

EXHIBIT “9”

HENNIGAN, BENNETT & DORMAN LLP
LAWYERS
LOS ANGELES, CALIFORNIA

1 HENNIGAN, BENNETT & DORMAN, L.L.P.
2 J. Michael Hennigan (SBN 59491)
3 Donald F. Woods, Jr. (SBN 051854)
4 601 South Figueroa Street, Suite 3300
5 Los Angeles, California 90017
6 Telephone: (213) 694-1200
7 Fax: (213) 694-1234

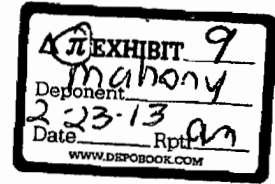
8 Attorneys for the Roman Catholic Archbishop of
9 Los Angeles, a corporation sole, also known as the
10 Archdiocese of Los Angeles

11 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF FRESNO

13 ROBERT DOE,) Case No. CV022793
14)
15 Plaintiff,) RESPONSE TO DEPOSITION SUBPOENA
16) FOR BUSINESS RECORDS
17)
18)
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PROPOUNDING PARTY: Plaintiff Robert Doe

RESPONDING PARTY: Custodian of Records, Archdiocese of Los Angeles



1 The Archdiocese of Los Angeles responds to the deposition subpoena for production of
2 business records propounded by Plaintiff Robert Doe by production of the attached documents,
3 bates numbers ALLI 00001 through ALLI 00037.

4
5 Dated: March 21, 2005.

HENNIGAN, BENNETT & DORMAN, L.L.P.
J. Michael Hennigan
Donald F. Woods, Jr.

6
7
8 By: Donald F. Woods, Jr.
9

10 Attorneys for the Roman Catholic Archbishop of
11 Los Angeles, a corporation sole, also known as
12 the Archdiocese of Los Angeles
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Hennigan, Bennett & ...
Los Angeles, California

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Verification

I, Monsignor Craig A. Cox, declare:

1. My business address is Monsignor Craig A. Cox, Archdiocese of Los Angeles, Vicar for Clergy Office, Archdiocese Catholic Center, 3424 Wilshire Boulevard, 11th Floor, Los Angeles, California 90010-2241.

2. I am and have been since January 2001 the Vicar for Clergy for The Roman Catholic Archbishop of Los Angeles, a corporation sole, also known as the Archdiocese of Los Angeles (the "Archdiocese").

3. I am a custodian of records for the clergy files of the Archdiocese

4. I am delivering herewith true copies of the documents described in the subpoena to the attorneys listed in the proof of service.

5. These records were found in the files of the Archdiocese.

6. The document, bates number ALLI 00003, did not copy well, despite numerous attempts to change the level of darkness of the copy. Therefore, in February, 2005, I prepared a transcript, taken from the original document, bates number ALLI 00003. The transcription has the bates number ALLI 00037, and is being provided as a courtesy. Bates number ALLI 00037 is an exact transcription of the document with bates number ALLI 0003 and I hereby verify its accuracy.

Executed this 22nd day of March, 2005, at Los Angeles, California.

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


Monsignor Craig A. Cox

HENNIGAN, BENNETT & LARSON LLP
LAWERS
LOS ANGELES, CALIFORNIA

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PROOF OF SERVICE

I declare as follows:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 601 South Figueroa Street, Suite 3300, Los Angeles, California 90017. On March 22, 2005, I served the foregoing document described as **Response to Deposition Subpoena for Business Records** on the interested parties in this action as follows:

- by transmitting via facsimile the documents listed above to the fax number set fourth below on this date. This transmission was reported as complete without error by a transmission report issued by the facsimile machine upon which the said transmission was made immediately following the transmission. A true and correct copy of the said transmission is attached hereto and incorporated herein by this reference.
- by placing the document listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as set forth below.
- by placing the document listed above in a sealed envelope and affixing a pre-paid air bill, and causing the envelope to be delivered as set forth below.

**Raymond P. Boucher
Anthony M. DeMarco
Kiesel Boucher & Larson LLP
8648 Wilshire Boulevard
Beverly Hills, California 90211-2910**

**Carey Johnson
Stammer, McKnight, Barnum & Bailey
2540 West Shaw Lane, Suite 110
Fresno, California 93711**

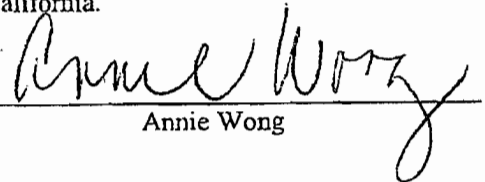
- by personally delivering the document listed above to the persons at the address set forth below.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postal meter date is more than one day after date of deposit for mailing in affidavit.

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

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on March 22, 2005, at Los Angeles, California.


Annie Wong



ARCHDIOCESE OF LOS ANGELES
1531 WEST NINTH STREET
LOS ANGELES 15, CALIFORNIA
DUnkirk 8-8101

November 18, 1963

His Excellency
Most Reverend Bernard T. Espelage, OFM, D.D.
The Chancery Office
P.O. Box 1338
Gallup, New Mexico

Your Excellency:

This office has received an enquiry concerning
Reverend ANGELICO FLAMM, OFM, who we understand is assigned
to the Navajo Indian Reservation in New Mexico.

Our purpose is simply to confirm this information.
Any assistance that your office might be in this regard will
be deeply appreciated.

With sentiments of profound esteem, I am

Sincerely yours,

Reverend John B. Thom
Assistant Secretary

Gallup, N.M. November 21, 1963.

Dear Rev. Father:- We have no idea of who this Rev. ANGELICO FLAMM IS AND
he certainly is not work on the Navaho Indian Reservation and we have never
hear of him. Sorry at being unable to help you.

+ Bernard J Espelage OFM
Bishop of Gallup.

ALLI 00001

ST. JUDE MISSION

P. O. Box 258

TUBA CITY, ARIZONA

November 22, 1963

Rt. Rev. Msgr. Joseph J. Truxaw
Church of the Immaculate Conception
1433 W. Ninth Street
Los Angeles 15, California

Dear Monsignor:

Your note was forwarded to me in yesterday's mail. The same mail brought a letter from Father Allison. In his letter Father told of a request for Mass stipends sent to him by Father Flann of Window Rock, Arizona. He said he procured \$50 in Mass stipends from you and sent the money to Father Flann. He wonders if I have received the money, because you, Monsignor, want verification of the fact.

Unfortunately, I must inform you that I am in complete ignorance of any such transaction. I sent no letter to Father Allison; I did not know his address until yesterday. Incidentally, his letter to me in yesterday's mail was quite correctly addressed.

Last evening I phoned my superior at St. Michael's Mission (three miles from Window Rock), in the hope that he might know something of this matter. He said our Bishop was recently asked for information about a Father Angelico Flamm, O.F.M. Apparently the request came from you or your Chancery Office. I fear the name is fictitious, Monsignor.

The whole situation smacks of deception--somewhere along the line. Let me offer this bit of information; perhaps you are not aware of it. Father Allison was here in the diocese for a year or so, perhaps three years ago. He was assistant to Father James Lindenmeyer, Our Lady of Guadalupe Church, 224 S. Kendrick St., Flagstaff, Arizona. Father Allison's record there was not, as I have heard from the Padres, commendable--though I am not cognizant of very many details. Father Lindenmeyer can fill you in, if you wish to write to him.

If I am speaking out of turn, I shall ask Father Allison's forgiveness. I do hope you will soon solve the present difficulty.

Sincerely in Christ,

Father Flann O'Neil, O.F.M.

Father Flann O'Neil, O.F.M.

ALLI 00002

Church of Our Lady of Guadalupe

224 SOUTH KENDRICK
FLAGSTAFF, ARIZONA

November 19, 1955

Right Reverend Joseph Frank
Bishop of the Diocese of Phoenix
1435 West McIntire
San Diego, California

Right Reverend and Dear Monsignor:

This is in answer to your letter of November 15th which arrived in this morning's mail.

Father William Allison is well known to me since he was an assistant in this parish for some time. He normally was in charge of the Newman Club work and in that capacity handled unacceptable bills. The money given him by the diocese for the Newman Club was not accounted for; many personal bills amounting to several hundred dollars were left unpaid and collectors are still in search of him. I had no indications whatsoever that he was taking anything from the collection. He is a man of very talents not the least of which is his preaching ability, and his personal appeal.

It is my own opinion that his financial difficulties arise from a greater difficulty, and that I do, respectfully - honorably. Like you, I too was concerned about his associates but never would I prove anything; never did I receive any complaints during his stay here. In fact he did great work with the Newman Club and accomplished a great deal for the parish. Since he left, however, three young men in the parish have told me of incidents involving him and I have no reason whatsoever to doubt their word. The one boy remained away from the Sacraments for a long time due to embarrassment and confusion. Monsignor, this man needs help but in my opinion the place is not in a parish. I do not understand how he can go from one place to another and so easily be given a position.

I would request that all this be kept in the strictest confidence, just at the seal of the Confessional. I do not want Fr. Allison to know about this for I do not wish to be involved in such matters again. He refuses to return to Via Gesù. Now, perhaps, can think of something else. I pray that he can be helped. In my opinion the only reason he has not been helped previously is because he refused the help.

In your letter you mentioned that you had a surplus of lanes stipends. One of the parishes here in town, St. Paul II, is in need of lanes and there are others in the diocese.

Should there be anything additional I can do, please do not hesitate to call on me.

Fraternally in Christ,
James Lindemann
Pastor

ALLI 00003

ST. JUDE MISSION
P. O. Box 258
TUBA CITY, ARIZONA

November 22, 1963

Dear Father Allison,

Good to hear from you. Hope all is going well at your end.

Regarding the Mass stipends you sent to me, I fear I can give you no information--other than the fact that I have not received any from you. It is possible that someone used my name, though I hope not--because Mass stipends are of serious concern. Sorry I can give you nothing more definite on this.

Wintry weather moved in a few days ago. Flagstaff had its first snowfall today--two inches. Tonight our temperature here is 30.

Take care of yourself, Father. You are in my prayers. Remember me now and then in yours.

Father Flann

ALLI 00004

Church of the Immaculate Conception
1433 West North Street
Los Angeles 15

Nov 2 6th

Monsignor:

I received the attached letter in your absence and leave it here lest you arrive on my off day.

When no acknowledgment arrived I wrote Fr. Flann and the enclosed letter is the answer. It is the first time in my life I have ever sent intentions to anyone and will never do it again unless personally. In keeping with the law I will either assume the obligation of the masses or refund the money to the fund.

I have sent off a letter to a former friend of mine, who formally managed the Ramada Inn in Flagstaff and, who for the past three years, has run an Indian Trading Store near the Window Rock Mission area, see if he can find out anything for me. He might run the post office there as so many store owners do in that area. I have delved into my mind trying to figure out who could have done this with so much information. The letter of request mentioned Fr. Lindenmeyer and Mary Wynn of Flagstaff. Mary Wynn is the only one in Flag who has my immediate address, and from whom the address was supposed to have been received. The letter of request was headed Catholic Indian Mission, Window Rock, Arizona to which, of course, I sent the answer.

Bill
(Allison)

ALLI 00005

Church of Our Lady of Guadalupe

224 SOUTH KENDRICK
FLAGSTAFF, ARIZONA

March 23, 1955

Dear Mr. [Name]:

Thank you for your letter of March 15, 1955.

I am sorry that I cannot give you the information you desire.

The information you request is contained in the records of the Church of Our Lady of Guadalupe, which are maintained in the office of the pastor. I am sorry that I cannot give you the information you desire.

I am sorry that I cannot give you the information you desire. The information you request is contained in the records of the Church of Our Lady of Guadalupe, which are maintained in the office of the pastor.

I am sorry that I cannot give you the information you desire. The information you request is contained in the records of the Church of Our Lady of Guadalupe, which are maintained in the office of the pastor.

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I am sorry that I cannot give you the information you desire. The information you request is contained in the records of the Church of Our Lady of Guadalupe, which are maintained in the office of the pastor.

James Lindenberg

~~CONFIDENTIAL~~

Rev. C. William Allison

Confidential

— Agreement extended
to Wm. Allison
to Oct. 31st

OK Boat
Agreement at admission Sept. 26

EXHIBIT “1”



MEMORAN M

January 10, 1988

FM: Monsignor Curry
TO: Archbishop Mahony
RE: Father Nicolas Aguilar- vera

In March 1987, Father Rivera, a priest of the Diocese of Tehuacan, Mexico, asked if he could work in the Archdiocese. We appointed him to assist pro tem in Our Lady of Guadalupe (Rosehill), and after we received a confidential letter from his Bishop, we appointed him Associate to Father James Barnes at St. Agatha (May 1987). His Bishop stated that he had come to the United States because of family problems and for health reasons. Father Rivera is forty-six and was ordained in 1970.

On Friday last, Father Bill McLean called me to tell me two of the families in his parish told him that Father Rivera had abused their children. One incident apparently took place over Christmas, when Father Rivera stayed at their house, and another took place at St. Agatha's during the summer, when the family visited him there. According to one of the families, he was involved with their children also, but Father McLean has not spoken to them.

I saw Father Rivera at St. Agatha's on Saturday morning and told him he could not serve in this Archdiocese until a full investigation took place, and that his faculties were withdrawn, and that his Bishop would have to be informed of the accusations. I offered to find a place for him to live until he could make other arrangements, but he volunteered that he would stay with his sister here and leave for Mexico on Monday or Tuesday of this week. He denied all the allegations.

I found out on Saturday that the principal of the school at Our Lady of Guadalupe has been informed of the accusations, so she will be obliged to report it to the police.

I asked Father McLean to encourage the parents to see me, and I will keep in contact with him. I have consulted with Sister Judith Murphy.

EXHIBIT “2”



ARCHDIOCESE OF LOS ANGELES
1531 WEST NINTH STREET
LOS ANGELES, CALIFORNIA 90015-1194
(213) 251-3288

COPY
FILE

30 de Marzo de 1988

Office of the Archbishop

Rev. Norberto Rivera C.
Obispo de Tehuacán
Apartado Postal 137
75700 TEHUACAN
Puebla
MEXICO



Muy Estimado Monseñor Rivera:

Acabo de recibir hoy mismo su atenta carta con la fecha de 17 de Marzo de 1988.

Quiero responderle a Vd. inmediatamente porque yo estoy sorprendido y trastornado por estas palabras en su carta: "En la carta de presentación del 27 de enero de 1987 incluí una fotografía de identificación y en carta CONFIDENCIAL del 23 de marzo del mismo año le hice un resumen de la problemática homosexual del Padre." Quiero decirle que yo no he recibido ninguna carta de Vd. con la fecha del 23 de marzo de 1987, ni otra información tocante a "la problemática homosexual del Padre."

Yo le mando una copia de su carta del 27 de enero de 1987, con la fotografía de identificación. En esta carta Vd. me escribió: "Por motivos familiares y por motivos de salud el Padre Nicolás Aguilar Rivera, Cura Párroco de Cuacnopalan, Pue., perteneciente a ésta Iglesia de Tehuacán, desea permanecer por Un Año al servicio de la Arquidiócesis de Los Angeles." Basado en sus palabras "Por motivos familiares y por motivos de salud" yo acepté el Padre Nicolás Aguilar Rivera para servir aquí en esta Arquidiócesis.

Estoy muy confundido, porque en la carta del 27 de enero de 1987, Vd. no mencionó ningún otro problema personal de la parte de este Padre Aguilar. Si Vd. me ha escrito que el Padre Aguilar tenía algún problema "homosexual," le aseguro que no lo hemos recibido aquí en esta Arquidiócesis. Tenemos aquí en la Arquidiócesis de Los Angeles un plan de acción bastante claro: no admitimos ningún sacerdote aquí con cualquier problema homosexual.

Es tan urgente que Vd. me mande, por favor, una copia de esta carta con la fecha 23 de marzo de 1987. No la hemos recibido, y ya es una situación muy grave porque Vd. supo el 27 de enero de 1987 que el Padre Aguilar tenía problemas homosexuales, y no compartió esta información conmigo ni con los oficiales de nuestra Arquidiócesis de Los Angeles en su primera carta.

ADLAEM 000C

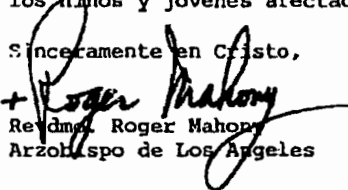
Revdmo. Norberto Rivera C.
30 de Marzo de 1988
Página dos

No puedo acentuar que ya tenemos una situación más grave porque yo hice una decisión a dar al Padre Aguilar un nombramiento temporáneo aquí basada en su carta del 27 de enero de 1987.

Voy a compartir con La Policía de Los Angeles su carta del 17 de Marzo de 1988, y espero que ellos puedan ubicarlo allá en México.

Le pido a Vd. que todos los sacerdotes de la Diócesis de Tehuacán oren por los niños y jóvenes afectados por las acciones del Padre Aguilar.

Sinceramente en Cristo,


+
Revdmo. Roger Mahony
Arzobispo de Los Angeles

j

EXHIBIT “3”

Marzo 23 de 1987.

Excmo. Sr. Arzobispo
Don Rogelio Mahony
1531 West Ninth Street
Los Angeles, CA 90015-1194
U.S.A.



CONFIDENCIAL.

Excelentísimo Señor:

Lo saludo atentamente deseándole toda clase de bendiciones en el Señor.

Quiero presentar a usted al Sr. Pbro. Nicolás Aguilar Rivera el cual pidió permiso por un año para ausentarse de ésta Diócesis y trabajar en la Arquidiócesis de los Angeles, California.

El Padre Nicolás Aguilar Rivera venía desempeñando -- muy laudablemente su trabajo en la Parroquia de San Sebastián Cuacnopalan. Es un sacerdote estimado por sus compañeros sacerdotes y por el pueblo al cual sirvió.

Lo que causó su salida de la Parroquia fue una agresión física muy delicada, se sospecha que detrás de los -- conflictos que provocaron esa agresión física hay problemas de homosexualidad. Las acusaciones sobre homosexualidad del Sacerdote son varias sin que se haya comprobado -- ninguna, todo ha quedado a nivel de acusaciones y de sospechas.

Aprovecho la oportunidad para encomendarme a sus oraciones y repetirme de usted su hermano y servidor.

/ NORBERTO RIVERA C.
OBISPO DE TEHUACAN

C.C. a Mons. Tomás Curry, Vicario General del Clero.

ADLAEM 0001

EXHIBIT “4”

Gobierno Eclesiástico
del
Obispado de Tehuacán
Apartado Núm. 137
75700

Enero 27 de 1987.

EXHIBIT 4	
Deponent	Mahony
Date	2-23-13 am
Rptr.	
WWW.DEPOBOOK.COM	

Excmo. y Rvdmo. Sr. Arzobispo
Don Rogelio Mahony.
P r e s e n t e .

Muy estimado Señor Arzobispo:

Lo saludo atentamente deseándole toda clase de bendiciones en el Señor.

Por motivos familiares y por motivos de salud el Padre Nicolás Aguilar Rivera, Cura Párroco de Cuacnopalan, Pue., perteneciente a ésta Iglesia de Tehuacán, desea permanecer por Un Año al servicio de la Arquidiócesis de Los Angeles. No tengo ningún inconveniente en conceder el permiso si Su Excelencia lo acepta para que trabaje en su Iglesia Local.

Agradezco sinceramente las atenciones que pueda prestar al Padre Nicolás cuya fotografía de identificación incluyo.

Su hermano y servidor.

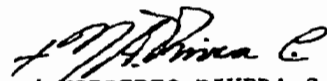
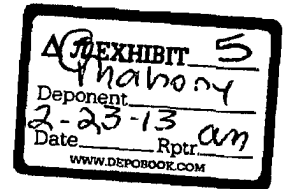

NORBERTO RIVERA C.
OBISPO DE TEHUACAN



EXHIBIT “5”

Gobierno Eclesiástico
del
Obispado de Tehuacán
Apartado Núm. 157
75700

Marzo 17 de 1988.



Excmo. Sr. Arzobispo
Don Rogelio Mahony
1531 West Ninth Street
Los Angeles, CA 90015-1194
U.S.A.

CONFIDENCIAL.

Muy estimado Monseñor Mahony:

Al recibir hoy su carta doy contestación inmediata para agradecerle la información que me da sobre el Padre Nicolás Aguilar Rivera. Ha sido muy doloroso para mí recibir estas informaciones de parte de la Curia y por la prensa de Estados Unidos y de México.

Estoy totalmente de acuerdo con usted en que el Padre responda ante las Autoridades competentes de los crímenes que se le imputan.

El Sacerdote mencionado no ha regresado a ésta Diócesis y no cuenta por tanto con las licencias que se le concedieron por Un Año con motivo del permiso que solicitó para residir en Los Angeles. Puedo informarle que el Padre estuvo por más de diez años en la Parroquia de San Sebastián Cuacnopalan y sin duda alguna la Policía ahí puede encontrar mucha información.

El Padre es hijo del señor Senén Aguilar y Fortuna Rivera y nació en Huehuetlán el Chico, Puebla en donde también hay muchos familiares que pueden informar sobre él. Sé que varios familiares viven en los Angeles, California, no tengo idea ni de sus nombres ni de sus domicilios. Usted comprenderá que no estoy en la posibilidad de localizarlo y mucho menos de poderle enviar por la fuerza a que comparezca en los tribunales. Estoy en la mejor disposición de colaborar para que se haga justicia y para que se evite el escándalo.

En la carta de presentación del 27 de enero de 1987 incluí una fotografía de identificación y en carta CONFIDENCIAL del 23 de marzo del mismo año le hice un resumen de la problemática homosexual del Padre.

Aprovecho la oportunidad para encomendarme a sus oraciones y repetirme de usted su hermano y servidor.


NORBERTO RIVERA C.
OBISPO DE TEHUACAN

EXHIBIT “6”

Nicholas Aguilera-Rivera

January 10, 1988

EXHIBIT	60
Deponent	Mahony
Date	2-23-13 am
Rpt.	
WWW.DEPOBOOK.COM	

On Friday, January 8, Father Bill McLean called me to say that a family had contacted him to say that a priest had abused their children. The mother would not give him the name of the priest. He called me later to tell me that another family had given him the name.

The Families are: [REDACTED] and [REDACTED], L.A., [REDACTED], [REDACTED], and [REDACTED], L.A., [REDACTED], [REDACTED]. He also believes that the family of [REDACTED] and [REDACTED], L.A., [REDACTED] is also involved.

He mentioned that they were all trustworthy people. On incident took place with a boy from [REDACTED]'s family last summer. The family went to visit St. Agata's and Father Rivera took one of the boys out to lock the church, and an incident occurred at that time. Another incident is alleged to have happened at Christmas when Father visited the other [REDACTED] family. There was a good deal of drinking, and the family asked him to stay. He slept in the room with the children and is supposed to have gotten into bed with one of the boys that night. It appears the [REDACTED] had told [REDACTED] about some problem with their children, but she did not believe them and asked him over for Christmas.

The parents were reluctant to talk to Father McLean, because they felt he would have a bad opinion about Latin priests. The children involved are: probably a seventh and fifth grader for the family of [REDACTED], and a fourth grader and a fourteen-year-old from the family of Valentina [REDACTED]. All except the fourteen year old attend Our Lady of Guadalupe school. The children have been talking among themselves. The parents have also discussed the matter between themselves.

I spoke to Sister Judith Murphy [REDACTED]
[REDACTED] [REDACTED]

I spoke with Father Rivera at St. Agatha's on Saturday morning, January 9. I told Father he would have to leave and that the Archdiocese would pay for him to stay at a retreat house. He volunteered that he would stay with [REDACTED] sister in Venice [REDACTED] Blvd., [REDACTED] (212 [REDACTED]-7553), and that he would leave for Mexico on Monday or Tuesday. (Father Harry Estrada came to interpret.) He asked that his bishop not be told, and I said that would not be possible. I told him the charges as I knew them, although I did not give the names of the families. He denied all, although he admitted that there was a good deal of drinking at Christmas. I told him that it was likely the accusations would be reported to the police and that he was in a good deal of danger.

On Saturday afternoon, January 9, Father McLean called me to say that the first grade teacher had been told and she had told the principal. The teacher seemed to think she was not bound to report. I checked with Sister Judith Murphy, [REDACTED] [REDACTED] [REDACTED] and I called Father McLean back and told him this. They had just found out the previous day. He told me that Father Rivera had called the parents sometime during this week and that they were both cold to him.

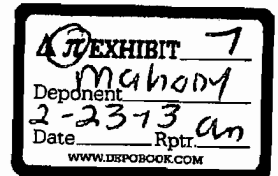
EXHIBIT “7”



Office of the Archbishop

ARCHDIOCESE OF LOS ANGELES

1531 WEST NINTH STREET
LOS ANGELES, CALIFORNIA 90015-1194
(213) 251-3288



July 22, 1986

REDACTED

Director
Foundation House
Servants of the Paraclete
Jemez Springs, NM 87025-

Dear REDACTED

I wish to acknowledge your letter of July 1, 1986 and the report on Monsignor Peter Garcia who was at your Foundation House for a follow-up workshop.

I am very grateful to you and to your staff for the care and concern which you are giving Monsignor Garcia, and I feel strongly that it would not be possible for Monsignor Garcia to return to California and to the Archdiocese of Los Angeles for the foreseeable future. The two young men who were involved with him and their parents have switched attorneys on several occasions, and I believe that if Monsignor Garcia were to reappear here within the Archdiocese we might very well have some type of legal action filed in both the criminal and civil sectors.

Since he is functioning well under your supervision and within the Archdiocese of Santa Fe, I would strongly recommend that we keep him on this course and not attempt anything different.

Thanking you again for your tremendous assistance in treating Monsignor Garcia and with every best wish, I am

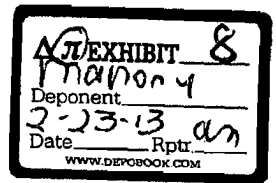
Sincerely yours in Christ,

Most Reverend Roger Mahony
Archbishop of Los Angeles

cc: Most Reverend Juan Arzube
Most Reverend Robert F. Sanchez
Monsignor Thomas Curry

eb

EXHIBIT “8”



MEMORANDUM

CONFIDENTIAL

DATE: January 26, 1988
FROM: Msgr. Curry
TO: Archbishop Mahony
RE: Rev. Nicolas Aguilar-Rivera

This concerns the Mexican priest who was assigned to St. Agatha and was accused of abusing children from Our Lady of Guadalupe. The police are making every effort to obtain the list of altar boys from St. Agatha's. Father Jim Barnes is very reluctant to give it to them, and I support that decision. We have no evidence that Father Aguilar-Rivera was involved with altar boys as such. All the boys involved were members of families he was friendly with in Our Lady of Guadalupe, and the alleged abuse took place while he was visiting these families or while they were visiting him.

Father Barnes has no knowledge of his being involved with boys at St. Agatha's, and his concern is that if the police come and interview the boys, the matter will spread around the parish. The parish there is a Black-Hispanic one, and he finds his situation as an Anglo pastor a very delicate one. He and I are also concerned about the police interviewing boys about this matter when we have no reasonable suspicion they know anything about it. If, in fact, nothing happened at St. Agatha's, such interviews may have a negative effect on the boys, their families, and the parish.

The whole issue of our records is a very sensitive one, and I am reluctant to give any list to the police.

We are being friendly but firm, and both Sister Judy and I are in contact with the police on this matter.

We ~~don't~~ give such a list for no cause whatsoever.

+ RMM

1-26-88

EXHIBIT “10”



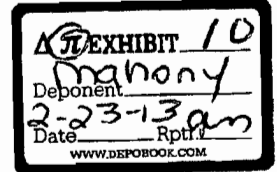
ARCHDIOCESE OF LOS ANGELES
 1531 WEST NINTH STREET
 LOS ANGELES, CALIFORNIA 90015-1194
 (213) 251-3200

COPY

OFFICE OF VICAR FOR CLERGY
 (213) 251-3284

December 28, 1987

Rev. Santiago Tamayo
 c/o REDACTED
 St. James Medical Clinic
 42 Mauricio Castro St.
 Laoag City, Philippines



Dear Father Tamayo:

Thank you for your letters to me and to Archbishop Mahony. I understand from your letter that you would like to return to this Archdiocese. However, given all that has taken place, that does not seem advisable, and all the advisors to the Archdiocese counsel against it for the foreseeable future. Our lawyers also inform us that you are liable to personal suits arising out of your past actions. Therefore it is not advisable that you return at all to the United States. Such suits can only open old wounds and further hurt anyone concerned, including the Archdiocese.

After much consideration, it is the opinion of the Archdiocesan authorities that you should seek to settle elsewhere, and we encourage you to seek incardination in the Philippines. While you are pursuing this possibility, the Archdiocese would like to pay you a salary beginning as of December 1, 1987. I would appreciate your keeping me informed of your progress, so that both you and the Archdiocese can continue to assess your situation.

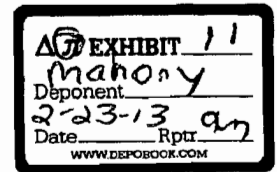
I do hope this will be of assistance to you, and that you will be able to find a suitable position there. Please be assured you have my prayers and best wishes during this transitional time.

Sincerely yours in Christ,

(Rev. Msgr.) Thomas J. Curry
 Vicar for Clergy

/lbm

EXHIBIT “11”

MEMORANDUM

November 8, 1987

To: Archbishop Mahony
 From: Msgr. Thomas Curry ✓
 Re: Father Santiago Tamayo

Attached is some correspondence from Father Tamayo in response to the standard annual letter I send to all the priests who are outside the Archdiocese. (Father Tamayo was the pastor of SS. Peter and Paul, Wilmington, and was the only one of the seven Filipino priests involved in the REDACTED case who is incardinated.)

Sister Judy advises that he never return to the Archdiocese and I agree. He mentions being rehabilitated, but I never understood that any of the priests involved asserted that the charges were false. He is still personally liable for damages.

In checking with Frank Wallace, however, he does feel that according to Canon 1350, we are liable for some support. He even feels that there could be a claim for back pay. His advice is that we offer some help for a limited time while Father Tamayo is adjusting to life elsewhere and that we couch our offer in the language of the Canon. I think this is a wise approach.

*I concur - do you want
to write, or shall I?*

Thanks!

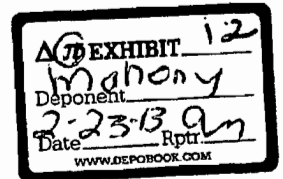
+ RMM

11-9-87

EXHIBIT “12”

THE ORDINARY MUTUAL ARI Retention Group Corporation

March 30, 1988



PERSONAL & CONFIDENTIAL

Most Reverend Roger Mahony
Archbishop of Los Angeles
1531 West Ninth Street
Los Angeles, California 90015

Dear Archbishop Mahony:

In compliance with the procedures for handling sexual misconduct incidents under the terms of the policy of The Ordinary Mutual, this is to advise you that no coverage exists for any acts of Father Nicholas Aguilar on and after Saturday, January 9, 1988 based upon allegations of sexual misconduct of which the Archdiocesan Sensitive Claim Team was made aware.

The Archdiocesan Team determined that there are sufficient grounds to suspect misconduct, but if it subsequently finds there are no grounds for the accusation full coverage will be retroactively restored and you will be given official notification. Otherwise, the procedures provide that you may apply to the Board of Directors of The Ordinary Mutual after the individual has had treatment and a minimum of five incident free years from the date coverage ceased, if you wish to request reinstatement of coverage on Father Aguilar.

Sincerely yours,

FMH/ce
cc: Sister Judy Murphy

PLEASE REPLY TO

GALLAGHER HEFFERNAN INSURANCE BROKERS
UNDERWRITING MANAGERS
160 SPEAR STREET P.O. BOX 7413
SAN FRANCISCO, CALIFORNIA 94120-7413

TELEPHONE (415) 548-9300 EASYLINK 62927569
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AMERICAN RISK MANAGEMENT, INC. MANAGERS
5 BURLINGTON SQUARE P.O. BOX 1521
BURLINGTON, VERMONT 05402-1521

TELEPHONE (802) 862-4400
TELEX 957061

ADLAEM 00008



FILE COPY

Archdiocese of Los Angeles

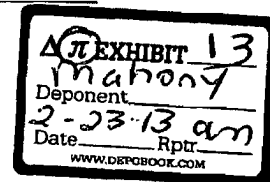
Office of
Vicar for Clergy
(213) 637-7284

3424
Wishire
Boulevard

Los Angeles
California
90010-2141

March 3, 1997

Reverend George Miller
13270 Maple Drive
Saint Louis, MO 63127-1999



Dear George,

The last few months have held some momentous changes for all of us. The recent changes in the child abuse reporting law and the statute of limitations here in California have changed the way we have to look at many things in our personnel policies. I know that one thing these changes have meant is that we had to send you a message that you would not be able to return to priestly ministry here in Los Angeles. That was a very hard thing for us to say, especially since we have heard that your participation in treatment has been so excellent. I also know that it was an extremely hard thing for you to hear.

In light of that, I want to reassure you that the Archdiocese is still very desirous and willing to be of support and help to you. I also want to remind you that your vested interest in the Priests Pension Plan is secure. You can begin to collect pension benefits, regardless of your state of life, at age 70. Until that time, we will certainly be of whatever reasonable financial assistance we can. Whether you choose to return to Southern California or to live elsewhere, we will be open to assisting you in your transition from treatment. If you choose to try to seek a benevolent bishop (realizing that he will have to know your story to make an informed decision), to take the CPE course recommended by Saint Michael's, to seek some other employment or to look into some other option, we will cooperate in so far as we are able.

We fully understand that at sixty years of age, the concept of starting a new profession is a truly daunting challenge - one I really wish you did not have to face. Even so, some gainful employment is an important part of every person's life. A significant part of each person's dignity is the knowledge of contributing to his own support.

Please know that your welfare is very important to us. At the same time, we have to take into account the good of the entire Archdiocese as well.

I look forward to hearing from you as you complete treatment and make important decisions about your future. I will do all I can to be of help during this time of transition. You have been and will continue to be in my prayers each day.

PAX!

Dick

Reverend Monsignor Richard A. Loomis
Vicar for Clergy

8545

EXHIBIT “14”

FINAL ADDENDUM TO THE REPORT TO THE PEOPLE OF GOD

OCTOBER 2008

EXHIBIT	14
Deponent	Mahony
Date	2-23-13 am
Rpt.	
WWW.DEPBOOK.COM	

The Archdiocese of Los Angeles remains in full compliance with the U.S. Bishops' 2002 Charter for the Protection of Children and Young People. Reports of suspected abuse are reported to the proper civil authorities; the lay-led Clergy Misconduct Oversight Board reviews all complaints of misconduct by clergy; and, adults and children throughout the Archdiocese continue to be trained in abuse prevention and awareness techniques. These efforts have led to a dramatic decline in reports of sexual misconduct by clergy and employees in the Archdiocese.

The following list includes names of clergy from a follow up review of Archdiocesan files, and names of clergy involved in Clergy I litigation which were not previously posted. The final portion of the global settlement of clergy cases has been concluded. Consequently, further updates to the Report to the People of God are not anticipated.

Incardinated Priests of Archdiocese:

	<u>Accused</u>	<u>Diocese</u>	<u>Status*</u>
1.	Bouska, Jerome	Los Angeles	Retired, with restrictions
2.	Cunningham, Christopher	Los Angeles	Inactive Leave
3.	Farrell, Terrence	Los Angeles	Inactive Leave
4.	Feeney, John J.C.	Los Angeles	Deceased
5.	Grasha, Donald	Los Angeles	Inactive Leave
6.	Higson, John	Los Angeles	Lay State
7.	Hollinger, William	Los Angeles	Deceased
8.	Hurley, Daniel	Los Angeles	Deceased
9.	Newell, Jeffrey	Los Angeles	Inactive Leave
10.	O'Brien, Kenneth	Los Angeles	Deceased
11.	Perez Carillo, Antonio	Los Angeles	Canonically Suspended
12.	Rodriguez Macal, Saul	Los Angeles	Inactive Leave
13.	Sanchez, Jose	Los Angeles	Excommunicated
14.	Sintef, Michael	Los Angeles	Inactive Leave
15.	Ugarte, Jose	Los Angeles	Inactive Leave

Externis:

	<u>Accused</u>	<u>Country</u>	<u>Status*</u>
1.	Alonso, Jose	Mexico	Left Archdiocese
2.	Arias, Andres	Mexico	Deceased
3.	Corcoles, Candido	Spain	Left Archdiocese
4.	De Otero, Roberto	U.S. (Honolulu)	Unknown
5.	Feeney, John Patrick	U.S. (Milwaukee)	Denied faculties/ Unknown
6.	Hollenbach, Frank	U.S. (Marquette)	Left Archdiocese
7.	Ilagan, Jose Medrano	Phillipines	Left Archdiocese
8.	Jablonowski, Anthony	U.S. (Cheyenne)	Lay State
9.	Lopez Lopez, Fernando	Colombia	Lay State
10.	McCarthy, Kevin	Canada	Left Archdiocese
11.	Power, Vincent	U.K. (England)	Lay State
12.	Riebe, Loren	Mexico	Left Archdiocese
13.	Robinson, James	U.K. (England)	Left Archdiocese
14.	Savarianandam, Arulappan	India	Left Archdiocese

Order Priests/Brothers:

	<u>Accused</u>	<u>Order</u>	<u>Status*</u>
1.	Boley, Robert	Carmelite Fathers	Left Archdiocese
2.	Chandler, David	Paulist Fathers	Left Archdiocese
3.	Chong, Damien	Carmelite Fathers (Brother)	Unknown
4.	Doehr, Anselm	Missionary Servants of the Holy Trinity	Left Archdiocese
5.	Eslava, Joseph	Claretian Missionaries (Brother)	Deceased
6.	Finn, William	Carmelite Fathers	Left Archdiocese
7.	Kain, Steven	Franciscan Friars	Left Archdiocese
8.	Koerner, Robert	Oblates of Mary Immaculate	Deceased
9.	McAsey, Joseph	Society of Jesus	Deceased
10.	McKeon, Martin	Franciscan Friars	Deceased
11.	Moreno, Kolbe	Norbertine Fathers	Left Archdiocese
12.	Pereira, Anthony	Salesians of St. John Bosco	Left Archdiocese
13.	Puthenkandam, Joseph**	Carmelites of Mary Immaculate	Left Archdiocese
14.	Shelton, Charles	Franciscan Friars	Left Archdiocese
15.	Stiechen, Raymond	Salesians of St. John Bosco	Lay State
16.	Su, Stanislaus	Congregation of St. John Baptist	Unknown
17.	Sweeney, Francis	Paulist Fathers	Left Archdiocese
18.	Villoria, Luis	Claretian Missionaries	Left Archdiocese
19.	Wert, William	Carmelite Fathers	Left Archdiocese
20.	Wood, William	Society of Jesus	Left Archdiocese

* Clergy listed as "Left Archdiocese" include those who left many years ago; information about the individuals is not maintained, including whether such persons are still alive.

** Not to be confused with extern priest with identical name who was never accused.