

Law Offices of Anthony Boskovich 28 North First Street, 6th Floor, San Jose, CA 95113 (408) 286-5150

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San Jose, California 95113-1210
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8 408-286-5150
9 Attorneys for Plaintiffs

Cs
Filed FEB 22, 2005
ROSA JUNQUEIRO, CLERK
By Charlene Gray
DEPUTY

11 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF SAN JOAQUIN**

14 KATHLEEN MACHADO, individually and)
in her capacity as Guardian ad Litem for)
15 RACHEL LOMAS and AMBER LOMAS,)
Plaintiffs,)
16 v.)
17 FATHER JOSEPH ILLO; FATHER FRANCIS)
JOSEPH a.k.a. FATHER FRANCIS ARAKAL;)
18 FATHER RICHARD RYAN; BISHOP STEVEN)
BLAIRE; THE DIOCESE OF STOCKTON;)
19 DOES 1 through 100,)
Defendants.)
20

No. CV 018440
**PLAINTIFFS' EXPERT
WITNESS DISCLOSURE FOR
TRIAL**
(Code Civ. Proc. §2034, subd.
(f) and
**EXPERT WITNESS
DECLARATION**
(Code Civ. Proc. §2034, subd.
(f)(2))

21 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

22 You, and each of you, will please take notice that plaintiffs KATHLEEN MACHADO,
23 RACHEL LOMAS and AMBER LOMAS may call the following expert witnesses to testify at the
24 time of trial.

- 25 I. RETAINED EXPERTS:
26 1) Sonnee Weedn, Ph.D.,
3 Hamilton Landing, Ste 230
27 Novato, Ca 94949.
28

1 Dr. Weedn is a clinical psychologist. Dr. Weedn will testify as to the emotional and
2 psychological damages of the plaintiffs and the causation thereto. Her testimony will cover past,
3 present and future damages.

4 Dr. Weedn has agreed to testify at the trial of this matter. Dr. Weedn will be sufficiently
5 familiar with the pending action to submit to a meaningful oral deposition concerning specific
6 testimony, including any opinions and their basis, that she is expected to give at trial.

7 Dr. Weedn's hourly rate for deposition testimony and consultation with retaining attorney
8 is \$250 per hour, not including expenses, and \$350 per hour, not including expenses, for trial.

9 Attached hereto as Exhibit A and incorporated herein by reference is the resume of the
10 professional qualifications of Dr. Weedn as well as a report prepared by Dr. Weedn in this matter.
11

12
13 2) Fr. Thomas Patrick Michael Doyle
14 7514 Cayuga Ave.
15 Bethesda, MD 20817

16 Fr. Doyle will testify with regard to the canonical, procedural, pastoral and institutional
17 workings of the Catholic Church with regard to the sexual abuse of children. He will also testify as
18 to the past and present policies and procedures used and instituted by the Catholic Church regarding
19 the sexual abuse of minors.

20 Fr. Doyle has agreed to testify at the trial of this matter. Fr. Doyle will be sufficiently familiar
21 with the pending action to submit to a meaningful oral deposition concerning specific testimony,
22 including any opinions and their basis, that he is expected to give at trial.

23 Fr. Doyle's hourly rate for deposition testimony and consultation with retaining attorney and
24 for trial testimony is \$300 per hour, not including expenses.

25 Attached hereto as Exhibit B and incorporated herein by reference is the resume of the
26 professional qualifications of Fr. Doyle.

27 3) A. W. Richard Sipe, address to be provided.
28

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1 Mr. Sipe will testify to the issues regarding liability regarding the psychology of the sexual
2 behavior of catholic priests w ho live and work in the state of celibacy. He will also testify about the
3 "celibate/sexual system" within the Catholic Church hierarchy. He will also testify to the Catholic
4 Church's general knowledge of sexual abuse of minors by clergy. He will also testify as to the
5 communication about sexual activity within the clerical system. He will also testify to the knowledge
6 of clergy sexual activity through suspicion/rumor/complaint/report. He will also testify to the
7 profound and lasting effects of sexual abuse by clergy.

8 Mr. Sipe has agreed to testify at the trial of this matter. Mr. Sipe will be sufficiently familiar
9 with the pending action to submit to a meaningful oral deposition concerning specific testimony,
10 including any opinions and their basis, that he is expected to give at trial.

11 Mr. Sipe's hourly rate for deposition testimony and consultation with retaining attorney and
12 trial testimony is \$300 per hour, not including expenses.

13 Attached hereto as Exhibit C and incorporated herein by reference is the resume of the
14 professional qualifications of Mr. Sipe.

- 15
- 16 4) Any and all individuals designated as experts by any of the parties in this action; and,
- 17 5) Any and all individuals hereinafter selected and designated as experts pursuant to
- 18 Code of Civil Procedure §2034.
- 19

20 In addition, plaintiffs KATHLEEN MACHADO, RACHEL LOMAS and AMBER
21 LOMAS hereby reserve the right, at their option, to withdraw any individual designated herein as
22 an expert.

23 The Plaintiffs also hereby expressly reserve the right to call such other experts at trial as are
24 necessary to rebut the testimony of experts who testify on behalf of other parties to this action.

25


26 Pursuant to the provisions of section 2034 subdivision (I) of the Code of Civil Procedure,
27 plaintiffs request that any party desiring to take the deposition of a potential expert witness herein
28

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1 declared shall tender a fee, in advance, to said potential expert witness based upon the anticipated
2 length of the deposition, not exceeding said deponent's customary hourly or daily fee for the time
3 reasonably and necessarily spent in connection with such deposition.

4 It is further to be understood that should the deposition take longer than originally
5 anticipated, the balance of the fee due shall be paid by the party noticing/requesting the deposition
6 within five (5) days of receipt of said deponent's itemized statement for services.

7
8 Dated: January 3, 2005

9
10
11 By: 
12 **ANTHONY BOSKOVICH**
13 Attorney for Kahleeh Machado, Rachel Lomas and Amber Lomas
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EXPERT WITNESS DECLARATION

1
2 I, Anthony Boskovich, declare:
3

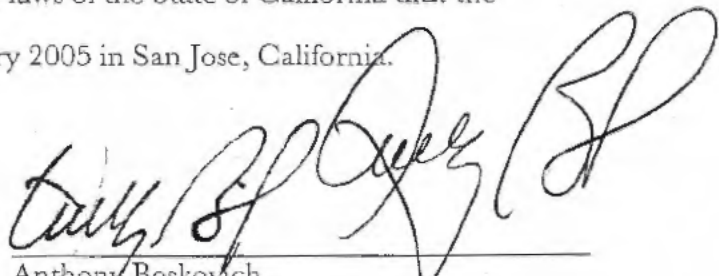
4 1. I am an attorney at law duly licensed to practice before all courts of the state of
5 California and am the attorney fo record for plaintiffs KATHLEEN MACHADO, RACHEL
6 LOMAS and AMBER LOMAS herein.
7

8 2. The statements set forth as to Dr. Sonnee Weedn above are true and correct. Dr.
9 Weedn has agreed to testify in this matter and will be sufficiently familiar with the pending action
10 to submit to a meaningful oral deposition concerning her specific testimony. Dr. Weedn's hourly
11 rate for deposition is \$250.
12

13 3. The statements set forth as to Fr. Thomas Doyle above are true and correct. Fr.
14 Doyle has agreed to testify in this matter and will be sufficiently familiar with the pending action
15 to submit to a meaningful oral deposition concerning his specific testimony. Fr. Doyle's hourly
16 rate for deposition is \$300.
17

18 4. The statements set forth as to A.W. Richard Sipe above are true and correct. Mr.
19 Sipe has agreed to testify in this matter and will be sufficiently familiar with the pending action to
20 submit to a meaningful oral deposition concerning his specific testimony. Mr. Sipe's hourly rate
21 for deposition is \$300.
22

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. Executed on 3 January 2005 in San Jose, California.
25



Anthony Boskovich

EXHIBIT A

Sonnet Weedin, Ph.D.
A Professional Corporation
Clinical Psychology and Assessment
PSY 12188

33946

Curriculum Vitae

Education:

- 1968 Ph.D. Clinical Psychology
California Graduate School of Family Psychology, San Rafael, CA
(Acquired by American School of Professional Psychology 7/99)
Doctoral Dissertation: "Brothers and Sisters of the Mentally Retarded: A Retrospective Descriptive Study"
- 1973 M.S. Counseling Psychology
University of Southern California, Los Angeles, CA
- 1969 M.S. Elementary Education
University of Southern California, Los Angeles, CA
- 1968 B.S. Social Studies (emphasis on Anthropology)
University of Southern California, Los Angeles, CA

Doctoral Internships:

- 1988 - 1990 Post-doctoral Intern at Redwood Psychological Services Center, Petaluma, CA
- 1985 - 1988 Pre-doctoral Intern at Petaluma Valley Hospital, Phoenix Program (inpatient treatment of chemical dependency), Petaluma, CA

Licenses and Credentials:

- 1991 Licensed Psychologist - PSY12188
- 1983 Marriage and Family Therapist - ME18670
- 1976 Administrative Services Credential
- 1973 Pupil Personnel Credential (Lifetime)
- 1969 Standard Elementary Credential (Lifetime)

Specialty Certification:

- 2003 National Registry of Certified Group Psychotherapists
- 1997 APA Certificate in Assessment and Treatment of Alcoholism and Other Substance Abuse

Honors and Awards:

- 2002 Awarded the Lady Vera Scholarship by the Angeles Arrien Foundation for Cross-cultural Education and Research. This fund receives no applications.

3 Hamilton Lane #13
Suite 230
Novato, CA 94949
TEL 415 • 883 • 7754
FAX 415 • 883 • 8385

Sonnet Weedn, Ph.D.

but scouts and awards scholarships as an unexpected blessing to those who have talent and promise and carry an altruistic spirit.

Clinical Experience:

1980 - Present

Private Practice, Novato and Petaluma, CA
Providing brief and long-term outpatient psychotherapy to individual adults, adolescents, children as young as five years of age, seniors, couples and families. Assessment and treatment of chemical dependency. Consultation to churches, schools and school districts, private business and community organizations in the areas of team building, organizational behavior, conflict resolution and stress management. Group psychotherapy, including four ongoing, long-term women's groups and two ongoing, long-term mixed groups.
Providing psychological evaluations for children, adolescents and adults and including the Wechsler Intelligence Scales, Rorschach: Comprehensive System, MMPI-II, MCMI-III, MACI, MMPI-A, TAT, Bender-Gestalt and drawings. Assessments provided for City and County of San Francisco, Marin County Child Welfare Department, Child Protective Services of Marin and Sonoma Counties, Workers Compensation, State of California, Board of Registered Nursing and by referral from other mental health professionals, attorneys and insurers.

1985 - 1986

Phoenix Program at Petaluma Valley Hospital, Petaluma, CA
Clinical psychology internship at inpatient treatment facility for chemically dependent adults. Provided individual, group and couples therapy on inpatient ward; lectured; performed psychological evaluations; directed aftercare program for patients out of the hospital for 90 days or more.

1981 - 1982

Catholic Social Services, Santa Rosa, CA
Marriage, Family, Child Counselor Internship. Provided outpatient treatment for wide variety of clientele.

Teaching and Consultation Experience:

2001 - present

Member Mandatory Continuing Education for Psychologists Accrediting Committee - One of three "Third Reviewers" in the state of California for California Psychological Association ruling on contested applications to provide continuing education for psychologists.

2001 - present

Featured presenter at Miraval Wellness Center, Tucson, AZ on integration of Spirituality in Group Therapy, Lakota Medicine, Women's Sexuality and Body Image, and Interpretation of Dreams.

1999 - present

Administrative Director of Continuing Education - Sierra Tucson,

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Sonnee Weedn, Ph.D.

- Tucson, AZ - Directing the delivery of continuing education for Registered Nurses, Psychologists, Licensed Clinical Social Workers and Marriage and Family Therapists in the area of group psychotherapy, couples therapy, dream interpretation, the integration of spiritual issues into psychotherapy and eating disorders, etc.
- 1999 - present Provider of Continuing Education for Licensed Psychologists, Registered Nurses, Marriage and Family Therapists and Licensed Clinical Social Workers on Group Psychotherapy as Transformational Experience, Integration of Spiritual Issues in Group Psychotherapy and Integration of Dream Interpretation in Group Psychotherapy.
- 1997 - present Owner of Sacred Calling Productions
Presentation of workshops and retreats for individuals and couples to enhance spiritual development and psychological well-being.
Providing training for Mental Health Clinicians in Group Psychotherapy as Transformational Experience. Yearly week-long training in Puerto Vallarta, Mexico and Santa Fe, New Mexico. Special events in the past have been sponsored by Sierra Tucson Hospital, Tucson, AZ and have included "The Heroine's Journey", "Archetypes of Healing and Wholeness", "The Power of Two", and "The Medicine Wheel as Sacred Space".
- 2004 Retreat leader and facilitator for Employee Assistance Personnel, Chevron/Texaco
- 2002 Retreat leader for staff of Marin General Hospital Psychiatric Unit.
- 2000 Featured presenter of Northern California Group Psychotherapy Society - "An Evening with the Masters"
- 2000 Provider of Continuing Education for Northern California Group Psychotherapy Society - Woman's Group Psychotherapy
- 2000 Featured presenter Northern California Group Psychotherapy Society Astoria Conference
- 1999 - 2000 Provider of Continuing Education for Department of Psychiatry, Kaiser-Permanente, Santa Rosa, CA - Group Therapy and Clinical Interviewing.
- 1998 - 2000 Consultant to Marin County Child Sexual Abuse Treatment Program in Group Psychotherapy and Clinical Interviewing.

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Sonnie Weedn, Ph.D.

- 1998 Consultant to Family Law Judges and Mediators of Sonoma County in the use of psychological assessments received by the court.
- 1986 - 1998 Contributor to feature articles on various topics related to mental health in The Quarterly magazine of Alpha Gamma Delta Fraternity.
- 1998 - 2001 Board of Psychology - oral examination commissioner
- 1985 Instructor, Sonoma County Bar Association - Alcoholism and Chemical Dependency (continuing education provider)
- 1982 - 1985 Partner - Lytle, Caro, Weedn, Inc.
Presenting psychotherapeutic and educational retreats - employing large and small group therapy, psychodrama, play therapy, milieu therapy, meditation instruction and practice, family genogram and art therapy.
- 1986 - 1987 California Graduate School of Family Psychology, Corte Madera, CA
Taught the lab section of the psychological assessment class.
- 1983 - 1985 PCG Seminars, Pasadena, CA
Taught case presentation skills to MFCC interns; taught seminars for professionals on child abuse; detection, reporting and treatment.
- Forensic Experience:**
- 1984 - present Custody Evaluator, Marin County, CA, Sonoma County, CA, Napa County, CA, Alameda County, CA, and Contra Costa County, CA
Court stipulated evaluator in child custody cases requiring psychological assessment and recommendations.
- 1982 - present Admitted as expert witness in various jurisdictions, including Sonoma County, Marin County, Contra Costa County, Solano County and Sacramento County in areas of child abuse, child custody and dependency, reliability of child witnesses, and psychological assessment.
- 1982 - present Deposition taken approximately twenty-five times in variety of cases.
- 1993 - 2001 Consultant, Probation Department - Civil Custody Unit, Sonoma County, CA
Providing monthly consultation to Probation Officers regarding disposition of high conflict, complex child custody cases. Approximately 900 cases reviewed and decided.

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Sonice Weedn, Ph.D.

Recent Related Training:

- Relevant Research for Custody Evaluators and Attorneys (3.5 hours)
- Psychological and Legal Issues in Relocation Cases (3.5 hours)
- Domestic Violence Update 2003 (4 hours)
- Addiction as Coping (3 hours)
- Cultural Considerations in Addiction Treatment (3 hours)
- Jung and Shamanism: Retrieving the Cultural Soul (6 hours)
- Report Writing and Testifying for Custody Evaluators (4 hours)
- Child Development Issues for Custody Evaluators (3.5 hours)
- Understanding Assessment & Working with High Conflict Families (3.5 hours)
- Domestic Violence Issues in Family Law (4 hours)
- Group Psychotherapy: Removing Barriers to Relationships Through Trauma Resolution Therapy (3 hours)
- Ethics & Risk Management Issues in Child Custody Evaluations and Family Law (6.5 hours)
- Alienation Issues for Child Custody Evaluators: Assessment and Treatment (4 hours)
- Sexual Abuse Assessment for Child Custody Evaluators (3.5 hours)
- Group Psychotherapy as Transformational Experience: You the Healer (32 hours)
- Rorschach Interpretation: Child and Adolescent (19.5 hours)
- Advanced Rorschach Interpretation (8.5 hours)
- Group Psychotherapy as Transformational Experience (31 hours)
- Women's Group Psychotherapy as Transformational Experience (31 hours)
- Law and Ethics for Psychologists (4 hours)
- Advances in the Treatment of Attention Deficit Disorder in Children and Adults (7 hours)

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Sonnet Weedd, Ph.D.

Domestic Violence: Psychological and Legal Dimensions (14 hours)

Domestic Violence: Yearly Legal Updates (4 hours per year)

Advanced Rorschach Interpretation: An Update for Clinical Practice (21 hours)

Substance Abuse Professional (DOT) (7 hours)

The MMPI-II and Rorschach in Court (7 hours)

HIV and AIDS Assessment and Training (7 hours)

Dreams, Life Transitions and Archetypes (6 hours)

EMDR: Level I and Level II (28 hours)

Rorschach Assessment of DSM IV Personality Disorders (14 hours)

MCMII-III and Rorschach Workshop (3.5 hours)

Post-Traumatic Stress Disorder: use of MCMII in Treatment Planning (3.5 hours)

MACI Workshop (2 hours)

MCMII Workshop (2 hours)

Group Psychotherapy Training Institute (12 hours)

Group Psychotherapy Training in Psychodrama, Women's Groups, Action
Techniques for Verbal Therapists and Shame and Sexual Molestation (12
hours)

Psychosynthesis: Integration of Psychotherapy and Spiritual Issues (9 hours)

Professional Associations:

American Psychological Association
California Psychological Association
Marin County Psychological Association
Society for Personality Assessment
Northern California Group Psychotherapy Society
Life Member - National Registry of Who's Who 2000

References Available upon Request

2/17/04
revised

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Sonnee Weedn, Ph.D.
A Professional Corporation
Clinical Psychology and Assessment
PSY 12188

November 28, 2004

George MacKoul, Esq.
Sabbath and MacKoul
49 Locust Street
Falmouth, MA 02540

RE: Rachel Lomas and Amber Lomas

Dear Mr. MacKoul:

This report is submitted in compliance with your request for an independent psychological evaluation of Rachel Lomas, age 16, and her sister, Amber Lomas, age 13, in order to provide you with information that would be useful in determining their current mental state and any current or future need for mental health services. My findings and recommendations are based upon clinical interviews, psychological testing, and review of records itemized below.

Sources of Information:

Clinical Interviews and Psychological Testing:

Amber Lomas – I met with Amber Lomas on November 12, 2004, for approximately three hours. During this time she was interviewed and administered The Rorschach: Comprehensive System, The Millon Adolescent Clinical Inventory, and the Minnesota Multiphasic Personality Inventory – Adolescent version.

Rachel Lomas – I met with Rachel Lomas on November 12, 2004, for approximately three hours. During this time she was interviewed and administered The Rorschach: Comprehensive System, The Millon Adolescent Clinical Inventory, and The Minnesota Multiphasic Personality Inventory – Adolescent version.

I spoke very briefly with the sister's mother, Ms. Machado, to explain what my procedures would consist of and what she could expect for the day of evaluation and to obtain her permission for the evaluation process.

B: Records Reviewed:

A letter and case notes from Diane L. Stephens, R.N., M.F.T., dated August 30, 2004.

Sonnee Weeden, Ph.D.

A deposition of Amber Lomas, dated October 7, 2004.
A deposition of Rachel Lomas, dated October 6, 2004.

A report from Johnny Smith Investigations dated October 20, 2004.

Notes made by George MacKoul from the deposition of Yvonne McLoughlin, M.F.T.

Progress notes for Yvonne McLoughlin, M.F.T., dated September 11, 2001.

Introduction:

This report will begin with a brief introduction and statement of the issues under consideration in this evaluation, followed by a report of my clinical evaluations of the individual family members. I will also present information from any relevant information from my review of records. Lastly, I will integrate the findings and make recommendations.

Evaluation of Amber Lomas

Psychological Procedures:

Clinical Interview, The Rorschach: Comprehensive System, The Minnesota Multiphasic Personality Inventory-II (MMPI-A), and The Millon Adolescent Clinical Inventory (MACI), and review of records.

Social History:

Amber Lomas is a thirteen-year-old girl, currently living with her mother and an older and younger sister in Hughson, CA. She is in the 8th grade at Sacred Heart School in Turlock, CA. She transferred to this school from her previous middle school because her grades had dropped and she was associating with children whom her mother judged to be a poor influence on her. At her new school, she is doing better. She believes it was a good move.

Amber's parents are divorced and she reports that she is glad of that fact because her father, Rosalio Machado, was physically abusive to her mother and to the children. Amber says that she does not see him often and does not want to see him because of his abusive behavior. Her mother retains sole physical custody of all the children.

Sonnee Weedn, Ph.D.

She is involved in several extra-curricular activities, including raising a meat goat for 4-H.

It is critical to note in understanding this child that Amber comes from a devoutly Catholic family and is used to attending Mass on almost a daily basis. Her daily life and the culture of her family are steeped in religious faith that permeates most aspects of her thinking and value system. She has been an active participant in all phases of Roman Catholic religious life as has been age-appropriate (catechism, altar-serving, first communion, confession, etc.).

Behavior During Evaluation:

Amber Lomas was pleasant and cooperative throughout the process of evaluation. She was shy, but friendly. She appeared forthcoming in all of her answers to my queries. She stated that she has a "good" relationship with her mother. She reports that she has angry outbursts at times that she cannot account for (her mother affirmed this). She believes that she is doing better in school since she moved to Sacred Heart School.

Amber reported that the process of her deposition was very stressful to her. She stated, "It was hard. Sometimes I didn't understand and they jumped from subject to subject."

When asked about her dealings with Father Illo, she was vehement in stating that the most upsetting thing for her was that he lied to her face about his relationship to her and her family, that she was fired from her job altar serving with no real explanation to her, and that he angrily accused her family of stalking him in front of other parishioners, which was humiliating and seemingly untrue. His handling of her attempt to receive help from him regarding her discomfort and concerns about Father Francis were especially traumatizing and disconcerting to her. She could not understand why he betrayed her and was angry with her. Amber became tearful, but tried to hold back her fears when discussing the details of these events.

From Amber's standpoint, Father Illo was her priest; a vaunted position denoting his deserving of the utmost respect and trust. He was her confessor and a family friend.

Amber stated that she does no longer receive communion on a regular basis. She said that one should not receive communion without first going to confession. She can only bring herself to go to confession about once a month. She stated that it is frightening for her to go to confession now because it means being alone in the confessional with a priest. She says that she has

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worked out a system in her own mind whereby she makes her confession directly to God and then says an Act of Contrition in order to feel that she is doing what she is supposed to do to honor the requirements of her religion.

Results are believed to be an accurate reflection of her current level of psychological functioning.

Cognitive Aspects:

No tests of cognitive ability were given. Amber was oriented times four and alert. It would appear from observation that Amber falls into at least the Average Range of intelligence when compared to the general population. No signs of cognitive slippage or other cognitive difficulties were noted.

Emotional Aspects:

Psychological testing indicates that Amber Lomas is capable of attending to her own experience in a reasonably open and flexible manner. She shows an adaptive balance between being able to deal with situations in a detached and uninvolved manner sometimes, and, at other times, in a concerned and engaged manner.

She appears extremely committed to seeing the world accurately. She is consequently capable of perceiving people and events realistically, but she is also likely to be highly precise in the impressions she forms of situations. Only rarely will she allow herself the risk of forming an impression that may be inexact.

Her thinking is logical and coherent, and she is, for the most part, as capable as most people of her age of coming to reasonable conclusions about relationships between events and of maintaining a connected flow of associations in which ideas follow each other in a comprehensible manner.

Amber's personality pattern is submissive, dependent, and of the type that seeks affection, attention, and security. Her fear of abandonment ~~often leads~~ her to be overly compliant within her family and obliging with her peers. ~~She~~ may act at times in a socially gregarious and charming manner to ~~attract the~~ positive attention of others. She is likely to be quite naïve and ~~immature~~ ~~in~~ interpersonal and social matters and to show thinking that is more ~~childlike~~ than others her age. When she is faced with family or peer tensions, she is likely to try to be superficially untroubled and buoyant, seeking to deny in a Pollyanna way all disturbing emotions or inner discomforts. In her heterosexual relationships she is likely to be immaturely admiring and accommodating.

Sonnet Weedn, Ph.D.

Despite her need to ally herself with the leadership and competencies of family and friends, she is not sure that these relationships will fulfill her needs fully or even protect her against loss. Because of her disillusionment with others, she has become alert to signs of potential hostility and rejection and seeks to minimize the dangers of their indifference and disapproval.

There are significant indications that situational stress is making more demands on her adaptive capacities than she is ordinarily required or accustomed to confront, and this may be reducing her usual level of effectiveness in making decisions and pursuing courses of action. Her excess situational stress is being imposed on a pre-existing stimulus overload, resulting in considerable vulnerability to becoming upset, anxious, and disorganized. Insufficient psychological resources to meet the demands she is experiencing are also likely to impair her capacity for self-control and to create a marked tendency toward impulsiveness.

Amber was already in a state of stimulus overload resulting from persistent difficulty in mustering adequate psychological resources to cope with the demands being imposed on her by external and internal events in her life. Consequently, she is at risk for recurrent episodes of overt anxiety, tension, nervousness, and irritability. She is at risk for becoming psychologically incapacitated (at least temporarily) and for appearing to others as noticeably agitated and distraught to others.

Though her testing indicates that she has the adaptive capacity to anticipate and establish close, intimate, and mutually supportive relationships with other people, she shows a propensity to appear awkward or inept in social situations. Though she seeks to acquire a measure of independence and maturity, she feels helpless when faced with adult-like responsibilities that demand autonomy or initiative. The loss of a significant source of support or identification may prompt severe dejection on her part. At these times, she will openly seek signs of reassurance. Guilt, illness, anxiety, and depression may be frankly displayed. In addition, she claims greater distress concerning sexuality than is typical for her age. She reports feelings of confusion and unhappiness in this area.

It is clear from the testing that Amber is experiencing episodes of affective disturbance involving depression. Though she may not complain of feeling depressed, indications point to her being disposed to affective malaise that interferes with her ability to function effectively. In addition, she feels atypically apprehensive and she may be experiencing an anxiety disorder.

Sonnce Weedn, Ph.D.

Evaluation of Rachel Lomas

Psychological Procedures:

Clinical Interview, The Rorschach: Comprehensive System, The Minnesota Multiphasic Personality Inventory – Adolescent version, (MMPI-A), and The Millon Adolescent Clinical Inventory, (MACI), and review of records.

Social History:

Rachel Lomas is sixteen years old and attends Hughson High School, where she is a junior. She is the eldest daughter of her parents, who are now divorced. She states that she is close to her mother and has a good relationship with her. She says that her mother supports her activities, which include FFA, keeping animals, sports, and 4-H.

She states that when her father lived with them it "was a living hell." He apparently became angry "over stupid things", and if anyone argued with him he became violent. Her mother has sole physical custody of her and her sisters. She says that she sees her father twice a month when he comes by to drop off money for them. Nowadays he is pleasant toward them, but she has no desire to see him or interact with him. She reports that he does not seem to want to see her or her sisters very much.

She does not currently have a boyfriend and says she does not want this type of relationship at the current time.

It is important in understanding this young woman to know that, like her sister, she comes from a family, which is devoutly Catholic. The theology of the church is held sacrosanct, and Rachel has been taught to hold priests in very high regard, believing that priests are called by divine inspiration to the priesthood. In her particular case, having survived the domestic violence and physical abuse of her father, she and the other members of her family looked to the church and its environs as especially important to their sense of safety and coherence. She was used to attending Mass almost every day and had been a regular altar server until she was fired from that job without explanation. Both she and her sister reported altar serving as one of their favorite things to do.

Behavior During Evaluation:

Rachel was pleasant and cooperative during the course of the evaluation. Her story regarding what had transpired with Father Illo and Father Francis was

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essentially as she reported it in her deposition. Therefore, the reader is directed to her sworn deposition for these details. However, Rachel emphasized that Father Francis made her uncomfortable from his first visit to their home. She had tried to distract him from tickling her sister, because this activity was making her uneasy. She stated that it had all happened very quickly and she could not really recount the exact sequence of events because it had happened so fast. In her view, one minute she was distracting Father Francis from Kolleen and the next minute he was on top of her and grabbing her breast. She stated that she had kept this all a secret because she thought no one would believe her because "priests are supposed to be holy people".

Rachel was clearly agitated as she was queried about these various events. Her body language was closed and she became tearful when speaking about not being willing to participate in the sacrament of confession anymore. This should preclude her from participating in the sacrament of holy communion, however, she does receive communion once a month without going to confession. She said that she just hoped no one would stop her from doing this as she cannot tolerate the idea of being alone with a priest in the confessional.

Rachel was also tearful when speaking of having been barred from altar serving. She said, "I loved to serve. I loved being on the altar. I was an active participant in worship and now I can't do it." She said that she would prefer to never see Father Ilio again, given his betrayal of her and her family. She said that she had gotten "the vibe of his attraction to my mom" after several years of his friendship with the family. She was quite distressed about his humiliating her mother outside of church by accusing her of gossiping about him. According to Rachel, who overheard the women's conversation, they were actually talking about rosaries they were going to make. Rachel moved her sisters away when father Ilio began yelling, but she believes they heard him.

Results are believed to be an accurate description of her current level of psychological functioning.

Cognitive Aspects:

No test of intellectual functioning was given, however it can be assumed that Rachel is functioning in the Above Average or Superior Range of intelligence when compared to the general population based on observation and her reported grades in high school.

She was oriented times four and alert. There were no indications of cognitive slippage or other neurological difficulties.

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Emotional Aspects:

Psychological testing indicates that Rachel is capable of attending to her experience in a reasonably open and flexible manner that constitutes a personality asset. She shows an adaptive balance between being able to deal with situations in a detached and uninvolved manner and, at other times, in a concerned and engaged manner.

She demonstrates fairly good abilities to form accurate impressions about herself, to interpret the actions and intentions of others without distortion, to adequately anticipate the consequences of her own actions, and to correctly construe what constitutes appropriate behavior in various kinds of situations. Her adequate reality testing constitutes a personality strength.

She shows a potentially adaptive repertoire of styles for experiencing and expressing affect in which she modulates emotions in much the same way as most people.

She shows an adaptive capacity to establish close, intimate, and mutually supportive relationships with other people. Nevertheless, her limited social skills make it difficult for her to sustain and enjoy interpersonal attachments. She reports that it is very difficult for her to be around other people, and she much prefers to be alone now. She frequently avoids situations where there are likely to be a lot of people. She reports having difficulty making friends and she does not like to meet new people. She seems less capable than most people of dealing effectively with everyday experience, especially with respect to social situations.

Rachel is experiencing a fair amount of stress that is giving rise to unpleasant affect and makes her susceptible to depression. Her scores on testing suggest that she flattens her emotions in an effort to deaden apprehensive and fearful mistrust of others. She exhibits shyness and a chronic social awkwardness that stems from a pattern of avoiding close peer and family relationships. Her desire is for closeness and affection, but this has been self-protectively restrained so severely that there is little spark and vitality to her current existence. Despite her efforts to dampen feelings, she experiences both anxiety and depression. Her thoughts about her self-esteem and social life are often so painful as to be intentionally confused. She is over-concerned with social rebuff and is ever ready to anticipate rejection.

Rachel shows a chronic self-deprecation of aptitudes and a needy and dependent search for supportive persons or institutions. Despite her

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unrequited desire to be accepted and cared for, she has felt it best to bury these needs and maintain a safe distance from others who may prove hurtful. She has learned to fade into the background, assuming a passive role, and willingly submitting to the expectations of others. As a consequence, she is likely to have withdrawn into increasing peripheral social, academic, and social roles. Her self-image of being unattractive and undesirable makes ordinary demands and relationships often seem frightening and potentially dangerous. In addition to her expectation of humiliation, her withdrawal may stem from low energy, anxiety, restrained anger, and depression and hopelessness. Sadly, Rachel reacts to her deep frustration and unhappiness by becoming self-punitive, self-demeaning, and hypersensitive to her shortcomings. She shows diminished capacity for pleasure, sleep difficulties, problems with appetite, and she may have periodic thoughts of suicide.

Discussion:

The discussion section is meant to shed light on the circumstances of both Amber and Rachel Lomas.

In evaluating these sister's current situation and need for current or future mental health services, it is important to keep several factors in mind. First of all, these girls have experienced the trauma of domestic violence in their family. They have a very poor, if currently peaceful relationship with their biological father, who is easily nettled and prone to violence when someone disagrees with him. In addition, there is apparently a restraining order against the paternal grandparents, as they have been deemed a threat to the family safety. This state of affairs reduces the pool of supportive adults for these girls. It is to their mother's credit that she was able to leave this marriage. It is good modeling for her girls, as it is a well-known fact that many, if not most, victims of domestic violence do not leave their abusers. Since she had little work experience, this took courage and determination.

During this very stressful time, this family took refuge in their church. They were deeply involved and faithful participants in the life of the church. This was at a time when they were all extremely vulnerable and had turned to the church as a place of safety, support, community, and meaning. Adults in this type of stressful situation typically seek guidance, healing, companionship, and community from their church. Children and adolescents seek stability, structure, and a place to belong. Male clergy often fill the role of a father for children who have been abandoned or brutalized by their own fathers.

It would appear from the sworn statements of Rachel and Amber Lomas and the evidence in their psychological profiles showing them to be generally

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forthcoming and highly moralistic girls, that there was misconduct on the part of both Father Illo and Father Francis that has traumatized them both. It is important to note that for the victims of clergy abuse, there are a plethora of variables that complicate a prognosis: age at time of abuse, frequency and severity of abuse, prior history of abuse, educational level, economic resources, etc. All of these variables need to be addressed when treating a survivor of abuse by a spiritual leader. But what makes abuse of any kind by a spiritual leader different from other forms of trauma is the crisis of faith that is inherent in this form of abuse, and which is so obvious in the interviews with both girls.

People who survive this type of abuse are usually left confused or angry with God. Some reject their religion altogether. For many persons of faith, there is an assumed reverence that is given to a spiritual leader. The culture of most religions tends to foster this reverence. Catholic theology teaches that the priesthood is the sacrament of Holy Orders, whereby God calls a man to the priesthood. This call is believed to be divinely inspired. Spiritual leaders are assumed to have an enlightened spirituality, are more knowledgeable about religion, or are considered to be "holy". Again, this view was evident in the interviews with both girls. It is because of this perceived position or perceived special relationship with God that abuse in this milieu can be so catastrophic. When individuals are abused and betrayed by their spiritual leader, many feel abused and betrayed by their God. Any treatment should include an assessment of the impact of the abuse on their relationship with their God and the effects that impact has had on their lives.

Clearly, both girls have been significantly impacted by the events that occurred in their relationships with Father Illo and Father Francis. The disclosure of the problem with Father Francis by Amber to Father Illo was horribly mishandled, worsening an already difficult and damaging situation, and further traumatizing Amber. Sadly, the actions of Yvonne McLoughlin, MFT, in her professional capacity, further muddied the waters, harming Amber, and enabling Father Illo to proceed with his maltreatment of Amber. The behavior of the adults in charge of this situation was largely unhelpful, at the least, and further damaging, at the worst. Subsequent to the events of September 11th, there was further emotional abuse in the form of the girls being dismissed from altar serving, with no explanation, being made to feel unwelcome in the church, and witnessing verbal/emotional abuse of their mother by Father Illo on church property.

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Recommendations

For Amber Lomas:

- 1) Amber should be evaluated by a psychiatrist to determine if medication is indicated to treat her diffuse anxiety states, and to increase her alertness and vigor. She is plagued by fatigue, lethargy and anxiety.
- 2) Environmental changes, recommended in the testing, in the form of a change of schools have already been implemented. Any determination of damages should take into consideration the need for a change of schools due to her faltering emotional state at the time of the change.
- 3) Long-term psychotherapy is indicated with a clinical psychologist well versed in post-traumatic stress disorder and clergy abuse. The indications for long-term therapy are Amber's excessive dependency and willingness to subjugate herself to anyone she perceives to be strong, helpful or an authority. This extreme submissiveness is problematic. She will resist any overt pressure toward independence and will require slow, gentle progression toward independence and autonomy. Breaking her dependency bond (which she will, hopefully develop with her therapist) too soon can only precipitate intense emotions or erratic behavior. This type of therapy is typically not included in insurance coverage by HMO's and other managed care and will typically cost from \$90 - \$135 an hour. Some treatments for trauma require hour and a half sessions. Weekly psychotherapy is indicated for a period no less than eighteen months at this time. There will likely be a further need for therapy at various developmental milestones in the future, such as when dating commences, when leaving home for the first time (for marriage, job, college, etc.), at the time of further religious sacraments for herself or her children. It will be ideal if Amber can return to therapy on an "as needed" basis whenever she needs to. It is well known that trauma occurring during the development of the brain (in childhood) predisposes victims to the very problems Amber is experiencing (anxiety, dependency).

Sonnee Weedn, Ph.D.

For Rachel Lomas:

- 1) It is imperative that Rachel be evaluated by a psychiatrist to determine if medication is indicated to treat the depression and anxiety evident in her psychological evaluation.
- 2) It is recommended that Rachel be seen in weekly psychotherapy by a clinical psychologist well versed in the treatment of post-traumatic stress disorder and clergy abuse. This treatment should commence immediately and continue for a minimum of eighteen months. Treatment should focus on countering her withdrawal tendencies, poor interpersonal skills, and diminishing her self-deprecating thoughts and behaviors. As noted previously, psychotherapy with a psychologist generally costs between \$90-\$135 an hour. Some treatments for trauma (such as EMDR) run an hour and a half a session. Rachel will require considerable support at developmental milestones, which will occur when she begins dating, leaves home for college or other pursuits, and especially in her dealings with men who are important to her (husbands, bosses, etc.). It will be ideal if Rachel can return to therapy on an "as needed" basis at these various potentially stressful times.

If there are further questions you may have regarding my evaluation and recommendations in this case, please call me directly.

Signed,



Sonnee D. Weedn, Ph.D.

EXHIBIT B

CURRICULUM VITAE

Thomas Patrick Michael Doyle

Thomas Doyle was born August 3, 1944 in Sheboygan WI, the son of Michael Doyle and Doris Mellenthein. He was baptized Patrick Michael Doyle. He is the eldest of three children. He attended primary and secondary school in Ogdensburg NY and Cornwall, Ontario. Undergraduate studies were at Wadhams Hall College, Ogdensburg NY, and Loras College, Dubuque, Iowa. In August, 1964 he entered the Dominican novitiate at Winona MN and was given the religious name of Thomas. He pronounced simple vows on August 16, 1965 and solemn vows on August 16, 1968.

Graduate studies in philosophy and theology took place at Aquinas Institute of Philosophy, River Forest IL and Aquinas Institute of Theology, Dubuque IA respectively. He pursued graduate studies in Political Science at the University of Wisconsin and graduate studies in Canon Law at the Gregorian University, Rome, Catholic University of America, the University of Ottawa and St. Paul's University, Ottawa. He was ordained a Catholic priest in the Dominican Order on May 16, 1970 in Dubuque, IA. Although he has had only one assignment as a full-time parish priest in civilian parishes, he has consistently worked in parishes on a part-time basis since the time of ordination to the priesthood.

After completing graduate work in theology and several months of clinical pastoral training, he was assigned as an associate pastor in River Forest IL. In 1974 he was appointed an advocate for the Metropolitan Tribunal of the Archdiocese of Chicago. In 1978 he was appointed a judge in the same tribunal. In 1981 he was asked to serve as secretary-canonist at the Vatican embassy in Washington D.C., a post which he held until early, 1986. On June 16, 1986 he was commissioned a reserve officer in the U.S. Air Force. His reserve Air Force assignments were at Dover AFB, Dover DE and Andrews AFB, Maryland. Air Force training took place at Lackland AFB, Texas and Maxwell AFB in Alabama. His active duty assignments have been at Grissom AFB, IN, Hurlburt Field, FL, Lajes Field, Azores, Tinker AFB, OK and Ramstein AB, Germany and Seymour Johnson AFB, North Carolina.

He has had extensive teaching experience in Canon law as a visiting lecturer at Catholic University of America and the Chicago Theological Union. He has also been a lecturer at the Matrimonial Tribunal Institutes of Catholic University of America and Mundelein Seminary as well as at the Institute for Spirituality in River Forest IL.

As a member of the canon law Society of America he served one term as member of the board of governors and three terms as chairman of the Marriage Research Committee. He was asked by the society to be the author of the section on marriage in the commentary prepared on the revised Code of Canon Law. He was also asked by the Commission for the Authentic Interpretation of the Code of Canon Law of the Holy See to prepare the footnotes on marriage for the annotated edition of the Code of Canon Law.

Fr. Doyle has given lectures and seminars on various aspects of Church Law throughout the United States, Canada, Australia and New Zealand. These have included topics in the areas of matrimonial jurisprudence, procedural law, penal law, religious law, property law as well as the theology of marriage among others. In 1986 he was the featured lecturer at the annual convention of the Canon Law Society of Australia and New Zealand.

In late 1984 he became involved with the issue of sexual abuse of children by Catholic clergy while serving at the Vatican Embassy. Since that time he has developed an expertise in the canonical and pastoral dimensions of this problem. He has worked with victims of abuse and their families, priests accused of abuse, bishops and superiors of religious institutes on this issue. He has developed policies and procedures for dealing with cases of sexual abuse by the clergy for dioceses and religious orders in the United States, Canada, Australia and New Zealand. In the capacity as an expert in this area, he has delivered lectures and seminars for clergy and lay groups throughout the U.S. In 1989 he appeared as an expert witness before the legislature of the State of Pennsylvania concerning that State's child protective legislation. He has also served and continues to serve as a consultant/court expert in cases of alleged

sexual abuse by the clergy throughout the United States, Canada, Ireland, Israel and the United Kingdom.

In recognition of his advocacy work for the victims of Catholic clergy sexual abuse Father Doyle received the Cavallo Award for Moral Courage in 1992, the Priest of Integrity Award from Voice of the Faithful in 2002 and the Isaac Hecker Award from the Paulist Fathers in 2003. In June of 2003 he was issued an official commendation from the Dominican Fathers for his "*prophetic work in drawing attention to clergy sexual abuse and for advocating the rights of victims and abusers.*"

ACADEMIC CREDENTIALS

- B.A.** Philosophy, Aquinas Institute of Philosophy, River Forest, IL, 1966
- M.A.** Philosophy, Aquinas Institute of Philosophy, River Forest, IL, 1968
Dissertation: "Organized Religion in Marxist-Leninist Philosophy."
- M.A.** Political Science, University of Wisconsin, Madison, 1971,
Dissertation: "Vladimir Lenin's Theory of Social Revolution."
- M.A.** Theology, Aquinas Institute of Theology, Dubuque, Iowa, 1971, Dissertation: "Liberation Theology in the Context of Social Needs in South America."
- M. Ch.A.** Administration, Catholic University of America, Washington, D.C., 1976
- M.A.** Canon Law, University of Ottawa, Ottawa, Ontario, 1977
Dissertation: "The Canonical and Legal Foundation of the Dominican Order in Canada."
- J.C.L.** Pontifical Licentiate in Canon Law. St. Paul University, Ottawa, 1977.
- J.C.D.** Pontifical Doctorate in Canon Law. Catholic University of America, Washington, D.C., 1978. Dissertation: "Marital Fidelity in the Canonical Tradition of the Catholic Church."
- Diploma:** Squadron officers School, Air University, May, 1996
- Diploma:** United States Navy Drug and Alcohol Counselor School, October, 2000
- Diploma:** Air Command and Staff College, Air University, July 5, 2002

POSITIONS HELD

- 2003-04 Chaplain, USAF, Seymour Johnson AFB, North Carolina
- 2001-03 Chaplain, USAF, Ramstein AB, Germany
- 1997 -01 Chaplain, USAF, Tinker AFB, Oklahoma
- 1995 -97 Chaplain, USAF, Lajes Field, Azores
- 1993 -95 Chaplain, USAF, Hurlburt Field, Florida
- 1990 -93 Chaplain, USAF, Grissom AFB, Indiana
- 1991-93 Tribunal Judge, Diocese of Lafayette in Indiana

1993-95 Tribunal Judge, Diocese of Pensacola-Tallahassee and Archdiocese for the Military Services, U.S.A.

1986-90 Tribunal Judge and Special Assistant to the Archbishop, Archdiocese for the Military Services, U.S.A.

1986-90 Tribunal Judge, Diocese of Scranton, PA.

1981-86 Secretary-Canonist, Vatican Embassy, Washington, D.C.

1981-86 Visiting Lecturer in Canon Law, Catholic University of America, Washington, D.C.

1979-86 Faculty Member, Midwest Tribunal Institute, Mundelein Seminary, Mundelein, IL.

1978-86 Faculty Member, Tribunal Institute of the Catholic University of America, Washington, D.C.

1979-81 Visiting Lecturer in Canon Law, Catholic Theological Union, Chicago IL.

1978-81 Tribunal Judge, Archdiocese of Chicago, IL.

1974-78 Advocate and Defender of the Bond, Tribunal, Archdiocese of Chicago, IL.

1978-85 Faculty member, Institute of Spirituality, River Forest IL.

1971-74 Associate Pastor, St. Vincent Ferrer Parish, River Forest IL.

1970-71 Graduate Student, Aquinas Institute of Theology, Dubuque, Iowa.

1966-70 Theological studies, Aquinas Institute of Theology

OTHER POSITIONS HELD

1983-85 Consultant to the Canonical Affairs Committee of the National Conference of Catholic Bishops

1978-81 Member, Board of Governors, Canon Law Society of America

1979-86 Chairman, Marriage research Committee, Canon Law Society of America

1979-85 Editor, Marriage Studies, Washington D.C.

1982-88 Weekly columnist, Arlington Catholic Herald

1988-90 Consultant to the Canonical Affairs Committee of the National Conference of Catholic Bishops

1986 Director of the Institute of Spirituality, River Forest, IL

1971 Clinical Pastoral Training, Minnesota State Prison

PUBLICATIONS: BOOKS

1. Comrades in Revolution. Dayton: Pflaum Press, 1969.
2. The Understanding of the "Bonum Fidei" in the Church's Canonical Tradition. Washington, D.C.: Catholic University of America, 1978.
3. Rights and Responsibilities in the Church. New York: Pueblo Press, 1983.
4. The Homilist's Guide to Scripture, Theology and Canon Law. (With John Burke, O.P.), New York: Pueblo Press, 1987.
5. The Code of Canon Law: A Commentary. Leesburg VA: Catholic Home Study Institute, 1988.
6. Christian Marriage. Leesburg VA: Catholic Home Study Institute, 1989.
7. Meeting the Problem of Sexual Abuse Among the Clergy in a Responsible Way. (With Michael Peterson, M.D. and F. Ray Mouton, J.D.), Suitland MD: St. Luke Institute, 1985.
8. Sex, Priests and Secret Codes. With A.W.R. Sipe and Patrick Wall. Los Angeles, Bonus Books, 2004.

PUBLICATIONS: ARTICLES

1. "A New Look at the 'Bonum Fidei'," Studia Canonica 12(1978), 6-40.
2. "The Individual's Right to marry in the Context of the Common Good." Studia Canonica 13(1979), 245-302.
3. "Marital Breakdown: The Experience of the Tribunal." The Priest, September 1981.
4. "The Obligation of the Divine Office." The Priest, February, 1980.
5. "The Contemporary Challenge to Christian Marriage." The Priest, November and December, 1981.
6. "Why Some Catholics Get Divorced." U.S. Catholic, August, 1980.
7. "The Effects of Marital Disintegration on Children." The Priest, June, 1981.
8. "The Relationship of Canon law to the Catholic Family." The Priest, February, 1983.
9. "Sacramental Theology: Where We Are Today." The Priest, November, 1983.
10. "The Sacraments in the New Code." The Priest, November and December, 1984.
11. "The Contemporary Challenge to the Christian Family." The Exchange, Winter, 1980.
12. "The Internal Forum Solution." Phoenix, Summer, 1982.
13. "The Roman Catholic Church and Mixed Marriages." Ecumenical Trends, June, 1985.
14. "The Moral Inseparability of the Unitive and Procreative Aspects of Human Sexual Intercourse." Monitor Ecclesiasticus, 109(1984), 447-469.
15. "The Canonical Status of Religious Institutes: Additional Considerations." Studia Canonica 18(1984), 347-364.

16. "The Church and Marital Breakdown." Listening 15(1980), 54-64.
17. "The Canonical Foundations for Pre-Marital Preparation." Marriage Studies, Vol. 1, Washington D.C.: Canon law Society of America, 1980, 65-77.
18. "Select Bibliography on the Sacrament of Marriage." Marriage Studies, Vol. 1, Washington D.C.: Canon law Society of America, 1980, 78-101.
19. "The Competent Forum, Matrimonial Trials and Norm 7 of the American procedural Norms." Marriage Studies, Vol. 1, Washington D.C., Canon Law Society of America, 1980, 102-143.
20. "Matrimonial Jurisprudence in the United States." Marriage Studies, Vol. 2, Washington D.C.: Canon law Society of America, 1982, 111-158.
21. "The Moral Inseparability of the Unitive and procreative Aspects of Sexual Intercourse in the Thought of Pope John Paul II." Marriage Studies, Vol. 3, Washington, D.C.: Canon Law Society of America, 1985.
22. "The Catholic Church and Marital Breakdown." The New Catholic World, February, 1986.
23. "The Canonical Status of Religious Institutes." Monitor Ecclesiasticus 110(1985), 227-245.
24. "The Theology of Marriage." Studia Canonica, 20(1986).
25. "More on the Canonical Status of Religious Institutes." Angelicum, 1987.
26. "The Dignity of the Human Person in the Thought of John Paul II." Social Thought, 1987.
27. "The Clergy in Court: Clergy Malpractice." The Priest, January and February, 1987.
28. "Faith and the Sacrament of Marriage." Proceedings of the Australian Canon law Society, 1987.
29. "Marriage." in The Code of Canon law: A Text and Commentary. New York: Paulist Press, 1985. P. 737-834.
30. "Ministry to the Military: Valid or Not." The Priest, June, 1987.
31. "Military Marriages: Some Special problems." Studia Canonica 21(1987).
32. "Military Marriages." Military Chaplain's Review, Spring, 1988.
33. "The Christian Vocation of Marriage." Handbook on Critical Sexual Issues. St. Louis: Pope John XXIII Center. 1983.
34. "The Clergy in Court: recent Developments." The Priest, July and August, 1990.
35. "Canon Law." 336 entries on Canon Law topics in The Concise Catholic Encyclopedia, Huntington IN: Our Sunday Visitor Press, 1990.
36. "The Rights of Priests Accused of Sexual Misconduct." Studia Canonica 24(1990).
37. "Canon Law." 274 entries in The Concise Catholic Dictionary, Huntington IN: Our Sunday Visitor Press, 1993.
38. "Healing the Pain." The Blue Book. Annual Proceedings of the National Catholic Council on Alcohol and Drug Related Problems, 1994.

39. "Privileged Communications in the Military." Hurlburt Field, FL, Chaplain Resource Board.
40. "Privileged Communications and Military Chaplains." USAF Chaplain Resource Board
41. "Roman Catholic Clericalism, Religious Duress and Clergy Sexual Abuse." Pastoral Psychology, 51(2003).
42. "Catholic Clergy Sexual Abuse Meets the Civil Law." Fordham Urban Law Journal Jan. 2004.
43. "Canon Law: Failure from Above," in Sin Against the Innocents, Thomas Plante, editor, Greenwood Publishing Group, March 2004.

PROFESSIONAL MEMBERSHIPS

Canon law Society of Great Britain and Ireland
Canon law Society of Australia and New Zealand
Canadian Canon law Society
Societe Internationale de Droit Canonique
National Rifle Association
Titanic Historical Society
Aircraft Owners and Pilots Association
Warbirds of America
Experimental Aircraft Association
Phi Alpha delta law Fraternity
Professional Association of Dive Instructors

MILITARY AWARDS AND DECORATIONS

National Defense Medal (2x)
NATO Service Medal
Kosovo Campaign Medal
Armed Forces Service Medal (2x)
Armed Forces Expeditionary Medal (2x)
Humanitarian Service Medal
Military Outstanding Volunteer Service Medal

Air Force Achievement Medal (2x)

US Army Achievement Medal

Air Force Commendation Medal (3x)

Meritorious Service Medal (3x)

"Most Distinguished Graduate," US Navy Drug and Alcohol Counselor School

MISCELLANEOUS

Winner of the 1992 Cavallo Award for Moral Courage in Government and Business

Major, United States Air Force, Active Duty

Member, Order of the Desert Legion (US Army)

FAA licensed pilot, multi-engine, commercial and instrument rated

P.A.D.I. certified Master Scuba Diver, Divemaster, Rescue Diver

"Priest of Integrity Award" from Voice of the Faithful, July, 2002

Isaac Hecker Award for Achievements in Social Justice, 2003

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EXHIBIT C

January 2005

Curriculum Vitae

A.W. RICHARD SIPE

EDUCATION

- Loyola College , Baltimore , Maryland , MS 1980
- The Seton Psychiatric Institute, Baltimore , Maryland , Certificate-Resident in Counseling of Religious 1965-1967
- The Menninger Foundation, Topeka , Kansas , Certificate in Counseling 1964-1965
- Saint John's Seminary, Collegeville , Minnesota , Ordained Roman Catholic Priest (M.Div. Equiv.) 1957-1959
- Collegio Sant' Anselmo, Rome , Italy 1955-1957
- Saint John's University , Collegeville , Minnesota — BA 1950-1955
- Saint John's Preparatory School , Collegeville , Minnesota 1946-1950

CERTIFICATION

- Psychiatrist Assistant. Registration No. S-00001 The Maryland State Board of Medical Examiners 1982-2000
- National Certified Counselor (NCC) Certificate #03879 1983-2000
- National Academy of Certified Clinical Mental Health Counselors (CCMHC) Certificate No. 183 1981-2000

PROFESSIONAL POSITIONS

- Pastoral Counselor (Volunteer) Owen Clinic, University of California at San Diego 2000-
- Psychiatrist Assistant (State of Maryland) 1982-1999
- Consultant, Task Force on Sexual Abuse — St. John's Abbey & University, Collegeville , Minnesota 1993-1994
- Supervisor in Family Therapy — Child and Adolescent Fellows Program, John's Hopkins Medical School Department of Psychiatry 1989-1993
- Counselor, (Private Practice Associates) 1970-1982
- Staff, Consultation Center for Clergy and Religious Archdiocese of Baltimore 1978-1982

- Consultant in Family Therapy North Baltimore Mental Health Center 1978-1980
- Counselor, Loyola College Counseling Service (Acting Director 1974) 1971-1979
- Consultant to the Program of Psychiatry and Religion, Spring Grove State Hospital,
Baltimore, Maryland 1969
- Personnel Director, St. John's Abbey 1968-1970
- Director of Family Services, the Seton Psychiatric Institute, Baltimore, Maryland 1967-1970
- Executive Director, Saint John's University Institute for Mental Health,
Collegeville, Minnesota 1965-1969
- Counselor, Saint Boniface High School, Cold Spring, Minnesota 1959-1964

ACADEMIC APPOINTMENTS

- Instructor in Psychiatry (part-time), John's Hopkins School of Medicine, Department
of Psychiatry, Baltimore, Maryland 1972-1997
- Adjunct Professor, Pastoral Counseling, Saint Mary's Seminary and University,
Baltimore, Maryland 1972-1984
- Adjunct Associate Professor of Psychology Loyola College, Baltimore, Maryland
1971-1975
- Assistant Professor of Pastoral Counseling, St. John's University, Collegeville,
Minnesota 1967-1970
- Lecturer in Pastoral Counseling, Woodstock College, Woodstock, Maryland 1968-1970

ARTICLES

- " Cincinnati's 30 pieces of silver," The National Catholic Reporter, December 12, 2003
- "Does the Church Really Care," Corpus Reports, September/October, 2003.
- "Abuse: From the Eye of the Storm," Bread Raising, June, 2003.
- "Priests Still Die of AIDS as Church Postpones Needed Dialogue," The National Catholic Reporter,
March 31, 2000.
- "Perilous Choice to Ignore AIDS Issue," The National Catholic Reporter, March 31, 2000.
- "Road Map and Road Blocks: The Seminarian's Dilemma," The TABLET (London), October 7, 1995

, (p. 1276-1278).

- "Achievement," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, October 1995.
- "Celibate Spirituality—In Search of the Feminine Voice," Sisters Today, September, 1995 (p. 342-346).
- "Transformation," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, September 1995.
- "Integration," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, August 1995.
- "Truth or Consequences," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, July 1995.
- "How I should Have Loved," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, June 1995.
- "Appropriate, Responsible, Mature," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, May 1995.
- "After the Fall," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, April, 1995
- "Authority and Power," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, March 1995.
- "Loneliness," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, February 1995.
- "Desire and Self Knowledge," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, January 1995.
- "Celibacy: Nature and Grace," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, December 1994.
- "How to be Celibate," Reflections on Celibacy series in Priestly People, Jemez Springs, New Mexico, November 1994.
- "Priest sex abuse case stirs political storm in Ireland," The National Catholic Reporter, December 2, 1994, (p. 17).
- "The Problem of Sexual Trauma and Addiction in the Catholic Church," Sexual Addiction and Compulsivity, Vol. 1, No. 2, 1994, (p. 130-137).
- "Celibacy and Power," The Tablet (London), November 26, 1994, (p. 1504-1505).
- "Divine Justice: William F. Love's Bishop Regain and Harry Kermelman's Rabbi Small" (with B.C. Lamb) The Armchair Detective, Vol. 27: No. 1, winter, 1994.
- "Victims of Clergy Abuse Achieve Rightful Status," Bread Rising, Vol. 4: No. 1, 1994.
- "A Step toward Prevention of Sexual Abuse," Human Development, Vol. 14: No. 4, 1993 (p. 27-28).

- "Clergy Sexual Abuse: The St. John's Initiative" St. John's Magazine, December, 1993.
- "To Enable Healing," The Natural Catholic Reporter, September 17, 1993.
- "Celibacy and Imagery: 'Horror Story' in the Making," The National Catholic Reporter, July 2, 1993.
- "Celibacy in Law and Life," Viewpoint, The Tablet (London), June 12, 1993.
- "The Celibacy Question," The Tablet (London), June 5, 1993, (p. 737-738).
- "A House Built on Sand," Viewpoint, The Tablet (London), September 12, 1992, (p. 1118).
- "Chesterton's Brown and Greeley's Blackie," (with B.C. Lamb), Commonweal, August 14, 1992, (p.18-25).
- "Double-Talk on Celibacy," The Tablet (London), May 16, 1992, (p. 605-606).
- "Sex and Celibacy," The Tablet (London), May 9, 1992, (p. 576-577).
- "Spirituality and Integrity," Fellowship of Prayer, Vol. 43, No. 6, December, 1991.
- "Education for Celibacy: An American Challenge," America, May 18, 1991, (p. 539-548).
- "Newfoundland Report a Church Reform Manifesto," The National Catholic Reporter, September, 21, 1990.
- "Outpatient Responses to Sexual Problems of Catholic Religious," The Bulletin of the National Guild of Catholic Psychiatrists, San Francisco, California, Vol. 32, 1988, (p. 42-45).
- "The Mental Health Institute at St. John's 1954-1984," The Scriptorium, Vol. 24, Collegeville, Minnesota, 1985.
- "The Psychological Dimensions of the Rule of St. Benedict," The American Benedictine Review, The American Benedictine Review, Inc., St. Benedict's Abbey, Atchison, Kansas, December, 1983, Vol. 34:4, (p. 424-435).
- "Memento Mori, *Memento Vivere* and the Rule of St. Benedict," The American Benedictine Review, North Central Publishing Co., St. Paul, Minnesota, Vol. XXV: 1, March, 1974, (p. 96-107).
- Introduction to Conflict in Community, Robert J. McAllister, M.D., St. John's University Press, pp. xiii-xv, 1969.
- "The Introduction of Psychiatry Into a Religious Setting," (with Ivan D. Junk, M.D.), The American Benedictine Review, North Central Publishing Co., St. Paul, Minnesota, Vol. XX.3, September, 1969, (p. 257-271).
- "The Celibate and Community Life," Sisters Today, Sentinel Publishing Co., Collegeville, Minnesota, Vol. 41:4, December, 1969, (p.206-210).
- "The Education of Religious: A Question of Goals," Sisters Today, Sentinel Publishing Co., Collegeville, Minnesota, Vol. 39:7, March, 1968, (p. 337-347).

REVIEWS IN

- Psychiatric Annals; Medical Insight; Theological Studies; American Journal of Psychiatry; Worship

LECTURES

- "Forgiveness of the Church for Sexual Abuse" VOTF , St. Thomas University, St. Paul, Minnesota, November 7, 2004.
- "A Dangerous Business: Questions & Truth Telling" SNAP National Meeting, Denver, CO, June 12, 2004 .
- "Sexual abuse and suicide" seminar, SNAP National Meeting, Denver, CO, June 11, 2004.
- "The Consequences of Guilt" Santa Clara Symposium on Sin Against the Innocent, Santa Clara, CA, May 14, 2004.
- "Family Secrets: the extent of abuse" SNAP Retreat, Minneapolis, March 2, 2004
- "Confessions of an Expert Witness" VOTF, Minneapolis, Minnesota, March 1, 2004 .
- "The Bishops have spoken. Is there hope?" Call to Action San Diego, Pacific Beach, California, March 6, 2004.
- "Beyond Abuse" VOTF Boston, January 24, 2004. .
- "Sexual Abuse: the Crisis Behind the Headlines" Call to Action, Milwaukee , Wisconsin , November 7-9, 2003 .
- "Being Catholic in the 21st Century: Crisis, Challenge, and Opportunity ." VOTF, Fordham University , Bronx , NY, October 25, 2003 .
- "Moral Leadership: Abuse Victims, the Press, Lawyers, and Law Enforcement." Keynote for the West Coast Conference of SNAP, Los Angeles , CA. October 18, 2003 .
- "An Historical Note on Clergy Abuse." National Clergy Abuse Network. Chicago , IL . October 3-4, 2003 .
- "A Theological Reflection in Three Acts-or-The Vegas Showgirl, God/Popeye, and Where the Church Went Wrong." Keynote for the National Meeting of Dignity, Las Vegas , Nevada , August 7-10, 2003 .
- "Does the Church Care?" Keynote for the National Conference of CORPUS, Dallas , Texas . June 27-29, 2003 .
- "View From the Eye of the Storm" Keynote for the 11th annual National Meeting of LINKUP. Louisville , Kentucky , February 22, 2003 .
- "Celibacy in Crisis" Institute for Continued Learning University of California San Diego , March 7,2003
- "Abuse at the Abbey" Survivors Network of Minnesota , Minneapolis , February 28-29, 2003 .
- "The Pastoral Challenge in a Climate of Distrust" State of California Chaplains' Conference, Oakland , California , October 23, 2002 .

- "Crisis in the Church" The Channel Club, Santa Barbara, California, September 27, 2002.
- "Religious Construction of HIV/AIDS Diagnosis in San Diego & its Impact on Decisions about Treatment & Care" Respondent, University of California San Diego Social Sciences Roundtable, February 13, 2002.
- "Was Jesus a Sexual Person?" CORPUS National Conference, Secaucus, New Jersey, June 30, 2001.
- "The Healing Hand of God" The Cathedral of St. John the Baptist, Roman Catholic Diocese of Paterson, New Jersey, October 14, 1998.
- "Is Sexual Abstinence Possible?" Towson State University, Towson, Maryland, May 7, 1997.
- "Religion and Psychiatry" Grand Rounds, Springfield State Hospital, Sykesville, Maryland, April 11, 1997.
- "Celibacy, Sex and Fiduciary Boundaries," Symposium on Boundary Issues and Violations in the Clergy, The Menninger Foundation, Topeka, Kansas, September 20-21, 1996.
- "Celibacy: A Way of Living, Loving and Serving" (15 lectures) St. John's Seminary, Collegeville, Minnesota, January 8-27, 1996.
- "Denial in Recovery" The Florida Medical Professional Group convention, Ft. Lauderdale, Florida, November 4, 1995.
- "Spirituality and Recovery" Keynote Panel National Council on Sexual Addiction and Compulsivity, Atlanta Georgia, March 23, 1995.
- "The Person of the Priest: Toward a Celibate Integration" (10 lectures) St John's Seminary, January 10-21, 1995.
- "The Prophetic Role of Victims of Clergy Sexual Abuse," Christian Survivors of Sexual Abuse, the Commonwealth Institute, London, October, 9, 1994.
- "Christian Roots of Abuse" LINKUP, National Conference, Collegeville, Minnesota, August 4, 1994.
- "Christian Leadership: Challenge to Sex and Power" LINKUP Leadership Conference, June 17, 1994.
- "Psychoanalysis and Family Therapy" George Washington University, Washington, D.C., June 14, 1994 and November 8, 1994.
- "The State of Sexual Abuse in the Catholic Church," Conference on Sexual Trauma in the Church, St. Johns University, Collegeville, Minnesota, August 12-13, 1993.
- "Sex and the Church" (15 lectures), St. Louis University, ~~Department of Theology, St. Louis~~ Missouri, July 19-23, 1993.
- "Negotiating Loneliness in the Celibate Process," Vincentian Fathers Annual Convocation, St. Louis, Missouri, June 16, 1993.
- "Sexual Abuse by Clergy: Who and Why," Maryland Governor's Conference on Child Abuse and Neglect, April 29, 1993.
- "The Clergy and Human Sexuality," Maryland Association of Private Practicing Psychiatrists, December 3, 1992.

- "Sexual Abuse by Priests—Why?" VOCAL, Chicago, Illinois, October 18, 1992.
- "Sex and the Clergy," The City Club of Cleveland, October 18, 1991.
- Grand Rounds, the Veterans Hospital of Baltimore, September 17, 1991.
- "Addictions and Spirituality," Prince George's County Health Department, May 20, 1991.
- "The Celibate/Sexual Adjustment of Roman Catholic Priests," Research Conference, John's Hopkins Medical School, Department of Psychiatry, May 6, 1991.
- "The Celibate/Sexual Agenda," CORPUS National Meeting, New York, June 22, 1991.
- "Outpatient Response to Sexual Problems Among Catholic Religious"—The National Guild of Catholic Psychiatrists, Montreal, Canada, May 8, 1991.
- "Facing Dangerous Questions: An Intellectual Odyssey," (Rolling-Leutkemeyer Lecture), McDonogh School, April 3, 1991.
- "Sexuality—Intimacy and Ministry" (2 lectures), Ministry Formation Program, Archdiocese of Baltimore, March 31, 1991.
- "Spirituality and Integrity" and "Remaining Credible Witnesses to Our Faith," Princeton Theological, December 4, 1990.
- "Sexual/Celibate Pressures of Catholic Priests," The American Psychological Association National Meeting, Boston, Massachusetts, August 11, 1990.
- "Celibacy and Sexuality" (13 lectures with Marianne Benkert, M.D.), St. John's University, July 23-26, 1990.
- "What Questions May a Theologian Ask About Celibacy," St. John's University School of Theology, July 25, 1990.
- "Life, Love and Celibacy" (3 lectures) St. John's Seminary, September 26, 1989.
- "Celibacy, Sex and the Place of Women"—First National Meeting of CORPUS, American University, Washington, D.C., June 17, 1988.
- "The Psychological Aspects of the Aging Process"—Catholic University of America, Washington, D.C., March 21, 1987.
- "Growth of Celibate Self: How? Now, Wow!" (10 lectures) (With Dr. Marianne Benkert), Erie Pennsylvania, August 7 to August 9, 1986.
- "Positive Patterns to Marriage"—Seminar, The United Hospitals of St. Paul, Minnesota, April 25, 1985.
- "Making Marriage Work" (6 lectures), Baltimore Archdiocese Marriage Preparation, July - August 1985.
- "Family Therapy Grows Up"—Springfield Hospital Center, Psychiatric Grand Rounds, Sykesville, Maryland, April 12, 1985.
- "Psychiatry and Religion: Partners in Health"—The United Hospitals of St. Paul, Minnesota, October 18, 1983.

- "Family Therapy: A Perspective Not a Technique" Psychiatric Residence Conference, University of Maryland Medical School, Baltimore, August 11, 1983.
- "Family Therapy." Veterans Administration Hospital, San Juan, Puerto Rico, March 16, 1983.
- "Retired Priests: An Adaptive Task" Stella Maris Hospice, Towson, Maryland, May 6, 1981.
- "Family Therapy as Sole Method of Treatment"—Panel: The Uses and Abuses of Family Therapy—American Ortho Psychiatric Meeting, New York, April 15, 1977.
- "Psychic Reconciliation" Loyola College Lenten Lecture, Baltimore, Maryland, May 24, 1976.
- "The Role of the Counselor"—American Orthopsychiatric Association, New York, June, 1973.
- "The Family:—Its Faith and Its Fears"—Wilmington, Delaware, March 10, 1971.
- "The Dilemma of the Hospital Chaplain: —Mid-West Health Congress, Kansas City, Missouri, March, 1970.
- "Occupational Hazards of Helping People"—Johns Hopkins, Medical School, April 1, 1969.
- "What Clergy Learn About Psychiatry"—Maryland Association of Private Practicing Psychiatrists, Baltimore, Maryland, January 30, 1969.
- "The Introduction of Psychiatry into a Religious Setting"—42nd Anniversary Congress of the Pan-American Medical Association, Buenos Aires, Argentina, November 26, 1967.
- "The Role of Benedictines in the Church Today" St. John's Chapter, Collegeville, Minnesota, October 21, 1967.
- "Psychiatric and Religious Intervention in Mental and Emotional Illness," George Washington University Faculty, Department of Psychiatry, Washington, D.C., February 16, 1966.

BOOKS AND CHAPTERS

- Introduction to: Spoils of the Kingdom: Clergy Misconduct and Social Exchange in Religious Life by Anson Shupe, University of Indiana Press, 2005.
- Living the Celibate Life: A Search for Models and Meaning, Triumph Books, Ligouri, Missouri, 2004.
- Sex, Priests & Church Documents :An Introduction to Clergy Sexual Abuse, with Thomas P. Doyz & Patrick J. Wall, Precept Press, Santa Monica, 2005
- "The Crisis of Sexual Abuse and the Celibate Agenda of the Church" in Sin Against the Innocents: Sexual Abuse by Priests and the Role of the Catholic Church, Thomas G. Plante, Ph.D., Editor, Westport, CT: Greenwood, 2004.
- Celibacy in Crisis: A Secret World Revisited, Brunner/Routledge, New York, 2003.
- "Celibacy" The Oxford Companion to Christian Thought Adrian Hastings, editor, Oxford University Press, Oxford, 2000.

- "The Sexual Abuse of Minors by Clergy: Problems of Prevention" in Bless Me Father for I Have Sinned, Thomas G. Plante, Ph.D., Editor, Westport, CT: Greenwood, 1999.
- "Clergy Abuse in Ireland" in Wolves Within the Fold: Religious Leadership and Abuses of Power, Anson Schupe, Editor, Rutgers University Press, New Jersey, 1998.
- Celibacy: A Way of Living, Loving and Serving, Triumph Books, Ligouri, Missouri & Gil/MacMillan, Dublin, Ireland 1997/E.J. Dwyer, Sydney, Australia, 1997.
- Sex, Priests and Power: Anatomy of a Crisis, Brunner/Mazel, New York, 1995, Cassell Publishers, London, 1995.
- "Negotiating Loneliness in the Celibate Process" in Living in the Meantime, (pp. 104-117), Paul Philibert, O.P. Editor, Paulist Press, New York, 1994.
- A Secret World: Sexuality and the Search for Celibacy, Brunner/Mazel, New York, 1990.
- Sexualität und Zölibat, Ferdinand Schöningh, Paderborn, 1992.
- Obedience (Roman Catholicism) p. 795-96; Retreats (Roman Catholicism) p. 1082-83; Religions, Pastoral Care of, p. 1060-1061, in: Dictionary of Pastoral Care and Counseling, Rodney J. Hunter, General Editor, Abingdon Press, Nashville, 1990.
- "Sexual Aspects of the Human Condition"—in Changing View of the Human Condition, Paul Pruyser, Editor, Mercer University Press, 1987.
- Psychiatry, Ministry and Pastoral Counseling, Editor (with C.J. Rowe, M.D.): The Liturgical Press, Collegeville, Minnesota, September, 1983.
- Beyond Crescent Gate, Fifteen American Poems, Walter O. Jahreiss, M.D. (A. W. Richard Sipe, Editor), Garamond/Pridemark, Baltimore, Maryland, 1971.
- Hope: Psychiatry's Commitment, Editor: Brunner/Mazel, New York, 1970.
- A Physician in the General Practice of Psychiatry: The Selected Papers of Leo H. Bartheimer, M.D., Editor (with P. A. Martin, M.D. and G.L. Usdin, M.D.); Brunner/Mazel Publishing Co., New York, 1970.

RESEARCH

- Priests With AIDS—A Desperate Cry: "The Church Has AIDS"
- Project: Celibacy in Literature and Life,—The Minister's Black Veil: Literature of Vocation, with Harris Gruman, Ph.D. & Dr. B.C. Lamb, Ph.D., JD. (T.B.P.)
- Apostles of Celibacy & the Problematic Paradigm (T.B.P.)
- "A Search for Celibacy, 1960-1985: Practice, Process and Achievement."
- "The Pastoral Promise: an Explanation of a Quality of Ministry" Master of Science Thesis, Loyola College, Maryland, December 5, 1979.
- "A Proposal for the Implementation for a Counseling Facility in a Small College Setting," St. John's University, Collegeville, Minnesota, July 1966.

- "The Ego Functioning of a Training Group: An Organizational Case Study Report"—Department of Preventive Psychiatry, The Menninger Foundation, Topeka , Kansas , 1965.
- "An Investigation into Parental Suicide and Adolescent Difficulties: Three Cases" St. Thomas University , St. Paul , 1964.

FORENSIC CONSULTATION

- Consultant and expert witness in over two hundred cases of Catholic clergy abuse of minors and other clergy professional malfeasance, 1988-2005. Witness and consultant in Grand Jury investigations 2002 & 2003.

BOARD, COMMITTEES, FELLOWSHIPS AND HONORS

- St. John's University INTERFAITH SEXUAL TRAUMA INSTITUTE Board of Directors, Chairman of the Board
1994-1996
- Isaac Taylor Institute for Psychiatry and Religion—Advisory Committee 1986-1989
- St. Luke's Institute, Suitland , Maryland , Board of Directors 1986-1988
- Institute for Religion and Human Development, Board of Directors (Chairman 1977-1983) St. John 's University
1977-1984
- Archdiocese Commission on Women in the Church (Baltimore) 1977
- Institute for Ecumenical and Cultural Research: Project Fellow (Faith: Human Condition)
1977-1982
- American Medical Association: Consultant, Committee for the AMA Handbook Human Sexuality
~~1988~~
- Who's Who in Religion 1975
- American Catholic Who's Who 1978-1979

PROFESSIONAL ASSOCIATIONS

- American Family Therapy Academy ~~1986-1996~~
- National Council on Family Relations (24505) 1971-1995
- American Association of Mental Health Counselors (President 1971) 1971-1980
- American Personnel and Guidance Association (S-4038114) 1975-1995
- American Mental Health Counselors Association 1978-1997
- Maryland Mental Health Counselors Association 1978-1997

MEDIA CONTACTS

- Television:

- TV Documentary SEXUAL IDENTITY BBC 2005
- TV Documentary CELIBACY BBC/HBO 2004
- Participant in ten TV documentaries on clergy sexual abuse, USA, France, & UK during 2003/2004.
- Court TV, January 2002.
- CNN, TV January 2002.
- "Non-Celibate Priests," Religion & Ethics PBS TV, July 2001.
- "Priests With AIDS," 20/20, ABC TV, January 2001.
- "St. John's Priest With AIDS," KSTP TV, January 2001.
- "Sexual Abuse & St. John's Abbey," KSTP TV, November 10-11, 2000.
- "Priests: A Question of Celibacy," Canada Sex TV, September 2000.
- NBC, CBS, ABC, Fox, CNBC: England, Yorkshire TV, BBC TV, Oxford TV, Netherlands TV, CBC TV, PBS, etc.
- "Our Father," HBO, 1996.
- "Sins of the Fathers," BBC-EVERYMAN September 10, 1995.

- Print Media:

- Interviews:

People Magazine, The National Review, The Boston Globe, Washington Post, Baltimore Sun, USA Today, New York Times, New York Post, News Day, A.P. News Service, Catholic News Service, The Catholic Register, National Catholic Reporter, London Times, The Chicago Tribune, Los Angeles Times, San Francisco Examiner, Wall Street Journal, Time, Newsweek, Hartford Courant, Miami Herald, Detroit Free Press, Playboy, L'Espresso, New Yorker, etc.

- Radio:

Major US networks: ABC, NBC, CBS, FOX, CNN; NPR, PBC, CBC, BBC— England, Ireland, Wales; Australian Radio, etc.

- Movies

Consultant in a Dan Wigatow/Sony Studio production. Screen play by Stanley Weiser.

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cy
Filed FEB 22 2005
ROSA JUNQUEIRO, CLERK
By Charlene Gray
DEPUTY

11 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF SAN JOAQUIN**

14 KATHLEEN MACHADO, individually and
in her capacity as Guardian ad Litem for
15 RACHEL LOMAS and AMBER LOMAS,
Plaintiffs,
16 v.
17 FATHER JOSEPH ILLO; FATHER FRANCIS
JOSEPH a.k.a. FATHER FRANCIS ARAKAL;
18 FATHER RICHARD RYAN; BISHOP STEVEN
BLAIRE; THE DIOCESE OF STOCKTON;
19 DOES 1 through 100,
Defendants.

No. CV 018440

**DEMAND FOR EXCHANGE OF
EXPERT TRIAL WITNESS
INFORMATION (CCP §2034)
AND DEMAND FOR
PRODUCTION OF EXPERT
REPORTS AND WRITINGS
(CCP § 2034 (a)(3))**

21 PARTY MAKING THIS DEMAND: Plaintiffs KATHLEEN MACHADO, individually
and in her capacity as Guardian ad Litem for
22 RACHEL LOMAS and AMBER LOMAS
23 DATE AND TIME OF EXCHANGE: 3 January 2005 at 10:00 a.m.
24 PLACE OF EXCHANGE: Law Offices of Anthony Boskovich
28 N. First Street, 6th Floor
San Jose, CA 95113

26 ///
27 ///

Law Offices of Anthony Boskovich 28 North First Street, 6th Floor, San Jose, CA 95113 (408) 286-5150


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TO DEFENDANTS, FATHER JOSEPH ILLO, FATHER FRANCIS JOSEPH a.k.a.
FATHER FRANCIS ARAKAL, FATHER RICHARD RYAN, BISHOP STEVEN BLAIRE,
AND THE DIOCESE OF STOCKTON, AND TO THEIR ATTORNEYS OF RECORD:

Plaintiffs KATHLEEN MACHADO, individually and in her capacity as Guardian ad Litem
for RACHEL LOMAS and AMBER LOMAS hereby demand under Code of Civil Procedure
section 2034 that on or before the above stated date of exchange and at the above stated place of
exchange all parties to this action participate in a mutual and simultaneous exchange of information
concerning each party's expert trial witnesses.

Plaintiffs also demand that each party produce for inspection and copying at the time and
place of exchange stated above, all discoverable reports and writings, if any, made in the course of
preparing an expert opinion by the responding party, if designated as an expert, and by any witness
on the list to be exchanged who is an employee of the responding party or has been retained by that
party for the purpose of forming and expressing an opinion in anticipation of the litigation or in
preparation for the trial of the action.

Dated: December 7, 2004

LAW OFFICES OF ANTHONY BOSKOVICH


ANTHONY BOSKOVICH
Attorneys for Plaintiffs

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9 Attorneys for Plaintiffs

11 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF SAN JOAQUIN**

14 KATHLEEN MACHADO, individually and
in her capacity as Guardian ad Litem for
15 RACHEL LOMAS and AMBER LOMAS,
Plaintiffs,
16 v.
17 FATHER JOSEPH ILLO; FATHER FRANCIS
JOSEPH a.k.a. FATHER FRANCIS ARAKAL;
18 FATHER RICHARD RYAN; BISHOP STEVEN
BLAIRE; THE DIOCESE OF STOCKTON;
19 DOES 1 through 100,
Defendants.

No. CV 018440
PROOF OF SERVICE

21 I am employed in the County of Santa Clara, State of California.
22 I am over the age of 18 and not a party to the within action; my business address is 28 North
23 First Street, Sixth Floor, San Jose, CA 95113-1210.

24 On December 8, 2004, I caused to be served the foregoing **DEMAND FOR EXPERT**
25 **EXCHANGE OF TRIAL WITNESS INFORMATION AND DEMAND FOR**
26 **PRODUCTION OF EXPERT REPORTS AND WRITINGS** on the parties involved in said
27 cause by placing a true and correct copy of the document listed above enclosed in a sealed
28

Law Offices of Anthony Boskovich 28 North First Street, 6th Floor, San Jose, CA 95113 (408) 286-5150


1 envelope(s) and causing said envelope(s) to be delivered to an overnight delivery carrier with delivery
2 fees provided for, addressed to the person(s) on whom it is to be served as follows:

3 Paul Balestracci
4 Neumiller & Beardslee
5 P.O. Box 20
6 Stockton, CA 95201-3020
7 Phone: (209)948-8200
8 Fax: (209)948-4910

9 Michael Coughlan
10 Coughlan & O'Rourke, LLP
11 3031 W. March Lane, Suite 210 West
12 Stockton, CA 95129
13 Phone: (209)952-3878

14 Executed on 8 December 2004, at San Jose, California.

15 I declare under penalty of perjury in accordance with the laws of the State of California that
16 the foregoing is true and correct.

17 
18 PAMELA WILSON
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