

ANSWER TO INTERROGATORY #2:

2. The following is a summary of the events alleged in the writ as best as I am able to recall them at this time: I met Father Gordon at St. Bernard's Church when I was 9. He was a favorite priest among all the children of the parish. Over the next few years, Father Gordon and I became very close. He was like the father I never had. We would get together several times a week. We would go out for pizza or see a movie. Sometimes we'd just drive in his car and talk. I trusted Father Gordon because he was my priest and my friend. He was the only person who seemed to understand me. Because he was a priest, I felt that he always had my best interest in mind and would never do anything to harm me.

During the winter 1988 and early spring 1989, I was alone with Father Gordon on many occasions. When I confided in him about my personal and financial problems, he would steer the conversation toward sex. He would say things like: "there is plenty of money if you know how to earn it." He told me he had a male friend who was a prostitute making \$600 an hour. This kind of talk confused me. I told Father Gordon that I thought homosexuality was sick. He asked me what I thought of cuddling or touching someone of the same sex in bed. I told him I didn't agree with it and he would close the subject by saying something like "I'm just letting you know." This same general conversation took place on a number of occasions.

In the summer of 1988, Father Gordon often put his arm around me and tickled me. I would ask him to stop. When he asked if it was all right to put his arm around me, I said "yes" because I thought he was my friend, the loving father I never had, and I didn't want to hurt his feelings. He was a priest and I didn't think he would do anything wrong or anything that would hurt me.

On a Sunday in October, I confided in Father Gordon that I needed money for a dance. He had often made gifts and loans of money to me in the past. Father Gordon again steered the conversation to sex. He asked "what if I'm only interested in picture?" I was upset and very confused. I tried to play stupid. Father Gordon explained what kind of pictures he was after. Father Gordon was my friend and my priest, I wanted to please him so I agreed to do what he wanted.

Father Gordon took me to his apartment. He took a camera out of a case and instructed me to undress in the bathroom. I complied with his instructions. Father Gordon told me to lie on my stomach and took pictures of me in several poses which he instructed me to assume, including holding my genitals in my hand. When Father Gordon ran out of film, he took me home and gave me a twenty, some ones and some change.

Later that week, Father Gordon picked me up. I asked him

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for \$10. He asked me if I wanted to do some more pictures. Again, I was confused and uncertain as to what I should do. We went to Father Gordon's apartment much the same as before. This time Father Gordon told me to give myself an erection. When he had run out of film, he gave me \$50. Later that same day, we were riding in his car and he gave me \$5 to buy him some cigarettes; when I tried to give him the change, he told me to keep it.

The following weekend, Father Gordon and I were riding in his car. During the conversation, I mentioned that I needed some money. He wanted to take more pictures. This third session was much the same as the others, except this time, Father Gordon instructed to ejaculate, and I did. After Father Gordon ran out of film, he took me home. Please see Exhibit A (statement made by [REDACTED] to Keene Police Department) and Exhibit B (Keene Police Department reports).