 11:35:26 5 A I read an article in the newspaper, "Santa
 11:35:29 6 Barbara News-Press."
 11:35:33 7 Q Do you recall when?
 11:35:41 8 A I believe it was in 2003, I believe.
 11:35:46 9 Q Do you recall whether it was early 2003,
 11:35:48 10 mid-2003?
 11:35:53 11 A I think maybe it was mid, maybe.
 11:35:55 12 Q Did you keep a copy of the article?
 11:35:58 13 A No.
 11:35:58 14 Q Is that a "no"? Speak to the reporter.
 11:36:02 15 A This is a no, correct.
 11:36:03 16 Q And so you read an article in the Santa
 11:36:06 17 Barbara newspaper?
 11:36:08 18 A And the article talked about priest abuse, and
 11:36:14 19 it said that it opened -- there was a window for a year
 11:36:21 20 of anybody that -- open for anybody that had abuse from
 11:36:25 21 years past, and so I read that.
 11:36:35 22 And up to that point, I'd been dragging around
 11:36:42 23 Father Kelly with me for a little over 35 years, and I
 11:36:51 24 don't know, it just seemed like a chance to maybe say
 11:36:56 25 something, to maybe get it off my back, you know, quit

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11:37:04 1 dragging it around, so to speak.
 11:37:07 2 So what happened was, I--
 11:37:09 3 MR. HALE: You need to exclude any
 11:37:10 4 conversations you had --
 11:37:13 5 THE WITNESS: Okay.
 11:37:13 6 MR. HALE: -- with your attorneys.
 11:37:15 7 THE WITNESS: Okay.
 11:37:15 8 And so that was my decision. I just made a
 11:37:18 9 decision then to seek out some type of relief in that
 11:37:22 10 area.
 11:37:23 11 BY MS. YOUNG:
 11:37:25 12 Q Prior to reading that article, had you met
 11:37:30 13 either Mr. Griffith or Mr. Hale?
 11:37:41 14 A I've known Tom for a while.
 11:37:46 15 MR. HALE: Tom (indicating).
 11:37:47 16 MS. YOUNG: Tom Griffith?
 11:37:48 17 THE WITNESS: Yes.
 11:37:48 18 BY MS. YOUNG:
 11:37:48 19 Q How did you come to know Tom Griffith? Did
 11:37:55 20 you know him socially? Is that what you mean?
 11:38:02 21 THE WITNESS: Can I answer that, Tom?
 11:38:04 22 MR. HALE: If -- if it's not related to you
 11:38:07 23 and your attorney-client relationship, if there's a
 11:38:09 24 social relationship, yeah, you can talk about it. If
 11:38:12 25 it's related to your discussion, anything related to

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11:38:13 1 legal representation of you by Mr. Griffith, no, you
 11:38:18 2 cannot.
 11:38:19 3 BY MS. YOUNG:
 11:38:19 4 Q Well, I'm not -- I'm not asking him what he
 11:38:21 5 said to you at any time or what you said to him, I'm
 11:38:24 6 asking how you first came to meet -- meet him.
 11:38:28 7 A I met Tom [REDACTED]
 11:38:30 8 Q So he's [REDACTED]?
 11:38:37 9 A Yes.
 11:38:38 10 Q Okay.
 11:38:39 11 So that's how you came to know him, through
 11:38:41 12 [REDACTED]?
 11:38:43 13 A Yeah.
 11:38:43 14 THE WITNESS: [REDACTED]
 11:38:44 15 [REDACTED]
 11:38:47 16 MS. YOUNG: That's -- that's --
 11:38:47 17 THE WITNESS: Sorry.
 11:38:47 18 MS. YOUNG: -- not a problem here.
 11:38:49 19 THE WITNESS: Yeah, but it's kind of a problem
 11:38:50 20 for us, though, you know. I mean, it's not --
 11:38:52 21 MS. YOUNG: Okay. Well, I understand. We'll
 11:38:52 22 keep it --
 11:38:52 23 THE WITNESS: -- stuff we like to talk about.
 11:38:53 24 MS. YOUNG: We'll keep it confidential.
 11:38:53 25 25

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11:38:55 1 BY MS. YOUNG:
 11:38:56 2 Q So had Mr. Griffith ever represented you
 11:38:59 3 before in any other matter?
 11:39:00 4 A No.
 11:39:01 5 Q So when did you first -- and I'm not asking
 11:39:07 6 you what you said, but when did you first talk to
 11:39:12 7 Mr. Griffith about filing suit against Father Kelly?
 11:39:21 8 When? Was it right after you read that article?
 11:39:26 9 A Shortly thereafter.
 11:39:27 10 Q And do you recall, and you might have already
 11:39:30 11 told me this, what paper that article was in?
 11:39:33 12 A It was in the "Santa Barbara News-Press."
 11:39:37 13 Q Santa Barbara what?
 11:39:39 14 A News-Press.
 11:39:41 15 Q News-Press.
 11:39:41 16 A Yes.
 11:39:48 17 Q So after you read the article -- by the way,
 11:39:54 18 let me back up a second. Strike that.
 11:39:59 19 Did the article mention the names of any
 11:40:00 20 lawyers who were representing any plaintiffs in the
 11:40:09 21 Santa Barbara area?
 11:40:10 22 A No.
 11:40:11 23 Q So after you read the article, you contacted
 11:40:19 24 Mr. Griffith, whom you knew?
 11:40:21 25 A Yes.

11:40:31 1 Q And was it Mr. Griffith that introduced you to
 11:40:35 2 Mr. Hale?
 11:40:35 3 MR. HALE: I think we're crossing the line
 11:40:37 4 here. You -- you've toed it for a while now.
 11:40:41 5 BY MS. YOUNG:
 11:40:42 6 Q Okay.
 11:40:42 7 How did you come to meet Mr. Hale?
 11:40:45 8 MR. HALE: Same issue.
 11:40:46 9 MS. YOUNG: I don't think that's
 11:40:47 10 attorney-client privilege if he tells me he was
 11:40:51 11 introduced or whatever. I'm not going to ask what was
 11:40:55 12 said.
 11:40:56 13 BY MS. YOUNG:
 11:40:57 14 Q Did you know Mr. Hale through Mr. Griffith or
 11:41:01 15 did you meet him some other way?
 11:41:04 16 MR. HALE: Maybe the way to ask him is did you
 11:41:06 17 know Mr. Hale prior to -- prior to meeting Mr. Griffith
 11:41:08 18 and that will answer the question for you, because I
 11:41:09 19 think -- otherwise you're getting into a communication.
 11:41:14 20 BY MS. YOUNG:
 11:41:15 21 Q Did you know Mr. Hale prior to Mr. Griffith?
 11:41:18 22 A No.
 11:41:19 23 Q Okay.
 11:41:31 24 How did you first meet Father Kelly?
 11:41:39 25 A I first met him personally -- I was introduced

11:42:58 1 there, 1967.
 11:43:01 2 Q And you were at the time how old?
 11:43:05 3 A I was around 12, maybe going on 13, around
 11:43:09 4 there.
 11:43:09 5 Q And how old was [REDACTED]?
 11:43:21 6 A [REDACTED] is a couple years older than me, so I
 11:43:23 7 believe he was 15, 16.
 11:43:28 8 Q And how old was [REDACTED]?
 11:43:30 9 A They were both the same age, I am pretty sure.
 11:43:32 10 Q So they were older than you were?
 11:43:33 11 A Yes.
 11:43:34 12 Q And on that day when you -- when they took you
 11:43:38 13 to Father Kelly's house --
 11:43:43 14 A Room.
 11:43:43 15 Q -- room --
 11:43:48 16 A He had a room upstairs.
 11:43:48 17 Q -- in the rectory, what -- how did that come
 11:43:48 18 about? What did they say to you?
 11:43:54 19 A What did they say to me when?
 11:43:56 20 Q Did they say "We're gonna introduce you to the
 11:43:59 21 priest"? I mean what -- they must have said something,
 11:44:02 22 how did --
 11:44:05 23 A I don't recall exactly what they said. I mean
 11:44:09 24 I was just, you know, they were my friends, my older
 11:44:12 25 friends, and I was just -- I just kind of followed them

11:41:44 1 to him by some guys that I went to school with.
 11:41:50 2 Q Who were those guys?
 11:41:53 3 A One was a guy named [REDACTED]
 11:41:57 4 Q [REDACTED]?
 11:41:59 5 A Yes, [REDACTED]. And the other was [REDACTED]
 11:42:02 6 [REDACTED]
 11:42:03 7 Q And [REDACTED] is your [REDACTED]?
 11:42:06 8 A No, [REDACTED] used to be my
 11:42:08 9 [REDACTED]
 11:42:09 10 Q Your [REDACTED]?
 11:42:10 11 A Correct.
 11:42:10 12 Q Your [REDACTED]? You said --
 11:42:13 13 A Ex --
 11:42:13 14 Q -- used to be --
 11:42:15 15 A Yeah --
 11:42:18 16 Q -- your [REDACTED]
 11:42:18 17 A -- my ex-, yeah.
 11:42:18 18 Q So did they both introduce you to Father Kelly
 11:42:25 19 at the same time, or how did that come about?
 11:42:30 20 A I went with the two of them over to the
 11:42:33 21 rectory at Our Lady of Guadalupe church, and they
 11:42:38 22 knocked on the door and Father Kelly came to the door
 11:42:41 23 and we all went upstairs to Father Kelly's room.
 11:42:45 24 Q And do you remember what year that was?
 11:42:55 25 A That was approximately maybe '67, around

11:44:18 1 around and I guess we were going to the Guadalupe
 11:44:21 2 church.
 11:44:24 3 Q So you mentioned they were both older than you
 11:44:28 4 and I think in one of the documents that your lawyers
 11:44:30 5 gave, it said in answer to those interrogatories, what
 11:44:33 6 you reviewed, it said you were trying to fit in with
 11:44:38 7 older guys at the time. Is that what you were doing?
 11:44:46 8 A That would be true.
 11:44:49 9 Q Why didn't you hang out with guys your own
 11:44:52 10 age?
 11:44:52 11 A I did; I had friends my own age.
 11:44:54 12 Q Okay.
 11:44:54 13 So these older guys, did they tell you
 11:44:56 14 anything about Father Kelly before they took you to his
 11:44:59 15 room at the rectory?
 11:45:00 16 A I believe he told me that Father Kelly was a
 11:45:05 17 cool priest and we could go over and listen to some
 11:45:08 18 music at his house.
 11:45:10 19 Q So it was their idea --
 11:45:12 20 A Correct.
 11:45:12 21 Q -- to go over there?
 11:45:13 22 A Yes.
 11:45:14 23 Q Did they ever tell you that -- well, let's do
 11:45:17 24 it one at a time. Did [REDACTED] ever tell you that
 11:45:21 25 he had been abused by Father Kelly?

11:45:23 1 A No.
 11:45:23 2 Q Did [REDACTED] ever tell you he had been abused
 11:45:27 3 by Father Kelly?
 11:45:28 4 A No.
 11:45:33 5 Q Where is [REDACTED] today; do you know?
 11:45:38 6 A He lives out in Goleta.
 11:45:41 7 Q And you said he was your [REDACTED]
 11:45:46 8 whose brother is he?
 11:45:51 9 A I don't think he has any brothers.
 11:45:53 10 Q No, whose broth- --
 11:45:55 11 A He was married to [REDACTED].
 11:45:59 12 Q Oh, okay. He was married to your [REDACTED].
 11:46:04 13 But he's not anymore?
 11:46:05 14 A Correct.
 11:46:13 15 Q And your friend [REDACTED] or your friend
 11:46:19 16 then, where -- where is he today; do you know?
 11:46:22 17 A I have no idea.
 11:46:24 18 Q Do you -- do you keep in touch with [REDACTED]
 11:46:26 19 [REDACTED]
 11:46:27 20 A No.
 11:46:27 21 Q When was the last time you spoke to him?
 11:46:34 22 A Maybe a year ago, maybe.
 11:46:39 23 Q Was it a telephone conversation or a personal
 11:46:41 24 meeting?
 11:46:44 25 A I'm pretty sure it was a family barbecue, I

11:47:46 1 see.
 11:47:53 2 Like two and a half years ago.
 11:47:55 3 Q So that would have been 2000 what?
 11:47:58 4 A Four. No, three.
 11:48:03 5 Q Then it's more than two and a half years ago?
 11:48:05 6 A It's about two and a half years ago.
 11:48:07 7 Q Was it after you filed the lawsuit or before
 11:48:09 8 you filed the lawsuit?
 11:48:13 9 A It was after.
 11:48:14 10 Q So after you filed the lawsuit -- so you filed
 11:48:17 11 the lawsuit the end of 2003, so it was sometime in 2004,
 11:48:23 12 you think?
 11:48:24 13 A 2004, yeah; maybe spring 2004.
 11:48:27 14 Q And you spoke to him. What did you say to
 11:48:28 15 him?
 11:48:33 16 A We talked about Father Kelly. We talked about
 11:48:44 17 going to the cabin.
 11:48:45 18 Q What did you talk about Father Kelly? Going
 11:48:48 19 to the cabin?
 11:48:48 20 A Yes.
 11:48:49 21 Q Were you talking to him about it or was he
 11:48:50 22 talking to you about it?
 11:48:52 23 A No, he wasn't talking to me about it.
 11:48:53 24 Q You were talking to him?
 11:48:55 25 A I was talking to him. And I told him about

11:46:47 1 believe.
 11:46:47 2 Q Was he still married to [REDACTED] at the
 11:46:50 3 time?
 11:46:50 4 A No.
 11:46:50 5 Q Okay.
 11:46:51 6 So even though he's no longer married to [REDACTED]
 11:46:53 7 [REDACTED] you still get together, he comes to family
 11:46:57 8 gatherings?
 11:46:57 9 A Him and [REDACTED].
 11:47:00 10 Q I see.
 11:47:00 11 A And they're grown up now, so he comes around
 11:47:03 12 with his new wife.
 11:47:04 13 Q He has a new wife.
 11:47:05 14 A Correct.
 11:47:07 15 Q And when you spoke to him the last time at
 11:47:09 16 that family gathering, did you talk at all about your
 11:47:14 17 allegations against Father Kelly?
 11:47:16 18 A No.
 11:47:17 19 Q Have you ever spoken to him about your
 11:47:19 20 allegations against Father Kelly?
 11:47:21 21 A Yes, I have.
 11:47:22 22 Q When? Or when was the first time?
 11:47:27 23 A I only talked to him one time.
 11:47:29 24 Q And when was that?
 11:47:38 25 A Maybe about summer -- summer 2000 -- let me

11:49:03 1 the many times that Father Kelly took me up to the cabin
 11:49:08 2 and allowed me to drink and -- and, you know, got me
 11:49:17 3 into bed with him. And I asked him if that had ever
 11:49:21 4 happened to him.
 11:49:22 5 Q And what did he say?
 11:49:24 6 A He said "No."
 11:49:26 7 Q Was he ever at the cabin at the same time you
 11:49:28 8 were there?
 11:49:29 9 A One time. One time.
 11:49:30 10 Q One time?
 11:49:31 11 A Yes.
 11:49:31 12 Q When was that?
 11:49:32 13 A Let me back up on that.
 11:49:36 14 We were there at the cabin, I think about two
 11:49:42 15 times, two, three times I believe in the beginning. One
 11:49:46 16 time overnight.
 11:49:49 17 Q You and --
 11:49:49 18 A [REDACTED]
 11:49:50 19 Q -- [REDACTED]?
 11:49:56 20 So you asked him whether that ever happened to
 11:49:59 21 him and he said "no"?
 11:50:00 22 A Correct.
 11:50:02 23 Q Did he -- what did he say to you when you told
 11:50:04 24 him all this? Was he surprised?
 11:50:15 25 A He looked embarrassed, I think.

11:50:17 1 Q He looked embarrassed?
 11:50:18 2 A He looked embarrassed.
 11:50:24 3 Q What do you mean he looked embarrassed? In
 11:50:24 4 what way did he look embarrassed? Was it something he
 11:50:26 5 said?
 11:50:26 6 A Wouldn't look at me in the eye. Just kind of
 11:50:30 7 kept his head kind of down like that (indicating), so he
 11:50:33 8 looked like he was feeling embarrassed of some sort. I
 11:50:37 9 don't -- I would think, at least that was my impression.
 11:50:41 10 Q And what did he say to you? Anything, other
 11:50:45 11 than it never happened to him?
 11:50:49 12 A It was kind of a cold conversation, really. I
 11:50:51 13 mean it wasn't much coming back from him. I don't know
 11:50:54 14 if it's -- I don't know. I don't know if it stirred
 11:50:58 15 something up with him. I don't know.
 11:51:03 16 Q And at that time did he know about the lawsuit
 11:51:04 17 you had filed?
 11:51:11 18 MR. HALE: Speculation.
 11:51:14 19 BY MS. YOUNG:
 11:51:15 20 Q Did he say anything to you during the
 11:51:17 21 conversation that would lead you -- lead you to believe
 11:51:18 22 that he knew about the lawsuit, or did you tell him
 11:51:20 23 about the lawsuit?
 11:51:22 24 A I believe I told him -- I'm pretty sure I told
 11:51:26 25 him that I was in the process of a lawsuit.

11:52:35 1 A I don't.
 11:52:36 2 Q He doesn't live in Santa Barbara, to the best
 11:52:38 3 of your knowledge?
 11:52:39 4 A To the best of my knowledge, I don't think he
 11:52:41 5 lives in Santa Barbara.
 11:52:46 6 Q When -- going back to the first time that
 11:52:52 7 [REDACTED] and [REDACTED] took you up to Father
 11:52:56 8 Kelly's room in the rectory, how well did you know [REDACTED]
 11:53:02 9 and [REDACTED] at that point in time? Had you been hanging
 11:53:06 10 out with them for a while?
 11:53:08 11 A For, you know, a short period. I mean we used
 11:53:10 12 to kind of hang out at lunch together because I was a
 11:53:13 13 kid that had, you know, maybe a dollar-fifty in his
 11:53:16 14 pocket. And, you know, we used to go to a little
 11:53:18 15 restaurant and buy a bunch of little taquitos and I'd
 11:53:24 16 share them with them. You know, I wanted to be friends
 11:53:26 17 with them. So we did that, you know, a few times.
 11:53:28 18 Q What else did you do with them before the --
 11:53:30 19 before you went to Father Kelly's, what else did you do
 11:53:34 20 other than lunch, taquitos? Did you socialize with them
 11:53:38 21 at other places?
 11:53:42 22 A I had known [REDACTED] prior to that, growing up
 11:53:46 23 on our side of town. We used to go hang out at a
 11:53:51 24 racetrack, you know, slot car racetracks.
 11:53:58 25 Q Was [REDACTED], during the time you knew him way

11:51:31 1 Q Did he respond to that?
 11:51:34 2 A No, he did not.
 11:51:38 3 Q And where did you say that conversation took
 11:51:40 4 place?
 11:51:41 5 A At his house out in Goleta.
 11:51:46 6 Q Was anyone else there?
 11:51:47 7 A No.
 11:51:47 8 Q What was the occasion of the two of you being
 11:51:50 9 there, having that conversation?
 11:51:55 10 A I went to his home.
 11:51:57 11 Q For what purpose?
 11:51:59 12 A To go ask him if any of this stuff had ever
 11:52:03 13 happened to him. He was the one that took me to meet
 11:52:09 14 Father Kelly. He was one of the guys that took me over
 11:52:11 15 to go first -- listen to music.
 11:52:16 16 Q Now, when -- did you -- at that time did you
 11:52:21 17 talk to [REDACTED]? Did you try to find [REDACTED] also?
 11:52:26 18 A No.
 11:52:27 19 Q So you've never spoken to [REDACTED] --
 11:52:29 20 A No.
 11:52:29 21 Q -- about the lawsuit or --
 11:52:30 22 A No.
 11:52:30 23 Q -- the allegations?
 11:52:32 24 A No.
 11:52:32 25 Q And you don't know where he is today?

11:54:00 1 back then, was he ever in any trouble --
 11:54:04 2 MR. HALE: Speculation.
 11:54:04 3 MS. YOUNG: -- that you knew of?
 11:54:06 4 THE WITNESS: Not that I knew of.
 11:54:07 5 BY MS. YOUNG:
 11:54:08 6 Q What about [REDACTED], same question, was he
 11:54:12 7 ever in any trouble?
 11:54:14 8 A Not that I knew of.
 11:54:15 9 Q Okay.
 11:54:33 10 Other than talking to [REDACTED] to ask if
 11:54:37 11 the same thing happened to him with Father Kelly, have
 11:54:43 12 you done any other investigation on your own?
 11:54:47 13 MR. HALE: Objection. Misstates testimony as
 11:54:49 14 to there being an investigation. Mischaracterizes his
 11:54:51 15 testimony.
 11:54:52 16 BY MS. YOUNG:
 11:54:52 17 Q Have you -- let me rephrase the question.
 11:54:54 18 Have you spoken to any other individuals that
 11:54:58 19 you knew back at the time Father Kelly was a priest to
 11:55:05 20 ask them whether the same thing happened to them?
 11:55:08 21 A No.
 11:55:10 22 Q So [REDACTED] was the only one basically
 11:55:14 23 that you asked that question to?
 11:55:15 24 A Yes.
 11:55:18 25 Q And that was the only time, what you've

11:55:21 1 described, that you talked to Mr. [REDACTED] about the
 11:55:24 2 Kelly -- about Father Kelly?
 11:55:27 3 A The one and only time.
 11:55:32 4 Q And have you told me everything you remember
 11:55:33 5 about that conversation?
 11:55:33 6 A Yes.
 11:55:46 7 Q Have you done any investigation yourself to
 11:55:55 8 find any evidence that would support your allegations
 11:55:58 9 against Father Kelly?
 11:56:0710 A No actual investigating. My -- I just found
 11:56:1111 out my younger sister has a -- a picture of our First
 11:56:2112 Holy Communion class at our Lady of Guadalupe church.
 11:56:2613 She is going to send that to me. But other than that,
 11:56:3014 no, no investigation.
 11:56:3215 Q Now, did you ask your sister -- how did it
 11:56:3516 come to pass that your sister told you she had that
 11:56:3817 picture?
 11:56:4018 A Well --
 11:56:4119 Q Were you asking her for things?
 11:56:4220 MR. HALE: Again, excluding any -- any
 11:56:4521 requests made by your attorneys that were --
 11:56:4822 MS. YOUNG: Right.
 11:56:4923 MR. HALE: -- communicated to you.
 11:56:5524 THE WITNESS: When I made the decision to file
 11:56:5825 this lawsuit, I went home and told my mom what I was

11:58:15 1 Catholic saints that he used to kiss every night, so he
 11:58:20 2 was a very Catholic, very -- you know, the church was
 11:58:23 3 something very special for him.
 11:58:26 4 And his response to her was -- I didn't find
 11:58:28 5 this out till afterwards till I told them, till I told
 11:58:32 6 my mom, and afterwards she told me that her father told
 11:58:37 7 her, you know, "What are you talking about? He's a
 11:58:39 8 priest," you know.
 11:58:41 9 Q And your grandfather passed away when?
 11:58:4310 A My grandfather passed away -- I believe in
 11:58:4911 1976, I believe.
 11:59:0112 Q Do you have any photos of yourself when you
 11:59:0613 were 13 years old or 14 years old or 15 years old?
 11:59:1414 A I believe I do, yes.
 11:59:1915 Q How tall are you?
 11:59:2016 A Today?
 11:59:2117 Q Uh-huh.
 11:59:2218 A Six --
 11:59:2219 Q Yes.
 11:59:2320 A -- one.
 11:59:2521 Q Do you remember how tall you were when you
 11:59:2722 were 14?
 11:59:3323 A I -- I could give you a guess.
 11:59:3524 Q Give me an estimate.
 11:59:3625 A Probably -- probably not too much shorter

11:57:07 1 doing and what Father Kelly used to do to me. And I
 11:57:11 2 told my sister also, my older sister, [REDACTED] So my
 11:57:22 3 family knows, my whole family knows.
 11:57:22 4 So my sister -- my younger sister, [REDACTED]
 11:57:25 5 she -- she -- she goes, "Yeah, don't you remember our
 11:57:33 6 communion picture? You know, I still have it."
 11:57:37 7 And so I talked to her a couple days ago and
 11:57:39 8 she said she was going to send it to me. She lives out
 11:57:43 9 of town. But, you know, my whole family knows now.
 11:57:4710 BY MS. YOUNG:
 11:57:4811 Q That was the first time you told your
 11:57:4912 family --
 11:57:5013 A Yeah.
 11:57:5014 Q -- after you filed the lawsuit?
 11:57:5215 A My --
 11:57:5216 Q But you --
 11:57:5317 A -- mother used to ask her father, "Hey, how
 11:57:5518 come the priest comes and picks up my son?"
 11:57:5819 And my grandfather --
 11:58:0120 Q Your mother used to ask who? I'm sorry.
 11:58:0421 A Her father.
 11:58:0522 Q Her father?
 11:58:0523 A My grandfather. Her father.
 11:58:0624 You know, "Isn't this kind of unusual?"
 11:58:1025 But my grandfather had a bunch of little

11:59:42 1 than -- I would probably estimate maybe five-eight,
 11:59:47 2 maybe five-seven, five-eight, maybe.
 11:59:49 3 Q And when you -- when did you attain your --
 11:59:50 4 let's put it this way: When did you get to about
 11:59:54 5 six feet? How old were you? Do you remember?
 12:00:00 6 A I don't think I changed much after 16 years
 12:00:04 7 old, I don't think.
 12:00:05 8 Q So by 16 years old, you were already almost
 12:00:07 9 your full height, if not your full height?
 12:00:1010 A I would say so.
 12:00:1411 Q Did you have a growth spurt sometime in your
 12:00:1712 teen years prior to 16 or was it a little at a time?
 12:00:2813 A I think I -- I think I would be giving you
 12:00:3014 a -- a guess because I -- I really don't recall. I
 12:00:3315 really didn't keep any kind of -- I know some people,
 12:00:3616 they have their child's markings on the walls like that,
 12:00:4317 as they grow older like that. We didn't have that way
 12:00:4318 at my house so...
 12:00:4419 Q That's usually when you're younger, though.
 12:00:4720 A I can't really recall if I had a spurt or...
 12:00:5121 Q Okay.
 12:00:5122 But by 16, you figure you're at least 6 feet
 12:00:5523 tall?
 12:00:5624 A I would say so.
 12:01:1625 Q You know, I'm not sure I asked you this

12:01:18 1 question before, but -- and not asking you what was
 12:01:24 2 said, but did you ever meet with your attorneys when
 12:01:37 3 either [REDACTED] were present also?
 12:01:44 4 A No.
 12:01:46 5 Q Okay.
 12:02:42 6 I'd like to talk a little bit about your
 12:02:44 7 family, family history, ask you some questions about it.
 12:02:51 8 I understand that you -- when you were in --
 12:02:54 9 let's say from the time you were born through junior
 12:03:0210 high, you lived with your mother; is that correct?
 12:03:0911 A Most of the time, correct.
 12:03:1212 Q And your father never lived at home with you;
 12:03:2013 is that correct?
 12:03:2414 A From what my mother tells me, my father has --
 12:03:2715 my -- or whom she says is my father, has no idea that
 12:03:3216 I'm alive.
 12:03:3317 Q And this is [REDACTED] --
 12:03:3618 A Correct.
 12:03:3619 Q -- is that his name?
 12:03:3720 A Uh-huh.
 12:03:3721 Q And she told you that he's your father, that
 12:03:4022 he was your father?
 12:03:4023 A Yes.
 12:03:4124 Q He's still alive?
 12:03:4225 A I have no idea.

12:03:45 1 Q When did you first find out what his name was?
 12:03:52 2 A Well, his name is on my birth certificate.
 12:03:57 3 Q Oh, okay.
 12:03:58 4 When was the first time you saw that?
 12:04:06 5 A I can't recall. I don't know.
 12:04:09 6 Q Did your mother ever tell you why she no
 12:04:13 7 longer -- well, is your mother in contact with him?
 12:04:16 8 A No.
 12:04:17 9 Q Did she ever tell you why she is not in
 12:04:2210 contact with him?
 12:04:2511 A Well, I have the story she tells me.
 12:04:2712 Q And what is that?
 12:04:3113 A They're both 19 years old, he's in the Navy,
 12:04:3614 they're dating. She got pregnant one time. When he got
 12:04:5015 discharged from the Navy and left, I think it was the
 12:04:5616 Port Hueneme or the Navy place over there, he wanted her
 12:05:0217 to go with him back to -- I guess Iowa was where he was
 12:05:0718 from. She didn't want to go. So he left and she stayed
 12:05:1219 in Santa Barbara and she was two months pregnant and he
 12:05:1520 didn't know and --
 12:05:1721 Q And she never told him?
 12:05:1822 A No.
 12:05:1923 Q But she put his name on the birth certificate?
 12:05:2224 A Correct. I don't know if she did or my
 12:05:2725 grandparents. I don't know who put the name on it.

12:05:32 1 Q Did your grandfather live with you also when
 12:05:34 2 you were growing up?
 12:05:36 3 A Yes, all the time.
 12:05:36 4 Q And your grandma -- he was married --
 12:05:38 5 A Yes.
 12:05:38 6 Q -- your grandfather?
 12:05:40 7 And your grandmother lived with you as well?
 12:05:43 8 A Yes, up until when she passed away.
 12:05:45 9 Q So was your grandfather -- now you say your
 12:05:5110 grandfather passed away what year, '76?
 12:05:5311 A I think it was '76, around there.
 12:05:5812 Q Was he ill?
 12:06:0113 A He was old.
 12:06:0214 Q How old was he when he died?
 12:06:0815 A I believe he was maybe 67, 66.
 12:06:1316 Q That's not old.
 12:06:1417 A Well, he had had -- he had --
 12:06:1618 MR. HALE: Back then it was.
 12:06:1819 THE WITNESS: He had bad asthma all his life.
 12:06:2020 He used to inhale this stuff. It's called Asthmador
 12:06:2621 powder. And he used make a little pile. It was like --
 12:06:2922 and he would burn this stuff and inhale it and just
 12:06:3323 choke, choke, choke, but it would do something to his
 12:06:3624 lungs and he would be able to breathe a little bit after
 12:06:3925 that.

12:06:39 1 BY MS. YOUNG:
 12:06:40 2 Q But he was approximately 67 when he passed
 12:06:43 3 away?
 12:06:43 4 A I believe so.
 12:06:48 5 Q And who else lived with you growing up besides
 12:06:50 6 your grandparents and your mother?
 12:06:54 7 A I had my mother's older sister, Aunt [REDACTED]
 12:06:58 8 who was always in the background.
 12:07:01 9 Q Did she live with you?
 12:07:0310 A She lived with us. She lived with us most of
 12:07:0811 the time, but she was always kind of like in her own
 12:07:1012 area, had her own little life. And my great Uncle
 12:07:1913 [REDACTED] he lived with us also, but he always lived like --
 12:07:2314 he always would like sleep in the garage or -- because
 12:07:2915 he liked his own little space kind of.
 12:07:4016 Q Did your mother ever get married?
 12:07:4717 A I think -- yeah, she did.
 12:07:4918 Q When was the first time your mother was
 12:07:5419 married?
 12:07:5620 A I don't know.
 12:07:5721 Q How old were you? Was this after you were
 12:08:0022 born?
 12:08:0223 A My mother never had a big celebration type of
 12:08:0724 wedding --
 12:08:0825 Q No, I --

12:08:09 1 A -- not that I know of. I -- I --
 12:08:10 2 Q No, I'm just asking you if she -- if your
 12:08:12 3 mother ever married somebody --
 12:08:13 4 A Yeah.
 12:08:14 5 Q -- after you were born.
 12:08:16 6 A I think she might have married two guys, I
 12:08:19 7 think.
 12:08:20 8 Q Okay. Well, let's talk about the first one.
 12:08:24 9 How old were you the first time your mother
 12:08:26 10 got married?
 12:08:38 11 A Maybe seven years old, maybe eight years old,
 12:08:40 12 maybe.
 12:08:41 13 Q So you were seven or eight. And what was the
 12:08:43 14 man's name who became your stepfather?
 12:08:46 15 A He was never my stepfather. I think at that
 12:08:48 16 point --
 12:08:49 17 Q Well --
 12:08:49 18 A -- she was living with him.
 12:08:53 19 Q And you were seven or eight?
 12:08:54 20 A I believe so, yes.
 12:08:55 21 Q What was his name?
 12:08:57 22 A His name was [REDACTED]
 12:09:00 23 Q I'm sorry, could you spell --
 12:09:02 24 A [REDACTED]
 12:09:03 25 Q [REDACTED]

12:09:06 1 A [REDACTED] I think.
 12:09:09 2 Q [REDACTED]?
 12:09:09 3 A Correct.
 12:09:09 4 Q Could you spell that?
 12:09:12 5 A [REDACTED]
 12:09:15 6 Q And you mentioned that at that time you were
 12:09:19 7 seven or eight, so that would have been approximately
 12:09:21 8 when? What year? You were born in '55.
 12:09:25 9 A '62 maybe, or something like that.
 12:09:29 10 Q And you mentioned your mother was living with
 12:09:31 11 him?
 12:09:31 12 A Yes.
 12:09:32 13 Q So at that point in time, when you were seven
 12:09:35 14 or eight, you were not living with your mother anymore?
 12:09:39 15 A Yes. As I mentioned, she lived with us most
 12:09:41 16 of the time. There was a couple little windows where
 12:09:47 17 she was elsewhere.
 12:09:48 18 Q So when she got married to [REDACTED],
 12:09:51 19 where was she living with him? In Santa Barbara?
 12:09:55 20 A Yes, I think. I'm pretty sure, yes.
 12:09:59 21 Q How long was she married to him?
 12:10:03 22 A I really don't know.
 12:10:04 23 Q How long did she live with him?
 12:10:09 24 A I would be guessing if I told you. I'm sorry.
 12:10:13 25 I don't know.

12:10:14 1 Q Was it a number of years? A number of months?
 12:10:19 2 A I don't believe it was a number of years. It
 12:10:21 3 could have been maybe a year, maybe.
 12:10:23 4 Q So it wasn't very long?
 12:10:25 5 A It wasn't very long.
 12:10:28 6 Q And a few minutes ago I said, "So he was your
 12:10:35 7 stepfather?" and you said very quickly, "No, he was
 12:10:37 8 never my stepfather." Did --
 12:10:39 9 A Well, he was never in our household, so he was
 12:10:43 10 never a part of giving me any kind of direction or being
 12:10:47 11 the man of the house or anything like that. So that's
 12:10:50 12 what I understand is being a stepfather.
 12:10:53 13 Q But your grandfather gave you direction, was
 12:10:56 14 the man of your house, growing up?
 12:10:59 15 MR. HALE: Misstates prior testimony.
 12:11:05 16 THE WITNESS: My grandfather was the man in
 12:11:07 17 the house, correct.
 12:11:07 18 BY MS. YOUNG:
 12:11:07 19 Q And he lived with you while you were growing
 12:11:09 20 up?
 12:11:10 21 A He lived with me all the time when I was
 12:11:12 22 growing up.
 12:11:12 23 Q And he's the one that told you you should go
 12:11:14 24 to mass?
 12:11:15 25 A Yes.

12:11:18 1 Q So did you ever do anything as a family at all
 12:11:23 2 with [REDACTED]?
 12:11:29 3 A I remember maybe a couple occasions where my
 12:11:32 4 mom, [REDACTED] and me and my sisters, we would go down to
 12:11:41 5 Santa Claus Lane maybe on a weekend and buy some -- God,
 12:11:45 6 what did I used to get down there? -- smoked jerky or
 12:11:52 7 something like that I think I used to get, and that was
 12:11:55 8 maybe a couple occasions only.
 12:11:57 9 Q Did you spend any time over at their home,
 12:12:00 10 your mother and Mr. [REDACTED]?
 12:12:04 11 A There was a couple, spend the night on the
 12:12:08 12 weekend maybe, because I remember they used to have
 12:12:11 13 pigeons, and I remember the pigeons. So there was a
 12:12:13 14 couple --
 12:12:14 15 Q Did you say pigeons?
 12:12:15 16 A Pigeons, birds.
 12:12:17 17 Q That's what I thought you said.
 12:12:18 18 A So there was a couple occasions where I'd
 12:12:21 19 spend a night on the weekend.
 12:12:25 20 Q How did you feel when your mother went off to
 12:12:26 21 live with Mr. [REDACTED]? Did that bother you?
 12:12:31 22 A I don't think I really felt -- you know, I
 12:12:36 23 might have felt -- I might have felt something funny
 12:12:39 24 about it. I mean I -- I can't really put a finger on
 12:12:43 25 it.

12:12:43 1 Q Did you like Mr. [REDACTED]?

12:12:48 2 A Yeah, he was -- he was okay.

12:12:51 3 Q Do you know why your mother ended up divorcing

12:12:55 4 him?

12:12:55 5 A I have no idea.

12:12:57 6 Q You never asked her why it only lasted a year

12:12:59 7 or less?

12:13:01 8 A No, I wouldn't ask my mom something like that.

12:13:03 9 Q Did Mr. [REDACTED] drink alcohol, to your

12:13:06 10 knowledge?

12:13:09 11 A I think I had heard somewheres that he did

12:13:12 12 drink.

12:13:13 13 Q Had you ever heard he was an alcoholic?

12:13:16 14 A No.

12:13:17 15 Q Where did you hear that he drank?

12:13:18 16 A Just, you know, the family, you know, just

12:13:21 17 little -- when you're a little kid, you know, you get to

12:13:24 18 hear all the little stuff going on.

12:13:25 19 Q That he drank too much, you heard?

12:13:28 20 A I don't think I heard that.

12:13:29 21 Q Just that he drank?

12:13:30 22 A Just that he drank. I mean, you know, most

12:13:32 23 normal people kind of have a drink every now and then.

12:13:36 24 I don't -- at that age I don't think I really, you know,

12:13:41 25 good, bad, I don't know.

12:13:43 1 Q Did your mother ever tell you that Mr. [REDACTED]

12:13:47 2 was mean to her?

12:13:48 3 A No.

12:13:54 4 Q Where is [REDACTED] today; do you know?

12:13:58 5 A I do not know.

12:13:59 6 Q When was the last time you saw him?

12:14:01 7 A Oh, my gosh.

12:14:03 8 Q Way back then?

12:14:04 9 A Yeah, way back.

12:14:05 10 Q '62, '63?

12:14:07 11 A No, maybe -- I think I helped him move a

12:14:11 12 little bit of furniture one time for my sister. That

12:14:16 13 had to have been maybe, I don't know, 20 years ago or

12:14:19 14 something like that.

12:14:21 15 Q So 1986, '87?

12:14:33 16 A I can't really recall the year. I'm sorry. I

12:14:35 17 don't want to guess either. I mean, you asked me not to

12:14:38 18 guess, and that's --

12:14:38 19 Q But you were on good terms with him --

12:14:40 20 A Yeah, sure.

12:14:41 21 Q -- throughout the whole time?

12:14:42 22 A Yeah, sure. Yeah. He's never treated me

12:14:48 23 funny or anything like that. We've always been okay

12:14:48 24 together.

12:14:48 25 Q And he was okay with your sisters, to the best

12:14:48 1 of your knowledge?

12:14:51 2 A Yes.

12:14:52 3 Q And you don't know where he is today?

12:14:57 4 A I do not.

12:14:58 5 Q And I take it you've never spoken to him about

12:15:01 6 your --

12:15:01 7 A No.

12:15:01 8 Q -- allegations against Father Kelly?

12:15:03 9 A No.

12:15:06 10 Q Now, you said your mother then married again

12:15:09 11 at some point after that?

12:15:11 12 A She married another fella that was from

12:15:17 13 Mexico. His name was -- should I spell it for you?

12:15:21 14 Q Sure.

12:15:23 15 A [REDACTED] --

12:15:24 16 Q Is this his first name you're spelling?

12:15:26 17 A This is his first name.

12:15:27 18 Q [REDACTED]

12:15:27 19 A [REDACTED] And his last name is

12:15:32 20 [REDACTED]

12:15:39 21 [REDACTED]

12:15:41 22 Q [REDACTED]

12:15:44 23 Okay. When did she marry him? Well, let's

12:15:57 24 put it this way. How old were you when she married him?

12:16:01 25 A Okay. How old was I? I was maybe -- maybe 11

12:16:22 1 years old. No, maybe 10, 11 years old, maybe.

12:16:27 2 Q Ten or 11?

12:16:28 3 A Yeah.

12:16:28 4 Q And did he move into your -- well, let me back

12:16:31 5 up a step.

12:16:31 6 After your mother and Mr. [REDACTED] got

12:16:34 7 divorced, or after they split, did she move back into

12:16:39 8 the house with you?

12:16:40 9 A Yes.

12:16:40 10 Q And then when she married Mr. [REDACTED] --

12:16:47 11 A Good.

12:16:48 12 Q -- did he move into your house or did she move

12:16:51 13 out of the house?

12:16:51 14 A No, he moved in.

12:16:52 15 Q So he moved in with you?

12:16:54 16 A Correct.

12:16:54 17 Q Where did she meet him; do you know?

12:16:58 18 A I have no idea.

12:16:59 19 Q Do you know whether she was dating him for a

12:17:01 20 while before they got married?

12:17:03 21 A I believe she was.

12:17:06 22 Q So you met him, I take it, before they got

12:17:09 23 married?

12:17:09 24 A Yes.

12:17:10 25 Q How long?

12:17:14 1 A Prior to them getting married?
 12:17:15 2 Q Yes.
 12:17:23 3 A I would say -- I think they were dating for a
 12:17:34 4 little while, maybe a year and a half, maybe, or
 12:17:36 5 something like that.
 12:17:39 6 Q So --
 12:17:40 7 A Because I used to go with them sometimes.
 12:17:42 8 Q On their dates?
 12:17:44 9 A Go on a little date, you know, I would be in
 12:17:45 10 the back seat and they would take a drive down the beach
 12:17:48 11 or something like that. And I was maybe nine, ten,
 12:17:53 12 something like that.
 12:17:57 13 Q So you were -- you said you were 10 or 11 when
 12:17:59 14 they got married and about a year and a half before that
 12:18:02 15 is when you met him, when your mother started dating
 12:18:07 16 him?
 12:18:08 17 A Yes.
 12:18:08 18 Q Did you like him?
 12:18:11 19 A Sure, he was okay, yeah.
 12:18:15 20 Q How long did -- how long did he live in the
 12:18:16 21 house with you after your parents got married -- I mean
 12:18:21 22 after he married your mother? Was it more than a year
 12:18:22 23 or less than a year?
 12:18:42 24 A Oh, no, it was for a substantial amount of
 12:18:45 25 time. It was maybe, I don't know, 10, 15 years, maybe.

12:20:23 1 divorced?
 12:20:25 2 A Yes.
 12:20:26 3 Q Do you recall how old you were when that
 12:20:28 4 happened?
 12:20:31 5 A I don't recall because I was already getting
 12:20:35 6 incarcerated and I was pretty much on my own then, so I
 12:20:38 7 really didn't -- I wasn't around any household and I
 12:20:43 8 wasn't around their home at all, so I really don't know.
 12:20:47 9 Q Well, during the time you were incarcerated,
 12:20:49 10 did you keep in touch with your mother?
 12:20:51 11 A Yes.
 12:20:51 12 Q Did she come visit you when you were
 12:20:53 13 incarcerated?
 12:20:54 14 A Yes.
 12:20:55 15 Q Did she ever come with him?
 12:20:57 16 A No.
 12:21:02 17 Q And so you don't remember when they got
 12:21:03 18 divorced --
 12:21:04 19 A No.
 12:21:05 20 Q -- whether it was 10 or 20 -- 10 or 15 years?
 12:21:11 21 A I would say so; that's a good fair guess.
 12:21:12 22 Q And when you were young, when you were 10,
 12:21:14 23 when they first got married, when they were dating and
 12:21:17 24 then when they got married, did you do things as a
 12:21:21 25 family?

12:18:50 1 Q So did you consider him your stepfather?
 12:18:57 2 He lived with you from the time you were 10
 12:19:00 3 until you were at least 20 -- or lived in your home from
 12:19:04 4 the time you were 10 until you were at least 20, maybe
 12:19:07 5 25?
 12:19:08 6 A No, not that old.
 12:19:09 7 Q You said 10, 15 years.
 12:19:12 8 A Yeah, so let's -- I'd say 10 years is a safe
 12:19:26 9 estimate.
 12:19:27 10 Q So from the time you were 10 until the time
 12:19:29 11 you were 20, even if you weren't home then, he was
 12:19:32 12 living with your mother --
 12:19:34 13 A Yes --
 12:19:34 14 Q -- or your family at home?
 12:19:35 15 A -- they were together, correct.
 12:19:37 16 Q They were married.
 12:19:37 17 So during the time that you alleged you were
 12:19:41 18 abused by Father Kelly, your mother was married to
 12:19:46 19 [REDACTED] and they were living at home with
 12:19:50 20 you?
 12:19:50 21 A Yes.
 12:20:04 22 Q I take it you never spoke to Mr. [REDACTED]
 12:20:09 23 about any of this, have you? No?
 12:20:13 24 A No, I have not.
 12:20:20 25 Q Were your mother and Mr. [REDACTED] eventually

12:21:27 1 A Not -- not anything -- I would say we went --
 12:21:38 2 we had parties, you know, barbecues maybe. I'm sure we
 12:21:43 3 went to little gatherings, you know, family gatherings
 12:21:45 4 and the sort, I would say.
 12:21:48 5 Q Did your family, and by your family I mean
 12:21:50 6 your sisters and yourself, did you like your mother's
 12:21:55 7 new husband, Mr. [REDACTED]?
 12:22:00 8 A I liked him. He --
 12:22:07 9 Q Did he treat your mother well?
 12:22:07 10 Go ahead, you were going to say something.
 12:22:07 11 A There's one point. He was -- he wasn't
 12:22:09 12 very -- he wasn't fluent at all in English.
 12:22:11 13 Q He spoke Spanish?
 12:22:13 14 A Correct. So there was a barrier there. I
 12:22:15 15 mean, so there wasn't really, "Well, how was school
 12:22:20 16 today, son?" or, you know, stuff like that.
 12:22:21 17 Q Well, you speak Spanish, don't you?
 12:22:23 18 A Yeah, I speak Spanish.
 12:22:26 19 Q Was Spanish your primary language when you
 12:22:28 20 were little?
 12:22:29 21 A No, English.
 12:22:30 22 Q English?
 12:22:34 23 MS. YOUNG: Why don't we take a break. We're
 12:22:35 24 about to run out of tape.
 12:22:45 25 THE VIDEOGRAPHER: We're going off the record.

12:22:46 1 The time is 12:22 p.m. This is the end of Media No. 1.
 12:22:51 2 (Recess.)
 12:27:24 3 THE VIDEOGRAPHER: We're going back on the
 12:27:37 4 record. The time is 12:27 p.m. This is the beginning
 12:27:41 5 of Media No. 2. Please continue.
 12:27:48 6 MS. YOUNG: Thank you.
 12:27:49 7 BY MS. YOUNG:
 12:27:49 8 Q Mr. [REDACTED] where was your mother born?
 12:27:53 9 A Santa Barbara.
 12:27:55 10 Q And so you were born in Santa Barbara as
 12:27:57 11 well --
 12:27:57 12 A Yes.
 12:27:58 13 Q -- is that correct?
 12:27:59 14 Where did she meet Mr. [REDACTED] do you
 12:28:01 15 know?
 12:28:02 16 A I have no idea.
 12:28:05 17 Q Do you know why they were divorced?
 12:28:08 18 A No, I do not.
 12:28:09 19 Q She never talked to you about that?
 12:28:10 20 A No.
 12:28:11 21 Q Did you ever see him mistreat her?
 12:28:14 22 A No.
 12:28:24 23 Q What was Mr. [REDACTED]'s occupation?
 12:28:30 24 A Mostly working in landscape, worked at golf
 12:28:35 25 courses, stuff like that, cutting grass and stuff like

12:29:44 1 A We celebrated Christmas.
 12:29:49 2 Q What other holidays did you celebrate?
 12:29:52 3 Easter?
 12:29:53 4 A Easter, Thanksgiving --
 12:29:57 5 Q So --
 12:29:57 6 A -- Fourth of July.
 12:30:04 7 Q Did your mother -- when you were growing up,
 12:30:10 8 did your mother work outside the home?
 12:30:11 9 A Yes.
 12:30:12 10 Q What was her occupation?
 12:30:14 11 A She was a -- a laborer, just a common laborer.
 12:30:18 12 She worked at -- she worked at -- laundries is where she
 12:30:24 13 worked at, laundry and dry cleaners is what she did.
 12:30:29 14 Q Do you remember any specific dry cleaner or
 12:30:32 15 laundry for which she worked?
 12:30:33 16 A She worked at [REDACTED]
 12:30:37 17 Q When was that?
 12:30:42 18 Or how old were you?
 12:30:44 19 A I was young when she worked there at [REDACTED]
 12:30:45 20 [REDACTED] It was right around the corner from our Lady of
 12:30:52 21 Guadalupe church, as a matter of fact. I was young. I
 12:30:56 22 don't know exactly the years that she worked there.
 12:30:58 23 Q But did she work continuously the entire time
 12:31:02 24 you were growing up?
 12:31:03 25 A She always worked.

12:28:39 1 that.
 12:28:42 2 Q For golf courses, did he have an employer?
 12:28:45 3 A Well, he worked at two golf courses that I
 12:28:47 4 knew of.
 12:28:49 5 Q Which ones were those?
 12:28:52 6 A I think one is called The Valley Club in
 12:28:56 7 Montecito.
 12:28:56 8 Q That's a nice one.
 12:28:59 9 A And the other --
 12:28:56 10 THE REPORTER: Pardon me?
 12:29:00 11 MS. YOUNG: That's a nice one.
 12:29:02 12 THE WITNESS: And then another one was a
 12:29:03 13 University Village out next to Isla Vista, out there.
 12:29:08 14 BY MS. YOUNG:
 12:29:09 15 Q So was he employed by the golf courses or --
 12:29:12 16 A Yes.
 12:29:12 17 Q -- was he -- yes?
 12:29:14 18 A Yes, yes.
 12:29:15 19 Q And Mr. [REDACTED] what was his occupation?
 12:29:19 20 A I don't know what he did for a living.
 12:29:28 21 Q When you were growing up, say, let's say when
 12:29:32 22 Mr. [REDACTED] was living with you when you were 10 or
 12:29:35 23 11, did you have a Christmas tree every Christmas?
 12:29:39 24 A Yes.
 12:29:40 25 Q Celebrated the holidays together as a family?

12:31:04 1 Q She -- at home --
 12:31:06 2 A She always worked.
 12:31:07 3 Q She always worked?
 12:31:08 4 A Correct.
 12:31:08 5 Q Did she work full-time?
 12:31:09 6 A She always worked full-time.
 12:31:12 7 Q During the day?
 12:31:12 8 A During the day, correct.
 12:31:13 9 Q Was she home when you got home from school or
 12:31:17 10 was she still working?
 12:31:18 11 A She was still working.
 12:31:20 12 Q So who was home in your house when you used to
 12:31:22 13 get home from school as a little kid when you were in
 12:31:24 14 grade school?
 12:31:25 15 A My Aunt [REDACTED] was always there.
 12:31:27 16 Q You said before your Aunt [REDACTED] had a life
 12:31:29 17 of her own or something like that.
 12:31:32 18 A Yes. Well --
 12:31:32 19 Q What did that mean?
 12:31:33 20 A Well, my Aunt [REDACTED] she always had her own
 12:31:42 21 separate room, and she'd -- she'd come out and cook,
 12:31:46 22 take care of her father a little bit, but --
 12:31:49 23 Q Her father was your mother's --
 12:31:51 24 A My grandfather, correct.
 12:31:52 25 Q -- your mother's father also?

12:31:54 1 A Correct.
 12:31:55 2 And --
 12:31:56 3 Q Did she have children?
 12:31:57 4 A She had one boy, [REDACTED].
 12:31:58 5 Q That was your cousin?
 12:32:01 6 A Yes.
 12:32:01 7 Q Was he the one that you used to go see in jail
 12:32:04 8 in Ventura?
 12:32:05 9 A No.
 12:32:05 10 Q That was a different cousin?
 12:32:07 11 A That was a woman; correct.
 12:32:09 12 Q A woman cousin?
 12:32:10 13 A Yes.
 12:32:10 14 Q What did she -- the woman cousin, what was her
 12:32:13 15 name?
 12:32:14 16 A Her name was [REDACTED].
 12:32:17 17 Q [REDACTED] who?
 12:32:18 18 A Same last name, [REDACTED].
 12:32:20 19 Q [REDACTED]?
 12:32:21 20 A Yeah.
 12:32:21 21 Q What did she do to get herself in jail?
 12:32:24 22 A She -- I -- I don't know what she -- on that
 12:32:27 23 occasion, I don't know.
 12:32:28 24 Q She was in jail on more than one occasion?
 12:32:30 25 A I'd say so, yes.

12:33:41 1 your birth father, [REDACTED], what his occupation
 12:33:45 2 is?
 12:33:47 3 A I have no idea.
 12:33:49 4 Q And you've never spoken to him?
 12:33:51 5 A No.
 12:33:52 6 Q Ever?
 12:33:53 7 A Never, ever.
 12:33:53 8 Q Never wanted to try to go --
 12:33:55 9 A I've tried.
 12:33:56 10 Q -- see him?
 12:33:56 11 A I've tried looking on the internet for, you
 12:33:59 12 know, find people fast. I think there's a website on
 12:34:02 13 the internet. I've tried that.
 12:34:04 14 Q So you have tried to locate him?
 12:34:07 15 A Yeah, I mean as far as I could go. I mean
 12:34:09 16 when they come up with -- I mean there's a bunch of [REDACTED]
 12:34:12 17 [REDACTED] and one time I wrote a bunch of letters to
 12:34:15 18 all of these [REDACTED].
 12:34:18 19 And I got a couple of responses. And one
 12:34:20 20 young [REDACTED] from Puerto Rico said there's a
 12:34:21 21 bunch of [REDACTED] in Puerto Rico and, you know, he
 12:34:27 22 wished me luck and, you know -- but I never came in
 12:34:31 23 contact with anybody that fit the age span.
 12:34:35 24 Q When you first -- when was the first time you
 12:34:38 25 tried to look for him? Is it recently or was it --

12:32:31 1 Q Was it drugs, drug-related?
 12:32:34 2 A You know, once again, I don't know exactly
 12:32:36 3 what she was in there for, but that's my assumption.
 12:32:40 4 Q That it was drug-related?
 12:32:42 5 A Correct.
 12:32:42 6 Q How old was she at the time?
 12:32:46 7 A At the time of what?
 12:32:47 8 Q When she was in jail when you went to visit
 12:32:49 9 her.
 12:32:54 10 A I don't know. I think [REDACTED] is maybe -- she
 12:33:00 11 might be five years older than me, so she might have
 12:33:03 12 been 20, maybe.
 12:33:04 13 Q Where is [REDACTED] now?
 12:33:06 14 A She is in Santa Barbara.
 12:33:10 15 Q Is she out of trouble?
 12:33:15 16 A I think so.
 12:33:16 17 Q You don't know, do you?
 12:33:18 18 A Well, I mean she -- she lives in her apartment
 12:33:19 19 and she's living in society, she's not in jail, so I --
 12:33:22 20 I would think she's out of trouble.
 12:33:25 21 Q And is she married?
 12:33:26 22 A No.
 12:33:30 23 Q So her name is still [REDACTED]?
 12:33:32 24 A Yes.
 12:33:38 25 Q Do you know what your birth father, if he is

12:34:46 1 A This was probably, I would be willing to say,
 12:34:48 2 around 1997.
 12:34:52 3 Q So it was after you were --
 12:34:54 4 A Yeah.
 12:34:57 5 Q -- clean and sober?
 12:34:58 6 A Yeah. Yes.
 12:35:01 7 Q Did your family -- when you were growing up as
 12:35:04 8 a boy in grade school, say, did your family ever have
 12:35:08 9 financial difficulties?
 12:35:11 10 A I don't know. There was always food on the
 12:35:14 11 table. We always had a nice place to stay. So I don't
 12:35:21 12 know. I don't know what the financial situation was,
 12:35:24 13 but it was okay.
 12:35:32 14 Q So to the best of your knowledge, your -- your
 12:35:35 15 family was never on welfare or other type of aid, state
 12:35:43 16 aid?
 12:35:45 17 MR. HALE: Misstates testimony.
 12:35:48 18 BY MS. YOUNG:
 12:35:49 19 Q Or do you know whether your family was ever on
 12:35:52 20 welfare?
 12:35:52 21 A There's two occasions. One time -- now this
 12:35:59 22 is just what I hear. My grandfather, I guess there was
 12:36:02 23 no money during the Depression, and he used to work and
 12:36:05 24 they used to pay him with little food coupons.
 12:36:09 25 Q But when you say "during the Depression," that

12:36:11 1 was before you were born.
 12:36:12 2 A Yes.
 12:36:12 3 Q No, I'm talking about --
 12:36:13 4 A Oh, during my lifetime.
 12:36:15 5 Q During your childhood.
 12:36:16 6 A Oh.
 12:36:17 7 Okay. My mother was on welfare one time.
 12:36:22 8 Q And when was that?
 12:36:24 9 A I don't exactly know, ma'am.
 12:36:27 10 Q Do you remember how old you were?
 12:36:28 11 A I don't even know if I was alive. Well, see,
 12:36:31 12 I don't even know if I was alive, but she's told me this
 12:36:33 13 story a couple times, because -- because she's -- other
 12:36:38 14 than that one little space in time, she's worked all her
 12:36:42 15 life. And it was a -- I don't know if it was a month.
 12:36:46 16 It was a really short period. And, you know, it was a
 12:36:56 17 one time.
 12:36:56 18 Q Did she say she lost her job or she couldn't
 12:36:59 19 work because she was disabled or some other reason?
 12:37:01 20 A You know, I don't even know if we got in --
 12:37:04 21 she never really told me the exact specifics of it, but
 12:37:06 22 she told me she was on welfare for a really short period
 12:37:10 23 one time and --
 12:37:11 24 Q When did she tell you that?
 12:37:15 25 A She's told me a couple times.

12:38:44 1 Yeah, I don't.
 12:38:45 2 Q Did you ever get evicted during that time
 12:38:47 3 period from a -- a -- a place that you were living?
 12:38:54 4 A My sense is that my grandfather always -- he
 12:38:59 5 always provided, he always worked, and so as far as
 12:39:02 6 eviction, I'd be willing to put my last dollar that that
 12:39:07 7 never happened to our family.
 12:39:07 8 Q What did your grandfather do --
 12:39:09 9 A He worked --
 12:39:10 10 Q -- for work?
 12:39:11 11 A He was a gardener also. He worked at Manning
 12:39:14 12 Park up in Montecito for a long time. But he was there
 12:39:21 13 every day, every day. He was just --
 12:39:24 14 Q When you say he was there every day --
 12:39:26 15 A You know, for work --
 12:39:27 16 Q -- five days a week?
 12:39:27 17 A You know, for work, yeah.
 12:39:29 18 Q Five days a week?
 12:39:30 19 A Correct.
 12:39:30 20 Q So was he off on the weekends?
 12:39:32 21 A Yes.
 12:39:33 22 Q Saturday and Sunday, he was off?
 12:39:34 23 A Yes.
 12:39:34 24 Q What about your mother, she worked every day
 12:39:38 25 five days a week?

12:37:17 1 Q And when was the first time she told you that?
 12:37:21 2 A It had to be after 1995. Because prior to
 12:37:26 3 that, I mean we didn't -- we weren't doing a heck of a
 12:37:30 4 lot of talking.
 12:37:32 5 Q Now, in the -- in your answers that you
 12:37:34 6 provided to us to the interrogatories, to those
 12:37:36 7 questions that you signed, it showed that you moved
 12:37:41 8 quite a lot when you were in kindergarten, you had about
 12:37:45 9 three different residences and then when you were in
 12:37:47 10 first to second grade.
 12:37:50 11 A Uh-huh.
 12:37:52 12 Q Why --
 12:37:53 13 A Yes, that's true.
 12:37:53 14 Q -- was that? Do you know why you moved so
 12:37:55 15 much?
 12:37:55 16 A I have no idea.
 12:38:01 17 Q You don't know?
 12:38:04 18 A No, I do not.
 12:38:12 19 Q And your mother never explained to you why you
 12:38:15 20 would move almost every year?
 12:38:23 21 A No.
 12:38:24 22 Q What did she say to you, "We're moving, pack
 12:38:26 23 up?"
 12:38:32 24 A I can't recall anybody ever saying anything
 12:38:35 25 specific about -- I don't recall anything, really.

12:39:38 1 A I would say so, yeah.
 12:39:39 2 Q Was she off on the weekends?
 12:39:41 3 A I -- I -- I'm pretty sure, yeah.
 12:39:51 4 Q Would you say you were close to your mother
 12:39:52 5 growing up? When I say "growing up," again I'm talking
 12:39:58 6 about grade school.
 12:40:02 7 A I think I was as close as any -- any of my
 12:40:05 8 friends, I would think. I mean, I -- I don't really
 12:40:08 9 have -- I don't think I had anything to compare it to.
 12:40:13 10 Q Were you close to your sisters growing up?
 12:40:15 11 A My sister [redacted] lived with us. [redacted] did not.
 12:40:19 12 Q And remind me, which was the older sister?
 12:40:23 13 A [redacted]
 12:40:23 14 Q And when you say "[redacted] did not," where did
 12:40:27 15 [redacted] live?
 12:40:28 16 A [redacted] lived with her dad, with [redacted] and his
 12:40:32 17 parents.
 12:40:33 18 Q So she's your half-sister?
 12:40:35 19 A Yes.
 12:40:36 20 Q You have the same mother, different father?
 12:40:38 21 A Correct.
 12:40:40 22 Q And [redacted]?
 12:40:43 23 A Same thing.
 12:40:43 24 Q Same mother, different father.
 12:40:45 25 Who was [redacted] s father?

12:40:50 1 A His name was [REDACTED]
 12:40:56 2 Q How do you spell the last name?
 12:40:57 3 A [REDACTED]
 12:41:00 4 Q And your mother was never married to him?
 12:41:05 5 A I do not think so. That was a little before
 12:41:10 6 my time, kind of.
 12:41:13 7 Q How old is [REDACTED]?
 12:41:16 8 A [REDACTED] is two years older than me, so she's at
 12:41:20 9 least 53 right now.
 12:41:2110 Q So she was born two years before you were and
 12:41:2711 you don't know -- do you know anything about your
 12:41:3012 mother's relationship with this [REDACTED]?
 12:41:3313 A No.
 12:41:3414 Q Did you ever meet [REDACTED]?
 12:41:3815 A No.
 12:41:4216 Q Do you know whether [REDACTED] ever met Mr. [REDACTED]
 12:41:4617 her father?
 12:41:4918 A I do not know.
 12:41:5819 Q Do you know where Mr. [REDACTED] lives now?
 12:42:0120 A I don't think he's alive anymore, I don't
 12:42:0321 think.
 12:42:0522 Q Do you know how your mother met him?
 12:42:0823 A (Inaudible response.) It was before my time.
 12:42:1124 Q Do you know whether she had a relationship
 12:42:1325 with him or whether it was a --

12:43:47 1 A When they got married?
 12:43:49 2 Q Yes.
 12:43:50 3 A Yeah, see, I don't know if she was before --
 12:43:53 4 you know, they got married after she was born already.
 12:43:56 5 I don't know.
 12:43:59 6 Q Well, in 1962 you were already about seven --
 12:44:05 7 A Uh-huh.
 12:44:05 8 Q -- correct?
 12:44:06 9 So [REDACTED] was about five at that point in time?
 12:44:1510 A Yeah. She's 49. She's two years younger than
 12:44:1811 I am.
 12:44:2212 Q So you don't know if your mother met
 12:44:2513 Mr. [REDACTED] --
 12:44:3014 A I -- I really don't.
 12:44:3115 Q -- a long time ago -- before 1962?
 12:44:3416 A I don't.
 12:44:4617 Q Where does [REDACTED] live today?
 12:44:5218 A She lives in the San Joaquin Valley. I think
 12:44:5519 in Le-- Lemoore, I think, California.
 12:45:0020 Q Is she married?
 12:45:0121 A I think she is.
 12:45:0322 Q You think she is?
 12:45:0423 A I'm pretty sure I seen a wedding ring. I mean
 12:45:0924 I haven't seen her for a little while.
 12:45:1225 Q When was the last time you saw her?

12:42:14 1 A I don't know.
 12:42:19 2 Q You don't know?
 12:42:19 3 A No.
 12:42:19 4 Q So you said since [REDACTED] lived with you, you
 12:42:22 5 were closer to [REDACTED]?
 12:42:24 6 A Yeah, we were; uh-huh, yes.
 12:42:25 7 Q But I take it you never told her anything
 12:42:28 8 about Father Kelly, I mean back then, when you were
 12:42:32 9 growing up?
 12:42:3310 A No.
 12:42:3711 Q And [REDACTED] lived with her father, [REDACTED]
 12:42:4512 [REDACTED]?
 12:42:4513 A Yes.
 12:42:4814 Q And how old -- how much older -- I mean how
 12:42:5215 much younger is [REDACTED] than you?
 12:42:5516 A I think she's two years younger than me.
 12:42:5817 Q So --
 12:42:5918 A So she's probably 49 right now, I would think.
 12:43:0319 Q So was [REDACTED] born when your mother was married
 12:43:0520 to Mr. [REDACTED]?
 12:43:1021 A I don't know.
 12:43:1422 Q You mentioned earlier that it was about 1962
 12:43:1923 when your mother married Mr. [REDACTED] which would place
 12:43:3824 [REDACTED] if she's two years younger than you are, already
 12:43:4425 a little girl at that point in time.

12:45:13 1 A Maybe a couple years ago.
 12:45:15 2 Q So you don't keep in regular touch with her?
 12:45:18 3 A No.
 12:45:18 4 Q Is there some feud between the two of you?
 12:45:21 5 A Not between me and her.
 12:45:24 6 Q Between who?
 12:45:31 7 A [REDACTED] sometimes has a hard time with [REDACTED]
 12:45:35 8 so that's where the problem is --
 12:45:37 9 Q In what way?
 12:45:3710 A -- right there.
 12:45:4011 Well, I think [REDACTED]
 12:45:4512 [REDACTED] I think, is my judgment. I
 12:45:5013 mean I don't know if that's reality. I don't know
 12:45:5214 because I don't know actually what [REDACTED]
 12:45:5615 But there's always been periods with [REDACTED]
 12:46:0216 [REDACTED] And then she
 12:46:0417 comes back around and [REDACTED]
 12:46:0518 [REDACTED]
 12:46:0919 Q Has she ever had, to your knowledge, any
 12:46:1220 psychological problems that caused her to be seen, if
 12:46:1721 you know?
 12:46:1722 A I don't know.
 12:46:1923 Q Has she ever been in trouble, to your
 12:46:2124 knowledge?
 12:46:2225 A Not to my knowledge, no.

12:46:23 1 Q And what about your older sister, [REDACTED] has
 12:46:26 2 she ever been in trouble?
 12:46:27 3 A She's been in trouble one time.
 12:46:28 4 Q And what was that involvement?
 12:46:31 5 A She was [REDACTED]
 12:46:35 6 Q How old was she?
 12:46:50 7 A She might have been maybe 39, maybe, late 30s.
 12:46:58 8 Q So at that point in time, you were about 37?
 12:47:06 9 A No, that's incorrect.
 12:47:08 10 Q Is she two years older than you, did you say?
 12:47:11 11 A She's two years older than I am.
 12:47:12 12 Q So how old were you when [REDACTED]
 12:47:15 13 A I tell you I really did good in math in
 12:47:17 14 school, okay.
 12:47:18 15 Q I believe you.
 12:47:21 16 A Well, let me -- let me -- let me see if we can
 12:47:24 17 get the time line here.
 12:47:27 18 When I was 40 years old, which was in 1995,
 12:47:34 19 she had just gone in [REDACTED]
 12:47:38 20 [REDACTED] so --
 12:47:39 21 Q In the what?
 12:47:40 22 A [REDACTED]
 12:47:42 23 [REDACTED]
 12:47:43 24 Q I'm sorry, but I don't know.
 12:47:46 25 A Okay. It's [REDACTED] that -- not for

12:48:26 1 You never talked to her about it?
 12:48:29 2 A No.
 12:48:29 3 Q And [REDACTED]
 12:48:33 4 A I think -- you know, she was [REDACTED]
 12:48:38 5 [REDACTED] I believe. So she might have
 12:48:41 6 got [REDACTED]
 12:48:44 7 [REDACTED]
 12:48:44 8 Q And this was [REDACTED] did you say?
 12:48:48 9 A Around that period.
 12:48:49 10 Q Around [REDACTED]
 12:48:55 11 A Yeah.
 12:48:55 12 Q And you have no knowledge as to whether she
 12:48:55 13 was ever involved with [REDACTED]
 12:48:57 14 A I --
 12:48:57 15 Q -- either [REDACTED]
 12:48:59 16 A I -- no.
 12:49:00 17 Q You don't know?
 12:49:02 18 A I don't -- I don't know for sure, but my
 12:49:04 19 suspicion is it wasn't, because she's never been that
 12:49:07 20 kind of person to get involved in stuff like that, so...
 12:49:12 21 Q So how did she get involved with it this time,
 12:49:14 22 then?
 12:49:15 23 A I don't know. I don't know. But I'm pretty
 12:49:19 24 sure, you know, [REDACTED] I'm sure.
 12:49:23 25 Q Is she married?

12:47:49 1 [REDACTED]
 12:47:51 2 Q A [REDACTED]
 12:47:51 3 A Yeah, it's a [REDACTED] yeah, you know, you
 12:47:54 4 get out and pick the flowers --
 12:47:56 5 Q Oh.
 12:47:56 6 A -- and feed the animals and cats and kind of
 12:47:58 7 stuff like that.
 12:47:59 8 Q Sounds good.
 12:48:00 9 A So it was her first time and her last time,
 12:48:02 10 basically.
 12:48:03 11 Q So that was her first time and last time?
 12:48:05 12 A That was her first and last time.
 12:48:07 13 Q Now how did she get involved [REDACTED] do
 12:48:08 14 you know?
 12:48:09 15 A I do not know.
 12:48:11 16 Q What was she -- what was [REDACTED]
 12:48:13 17 A She was [REDACTED]
 12:48:15 18 Q [REDACTED]
 12:48:16 19 A Yes.
 12:48:17 20 Q Do you know whether she [REDACTED]
 12:48:19 21 A I do not -- I don't know, but my suspicion is
 12:48:22 22 she [REDACTED]
 12:48:24 23 Q So where [REDACTED]
 12:48:25 24 A Oh, I don't know.
 12:48:26 25 Q You don't know.

12:49:24 1 A We talked about that.
 12:49:25 2 Q What?
 12:49:25 3 A [REDACTED]
 12:49:28 4 You know, [REDACTED]
 12:49:31 5 Q Was your sister married at the time?
 12:49:34 6 A No.
 12:49:36 7 Q And you say [REDACTED]
 12:49:39 8 [REDACTED]
 12:49:40 9 Did she have regular job at that time?
 12:49:42 10 A She did.
 12:49:43 11 Q And what did she do?
 12:49:44 12 A She did [REDACTED]
 12:49:45 13 Q She did what?
 12:49:46 14 A [REDACTED]
 12:49:47 15 Q [REDACTED]
 12:49:47 16 A Yes.
 12:49:47 17 Q -- for [REDACTED]
 12:49:49 18 A [REDACTED]
 12:49:49 19 Q -- individual?
 12:49:51 20 A No, she had a [REDACTED]
 12:49:52 21 Q She had a [REDACTED] What was it
 12:49:52 22 called?
 12:49:53 23 A I don't know.
 12:49:56 24 Q So when she had [REDACTED] she
 12:49:58 25 [REDACTED]

12:50:01 1 A Yes.
 12:50:05 2 Q What does she do today?
 12:50:08 3 A She works at [REDACTED] which is
 12:50:11 4 an [REDACTED]
 12:50:17 5 [REDACTED] and --
 12:50:18 6 Q What does she do for them?
 12:50:20 7 A She works on [REDACTED] that they install
 12:50:24 8 [REDACTED] and sort of operation.
 12:50:30 9 Q Is it like an assembly-line-type job or --
 12:50:33 10 A I think so, yeah; yeah.
 12:50:34 11 Q Did your sister attend school?
 12:50:38 12 A Yes.
 12:50:38 13 Q Did she get a degree?
 12:50:40 14 A A degree for --
 12:50:42 15 Q [REDACTED] Any -- high school degree?
 12:50:45 16 A I'm pretty sure she graduated from high
 12:50:47 17 school.
 12:50:47 18 Q And what about post-high school, anything?
 12:50:50 19 A I don't think she did any college or anything
 12:50:52 20 like that, no.
 12:50:52 21 Q What about your younger sister?
 12:50:54 22 A No.
 12:50:55 23 Q No high school?
 12:50:56 24 A I don't know if she graduated from high
 12:50:57 25 school, but I know she didn't go to college.

12:52:32 1 [REDACTED]
 12:52:38 2 [REDACTED]
 12:52:39 3 Did you have any other relatives that were in
 12:52:42 4 trouble with the law when you were growing up?
 12:52:48 5 A I -- [REDACTED] had an older brother, [REDACTED]
 12:52:51 6 Q So he was your [REDACTED]
 12:52:53 7 [REDACTED] was --
 12:52:54 8 A Yes.
 12:52:54 9 Q -- his last name [REDACTED] as well?
 12:52:58 10 A Yes.
 12:52:58 11 Q Was he older than you or younger than --
 12:53:01 12 A Yes --
 12:53:02 13 Q -- you?
 12:53:02 14 A -- he's older than me.
 12:53:03 15 Q How much older?
 12:53:12 16 A I would be guessing. He's -- he's -- I know
 12:53:15 17 he's older than [REDACTED] So she's about five years older
 12:53:20 18 than me so I don't know if he's six, seven. I don't
 12:53:22 19 know.
 12:53:23 20 Q Okay.
 12:53:23 21 So what -- when did [REDACTED] -- what was
 12:53:26 22 [REDACTED]'s problem with the law?
 12:53:29 23 A [REDACTED] got in a fight with somebody, and this
 12:53:35 24 is when I was young -- he got in a fight with somebody
 12:53:38 25 and that person died and then [REDACTED] went to court

12:51:00 1 Q And you don't know whether she graduated from
 12:51:02 2 high school?
 12:51:03 3 A I do not know.
 12:51:04 4 Q How long did she live with your -- her father,
 12:51:06 5 your -- Mr. [REDACTED]? Until she was how old?
 12:51:14 6 A Pretty much all her life.
 12:51:16 7 Q All her life --
 12:51:17 8 A Correct.
 12:51:17 9 Q -- she lived with him?
 12:51:19 10 A Yeah.
 12:51:20 11 Q So she's kept in touch with him?
 12:51:22 12 A Well, in the beginning, they lived -- they
 12:51:24 13 lived in a household. His parents lived in the front
 12:51:29 14 house and he lived in the back. I'm pretty sure [REDACTED]
 12:51:32 15 lived in the front house with the grandparents. So
 12:51:35 16 that -- she lived there pretty much all her growing up.
 12:51:43 17 Q Do you have any other siblings other than your
 12:51:45 18 two sisters?
 12:51:46 19 A Not that I know of.
 12:52:05 20 Q Has anyone in your family objected to your
 12:52:08 21 filing this lawsuit?
 12:52:12 22 A No. At least I don't believe so. Nobody has
 12:52:22 23 expressed anything to me.
 12:52:24 24 Q Now, you mentioned that your younger sis -- I
 12:52:27 25 mean your older sister once [REDACTED]

12:53:42 1 and --
 12:53:43 2 Q You mean he was accused of murder?
 12:53:45 3 A Yeah. And he went to a -- or, you know what,
 12:53:48 4 I don't even know. I can't -- that's not a good answer.
 12:53:52 5 Q How old were you when this happened?
 12:54:02 6 A I was maybe 11, maybe.
 12:54:09 7 Q Did [REDACTED] and his sister at the time live
 12:54:13 8 with their parents?
 12:54:14 9 A Yes.
 12:54:15 10 Q Mother and father?
 12:54:15 11 A Yes.
 12:54:16 12 Q They had a mother and father?
 12:54:17 13 A Yes.
 12:54:17 14 Q And they lived in Santa Barbara also?
 12:54:20 15 A Yes.
 12:54:20 16 Q So you knew them growing up? I mean they were
 12:54:27 17 part of your family gathering?
 12:54:30 18 A Yeah, they're family, correct.
 12:54:31 19 Q So [REDACTED] -- did [REDACTED] go to jail for this
 12:54:33 20 whatever he was accused of in connection --
 12:54:37 21 A He went to jail --
 12:54:38 22 Q -- with this man's death?
 12:54:38 23 A He went to jail and then he went to court and
 12:54:41 24 they acquitted him.
 12:54:41 25 Q So they -- he was never convicted --

12:54:43 1 A Correct.
 12:54:44 2 Q -- is that what you're saying?
 12:54:46 3 So then what -- was [REDACTED] ever in trouble
 12:54:48 4 again?
 12:54:48 5 A I think -- yes, he was.
 12:54:55 6 Q What --
 12:54:55 7 A I think he did some time.
 12:54:55 8 Q What did he do next?
 12:54:55 9 A I think he [REDACTED], I
 12:54:5710 believe.
 12:54:5811 Q How old were you then?
 12:55:0612 A I don't know, maybe -- you know what, I don't
 12:55:0913 know.
 12:55:1014 Q Well, you were older than 11?
 12:55:1215 A Yeah.
 12:55:1216 Q So was it 12, 13?
 12:55:1917 A I don't really recall when he disappeared. I
 12:55:2218 mean we -- we weren't neighbors families. I mean, you
 12:55:2419 know, they always lived away from us.
 12:55:2920 Q You mean you didn't live in the same house?
 12:55:3121 A No, no, they always --
 12:55:3222 Q But they lived in Santa Barbara, in the same
 12:55:3623 city?
 12:55:3624 A He lived in Santa Barbara, correct.
 12:55:3825 Q And his -- how are you related? His mother

12:56:27 1 pretty sure.
 12:56:28 2 Q And where is he now?
 12:56:29 3 A He lives in Washington.
 12:56:30 4 Q The state of Washington?
 12:56:33 5 A The state of Washington.
 12:56:34 6 Q Is he married?
 12:56:36 7 A I do not know.
 12:56:38 8 Q I take it you don't keep in touch with him?
 12:56:40 9 A No.
 12:56:4010 Q Do you keep in touch with [REDACTED]
 12:56:4211 A No.
 12:56:4412 Q And then there's [REDACTED] Is [REDACTED] older?
 12:56:4813 A [REDACTED] was about three years older than me.
 12:56:5314 Q Now, was [REDACTED] in trouble with the law also?
 12:56:5515 A [REDACTED] has been in trouble with the law also.
 12:56:5816 Q And what was the first thing you remember
 12:57:0217 [REDACTED] did to get himself in trouble with the law?
 12:57:0818 A I don't really recall with [REDACTED]
 12:57:0919 Q But he's been in trouble with the law?
 12:57:1220 A Yeah, he's been in trouble --
 12:57:1321 Q Ongoing?
 12:57:1422 A -- a few times, yeah.
 12:57:1523 Q What types of trouble?
 12:57:1724 A Just drinking and drug trouble.
 12:57:1925 Q Drinking and drugs?

12:55:40 1 was your mother's --
 12:55:41 2 A His dad and my mother are siblings.
 12:55:44 3 Q Brother and sister?
 12:55:44 4 A Yes.
 12:55:46 5 Q Was his dad ever in trouble?
 12:55:48 6 A No.
 12:55:48 7 Q His parents were never in trouble?
 12:55:50 8 A Never in trouble.
 12:55:51 9 Q Just him?
 12:55:5210 A Correct.
 12:55:5211 Q And his sister? Did they have any other
 12:55:5412 siblings?
 12:55:5513 A They had other siblings. [REDACTED]
 12:56:0214 Q Well, let's -- before we get to [REDACTED] let's
 12:56:0315 go back to [REDACTED] for a minute.
 12:56:0516 A Okay.
 12:56:0517 Q So you have the thing in connection with the
 12:56:0818 man's death and then there was the armed robbery. Did
 12:56:1119 he serve time for the armed robbery?
 12:56:1320 A He did.
 12:56:1321 Q So he was convicted of that?
 12:56:1522 A Yes.
 12:56:1923 Q And did he do something else that got him in
 12:56:2224 trouble after the armed robbery?
 12:56:2425 A I think that's where it stopped for him. I'm

12:57:21 1 A Yeah.
 12:57:21 2 Q And he's three years older than you are?
 12:57:24 3 A Yes, he was.
 12:57:25 4 Q He's no longer alive?
 12:57:26 5 A He's no longer alive.
 12:57:32 6 Q What happened to him?
 12:57:32 7 A He -- he drank himself to death, basically.
 12:57:35 8 Q How old were you when that happened?
 12:57:37 9 A That was since I've -- since '95.
 12:57:3910 Q Oh.
 12:57:4011 So when is the -- how old were you the first
 12:57:4312 time you remember [REDACTED] getting himself in trouble?
 12:57:4713 A I don't really recall.
 12:57:4814 Q Were you a child?
 12:57:4815 A Had to be when I was -- I don't really recall.
 12:57:5116 [REDACTED] wasn't anything -- you know, [REDACTED] who was in
 12:57:5717 the newspaper, all the family was talking about it, so,
 12:58:0018 you know, I remember that.
 12:58:0219 And then when he got in trouble again, I
 12:58:0420 remember that, but [REDACTED] really -- he was really
 12:58:0921 nothing spectacular that anybody talked about. So I
 12:58:1322 really don't recall when he first got in trouble.
 12:58:1623 Q Drinking and drugs, you said, was his problem?
 12:58:1824 A Yes.
 12:58:2025 Q You were a child when he first got in trouble,

12:58:22 1 then?
 12:58:23 2 A I don't -- I don't recall when he first got in
 12:58:25 3 trouble. I'm sorry.
 12:58:27 4 Q Any other siblings in that family?
 12:58:29 5 A Yes.
 12:58:32 6 Q Who else?
 12:58:34 7 A [REDACTED]
 12:58:35 8 Q Was she in trouble with the law too?
 12:58:37 9 A She's never been in trouble.
 12:58:39 10 Q Good.
 12:58:39 11 Who else?
 12:58:40 12 A Yeah. [REDACTED]
 12:58:42 13 Q Has she ever been in trouble --
 12:58:45 14 A Never been in trouble.
 12:58:46 15 Q Only the boys?
 12:58:47 16 A And then [REDACTED]
 12:58:49 17 Q Is that a boy or a girl?
 12:58:50 18 A [REDACTED] is a boy.
 12:58:57 19 Q He was in trouble, too?
 12:59:02 20 A You know, I don't -- I don't -- I don't know
 12:59:03 21 if [REDACTED] was ever in trouble.
 12:59:06 22 Q How old is -- is [REDACTED] older than you or
 12:59:08 23 younger than you?
 12:59:09 24 A [REDACTED] is younger than me.
 12:59:16 25 Q By how much?

13:00:21 1 Any other siblings in that family?
 13:00:27 2 A [REDACTED] is the youngest.
 13:00:29 3 Q And how much younger is [REDACTED] than you?
 13:00:36 4 A I think [REDACTED] is maybe -- he might be 44
 13:00:42 5 right now, maybe. He was pretty close to Ronnie.
 13:00:49 6 Q And was [REDACTED] ever in trouble?
 13:00:52 7 A [REDACTED]'s pretty much been in trouble all his
 13:00:54 8 life.
 13:00:55 9 Q What kind of trouble?
 13:00:57 10 A Just petty, just drinking in public --
 13:01:00 11 Q Drugs?
 13:01:00 12 A Drugs, maybe some marijuana or something like
 13:01:06 13 that.
 13:01:06 14 Q Has he been in jail for those things?
 13:01:09 15 A Yes.
 13:01:10 16 Q So he's -- you say he's been in trouble all
 13:01:14 17 his life. Is that still getting in trouble?
 13:01:19 18 A I don't know if he's getting in trouble today.
 13:01:21 19 I don't know.
 13:01:21 20 Q But when you were growing up, he was getting
 13:01:24 21 in trouble?
 13:01:26 22 A Yes.
 13:01:30 23 Q And his last name is [REDACTED] also?
 13:01:31 24 A Yes.
 13:01:32 25 Q Any other kids in that family?

12:59:19 1 A Maybe [REDACTED] would have been maybe 45 now if
 12:59:23 2 he was still alive.
 12:59:25 3 Q And how did he die?
 12:59:27 4 A He was up in the mountains with a bunch of
 12:59:29 5 friends and they were drinking and a guy came up from
 12:59:33 6 behind that had something against [REDACTED] and he stabbed
 12:59:36 7 him. And by the time they got back to town, [REDACTED] was
 12:59:40 8 dead.
 12:59:41 9 Q Was he in a gang, [REDACTED] ?
 12:59:42 10 A No, they were just up there just drinking.
 12:59:44 11 Q This was somebody he knew --
 12:59:46 12 A Yes.
 12:59:46 13 Q -- that stabbed him?
 12:59:48 14 A Yes, it was an older -- older fella.
 12:59:50 15 Q How old were you when that happened?
 12:59:54 16 A I think I was maybe in my 20s already, I
 12:59:56 17 think.
 12:59:58 18 Q Your early 20s or...
 13:00:00 19 A Early 20s. I think I was in the youth
 13:00:02 20 authority by then.
 13:00:08 21 Q And do you remember [REDACTED] getting in trouble
 13:00:08 22 before that or didn't you know?
 13:00:17 23 A I don't think [REDACTED] was -- I don't know if he
 13:00:19 24 was in trouble at all.
 13:00:21 25 Q Okay.

13:01:34 1 A No.
 13:01:34 2 Q That's it. That's good thing.
 13:01:38 3 A That was the one big family.
 13:01:40 4 Q Otherwise we would be here for another week.
 13:01:54 5 Now, was your mother close to your -- to her
 13:01:57 6 brother, the one who raised [REDACTED] and [REDACTED] and
 13:02:01 7 [REDACTED] and [REDACTED] and...
 13:02:04 8 A I would say so.
 13:02:06 9 Q They were close?
 13:02:06 10 A I would say so.
 13:02:07 11 Q So was your -- did you ever see your mother or
 13:02:14 12 hear your mother upset because all of her brother's kids
 13:02:16 13 were getting in -- well, not all of her brother's kids,
 13:02:19 14 but the boys were getting in trouble?
 13:02:21 15 A No.
 13:02:22 16 Q No?
 13:02:24 17 A No.
 13:02:24 18 Q Did you discuss it as a family when you were
 13:02:27 19 young while this was happening?
 13:02:34 20 A No -- no.
 13:02:38 21 Q So would it be fair to say that you weren't
 13:02:40 22 the first one in your family to get in trouble?
 13:02:47 23 A That would be very accurate. [REDACTED] got in
 13:02:49 24 trouble before me.
 13:02:55 25 Q Did you have other relatives living in the

13:02:57 1 area while you were growing up, other than the ones
 13:03:00 2 you've already mentioned?
 13:03:03 3 A Other relatives?
 13:03:04 4 Q Yeah --
 13:03:05 5 A Uh-huh.
 13:03:05 6 Q -- cousins.
 13:03:06 7 Which ones that we haven't mentioned yet?
 13:03:09 8 A I have a cousin [REDACTED].
 13:03:12 9 Q And she lived in Santa Barbara while you were
 13:03:1410 growing up?
 13:03:1511 A Yes.
 13:03:1612 Q Is she older or younger than you?
 13:03:1913 A She's younger than me.
 13:03:2014 Q And is she a cousin on your -- she's a cousin
 13:03:2115 on your mother's side of the family?
 13:03:2316 A She's -- her mother is my mom's sister.
 13:03:2517 Q And does she have any other siblings?
 13:03:2818 A She has two siblings.
 13:04:3219 Q Brothers or sisters?
 13:04:3220 A One and one.
 13:04:3221 Q Now, has [REDACTED] ever been in trouble?
 13:04:3222 A No.
 13:04:3223 Q And what about her brother?
 13:04:3224 A Her brother, I think, has been in a little bit
 13:04:3225 of trouble.

13:09:26 1 just -- he got in trouble as an adult, not as a child?
 13:09:29 2 A Correct.
 13:09:29 3 Q Now, what was the nature of the trouble he got
 13:09:31 4 into?
 13:09:32 5 A I'm not exactly sure.
 13:09:34 6 Q Was it drug- and alcohol-related?
 13:09:35 7 A That's my suspicion, yeah.
 13:09:38 8 Q And his -- tell me again, his mother was your
 13:09:41 9 mother's sister, is that how they're --
 13:09:4310 A Is my mother's sister, correct.
 13:09:4511 Q -- related?
 13:09:4612 Is your mother's sister?
 13:09:4913 A Correct.
 13:09:4914 Q What's -- and he has other sisters and
 13:09:5315 brothers?
 13:09:5416 A He has another sister named [REDACTED].
 13:09:5617 Q And has she been in trouble?
 13:09:5818 A Never has.
 13:09:5919 Q Any other sisters and brothers?
 13:10:0120 A In that family?
 13:10:0221 Q In that family.
 13:10:0422 A No.
 13:10:0423 Q And what other cousins or relatives do you
 13:10:0624 have living in the Santa Barbara area when you were
 13:10:1025 growing up?

13:04:32 1 Q Now, what kind of trouble -- what's his name?
 13:04:32 2 A His name is [REDACTED].
 13:04:33 3 Q And what's his last name?
 13:04:33 4 A [REDACTED].
 13:04:33 5 Q Is he younger than you?
 13:04:33 6 A Yes.
 13:04:33 7 Q How much younger?
 13:04:33 8 A I don't know exactly how old [REDACTED] is.
 13:04:33 9 Q And when he was growing up, he was -- got in
 13:04:3310 trouble?
 13:04:3311 A No.
 13:04:3312 Q As an adult?
 13:04:3313 A I think so, yeah.
 13:04:3314 THE REPORTER: Can we go off for a minute,
 13:04:3315 please?
 13:04:3316 MS. YOUNG: Sure.
 13:04:3317 THE VIDEOGRAPHER: We're going off the record.
 13:04:3318 The time is 1:04 p.m.
 13:04:3319 (Recess.)
 13:09:1020 THE VIDEOGRAPHER: We're going back on the
 13:09:1521 record. The time is 1:09 p.m. Please continue.
 18:59:5422 BY MS. YOUNG:
 13:09:1923 Q Okay.
 13:09:2024 Mr. [REDACTED], when we went off the record, we were
 13:09:2225 talking about your cousin [REDACTED], and you said he

13:10:11 1 A I have other cousins.
 13:10:13 2 Q First cousins?
 13:10:14 3 A [REDACTED].
 13:10:15 4 Q And how is [REDACTED] related -- how are [REDACTED]'s
 13:10:19 5 parents related?
 13:10:20 6 A [REDACTED]'s mother is my mom's sister.
 13:10:24 7 Q And she lived in Santa Barbara when you were
 13:10:27 8 growing up?
 13:10:27 9 A Yes.
 13:10:2810 Q And was she in trouble growing up?
 13:10:3011 A I don't -- I don't think so.
 13:10:3212 Q But you're not sure?
 13:10:3313 A Well, she lived in Isla Vista back in the old
 13:10:3714 days. So, you know, as far as trouble with the law, no.
 13:10:4015 I mean -- but, yeah, not to my knowledge.
 13:10:4816 Q Is [REDACTED] older or younger than you are?
 13:10:5117 A [REDACTED] was older.
 13:10:5318 Q How much older?
 13:10:5919 A I would think maybe -- I don't know. Maybe
 13:11:0320 four years older than me, maybe.
 13:11:0621 Q What's her last name?
 13:11:0722 A [REDACTED].
 13:11:0723 Q Can you spell that?
 13:11:0924 A [REDACTED].
 13:11:1725 Q And does she have any brothers or sisters?

13:11:19 1 A She has one brother and a sister.
 13:11:24 2 Q And her brother's name?
 13:11:25 3 A Her brother's name is -- gosh. [REDACTED] I
 13:11:43 4 can't pull up his name right now. I am sorry.
 13:11:44 5 Q You're blank on his name?
 13:11:46 6 A I think I am, yeah.
 13:11:49 7 Q Was her brother in trouble --
 13:11:50 8 A It has nothing to do with old age, either. I
 13:11:56 9 just can't remember.
 13:11:56 10 Q Was your brother in trouble -- was her brother
 13:11:56 11 in trouble?
 13:11:57 12 A No.
 13:11:58 13 Q Okay.
 13:11:58 14 A No.
 13:11:58 15 Q And her sister?
 13:11:59 16 A Her sister -- [REDACTED] Gosh, I haven't been
 13:12:11 17 close to these folks in a long time.
 13:12:14 18 Q When you were growing up, did you -- did all
 13:12:17 19 your cousins get together?
 13:12:21 20 A Well, this particular family right here, I
 13:12:24 21 used to go out to their house and spend maybe the
 13:12:26 22 weekend.
 13:12:27 23 Q So at one time you were close --
 13:12:28 24 A Yes.
 13:12:28 25 Q -- growing up?

13:13:35 1 you were growing up?
 13:13:36 2 A Off and on.
 13:13:37 3 Q Off and on?
 13:13:38 4 A He was a traveler.
 13:13:39 5 Q He was what?
 13:13:40 6 A He was a traveler; he moved around a lot.
 13:13:42 7 Q Was he ever in trouble with the law?
 13:13:46 8 A I don't -- I think I remember when I was a
 13:13:49 9 little kid, he -- I heard the adults talk about he was
 13:13:53 10 in jail for a little while.
 13:13:55 11 Q What's his last name, [REDACTED]?
 13:13:57 12 A [REDACTED] yeah.
 13:13:58 13 He's passed on now.
 13:14:00 14 Q So when you were a kid, you heard the adults
 13:14:02 15 talking about he was in jail.
 13:14:04 16 Do you know what he was in jail for?
 13:14:06 17 A My suspicion is --
 13:14:08 18 MR. HALE: Don't guess.
 13:14:09 19 THE WITNESS: Yeah, I -- I don't know what he
 13:14:11 20 was in jail for. I don't.
 13:14:13 21 BY MS. YOUNG:
 13:14:14 22 Q But your suspicion was going to be drugs?
 13:14:17 23 A No.
 13:14:18 24 Q No?
 13:14:19 25 A No, he wasn't a drug user.

13:12:30 1 A Uh-huh. Both the parents are dead. My Uncle
 13:12:33 2 [REDACTED] and my Aunt [REDACTED] are dead. [REDACTED] has also passed
 13:12:38 3 away. She had bad physical -- she had diabetes, she got
 13:12:43 4 liver stuff and kidneys or something like that.
 13:12:46 5 Q And you can't remember the name of her brother
 13:12:47 6 and sister?
 13:12:52 7 A I can't right now, sorry.
 13:12:54 8 Q But to the best of your knowledge, other than
 13:12:59 9 [REDACTED] living in -- what's it called, Isla what?
 13:13:02 10 A Isla Vista.
 13:13:04 11 Q -- Isla Vista, maybe some recreational --
 13:13:06 12 A Yeah --
 13:13:07 13 Q -- use of something --
 13:13:08 14 A -- or drinking or something.
 13:13:09 15 Q -- illegal, you can't remember any of those
 13:13:11 16 people ever getting in trouble?
 13:13:12 17 A No, they never did.
 13:13:14 18 Q Okay.
 13:13:14 19 What other cousins or relatives do you have
 13:13:17 20 that you grew up with in the area?
 13:13:22 21 A I got an uncle, my Uncle [REDACTED]
 13:13:26 22 Q And how is he related to your mother? Is
 13:13:28 23 he --
 13:13:29 24 A He's my mother's brother.
 13:13:31 25 Q And your Uncle [REDACTED] lives in Santa Barbara when

13:14:20 1 Q Do you know -- you have no idea?
 13:14:22 2 A I do not know what he was in there for, I
 13:14:24 3 don't.
 13:14:27 4 Q How old were you at that time, when you heard
 13:14:29 5 that he was in jail?
 13:14:36 6 A Maybe nine, ten, maybe.
 13:14:45 7 Q So that would have been about 1965 -- 1965,
 13:14:45 8 1964, that area?
 13:14:48 9 A Something like that.
 13:14:51 10 Q Did he have children?
 13:14:52 11 A Yes.
 13:14:54 12 Q And they lived in the area as well?
 13:14:57 13 A Off and on.
 13:14:58 14 Q Off and on?
 13:14:58 15 A Yeah.
 13:14:59 16 Q And -- and -- and who were his -- how many
 13:15:01 17 children did he have?
 13:15:01 18 A He had three. One was named [REDACTED] was the
 13:15:06 19 oldest brother.
 13:15:08 20 Q Was [REDACTED] older than you?
 13:15:11 21 A No, he was younger.
 13:15:12 22 Q Younger? How much younger?
 13:15:15 23 A I don't know, maybe five years, maybe.
 13:15:18 24 Q Was Johnny in trouble with the law?
 13:15:21 25 A I think later on in his later years he's been

13:15:24 1 in trouble, I believe.
 13:15:25 2 Q You mean recently --
 13:15:26 3 A I don't know about --
 13:15:27 4 Q -- he's been in trouble?
 13:15:29 5 A Oh, I don't know.
 13:15:30 6 Q At some point, but you don't know when?
 13:15:32 7 A Yes.
 13:15:33 8 Q What's he in trouble for?
 13:15:34 9 A I have no idea.
 13:15:36 10 Q He's been in jail?
 13:15:41 11 A I don't know.
 13:15:42 12 Q Was his last name [REDACTED]?
 13:15:45 13 A [REDACTED] yes.
 13:15:46 14 Q And what other children did your Uncle [REDACTED]
 13:15:48 15 have?
 13:15:49 16 A [REDACTED] is a daughter.
 13:15:50 17 Q And is she younger than you?
 13:15:52 18 A Yes.
 13:15:53 19 Q How much younger?
 13:15:57 20 A Maybe eight years younger, maybe.
 13:16:02 21 Q Has she been in trouble?
 13:16:04 22 A No.
 13:16:04 23 Q And what other -- you said one more child.
 13:16:07 24 A [REDACTED]
 13:16:08 25 Q [REDACTED] is he younger than you?

13:16:53 1 Q Family talks about it?
 13:16:54 2 A Yeah.
 13:16:54 3 Q What do they say? What did you hear?
 13:16:59 4 A I think [REDACTED] has had trouble with his wife
 13:17:02 5 or keeping a job and stuff like that and so...
 13:17:07 6 Q But that's not trouble with the law -- well,
 13:17:10 7 unless he beats his wife.
 13:17:13 8 A Yeah.
 13:17:13 9 Q I guess my question was, has he been in
 13:17:15 10 trouble with the law? Has he abused his wife, to the
 13:17:21 11 best of your knowledge?
 13:17:23 12 A You know what, I don't know.
 13:17:23 13 Q Did you hear that?
 13:17:24 14 A No. It might have had something to do with --
 13:17:31 15 you know, I don't know. I would be guessing if I gave
 13:17:31 16 you -- because I really don't know exactly what he was
 13:17:33 17 in trouble for, if he was in trouble. My sis -- yeah,
 13:17:36 18 there we go. I don't know.
 13:17:41 19 They're not really close. That part of the
 13:17:42 20 family is not really -- you know, because their father
 13:17:46 21 was always going -- picking fruits all up and down
 13:17:52 22 California, so they were --
 13:17:54 23 Q That's what his father -- that's what --
 13:17:56 24 A Yes.
 13:17:56 25 Q -- your uncle does?

13:16:11 1 A Yeah, he was younger.
 13:16:12 2 Q How much younger?
 13:16:14 3 A He's about in the middle of those two
 13:16:15 4 siblings.
 13:16:16 5 Q So he's just a little bit younger than you
 13:16:18 6 are?
 13:16:21 7 A No. [REDACTED] is like five years younger than
 13:16:23 8 me. [REDACTED] is about eight years. So [REDACTED] has got to
 13:16:27 9 be --
 13:16:27 10 Q Six or seven years --
 13:16:30 11 A Yeah --
 13:16:30 12 Q -- younger than you are?
 13:16:31 13 A -- something like that.
 13:16:32 14 Q And was he in trouble with the law?
 13:16:34 15 A I think he has been.
 13:16:35 16 Q Growing up?
 13:16:35 17 A Later on in life.
 13:16:37 18 Q When you say --
 13:16:38 19 A His adult -- adult years, I'm thinking.
 13:16:39 20 Q What type of trouble is he in?
 13:16:42 21 A I don't know.
 13:16:43 22 Q Has he been in jail?
 13:16:45 23 A I don't know.
 13:16:46 24 Q So what makes you think he's been in trouble?
 13:16:50 25 A Just from hearing stuff in the family.

13:17:56 1 He -- he's a --
 13:17:56 2 A That's what they used to do.
 13:17:58 3 Q Okay.
 13:17:58 4 What does he do now? Is he still alive?
 13:18:01 5 A He's dead.
 13:18:02 6 Q And where are your cousins now, [REDACTED]
 13:18:04 7 and [REDACTED]?
 13:18:06 8 A I'm pretty sure they live up in [REDACTED] I
 13:18:08 9 believe, state of [REDACTED]
 13:18:17 10 Q Any other cousins that you grew up with in
 13:18:20 11 Santa Barbara or other relatives?
 13:18:29 12 A Not that I -- no, I think that's about it, I
 13:18:32 13 think.
 13:18:35 14 MS. YOUNG: Why don't we go to lunch --
 13:18:37 15 MR. HALE: Okay.
 13:18:37 16 MS. YOUNG: -- before he remembers another
 13:18:40 17 one.
 13:18:43 18 THE VIDEOGRAPHER: Off the record?
 13:18:43 19 MS. YOUNG: Yes.
 13:18:49 20 THE VIDEOGRAPHER: We're going off the record.
 13:18:50 21 The time is 1:19 p.m.
 13:18:52 22 (Lunch taken.)
 14:02:22 23 THE VIDEOGRAPHER: We're going back on the
 14:14:33 24 record. The time is 2:14 p.m. Please continue.
 01:59:54 25 BY MS. YOUNG:

14:14:37 1 Q Good afternoon, Mr. [REDACTED]
 14:14:39 2 A Good afternoon.
 14:14:41 3 Q Do you understand you're still under oath?
 14:14:42 4 A Yes.
 14:14:43 5 Q Okay.
 14:14:43 6 And all the rules that we discussed this
 14:14:45 7 morning are still applicable.
 14:14:51 8 Next question I'm going to ask you is a
 14:14:55 9 yes-or-no answer. Did you discuss the substance of your
 14:14:57 10 testimony this morning with your attorneys over lunch?
 14:15:07 11 A The substance of my -- of our testimony today?
 14:15:11 12 Q Yes.
 14:15:15 13 MR. HALE: Wait a minute. However you want to
 14:15:17 14 phrase it, you're still asking for an attorney-client
 14:15:21 15 communication there. You're not going to answer that.
 14:15:23 16 Granted, you're not asking for the exact details, but
 14:15:26 17 substance, I mean -- no, you're not gonna answer that.
 14:15:30 18 And vague and ambiguous, as well, as to definition.
 14:15:34 19 MS. YOUNG: So you're instructing him not to
 14:15:36 20 answer.
 14:15:36 21 BY MS. YOUNG:
 14:15:37 22 Q Are you going to follow your attorney's
 14:15:38 23 instruction?
 14:15:39 24 A Yes.
 14:15:39 25 Q Okay.

15:23:56 1 BY MS. YOUNG:
 14:17:27 2 Q I don't mean to argue with you. Just you
 14:17:29 3 don't remember whether you were 12 or whether you were
 14:17:31 4 13 when that happened?
 14:17:36 5 A I know that I was in the beginning years of
 14:17:38 6 seventh grade, so...
 14:17:45 7 Q How old were you the first time you had a
 14:17:47 8 beer, one beer?
 14:17:55 9 A It was -- I think on the second visit up to
 14:18:01 10 the cabin with Father Kelly.
 14:18:06 11 Q So you had never had a beer before you were at
 14:18:07 12 Father Kelly's cabin?
 14:18:08 13 A Never had.
 14:18:09 14 Q Never had an alcoholic beverage before you
 14:18:11 15 were at Father Kelly's cabin?
 14:18:13 16 A Never have.
 14:18:13 17 Q And I take it that prior to the time you were
 14:18:18 18 13 or prior -- let's say prior to the time you were in
 14:18:18 19 seventh grade, you never -- other than masturbation, you
 14:18:20 20 never had any other sexual experience?
 14:18:21 21 A No.
 14:18:22 22 Q With a woman or with a man?
 14:18:23 23 A No.
 14:18:24 24 Q Boy or girl? No? Okay.
 14:18:25 25 Now, are you currently married?

14:15:45 1 How old were you when you went through
 14:15:48 2 puberty?
 14:15:57 3 A I don't really know the definition of
 14:15:58 4 "puberty."
 14:16:02 5 Q How old were you the first time you
 14:16:06 6 masturbated?
 14:16:13 7 A Around 11, maybe.
 14:16:15 8 Q Eleven?
 14:16:24 9 And starting from the time you were 11, how
 14:16:27 10 often did you do that between the time you were 11 and
 14:16:32 11 15? I'm talking one time a week? Two times a week?
 14:16:37 12 One time a month?
 14:16:44 13 A Up until when? To Father Kelly or up until I
 14:16:50 14 was --
 14:16:51 15 Q Well, let's say up until Father Kelly.
 14:16:59 16 A Maybe once every couple weeks, I might think.
 14:17:02 17 Q Father Kelly, the first time you alleged you
 14:17:04 18 were sexually abused by Father Kelly, you were 13; is
 14:17:11 19 that correct?
 14:17:14 20 A I was approximately around the 12, 13 area,
 14:17:16 21 seventh grade.
 14:17:17 22 Q So you don't remember whether you were 12 or
 14:17:19 23 whether you were 13?
 14:17:22 24 MR. HALE: Asked and answered. Argumentative.
 14:17:24 25

14:18:57 1 A No.
 14:18:59 2 Q But you've been married before, correct?
 14:19:01 3 A Yes.
 14:19:05 4 Q How many times have you been married?
 14:19:07 5 A Two times.
 14:19:09 6 Q Now let's talk about the first time.
 14:19:10 7 The first time you were married to somebody
 14:19:12 8 named [REDACTED], is that --
 14:19:14 9 A Yes.
 14:19:14 10 Q -- correct?
 14:19:16 11 A Yes.
 14:19:17 12 Q Try to wait until I finish my question.
 14:19:19 13 A Okay.
 14:19:20 14 Q Where did you meet [REDACTED]?
 14:19:22 15 A I met [REDACTED] at a -- at [REDACTED]
 14:19:28 16 [REDACTED].
 14:19:28 17 Q And [REDACTED] was where
 14:19:31 18 you went when you were how old?
 14:19:37 19 A I believe I was around 15 years old.
 14:19:43 20 Q How long did you attend [REDACTED]
 14:19:47 21 [REDACTED].
 14:19:49 22 A For a couple months only.
 14:19:50 23 Q And that's where you met [REDACTED] --
 14:19:52 24 A Correct.
 14:19:52 25 Q -- when you were a student there?

14:19:54 1 A Yes.
 14:19:54 2 Q Was she a student there also?
 14:19:55 3 A Yes.
 14:19:56 4 Q How old -- so when you met her, how old were
 14:20:00 5 you?
 14:20:03 6 A We were both -- we were both -- we were
 14:20:16 7 both -- she's a couple months older than I am. We were
 14:20:21 8 both at the end of our 15th year, I'm pretty sure.
 14:20:25 9 Q So you were both 15 --
 14:20:26 10 A Yes.
 14:20:26 11 Q -- almost 16.
 14:20:29 12 Now, tell me about the [redacted] school.
 14:20:33 13 What's the purpose of a [redacted] school? Is it for
 14:20:36 14 kids who have been in trouble?
 14:20:39 15 A I be -- yes, it is.
 14:20:41 16 Q And what trouble had [redacted] been in?
 14:20:44 17 MR. HALE: Speculation.
 14:20:45 18 THE WITNESS: I don't know.
 14:20:45 19 BY MS. YOUNG:
 14:20:46 20 Q You don't know at the time you met her what
 14:20:48 21 trouble she had been in?
 14:20:50 22 A No, I don't.
 14:20:51 23 Q And you say you met her in what year? I'm
 14:20:53 24 sorry, I forgot if you told me.
 14:20:58 25 A I don't think I told you what year it was.

14:22:25 1 no, '72?
 14:22:42 2 A I don't recall being employed then.
 14:22:48 3 Q So what were you doing? Anything?
 14:22:52 4 A Nothing really.
 14:22:54 5 Q Were you out of jail?
 14:22:56 6 A Yes.
 14:22:59 7 Q And did you have children with [redacted]?
 14:23:03 8 A She was pregnant when we got married.
 14:23:05 9 Q And so she was pregnant with your oldest
 14:23:09 10 daughter?
 14:23:09 11 A Yes.
 14:23:10 12 Q What's your oldest daughter's name?
 14:23:14 13 A [redacted]
 14:23:14 14 Q [redacted]
 14:23:15 15 And how far pregnant was she when you got
 14:23:20 16 married?
 14:23:20 17 A She was pretty close. Eight months, maybe.
 14:23:28 18 Q Did [redacted] use drugs when you were with her?
 14:23:37 19 A I -- she smoked pot, yeah, she smoked pot, I
 14:23:41 20 believe, yeah.
 14:23:43 21 Q Did she use any other drugs other than pot?
 14:23:47 22 A I think she -- maybe she took a couple diet
 14:23:50 23 pills. She took some diet pills.
 14:23:52 24 Q Anything else? Anything stronger than --
 14:23:55 25 A No.

14:21:00 1 Q Do you recall what year it was? I mean you
 14:21:03 2 were 15, so --
 14:21:04 3 A It was probably --
 14:21:05 4 Q -- '70? '71? Almost 16?
 14:21:09 5 A '71, I believe.
 14:21:12 6 Q And you got married to [redacted] in June of 1972;
 14:21:16 7 is that correct?
 14:21:18 8 A I believe so.
 14:21:23 9 Q So you got married to [redacted] when you were...
 14:21:29 10 A Seventeen years old.
 14:21:29 11 Q You were both 17 -- approximately 17 years
 14:21:35 12 old.
 14:21:35 13 Where were you married? I mean, were you
 14:21:40 14 married in a church or --
 14:21:42 15 A No.
 14:21:42 16 Q -- were you -- where?
 14:21:44 17 A At the courthouse in Santa Barbara.
 14:21:49 18 Q Were you still attending school when you were
 14:21:51 19 married, at the [redacted] school?
 14:21:57 20 A No.
 14:22:08 21 Q Did you have a honeymoon?
 14:22:13 22 A No.
 14:22:13 23 Q Okay.
 14:22:17 24 What were you doing, I mean employment-wise,
 14:22:20 25 when you married [redacted] in June of 1972 -- '73, sorry --

14:23:55 1 Q -- drugs -- than --
 14:23:57 2 A No.
 14:23:58 3 Q -- marijuana and diet pills?
 14:24:01 4 A No.
 14:24:01 5 Q No?
 14:24:02 6 During the time you were married to [redacted] was
 14:24:06 7 she ever in trouble with the law?
 14:24:08 8 A No.
 14:24:10 9 Q Now, how long were you married to [redacted]?
 14:24:19 10 A We were legally married up until, I think,
 14:24:29 11 1985, but when we were living together married, she
 14:24:37 12 never was in any trouble or nothing like that.
 14:24:45 13 Q Was she in any trouble when you weren't
 14:24:47 14 married?
 14:24:48 15 A I believe she got into some trouble.
 14:24:50 16 Q What kind of trouble?
 14:24:53 17 A Trouble with the law trouble.
 14:24:56 18 Q What kind of trouble with the law?
 14:24:58 19 A [redacted]
 14:25:00 20 [redacted]
 14:25:03 21 Q [redacted]
 14:25:03 22 A [redacted] correct.
 14:25:05 23 Q [redacted]
 14:25:06 24 A Yes.
 14:25:07 25 Q [redacted]

14:25:09 1 A I believe so.
 14:25:11 2 Q [REDACTED]
 14:25:13 3 A I don't know.
 14:25:14 4 Q But you know [REDACTED]
 14:25:15 5 A Yes.
 14:25:16 6 Q And when did she get in that trouble? Was
 14:25:19 7 that after you were married -- after --
 14:25:21 8 A After.
 14:25:21 9 Q -- you were no longer married?
 14:25:24 10 A We were no longer together anymore.
 14:25:26 11 Q And my last question was actually how long
 14:25:28 12 were you married? And I'm not sure I got the answer.
 14:25:39 13 A Maybe for -- gosh, my -- my approximation,
 14:25:45 14 maybe a year and a half, maybe two years.
 14:25:47 15 Q That's all?
 14:25:48 16 A Yes.
 14:25:51 17 Q Are you sure?
 14:25:55 18 A To the best of my recollection.
 14:25:57 19 Q Well, the reason I'm asking is, you can
 14:25:59 20 correct me if I'm wrong, but it looks like she filed for
 14:26:08 21 divorce in April of 1993 for the second time. And my
 14:26:17 22 understanding and our records show she filed for divorce
 14:26:20 23 in January of 1988, but that was dropped and then in
 14:26:23 24 April -- in April of '93, she filed again. That would
 14:26:26 25 make you married for a lot longer than two years.

14:27:31 1 Q Where are they?
 14:27:32 2 A I would imagine they're at some courthouse
 14:27:34 3 somewhere, I would imagine.
 14:27:36 4 Q Okay.
 14:27:36 5 But you don't keep a copy?
 14:27:38 6 A No, I was -- I was still in bad shape around
 14:27:40 7 that time. I -- I didn't have much need to keep
 14:27:43 8 records. I don't mean to be like that, but I never kept
 14:27:50 9 anything.
 14:27:50 10 Q Now, your second daughter, [REDACTED] is that how
 14:27:54 11 you --
 14:27:55 12 A [REDACTED]
 14:27:56 13 Q [REDACTED]
 14:27:56 14 A Uh-huh.
 14:27:57 15 Q Was she -- was [REDACTED] her mother as well?
 14:27:59 16 A Yes.
 14:27:59 17 Q And what year was [REDACTED] born?
 14:28:03 18 A [REDACTED] was born in [REDACTED]. Could be wrong.
 14:28:24 19 Q So you're saying that [REDACTED] was born in [REDACTED]
 14:28:31 20 the same year you were married, correct?
 14:28:33 21 A [REDACTED]
 14:28:35 22 Q [REDACTED] was four years younger?
 14:28:38 23 A [REDACTED] was born in [REDACTED]
 14:28:41 24 Q Isn't [REDACTED] less than nine months younger
 14:28:44 25 than --

14:26:33 1 A I think --
 14:26:34 2 Q Does that refresh your recollection?
 14:26:35 3 A -- my original answer to you was we were
 14:26:39 4 married on paper, from this point when we got married up
 14:26:42 5 until where I filed for divorce in 1985, when I was at
 14:26:46 6 the California Men's Colony.
 14:26:49 7 Q Okay.
 14:26:49 8 So you filed for divorce in 1985 when you were
 14:26:52 9 at California Men's Colony?
 14:26:54 10 A Yes. But as far as us actually living
 14:26:57 11 together at -- at the moments where I was out of jail
 14:27:02 12 maybe lasted a year and a half, maybe two years.
 14:27:07 13 I have no idea about those divorce
 14:27:10 14 applications that you said she applied for. I -- I have
 14:27:14 15 no idea.
 14:27:15 16 Q Okay.
 14:27:16 17 So you filed for divorce in 1985, and that
 14:27:19 18 became final --
 14:27:21 19 A Yes.
 14:27:21 20 Q -- at some point in time?
 14:27:22 21 A I believe so.
 14:27:23 22 Q As far as you know?
 14:27:24 23 A Uh-huh.
 14:27:25 24 Q Do you have a copy of your divorce documents?
 14:27:29 25 A No.

14:28:45 1 A No, [REDACTED] is a couple years younger than
 14:28:48 2 [REDACTED]
 14:28:50 3 Q A couple years younger than [REDACTED]?
 14:28:52 4 A Yes.
 14:28:57 5 MS. YOUNG: Either he's wrong or there's a
 14:28:59 6 mistake in the material that you sent to me.
 14:29:04 7 MR. HALE: That's entirely possible.
 14:29:04 8 MS. YOUNG: So we should check that out.
 14:29:05 9 Okay. I'm not asking you these questions to try to trip
 14:29:08 10 you up. I'm just going on the basis of the information
 14:29:10 11 that was sent to me by your lawyer, so...
 14:29:12 12 THE WITNESS: And you know, the thing is, what
 14:29:14 13 father doesn't know when his daughter was born? You
 14:29:17 14 know. What father? You know, and I'm here trying to
 14:29:21 15 answer this question, and I can't give you an accurate
 14:29:25 16 answer.
 14:29:25 17 BY MS. YOUNG:
 14:29:25 18 Q Well, you must have given your lawyer an
 14:29:29 19 accurate answer because he sent me the information. I'm
 14:29:31 20 sure he didn't know without your telling him.
 14:29:34 21 A Yeah.
 14:29:34 22 Q Or without --
 14:29:34 23 A I'm sure --
 14:29:35 24 Q -- seeing some documents.
 14:29:36 25 A Yeah, I'm sure I would have got -- I might

14:29:39 1 have taken a birth certificate or something, I don't
 14:29:42 2 know.
 14:29:43 3 Q What was the grounds for your divorce from
 14:29:47 4 [REDACTED]
 14:29:50 5 A Well, at the time when I actually filed it, we
 14:29:54 6 hadn't been together for a long time, so I don't know.
 14:29:57 7 Q Did you have a lawyer that represented you on
 14:29:59 8 that divorce?
 14:29:59 9 A No. They -- when you're in prison, they do
 14:30:02 10 stuff like that kind of for free.
 14:30:05 11 Q So you filed it when you were in prison?
 14:30:08 12 A Correct.
 14:30:08 13 Q When was the last time you saw her, [REDACTED]
 14:30:11 14 A [REDACTED]
 14:30:12 15 Q [REDACTED]
 14:30:13 16 A [REDACTED]
 14:30:14 17 Q [REDACTED]
 14:30:15 18 A -- [REDACTED] correct.
 14:30:16 19 Q So do you see her on an ongoing basis?
 14:30:20 20 A I see her occasionally.
 14:30:21 21 Q Is she remarried?
 14:30:23 22 A I do not know.
 14:30:24 23 Q You don't know?
 14:30:24 24 A No.
 14:30:25 25 Q Does she have any other children?

14:31:25 1 Q With [REDACTED]
 14:31:27 2 A Correct.
 14:31:31 3 Q As far as you knew, was she a good mother to
 14:31:34 4 them?
 14:31:34 5 A As far as I knew.
 14:31:35 6 Q Yes?
 14:31:36 7 A Yes.
 14:31:36 8 Q You have to speak up for the court reporter.
 14:31:41 9 A As far as I knew, yes.
 14:31:42 10 Q Have your daughters ever been in trouble with
 14:31:44 11 the law, either of them?
 14:31:45 12 A [REDACTED]
 14:31:47 13 Q [REDACTED]
 14:31:49 14 A [REDACTED]
 14:31:50 15 Q What --
 14:31:51 16 A [REDACTED]
 14:31:51 17 Q [REDACTED]
 14:31:52 18 A Yes.
 14:31:53 19 Q [REDACTED]
 14:31:58 20 A I think she -- I think [REDACTED] I
 14:32:01 21 believe, pretty sure.
 14:32:03 22 Q [REDACTED]
 14:32:04 23 A [REDACTED]
 14:32:06 24 Q Was she -- [REDACTED]
 14:32:08 25 A [REDACTED] correct.

14:30:28 1 A She has -- I think she has four other children
 14:30:34 2 also.
 14:30:35 3 Q And are those children younger than the
 14:30:37 4 children that the two of you have together?
 14:30:40 5 A Yes.
 14:30:41 6 Q Do you know whether she was married when she
 14:30:43 7 had those children?
 14:30:45 8 A I do not know.
 14:30:50 9 Q Has [REDACTED]
 14:30:52 10 [REDACTED]
 14:30:53 11 A [REDACTED]
 14:30:53 12 Q And what [REDACTED]
 14:30:56 13 [REDACTED]
 14:30:56 14 A Yes.
 14:30:57 15 Q Anything else?
 14:30:58 16 A No, just -- no, not that I know of. I mean,
 14:31:01 17 [REDACTED]
 14:31:05 18 Q [REDACTED]
 14:31:08 19 [REDACTED]
 14:31:09 20 A She didn't -- she --
 14:31:12 21 Q She didn't do that during the marriage?
 14:31:14 22 A She didn't really do that then.
 14:31:18 23 Q And who did your two children live with while
 14:31:21 24 you were in jail when you were married to [REDACTED]
 14:31:24 25 A With her.

14:32:10 1 Q [REDACTED]
 14:32:12 2 A Yes.
 14:32:12 3 Q And when was that? How old were you at the
 14:32:17 4 time?
 14:32:19 5 A This has been within the last -- all this
 14:32:22 6 [REDACTED]
 14:32:26 7 [REDACTED]
 14:32:27 8 Q [REDACTED]
 14:32:28 9 A Yes.
 14:32:30 10 Q Have you talked to her about it?
 14:32:33 11 A About...
 14:32:34 12 Q [REDACTED] do you counsel her at
 14:32:40 13 all?
 14:32:44 14 A I counseled her by trying to be a good
 14:32:47 15 example. I don't tell her, "Hey, you need to stop doing
 14:32:50 16 that," because it never -- I just don't think it works.
 14:33:01 17 Q Is she --
 14:33:02 18 A I wish Father Kelly would have counseled me.
 14:33:05 19 I wish he would have sent me down a different road.
 14:33:10 20 Then I could have been able to counsel her maybe and
 14:33:12 21 been a good father maybe.
 14:33:15 22 Q Move to strike as nonresponsive.
 14:33:17 23 Is she still [REDACTED]
 14:33:20 24 [REDACTED]
 14:33:27 25 A I -- I think she's better now. I seen her

14:33:30 1 over the holidays. She came and celebrated Christmas
 14:33:33 2 with us over the holidays.
 14:33:36 3 Q Who else was celebrating with you over the
 14:33:38 4 holidays?
 14:33:42 5 A All our immediate family.
 14:33:44 6 Q So was your mother?
 14:33:46 7 A My mother was there. My sisters were there.
 14:33:51 8 Their children were there. My children were there.
 14:33:55 9 Just all my immediate family was there.
 14:34:08 10 Q Did you and [REDACTED] ever see any marriage
 14:34:11 11 counselors or spiritual advisers while you were married?
 14:34:15 12 A No.
 14:34:21 13 Q And your second marriage was to whom?
 14:34:23 14 A To [REDACTED]
 14:34:25 15 Q [REDACTED]
 14:34:26 16 A Yes.
 14:34:28 17 Q When did you get married to Ms. [REDACTED]
 14:34:31 18 A In [REDACTED]
 14:34:36 19 Q Let me go back to [REDACTED] for a minute. I'm
 14:34:38 20 sorry, I didn't finish up what I had intended to.
 14:34:42 21 You mentioned the last time you saw her was
 14:34:43 22 this past Christmas; is that correct?
 14:34:46 23 A Uh-huh.
 14:34:46 24 Q And she was -- was she celebrating Christmas
 14:34:49 25 with your family?

14:35:50 1 my oldest daughter.
 14:35:53 2 Q Have you ever spoken to [REDACTED] about your --
 14:35:56 3 the allegations against Father Kelly?
 14:35:59 4 A No.
 14:36:01 5 Q Have you ever spoken to her about the lawsuit?
 14:36:06 6 A I told her a while back that because of the
 14:36:12 7 lawsuit she might have an investigator coming to talk to
 14:36:17 8 her.
 14:36:20 9 Q You told her that after you filed the lawsuit?
 14:36:23 10 A This was a few months ago.
 14:36:24 11 Q Oh, a few months ago.
 14:36:26 12 A Because some investigator showed up at
 14:36:30 13 [REDACTED]'s doorstep, asking questions, out of the blue
 14:36:33 14 skies.
 14:36:35 15 Q And so after that you called [REDACTED]?
 14:36:36 16 A (Inaudible response.)
 14:36:39 17 Q And told her she might have an investigator
 14:36:41 18 show up?
 14:36:42 19 A (Inaudible response.)
 14:36:42 20 Q And what did she say?
 14:36:44 21 A Nothing in particular.
 14:36:50 22 Q And are those the only conversations you ever
 14:36:53 23 had with her about the lawsuit?
 14:36:54 24 A Yes.
 14:36:55 25 Q You never described the lawsuit in any --

14:34:50 1 A Not with my family, no. She celebrates with
 14:34:52 2 her family.
 14:34:54 3 Q So what was the occasion of your seeing her on
 14:34:59 4 Christmas?
 14:34:59 5 A I went to go pick up my grandchildren over at
 14:34:59 6 her house.
 14:34:59 7 Q And these are whose children, your --
 14:35:02 8 A [REDACTED]'s, my oldest daughter's.
 14:35:04 9 Q Okay.
 14:35:04 10 Is [REDACTED] still married?
 14:35:08 11 A I don't know.
 14:35:10 12 Q You don't know whether she's still married?
 14:35:12 13 A I don't.
 14:35:15 14 Q And -- but her grandchildren -- your
 14:35:18 15 grandchildren, her children live with [REDACTED]
 14:35:21 16 A They were with [REDACTED] that day. They live with
 14:35:23 17 [REDACTED]
 14:35:24 18 Q I see.
 14:35:26 19 And prior to Christmas, this past Christmas
 14:35:32 20 when you saw [REDACTED] when was the time you saw her before
 14:35:35 21 that?
 14:35:39 22 A I think it might have been during the summer.
 14:35:42 23 Q And what was -- what was that occasion? Did
 14:35:44 24 you go pick up your kids or was it some other occasion?
 14:35:46 25 A I just stopped at the house to pick up [REDACTED]

14:36:57 1 A No.
 14:36:57 2 Q -- more detail?
 14:36:58 3 A No.
 14:37:01 4 Q Did you ever, while you were married to [REDACTED]
 14:37:05 5 or at any time after that, did you ever talk to her
 14:37:07 6 about what happened between you and Father Kelly?
 14:37:18 7 A I can't -- I can't imagine talking to a woman
 14:37:21 8 about something like that.
 14:37:24 9 Q So the answer is no?
 14:37:25 10 A The answer is a definite no.
 14:37:28 11 Q Okay.
 14:37:30 12 So your second marriage was to [REDACTED] and
 14:37:36 13 when were you married to Colette?
 14:37:37 14 A In [REDACTED]
 14:37:41 15 Q Oh, what -- what day in [REDACTED] were you married;
 14:37:44 16 do you remember?
 14:37:48 17 A No.
 14:37:48 18 Q Was it Valentine's Day?
 14:37:50 19 A It was my grandfather's birthday, thank you.
 14:37:54 20 Q Valentine's Day?
 14:37:55 21 A Yes.
 14:37:55 22 Q How old -- is [REDACTED] younger than you are?
 14:37:58 23 A She's younger.
 14:37:59 24 Q How much younger?
 14:38:02 25 A I think she might be three years younger than

14:38:04 1 me, maybe.
 14:38:09 2 Q Now, by the time you were married to [REDACTED]
 14:38:12 3 by the time you initially got married to [REDACTED] you
 14:38:17 4 were clean and sober; is that correct?
 14:38:18 5 A I'm sorry, give me that again.
 14:38:20 6 Q By the time you married [REDACTED] in February of
 14:38:23 7 1996, you were clean and sober?
 14:38:25 8 A Yes.
 14:38:25 9 Q And I use that expression because that's the
 14:38:28 10 expression that they use in --
 14:38:29 11 A Thank you.
 14:38:30 12 Q -- AA --
 14:38:30 13 A That's fine.
 14:38:30 14 Q -- as far as I know.
 14:38:32 15 A Yes.
 14:38:32 16 Q So by February of '96, you were clean and
 14:38:34 17 sober, correct?
 14:38:36 18 A Yes.
 14:38:40 19 Q How long were you married to [REDACTED]?
 14:38:49 20 A Approximately maybe -- approximately two
 14:38:51 21 years.
 14:38:55 22 Q Do you know when -- who filed for divorce, you
 14:38:57 23 or [REDACTED]?
 14:39:01 24 A She did, I believe.
 14:39:08 25 Q Would it have been about -- would it refresh

14:40:22 1 you don't believe her, or what do you mean by
 14:40:24 2 "supposedly"?
 14:40:30 3 A I don't know if -- the father and the -- the
 14:40:32 4 father knows. The father and the daughter know. I
 14:40:35 5 don't -- that's supposedly what happened. I don't know.
 14:40:40 6 Q Is there any reason -- is there any reason
 14:40:43 7 that you believe it didn't happen?
 14:40:45 8 A No, there's no reason to believe that.
 14:40:46 9 Q Okay.
 14:40:47 10 You just don't know because you weren't there
 14:40:49 11 firsthand?
 14:40:50 12 A Thank you, yes.
 14:40:51 13 Q Is that what you mean?
 14:40:52 14 A Yes.
 14:40:53 15 Q But that's what [REDACTED] told you?
 14:40:56 16 A That's --
 14:40:56 17 MR. HALE: Hang on. Objection. There is a
 14:40:59 18 marital privilege. If that conversation took place
 14:41:01 19 while you were married, you have a right not to disclose
 14:41:04 20 it, so that's kind of your call. I'm not going to
 14:41:06 21 instruct you not to answer.
 14:41:08 22 But it's your call.
 14:41:17 23 THE WITNESS: She called the police and made a
 14:41:21 24 complaint.
 25

14:39:11 1 your recollection any if I told you the marriage, that
 14:39:15 2 she filed 13 months after you were married, or does that
 14:39:21 3 sound too short?
 14:39:38 4 A It sounds short.
 14:39:39 5 Q Did you have any children with [REDACTED]?
 14:39:41 6 A No.
 14:39:42 7 Q Now, when you married [REDACTED]
 14:39:44 8 [REDACTED]
 14:39:51 9 [REDACTED]
 14:39:56 10 A That happened when I was with her already.
 14:40:00 11 That supposedly happened when I was with her.
 14:40:02 12 Q When you were married to her or before you
 14:40:05 13 were married to her?
 14:40:07 14 A No, before.
 14:40:07 15 Q Before.
 14:40:07 16 How long did you know her before you got
 14:40:09 17 married?
 14:40:09 18 A About five months, I think.
 14:40:13 19 Q So were you dating during that time --
 14:40:14 20 A Yes.
 14:40:15 21 Q -- dating her?
 14:40:16 22 A Yes.
 14:40:16 23 Q And you say that "supposedly happened."
 14:40:18 24 A Yeah, I --
 14:40:20 25 Q You don't know whether it happened or not, or

14:41:21 1 BY MS. YOUNG:
 14:41:21 2 Q And this was before you were married, right?
 14:41:24 3 A This was before we were married.
 14:41:25 4 Q But you knew -- but you were with her at that
 14:41:29 5 time?
 14:41:29 6 A Yes.
 14:41:29 7 Q Okay.
 14:41:42 8 Where were you married, you and [REDACTED]?
 14:41:45 9 A At the courthouse.
 14:41:47 10 Q Did you go on a honeymoon?
 14:41:49 11 A No.
 14:41:49 12 Q Where did you meet?
 14:41:53 13 A At [REDACTED]
 14:41:54 14 Q At a what?
 14:41:54 15 A At [REDACTED]
 14:41:56 16 Q In [REDACTED]
 14:41:59 17 A [REDACTED] correct.
 14:42:03 18 Q And why did you get divorced?
 14:42:11 19 A I think we just grew apart, I think.
 14:42:16 20 Q Do you have a copy of the divorce papers?
 14:42:19 21 A No.
 14:42:20 22 Q Did [REDACTED] ever tell you that she blames the
 14:42:22 23 divorce on herself?
 14:42:24 24 A No.
 14:42:31 25 Q Is she remarried?

14:42:34 1 A Not that I know of.
 14:42:36 2 Q Now, you mentioned that she called you and
 14:42:38 3 said that an investigator came to see her?
 14:42:40 4 A Yes.
 14:42:41 5 Q When was that? When did she call you?
 14:42:46 6 A The exact date, I don't recall, but it was
 14:42:49 7 within the last couple months, I believe.
 14:42:51 8 Q And what did she tell you exactly?
 14:42:56 9 A That the investigator asked her questions
 14:43:01 10 about me, what kind of person I was, and -- and she just
 14:43:12 11 responded and just, you know, talked about our lives
 14:43:17 12 together when we were married and since then also.
 14:43:27 13 Q And what did you say to her after she told you
 14:43:30 14 this, that the investigator had called? Anything?
 14:43:32 15 A I didn't say nothing because she just said the
 14:43:34 16 truth. I mean, you know.
 14:43:36 17 Q Did she tell you that she told the
 14:43:38 18 investigator that it was -- that she felt it was her
 14:43:41 19 fault that the marriage didn't work out?
 14:43:48 20 A Did she tell -- give me that again.
 14:43:50 21 Q Did she tell you that she told the
 14:43:52 22 investigator she felt it was her fault that your
 14:43:55 23 marriage didn't work out?
 14:43:57 24 A No, she didn't tell me that.
 14:44:01 25 Q And you said your impression of why the

14:45:23 1 Q You mean she was [REDACTED]
 14:45:27 2 [REDACTED]
 14:45:28 3 A No, no, she didn't -- no, she wasn't doing
 14:45:31 4 anything like that. See -- see, it's not all about
 14:45:33 5 [REDACTED] It's about thinking, our way of thinking.
 14:45:39 6 Q Do you still see her?
 14:45:40 7 A Sure, I do.
 14:45:42 8 Q And she has -- when you got married, she had
 14:45:52 9 a -- how many children?
 14:45:53 10 A One.
 14:45:54 11 Q One.
 14:45:54 12 And did you take an active part in raising
 14:45:57 13 that one child while you were married?
 14:46:01 14 A Yeah.
 14:46:01 15 Q It's a daughter?
 14:46:02 16 A I've been trying.
 14:46:03 17 Q And you still do?
 14:46:04 18 A Yes.
 14:46:12 19 Q Did you ever meet her first husband?
 14:46:13 20 A Yes.
 14:46:15 21 Q When did you meet him?
 14:46:19 22 A When I first started [REDACTED]
 14:46:23 23 Q Was he part of [REDACTED]? Is that
 14:46:26 24 what you're saying?
 14:46:27 25 A Yes.

14:44:04 1 marriage broke up was that the two of you grew apart?
 14:44:09 2 A (Inaudible response.)
 14:44:09 3 Q What do you mean by that?
 14:44:10 4 MR. HALE: That calls for expert testimony.
 14:44:13 5 MS. YOUNG: No, I'm asking him what he means
 14:44:14 6 by it.
 14:44:15 7 MR. HALE: I understand.
 14:44:15 8 BY MS. YOUNG:
 14:44:18 9 Q What did you mean when you said that?
 14:44:20 10 MR. HALE: Same objection.
 14:44:24 11 You can answer.
 14:44:25 12 A Okay.
 14:44:25 13 BY MS. YOUNG:
 14:44:25 14 Q In what ways did you grow apart?
 14:44:35 15 A I've been trying to learn how to live in this
 14:44:42 16 [REDACTED] and live out here with all you people, and I
 14:44:51 17 try to do the best I can, try to move forward, and I was
 14:45:00 18 trying to do that, and we just -- she was just going at
 14:45:07 19 a different direction.
 14:45:08 20 Q And what direction was she going?
 14:45:09 21 A Well, she was going down [REDACTED] path,
 14:45:13 22 whatever that path was, and it wasn't -- it wasn't what
 14:45:16 23 I wanted anymore, you know. I just wanted -- I wanted
 14:45:20 24 to live happy. I'm trying to live a different life
 14:45:23 25 and --

14:46:27 1 Q So you knew him before you knew her?
 14:46:31 2 A No.
 14:46:32 3 Q Same time?
 14:46:33 4 A Afterwards. I met him after her.
 14:46:36 5 Q Okay.
 14:46:36 6 But were [REDACTED]
 14:46:40 7 [REDACTED]?
 14:46:42 8 A In Santa Barbara, there's about [REDACTED]
 14:46:48 9 [REDACTED] Not all the same
 14:46:51 10 people go [REDACTED]
 14:46:53 11 Q I see. So how does it work? You'll have to
 14:46:53 12 pardon my ignorance again. Do you -- you can go to
 14:46:57 13 whichever [REDACTED]
 14:46:59 14 You don't [REDACTED]
 14:47:04 15 A I personally do.
 14:47:05 16 Q Okay.
 14:47:05 17 A Other people don't.
 14:47:06 18 Q I see.
 14:47:09 19 So you met her at [REDACTED]
 14:47:11 20 A I met her --
 14:47:11 21 Q And which [REDACTED] was that? Which [REDACTED] was
 14:47:14 22 that? Do the [REDACTED]
 14:47:17 23 A It was an [REDACTED] in Santa
 14:47:23 24 Barbara.
 14:47:23 25 THE REPORTER: I'm sorry? What?

14:47:24 1 THE WITNESS: It was an [REDACTED]
 14:47:24 2 [REDACTED] in Santa Barbara. It's a meeting place.
 14:47:25 3 BY MS. YOUNG:
 14:47:26 4 Q And then you meet -- and then you met her
 14:47:30 5 ex-husband, first husband, at a different [REDACTED]
 14:47:33 6 different meeting place?
 14:47:35 7 A I met him at that same [REDACTED] -- boy, I knew
 14:47:39 8 who he was in the beginning. We weren't on handshake
 14:47:48 9 status kind of. That has since changed.
 14:47:55 10 Q What do you mean that has since changed?
 14:47:58 11 A Well, he hasn't -- he's had a hard time
 14:48:02 12 staying. In and out, in and out, in and out. And as I
 14:48:10 13 stay in the program and live a little bit longer in this
 14:48:13 14 life, we kind of are changing things a little bit -- our
 14:48:20 15 thinking changes a little bit and we try to welcome
 14:48:23 16 people like that, the ones that go out and come back and
 14:48:29 17 go out and come back. No matter what they've done or
 14:48:31 18 what kind of baggage they got, we try to just welcome
 14:48:34 19 them back, welcome them back.
 14:48:36 20 Q So you mean you become closer to him?
 14:48:38 21 A No, not closer, just -- just when I see him, I
 14:48:41 22 reach out and say, "Hey, how's it going, welcome back."
 14:48:42 23 We have never sat down and had coffee or anything like
 14:48:43 24 that, if you know what I mean.
 14:48:50 25 Q Uh-huh. When was the last time you talked --

14:49:39 1 A [REDACTED]
 14:49:40 2 Q How do you spell that?
 14:49:42 3 A [REDACTED]
 14:49:44 4 Q And so she's 16; she's in high school?
 14:49:46 5 A She's in 11th grade.
 14:49:48 6 Q And I take it she has never been in any
 14:49:50 7 trouble?
 14:49:51 8 A No. She does really good in school.
 14:49:56 9 Q Does she stay in touch with her real father,
 14:49:59 10 her birth father?
 14:50:00 11 A No contact at all.
 14:50:01 12 Q No contact at all.
 14:50:02 13 And what about [REDACTED], does she stay in touch
 14:50:05 14 with her ex-husband?
 14:50:07 15 A No contact at all.
 14:50:09 16 Q What's her ex-husband's name?
 14:50:11 17 A [REDACTED]
 14:50:11 18 Q [REDACTED] what?
 14:50:12 19 A [REDACTED]
 14:50:14 20 Q Okay. I don't know.
 14:50:16 21 A That's okay.
 14:50:21 22 Q Now, those are the only two marriages you've
 14:50:27 23 ever had, correct?
 14:50:29 24 A Yes.
 14:50:34 25 Q And prior to [REDACTED] did you have any

14:48:56 1 the last time you talked to [REDACTED] you told me was
 14:49:01 2 when she called you and told you the investigator was
 14:49:03 3 there?
 14:49:04 4 A No, I talked to her last night.
 14:49:06 5 Q So you did.
 14:49:07 6 And what was the substance of that
 14:49:08 7 conversation last night? Did she call you or did you
 14:49:11 8 call her?
 14:49:11 9 A She called me.
 14:49:12 10 Q And does she know you're having a deposition
 14:49:14 11 today?
 14:49:15 12 A Yes.
 14:49:15 13 Q When did you tell her that?
 14:49:16 14 A I let her know that I was leaving to come and
 14:49:19 15 do this deposition and that after that I was going on
 14:49:23 16 vacation till the 14th, because her daughter lives with
 14:49:26 17 me at my house.
 14:49:27 18 Q Her daughter lives with you now?
 14:49:28 19 A Correct. She's been with me for a little
 14:49:31 20 while now.
 14:49:32 21 Q How old is her daughter?
 14:49:33 22 A [REDACTED] is 16.
 14:49:35 23 Q And her name is [REDACTED] what?
 14:49:38 24 A [REDACTED]
 14:49:39 25 Q What?

14:50:41 1 girlfriends?
 14:50:50 2 A I had a girlfriend for a brief period,
 14:50:52 3 correct.
 14:50:53 4 Q And what was her names?
 14:50:54 5 A Her name was [REDACTED]
 14:50:56 6 Q [REDACTED] what?
 14:50:57 7 A [REDACTED]
 14:50:57 8 Q And how old were you when you had that
 14:50:59 9 girlfriend? It would have been before you were 17,
 14:51:03 10 right?
 14:51:04 11 A For a short -- for a short period when I was
 14:51:10 12 beginning 15, I believe.
 14:51:11 13 Q Beginning at 15?
 14:51:12 14 A (Inaudible response.)
 14:51:13 15 Q Where did you meet [REDACTED]
 14:51:20 16 A Where did I meet [REDACTED] I don't recall, to
 14:51:30 17 tell you the truth.
 14:51:34 18 Q Was that after the Father Kelly --
 14:51:38 19 A Yes.
 14:51:38 20 Q -- incidents that you met [REDACTED]
 14:51:42 21 Was it shortly after?
 14:51:42 22 A No. It was a couple years down the road when
 14:51:49 23 I met [REDACTED]
 14:51:53 24 Q Then it must have been after you were 15,
 14:51:55 25 wouldn't it, or no?

14:52:08 1 A Why do you say that?
 14:52:10 2 Q Well, I believe in your -- the papers that
 14:52:14 3 your lawyer has given out, it said that the abuse that
 14:52:18 4 you're alleging with Father Kelly didn't start until you
 14:52:24 5 were 13, even though you met him when you were 12.
 14:52:27 6 A Uh-huh.
 14:52:28 7 Q And lasted approximately two years. And you
 14:52:34 8 just said, I believe, that you met [REDACTED] a couple years
 14:52:37 9 after that.
 14:52:4210 A So I -- so when Father Kelly was still
 14:52:4711 happening, I met [REDACTED]
 14:52:4912 Q Oh, okay. That was my question. I didn't --
 14:52:5113 A Oh, okay.
 14:52:5114 Q I thought you had said after that.
 14:52:5515 So you met [REDACTED] while Father Kelly was still
 14:52:5716 happening?
 14:52:5817 A Exactly.
 14:52:5818 Q And you started seeing her --
 14:53:0019 A Uh-huh.
 14:53:0020 Q -- as a girlfriend?
 14:53:0221 A For a short period, yeah.
 14:53:0422 Q And what is a short period? How long did you
 14:53:0623 see her?
 14:53:0924 A I think maybe I was with her for a couple
 14:53:1125 months, maybe.

14:54:02 1 A No, my -- my first [REDACTED]
 14:54:06 2 [REDACTED]
 14:54:11 3 Q [REDACTED]
 14:54:12 4 A Yeah, he's in prison now, and she writes to
 14:54:15 5 him sometimes, too.
 14:54:16 6 Q And so you met her [REDACTED]
 14:54:19 7 A No, I met her when I was -- when I was around
 14:54:21 8 15 years old.
 14:54:26 9 Q So what is [REDACTED] in prison for?
 14:54:4710 A He is in prison for his third strike.
 14:54:4711 Q But what did he do? What was his first
 14:54:4712 strike?
 14:54:4713 A I don't know what his first strikes were. But
 14:54:4914 his third strike, they caught him with a little bit of
 14:54:5615 heroin, about that much (indicating), like that.
 14:54:5816 THE REPORTER: Counsel, I need to go off
 14:54:5917 again. I am sorry.
 14:55:0218 MS. YOUNG: Okay.
 14:55:0919 THE VIDEOGRAPHER: We're going off the record.
 14:55:1020 The time is 2:55 p.m.
 21 (Recess.)
 14:58:2222 THE VIDEOGRAPHER: We're going back on the
 14:59:1123 record. The time is 2:59 p.m. Please continue.
 15:25:1624 BY MS. YOUNG:
 14:59:1525 Q Thank you.

14:53:12 1 Q What did you say her last name was again?
 14:53:14 2 A [REDACTED]
 14:53:15 3 Q [REDACTED]
 14:53:16 4 A Uh-huh.
 14:53:18 5 Q When was the last time you spoke to [REDACTED]
 14:53:24 6 A Maybe a couple months ago.
 14:53:26 7 Q So you keep in touch with her?
 14:53:28 8 A No, I see her at a store.
 14:53:29 9 Q So she still lives in Santa Barbara?
 14:53:3210 A Yes.
 14:53:3311 Q Do you know where she lives?
 14:53:3412 A No.
 14:53:3513 Q Did you ever tell her about your allegations
 14:53:3714 against Father Kelly?
 14:53:3815 A No.
 14:53:3916 Q Did you ever talk to her about the substance
 14:53:4117 of your lawsuit?
 14:53:4218 A No.
 14:53:4319 Q And so when you ran into her in the store a
 14:53:4620 couple months ago, what did you talk about? Anything
 14:53:4821 special?
 14:53:5122 A Our conversation usually consists of have you
 14:53:5423 heard from so and so? How is he doing? We just sent
 14:53:5924 him a package --
 14:54:0025 Q You mean school friends?

14:59:16 1 Mr. [REDACTED] when you were dating [REDACTED]
 14:59:21 2 did you have sex with her?
 14:59:23 3 A Yes.
 14:59:24 4 Q On how many occasions?
 14:59:35 5 A Not many. Maybe five, maybe.
 14:59:37 6 Q And was this at the same time you were having
 14:59:41 7 problems with Father Kelly?
 14:59:43 8 A Yes.
 14:59:43 9 Q Okay.
 14:59:4510 During the time you were having the problems
 14:59:4811 with Father Kelly, did you have sex with any other
 14:59:5112 people?
 15:00:0313 A Not that I can recall.
 15:00:1014 Q Do you consider yourself heterosexual as
 15:00:1215 opposed to homosexual?
 15:00:2016 A Yes.
 15:00:2017 Q Have you -- other than whatever happened
 15:00:2318 between you and Father Kelly, have you ever had [REDACTED]
 15:00:2719 [REDACTED]
 15:00:3720 A Yes.
 15:00:3821 Q And when was that?
 15:00:4422 A 1981.
 15:00:4723 Q And who was that person?
 15:00:5024 A [REDACTED]
 15:00:5325 Q [REDACTED] who?

15:00:53 1 A [REDACTED]
 15:00:56 2 Q And how did you know [REDACTED]
 15:01:01 3 A He was my [REDACTED]
 15:01:07 4 Q Is that how you met him?
 15:01:13 5 A I had met him in the county jail prior to
 15:01:15 6 that.
 15:01:17 7 Q Did you ever go to -- was he somebody you went
 15:01:19 8 to school with or --
 15:01:21 9 A No.
 15:01:21 10 Q -- just met him in jail?
 15:01:22 11 A No, I just met him in jail.
 15:01:25 12 Q And he has passed away; is that correct?
 15:01:28 13 A That's what I hear.
 15:01:30 14 Q How did you find out that he had passed away?
 15:01:33 15 A I just heard on the streets.
 15:01:38 16 Q What was he in jail for in 19-- whenever you
 15:01:41 17 were in jail with him?
 15:01:43 18 A I think burglary, I think.
 15:01:46 19 Q Did you ever commit any crimes together?
 15:01:49 20 A No.
 15:01:49 21 Q So it was separate?
 15:01:52 22 A (Inaudible response.)
 15:01:54 23 Q And [REDACTED]
 15:01:58 24 [REDACTED]
 15:01:59 25 A [REDACTED]

15:03:17 1 Q After he died?
 15:03:18 2 A Yeah,
 15:03:19 3 Q Or after --
 15:03:20 4 A No, no, no.
 15:03:20 5 Q [REDACTED]
 15:03:21 6 A [REDACTED]
 15:03:22 7 Q [REDACTED]
 15:03:23 8 A -- the '80s, yeah.
 15:03:24 9 Q [REDACTED]
 15:03:26 10 A Yes.
 15:03:26 11 Q [REDACTED]
 15:03:28 12 A [REDACTED]
 15:03:35 13 Q Let me go back one more question about [REDACTED]
 15:03:37 14 [REDACTED]
 15:03:39 15 Did the two of you ever seek marriage
 15:03:41 16 counseling or any type of counseling for your marriage?
 15:03:47 17 A Yes.
 15:03:48 18 Q And who did you see when you sought that
 15:03:51 19 counseling? Who was the counselor?
 15:03:57 20 A I think there was one guy by the last name of
 15:04:01 21 [REDACTED]
 15:04:02 22 Q [REDACTED]
 15:04:02 23 A I believe so.
 15:04:03 24 Q Was he in Santa Barbara?
 15:04:05 25 A Yes.

15:02:02 1 Q Did you [REDACTED]
 15:02:04 2 [REDACTED]
 15:02:05 3 A No.
 15:02:05 4 Q [REDACTED]
 15:02:08 5 A [REDACTED]
 15:02:09 6 Q [REDACTED]
 15:02:12 7 A Yes.
 15:02:13 8 Q Did you [REDACTED]
 15:02:16 9 [REDACTED]
 15:02:21 10 [REDACTED]
 15:02:23 11 A No.
 15:02:23 12 Q No?
 15:02:24 13 A No.
 15:02:32 14 Q Did you ever tell [REDACTED] about Father
 15:02:34 15 Kelly?
 15:02:35 16 A No.
 15:02:42 17 Q Do you know where [REDACTED] went to school?
 15:02:45 18 A No.
 15:02:54 19 Q Do you know how [REDACTED] died?
 15:02:58 20 A No.
 15:03:01 21 Q You don't know what he died from?
 15:03:03 22 A I heard he died from AIDS.
 15:03:08 23 Q [REDACTED]
 15:03:10 24 [REDACTED]
 15:03:12 25 A [REDACTED]

15:04:05 1 Q Is he a -- a psychologist, a psychiatrist, a
 15:04:09 2 medical doctor? A social worker?
 15:04:10 3 A I don't know what he was, just somebody
 15:04:13 4 suggested we go talk to him. He was a marriage
 15:04:15 5 counselor and we went and talked to him.
 15:04:17 6 Q Do you know his first name?
 15:04:27 7 A I want to say [REDACTED] I'm not sure, though.
 15:04:34 8 Q And who referred you to him?
 15:04:36 9 A I don't --
 15:04:36 10 Q You said somebody recommended you go see him.
 15:04:38 11 A I don't recall who it was.
 15:04:39 12 Q How many times did you see him?
 15:04:41 13 A Once, I think.
 15:04:43 14 Q Once together?
 15:04:43 15 Did you see him at all, either one of you, by
 15:04:45 16 yourselves?
 15:04:47 17 A I don't believe so. I think one time only.
 15:04:52 18 Q And what year would that have been?
 15:04:58 19 A I believe it was in '96.
 15:05:00 20 Q Now, you were married in [REDACTED] in February of
 15:05:03 21 [REDACTED] Was it toward the end of [REDACTED]
 15:05:05 22 A I -- I -- that would be my guesstimate, yes.
 15:05:21 23 Q Did the counseling help you?
 15:05:25 24 A We got divorced.
 15:05:26 25 Q So the answer is no?

15:05:28 1 A I think so.
 15:05:29 2 Q Or it might be yes.
 15:05:31 3 A I think so.
 15:05:37 4 Q But to the best of your recollection, only one
 15:05:40 5 time you saw him?
 15:05:41 6 A Yes.
 15:05:42 7 Q Now, who was [REDACTED]?
 15:05:52 8 A She was an old -- an acquaintance, a girl that
 15:05:57 9 I used to kind of hang out with.
 15:06:00 10 Q Was she a girlfriend?
 15:06:01 11 A I guess you could call her a girlfriend.
 15:06:04 12 Q You had sexual relations with her?
 15:06:06 13 A Yes.
 15:06:07 14 Q On many occasions?
 15:06:08 15 A Yes.
 15:06:09 16 Q During what period of time?
 15:06:12 17 A That would be a hard one to recall, because
 15:06:16 18 she used to go to jail and prison a lot too, so if we
 15:06:20 19 just managed to be out at the same time, then we'd be
 15:06:25 20 together for a little while. But --
 15:06:31 21 Q During what span of years was this --
 15:06:31 22 A I'd say --
 15:06:31 23 Q -- going on?
 15:06:35 24 A I'd say maybe from around 1983 to possibly
 15:06:52 25 around 1990, maybe. Off and on just, I mean.

15:08:10 1 A Not really.
 15:08:11 2 Q Then what was the occasion of your last
 15:08:13 3 meeting or talk, or was it a phone call or person --
 15:08:17 4 A She -- she calls me on occasion and just asks
 15:08:19 5 me how I'm doing.
 15:08:20 6 Q And do you ask her how she's doing?
 15:08:23 7 A I do.
 15:08:23 8 Q How is she doing?
 15:08:26 9 A She does good sometimes, sometimes she's not
 15:08:29 10 doing well. The last time I talked to her, she was
 15:08:32 11 doing okay.
 15:08:32 12 Q So is she a [REDACTED]?
 15:08:35 13 A I do not know.
 15:08:37 14 Q You've never seen her at [REDACTED] that she --
 15:08:38 15 that you've gone to?
 15:08:39 16 A No.
 15:08:41 17 Q Do you know whether she still [REDACTED]?
 15:08:44 18 A I have no idea.
 15:09:07 19 Q Have you ever been accused of mistreating any
 15:09:13 20 of your children or stepchildren?
 15:09:15 21 A No.
 15:09:19 22 Q Do you currently have a significant other?
 15:09:25 23 A Yes.
 15:09:25 24 Q And what is her name?
 15:09:26 25 A [REDACTED]

15:06:57 1 Q Have you spoken to her since then?
 15:07:01 2 A I have.
 15:07:03 3 Q When was the last time you spoke to her?
 15:07:07 4 A Maybe about six months ago, maybe.
 15:07:10 5 Q Did you speak to her about this case?
 15:07:12 6 A No.
 15:07:14 7 Q Did you ever tell her about what Father Kelly
 15:07:15 8 did to you?
 15:07:18 9 A No.
 15:07:21 10 Q Now, did the two of you [REDACTED]?
 15:07:24 11 A Yes.
 15:07:26 12 Q And do you have some [REDACTED]
 15:07:28 13 while she was with you?
 15:07:29 14 A Yes.
 15:07:31 15 Q How many? On how many occasions did that
 15:07:34 16 happen?
 15:07:38 17 A Around three occasions, maybe.
 15:07:43 18 Q Did she ever go with you to a [REDACTED]
 15:07:47 19 [REDACTED]?
 15:07:54 20 A I don't believe she ever went to the hospital.
 15:07:57 21 Q She was just with you?
 15:08:00 22 A She was just with me, and she made the 911
 15:08:02 23 call and made sure they got me before I died.
 15:08:07 24 Q And you still keep in touch with her, I take
 15:08:10 25 it?

15:09:28 1 Q That's [REDACTED]
 15:09:29 2 A Yes.
 15:09:30 3 Q [REDACTED]
 15:09:32 4 A (Inaudible response.)
 15:09:32 5 Q And where did you meet [REDACTED]?
 15:09:34 6 A I met her at -- at [REDACTED]
 15:09:37 7 Q [REDACTED]
 15:09:38 8 A Yes.
 15:09:38 9 Q How -- how long have you been seeing her? Or
 15:09:46 10 how long have you been seeing her romantically.
 15:09:51 11 A I've been seeing her since -- since around
 15:09:57 12 [REDACTED]
 15:10:00 13 Q So you've been seeing her steadily since [REDACTED]
 15:10:06 14 A Yes.
 15:10:09 15 Q [REDACTED]
 15:10:12 16 [REDACTED]
 15:10:15 17 A [REDACTED]
 15:10:19 18 [REDACTED]
 15:10:24 19 Q [REDACTED]
 15:10:24 20 [REDACTED]
 15:10:24 21 A Yes.
 15:10:27 22 Q [REDACTED]
 15:10:29 23 A No.
 15:10:29 24 Q Okay.
 15:10:31 25 And how long, if you know, has [REDACTED] been

15:10:38 1 [REDACTED]
 15:10:47 2 A I don't exactly know.
 15:10:49 3 Q Does she come to [REDACTED]
 15:10:51 4 A Yes.
 15:10:56 5 Q Is she going on vacation with you tomorrow?
 15:11:00 6 A Yes.
 15:11:01 7 Q So she scuba dives also?
 15:11:04 8 A No.
 15:11:04 9 Q Oh.
 15:11:0410 A She snorkles only.
 15:11:0611 Q Oh, okay.
 15:11:0712 Do you live together?
 15:11:0913 A No.
 15:11:1014 Q Does she have children?
 15:11:1215 A She has [REDACTED]
 15:11:1316 Q And how [REDACTED]
 15:11:1617 A I think [REDACTED]
 15:11:1818 Q Has -- do you -- is [REDACTED]
 15:11:2719 [REDACTED] do you know?
 15:11:2820 A Yes.
 15:11:2921 Q And do you do things with [REDACTED] or
 15:11:3322 is it just [REDACTED]?
 15:11:3523 A Just [REDACTED]
 15:11:3624 Q Okay.
 15:11:3725 So you're not close to her [REDACTED]

15:12:39 1 So does [REDACTED]
 15:12:42 2 [REDACTED]
 15:12:42 3 A Yes.
 15:12:43 4 Q Yes? So they [REDACTED]
 15:12:49 5 but they're not really, or what's -- you tell me.
 15:12:53 6 What's the situation?
 15:12:54 7 MR. HALE: Don't you read the responses? It's
 15:12:56 8 in there.
 15:12:58 9 MS. YOUNG: No, I didn't.
 15:12:5910 MR. HALE: Go ahead.
 15:12:5911 MS. YOUNG: I must have missed it. I was
 15:13:0112 concentrating on my next question.
 15:13:0413 THE WITNESS: She -- [REDACTED] I
 15:13:0914 mean they -- [REDACTED]
 15:13:1215 [REDACTED]
 15:13:1416 BY MS. YOUNG:
 15:13:1417 Q And how long [REDACTED]
 15:13:1818 A Longer than [REDACTED]
 15:13:2119 Q Okay.
 15:13:2220 And when you say [REDACTED]
 15:13:2421 [REDACTED] so the whole time that you and [REDACTED] have been
 15:13:2722 together, she's [REDACTED]
 15:13:3123 A Yes.
 15:13:3224 Q Okay.
 15:13:3625 And [REDACTED]

15:11:40 1 A No.
 15:11:41 2 Q Is -- has her [REDACTED] been in trouble with the
 15:11:44 3 law?
 15:11:47 4 A No.
 15:11:48 5 Q Is he a good kid?
 15:11:51 6 A He's getting ready to graduate from [REDACTED]
 15:11:55 7 Q So he's --
 15:11:56 8 A A good --
 15:11:56 9 Q How old did you say he was?
 15:11:5810 A [REDACTED]
 15:11:5811 Q So he's a child genius?
 15:12:0112 A (Inaudible response.)
 15:12:0213 Q Is that a yes?
 15:12:0214 A God, isn't that amazing?
 15:12:0415 Q So he's a good kid?
 15:12:0616 A He's a good kid.
 15:12:1717 Q Where does [REDACTED] live?
 15:12:2018 A In Santa Barbara.
 15:12:2319 Q Who does she live with, because her [REDACTED]
 15:12:2520 doesn't live with her because [REDACTED] in [REDACTED] right?
 15:12:2921 A [REDACTED]
 15:12:3122 Q Oh, she's [REDACTED]
 15:12:3223 A Yes.
 15:12:3424 Q Okay.
 15:12:3625 Let me back up a few steps, then.

15:13:36 1 A Yes.
 15:13:36 2 Q And is [REDACTED]
 15:13:45 3 A I don't think so.
 15:13:47 4 Q You don't think so --
 15:13:48 5 A No, [REDACTED]
 15:13:49 6 Q -- or you don't know?
 15:13:50 7 A [REDACTED]
 15:13:50 8 Q No?
 15:13:51 9 A [REDACTED]
 15:13:5210 MR. HALE: That was a facetious response.
 15:13:5411 MS. YOUNG: Oh, okay. Well --
 15:13:5612 MR. HALE: I know.
 15:13:5613 MS. YOUNG: I'm still not sure I understand.
 15:13:5714 MR. HALE: I think we're all operating under
 15:14:0015 the belief that you had read the injury responses and
 15:14:0416 obviously you haven't.
 15:14:0517 MS. YOUNG: The what response?
 15:14:0618 MR. HALE: The injury response.
 15:14:0719 And obviously you haven't and [REDACTED] will
 15:14:0920 explain the situation.
 15:14:1021 MS. YOUNG: Okay. The injury response.
 15:14:1222 MR. HALE: In the special rogs, there's a
 15:14:1423 portion that refers to what injuries did you suffer as a
 15:14:1624 result of the abuse, and there's like 12 pages of
 15:14:1925 factual discussion --

15:14:19 1 MS. YOUNG: Oh.
 15:14:22 2 MR. HALE: -- in special rogs.
 15:14:23 3 MS. YOUNG: Did I miss that?
 15:14:26 4 MR. HALE: It's in there.
 15:14:27 5 MS. YOUNG: I read it. Maybe I didn't.
 15:14:29 6 MR. HALE: Maybe it was very dry.
 7 BY MS. YOUNG:
 15:14:33 8 Q Okay.
 15:14:33 9 So tell me about what [REDACTED]
 15:14:40 10 [REDACTED]
 15:14:44 11 [REDACTED]
 15:14:46 12 MR. HALE: No, no, no, that's not -- no,
 15:14:47 13 no. When you asked for injuries as a result of the
 15:14:49 14 abuse, the sexual abuse, the Father Kelly abuse, and
 15:14:55 15 this sets forth the -- his entire psychosocial history.
 15:15:00 16 That's where you would have found out about this
 15:15:04 17 relationship and the nature of the relationship. He can
 15:15:07 18 tell you better than I can.
 15:15:08 19 MS. YOUNG: Okay.
 15:15:08 20 MR. HALE: But it's all in there, but not
 15:15:10 21 because there was abuse by the --
 15:15:11 22 MS. YOUNG: Oh, okay.
 15:15:11 23 MR. HALE: [REDACTED]
 15:15:11 24 MS. YOUNG: I'm sorry. I'm --
 15:15:12 25 MR. HALE: I'm sorry, I'm not trying to

15:16:37 1 Q When was the last time that you [REDACTED]
 15:16:42 2 [REDACTED]
 15:16:46 3 A [REDACTED]
 15:16:51 4 Q [REDACTED]
 15:16:55 5 A [REDACTED]
 15:17:01 6 Q In the Santa Barbara area?
 15:17:03 7 A Yes.
 15:17:04 8 Q Okay.
 15:17:04 9 [REDACTED]
 15:17:05 10 A [REDACTED]
 15:17:09 11 Q And prior to that, when was the last time you
 15:17:13 12 [REDACTED]
 15:17:23 13 A [REDACTED]
 15:17:25 14 Q And was [REDACTED]
 15:17:27 15 A Yes.
 15:17:36 16 Q When was the first time [REDACTED]
 15:17:39 17 [REDACTED]
 15:17:54 18 A I can't really recall. I don't know.
 15:17:57 19 Q Was it when you were a teenager?
 15:18:07 20 A No.
 15:18:08 21 Q Later?
 15:18:08 22 A It had to have been, yeah, it's gotta be
 15:18:11 23 later. [REDACTED]
 15:18:17 24 [REDACTED]
 15:18:20 25 Q But [REDACTED]

15:15:13 1 confuse you any more.
 15:15:14 2 MS. YOUNG: -- just lost.
 15:15:16 3 MR. HALE: It's just a complicated
 15:15:17 4 [REDACTED] put it that way.
 15:15:19 5 BY MS. YOUNG:
 15:15:20 6 Q Okay.
 15:15:21 7 So you -- so you've been seeing [REDACTED]
 15:15:24 8 [REDACTED]
 15:15:28 9 [REDACTED]
 15:15:31 10 A [REDACTED]
 15:15:31 11 Q [REDACTED] what?
 15:15:32 12 A [REDACTED]
 15:15:43 13 Q So tell me about this [REDACTED] When it
 15:15:46 14 started she [REDACTED] and you told me [REDACTED]
 15:15:50 15 [REDACTED] Did you ask [REDACTED]
 15:15:53 16 A At some point throughout the years, we've
 15:15:55 17 talked about it, but I never asked [REDACTED]
 15:15:59 18 [REDACTED] I mean --
 15:16:06 19 Q Did you ever tell her that if she [REDACTED]
 15:16:09 20 [REDACTED]
 15:16:12 21 A I've -- I've told her at some point that
 15:16:14 22 that -- you know, I would like to end up living with her
 15:16:17 23 at some point.
 15:16:23 24 Q [REDACTED]
 15:16:33 25 A [REDACTED]

15:18:22 1 A Yeah, there was [REDACTED]
 15:18:23 2 [REDACTED]
 15:18:26 3 Q Does [REDACTED]
 15:18:29 4 [REDACTED]
 15:18:30 5 A I don't know.
 15:18:32 6 MR. HALE: Speculation.
 13:10:27 7 BY MS. YOUNG:
 15:18:34 8 Q What's your relationship with [REDACTED]? Do
 15:18:38 9 you see him socially?
 15:18:40 10 A No.
 15:18:40 11 Q Have you ever met him?
 15:18:42 12 A No.
 15:18:42 13 Q Oh.
 15:18:46 14 But you say he knows about [REDACTED]
 15:18:50 15 [REDACTED] Was that your testimony?
 15:18:53 16 A Is what [REDACTED] tells me.
 15:18:55 17 Q That's what [REDACTED] tells you?
 15:18:57 18 A Yeah.
 15:18:57 19 Q Does she tell you that [REDACTED]
 15:19:00 20 A No.
 15:19:03 21 Q Does -- does she tell you that [REDACTED]
 15:19:06 22 [REDACTED]
 15:19:11 23 A She's never told me that.
 15:19:19 24 Q What has she told you with respect to [REDACTED]
 15:19:23 25 [REDACTED]

15:19:31 1 A Kind of the -- kind of the way the situation
 15:19:33 2 is, I live in my home, [redacted] lives in her home,
 15:19:45 3 sometimes we get together throughout the week, [redacted]
 15:19:53 4 Holidays and stuff, [redacted] goes with her family and I
 15:19:58 5 stay with my family. Her [redacted]
 15:20:02 6 Her [redacted] -- and [redacted]
 15:20:05 7 [redacted]
 15:20:06 8 Q [redacted]
 15:20:08 9 A Yes.
 15:20:09 10 Q [redacted]
 15:20:10 11 A Yes.
 15:20:14 12 Her parents or nobody knows nothing about me.
 15:20:23 13 Q Have you ever talked to [redacted] about
 15:20:30 14 this --
 15:20:30 15 A No.
 15:20:32 16 Q -- case? No?
 15:20:35 17 A No.
 15:20:36 18 Q Have you talked to [redacted] about it?
 15:20:39 19 A Yes.
 15:20:45 20 Q When? When was the first time?
 15:21:09 21 A It was around the time I believe when I --
 15:21:14 22 after when I read the newspaper article about the open
 15:21:18 23 window.
 15:21:18 24 Q So 2003 --
 15:21:19 25 A Yeah.

15:22:52 1 Q And that's when you changed sponsors?
 15:22:54 2 A Yes.
 15:23:03 3 Q When was the first time you told anybody about
 15:23:06 4 the abuse that you're alleging against Father Kelly?
 15:23:17 5 A In -- in this [redacted] or other -- [redacted]
 15:23:25 6 [redacted] also, they have these [redacted] that you're
 15:23:28 7 supposed to work, you're supposed to do these [redacted]
 15:23:32 8 actually apply them. And there's one step that deals
 15:23:37 9 with specifically resentments and secrets. And --
 15:23:48 10 Q So what year was it that you first told
 15:23:52 11 anybody?
 15:23:52 12 A 1995.
 15:23:54 13 Q And was that [redacted] ?
 15:23:56 14 A It was.
 15:23:58 15 Q And by the way, what prison is [redacted]
 15:24:01 16 in?
 15:24:02 17 A I -- he is in Coalinga.
 15:24:08 18 Q Do you ever go see him?
 15:24:09 19 A No.
 15:24:15 20 Q And so in 1995, what did you tell him? You
 15:24:19 21 told him privately or was this at a --
 15:24:21 22 A Yes, it was private.
 15:24:23 23 Q Privately?
 15:24:24 24 A It was a one-on-one.
 15:24:25 25 Q I see. What did you tell him?

15:21:19 1 Q -- somewhere in that?
 15:21:22 2 A Somewheres around there.
 15:21:29 3 Q Or 2002. I'm not sure what year that was, but
 15:21:29 4 somewhere in there, you told her?
 15:21:30 5 A Uh-huh.
 15:21:31 6 Q And what did you tell her?
 15:21:35 7 A I told her about the newspaper article and
 15:21:41 8 that I was gonna go talk about it with someone.
 15:21:47 9 Q Did you tell her about the abuse that you're
 15:21:49 10 alleging Father Kelly did to you?
 15:22:02 11 A I -- I think -- I -- I think I shared some
 15:22:04 12 information with her, but no specifics.
 15:22:06 13 Q And what information did you share with her?
 15:22:11 14 Tell me what you told her.
 15:22:12 15 A That -- that I had been abused by Father
 15:22:25 16 Kelly.
 15:22:25 17 Q And did you tell her what that abuse
 15:22:28 18 specifically consisted of?
 15:22:30 19 A No, I couldn't tell her that.
 15:22:32 20 Q Now, in your papers -- well, let me back up a
 15:22:37 21 minute.
 15:22:38 22 Was the reason that you had to [redacted]
 15:22:39 23 [redacted] went to jail?
 15:22:45 24 A No, he left town and he went down to Mexico to
 15:22:49 25 work in a -- to open a coffee shop.

15:24:26 1 A I told him that when I was a young kid, Father
 15:24:28 2 Kelly over at the Guadalupe church used to take me up to
 15:24:34 3 the cabin and supply me with beer, give me beer to
 15:24:37 4 drink, and -- and he would molest me in his bed.
 15:24:42 5 Q Did you tell him any more specifics than that?
 15:24:47 6 A I told him that he used to rub on me, that he
 15:24:49 7 would rub on me and hump the bed.
 15:24:54 8 Q Anything more specific than that?
 15:25:02 9 A I think that's all I told him. That's the
 15:25:05 10 best of my recollection.
 15:25:10 11 Q Now, also in 1995, I believe, you told some
 15:25:10 12 other people about what you're saying happened between
 15:25:15 13 yourself and Father Kelly?
 15:25:16 14 A Not true.
 15:25:17 15 Q Nobody else?
 15:25:18 16 A Nope.
 15:25:20 17 Q Do you remember telling people at a men's
 15:25:23 18 retreat what happened between you and Father Kelly?
 15:25:26 19 A I've never mentioned Father Kelly. I've never
 15:25:31 20 mentioned any names when talking about any kind of abuse
 15:25:35 21 or sexual abuse. I've never mentioned Father Kelly's
 15:25:39 22 name, only to Steve, only.
 15:25:41 23 Q Only -- only to [redacted]
 15:25:41 24 A Correct.
 15:25:42 25 Q Now, but did you talk about the abuse to a