

17. Please provide the details of the agreement entered into on or about November 1983 whereby the Church offered treatment to a minor and paid for such treatment after Gordon MacRae had been accused of kissing and fondling a youth in June of 1983 in Hampton, New Hampshire.

PLEASE NOTE: There is a typo with regard to the above question. The incident was reported in November of 1982, not 1983. There are no reports of any incidents in 1983.

As such, there was no agreement entered into regarding the treatment of the alleged victim. It is the policy of the Diocese and Catholic Charities that such treatment would be offered to any such individual immediately and without any charge.

As part of the young man's therapy, it was recommended by his therapist that he attend St. Thomas Aquinas High School. Because of the financial situation of the family, the therapist inquired into the possibility of financial assistance for the individual. The two requests, one dated June 1, 1984, and the other May 10, 1985, were granted immediately, and his tuition bill was paid in full.

18. Please provide the details with respect to your knowledge of any treatment received or provided to Gordon MacRae after this incident in the fall of 1983.

We are not aware of any incidents in the Fall of 1983.

In the Fall of 1982, Gordon MacRae was in counseling with Dr. Henry Guertin-Quellette of the Clergy and Religious Consultation Service.

19. Please provide the specific details with respect to Monsignor John Quinn's report to Richard A. Chevrefils or any other employee of DCYS regarding incidents of child abuse by Gordon MacRae on November 29, 1983.

Msgr. Quinn's records only indicate an upcoming meeting with Jeannette Gagnon of the DCYS staff on November 23, 1982. We have no records of any meeting with Mr. Chevrefils in either November of 1982 or 1983.

We are unaware of any incident of child abuse by Gordon MacRae in 1983.

20. Please provide the details of any and all contacts that Monsignor John Quinn had with Ms. Jeannette Gagnon, Administrator of the Office of Social Services, Division of Welfare, including the following:

- A. The dates on which all communications were made;
- B. The substance of any such communications regarding Father MacRae;
- C. The outcome or agreements entered into as a result of any such communications.

Subsequent to the aforementioned November 23rd meeting with Ms. Gagnon, Msgr. Quinn received a letter from her on January 26, 1984, regarding continued contact between Gordon MacRae and an individual who had been under his supervision earlier. Though there were no charges of improper conduct on the part of MacRae, it was felt that the matter should be investigated because of the earlier incident reported in Hampton.

Msgr. Quinn informed Msgr. Christian that he was recommending that MacRae be told to cease contact with this individual immediately. Msgr. Christian so informed MacRae on 2/2/89.

There were no further contacts between Ms. Gagnon and Msgr. Quinn re: MacRae.

21. Please provide the details of any agreements, arrangements or practices between the Catholic Diocese and the Commissioner of Health and Welfare or any representative of DCYS whereby reports of child abuse by priests would be handled directly at the main office of DCYS in Concord and not through the district branches of DCYS. Please include any documentation which may support your answer.

There were no such agreements, arrangements or practices made or agreed to between the Diocese and either the Commissioner of Health and Welfare or DCYS.

22. Please provide any information relative to the Church's request of Father Gordon MacRae to start a "Youth Ministry" while he was at St. Bernard's Parish in Keene, New Hampshire.

The Diocese never requested or required Gordon MacRae to start a Youth Ministry while he was at St. Bernard's Parish in Keene. Any involvement in such an activity would have been part of the normal and expected duties of an associate pastor.

23. Please provide the details of any agreements between Bishop Gendron and the Commissioner of Health and Human Services whereby Gordon MacRae would no longer work with children after the 1983 incident and would enter counseling as a result of his alleged behavior in November 1983.

- A. There was no incident in 1983 of which we are aware. (Cf. Comments on Questions 8 and 17.)
- B. With regard to November 1982, there were no agreements made by Bishop Gendron or the Commissioner regarding Gordon MacRae.

24. Please provide the details of any conversations between Monsignor Quinn or Bishop Gendron and Elizabeth Davis, a social worker for the Division of Children and Youth Services in the Portsmouth District Office in Portsmouth, New Hampshire.

There were no conversations or communications, to our knowledge, between Msgr. Quinn or Bishop Gendron with Elizabeth Davis of DCYS, Portsmouth.

Respectfully submitted,

JOHN DOE, A MINOR, BY HIS
MOTHER AND NEXT FRIEND,

By His Attorneys
GREEN, McMAHON AND HEED
28 Middle Street
Keene, New Hampshire 03431
(603) 352-3523

Dated: June 29, 1993

By: *Peter W. Heed*
Peter W. Heed, Esquire

I hereby certify that an original plus two (2) copies of the foregoing Interrogatories were mailed this date to James E. Higgins of Sheehan, Phinney, Bass & Green, P.A., P.O. Box 3701, Manchester, New Hampshire - 03105-3701, Counsel for the Defendant.

Peter W. Heed
Peter W. Heed, Esquire

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THE ROMAN CATHOLIC BISHOP
OF MANCHESTER, INC.

Dated: Sept. 20, 1993

By: *Francis J. Christian (Msgr.)*
Msgr. Francis J. Christian,
Its Representative

STATE OF NEW HAMPSHIRE
CHESHIRE, SS.

The foregoing instrument was acknowledged before me this 20 day of September 1993 by Msgr. Francis J. Christian of the Roman Catholic Bishop of Manchester, Inc., a New Hampshire corporation, on behalf of the corporation.

Franceen M. Morasse
Justice of the Peace/Notary Public

Franceen M. Morasse, Notary Public
My Commission Expires On May 24, 1994