

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION



ATTORNEYS AT LAW

May 2, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Gordon J. MacRae
P. O. Box 10
Jemez Springs, NM 87025-0010

Re: [REDACTED] v. MacRae
[REDACTED] v. MacRae
[REDACTED] v. MacRae

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Dear Mr. MacRae:

I have your fax of April 26th concerning Judge Conboy. Your concern may be premature as she has been assigned the consolidated cases for purposes of discovery only. This means that she will not necessarily be the Judge that hears the cases at trial. Indeed, it is not clear that the cases will remain consolidated for trial. Judge Conboy's task will be to umpire discovery disputes which may arise in the course of case preparation.

I am generally familiar with Judge Conboy's career before her appointment. She has been on the bench for less than 2 years. I also have had an opportunity to get to know her a little better since her elevation to the bench. I believe her to be intellectually sound and fair to litigants. In the courtroom I would expect her to make decisions based on the facts and the law as she understands it and to be fair to all parties. Hence, I, on behalf of the Diocese, would not support a Motion to Disqualify Judge Conboy.

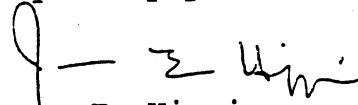
Of course, I have no independent knowledge of the information passed on to me in your letter. Specifically, I do not know about Judge Conboy's service on the Task Force, I am not familiar with Detective McLaughlin's participation in the same Task Force, nor do I know anything of their interaction on the Committee. I would appreciate learning the source of your information and anything further you

9920

Gordon J. MacRae
May 2, 1994
Page 2

may learn in connection with Judge Conboy's contacts
with Detective McLaughlin.

Very truly yours,



James E. Higgins

JEH/slb

cc: Monsignor Francis Christian
Mr. Raymond Dumont

9921

Rev. Gordon J. MacRae
Post Office Box 10
Jemez Springs, NM 87025-0010

Tel: (505) 842-1987 / Fax: (505) 829-3706

April 26, 1994

James E. Higgins, Esq.
Sheehan, Phinney, Bass & Green
P. O. Box 3701
Manchester, NH 03105-3701

Dear Mr. Higgins:

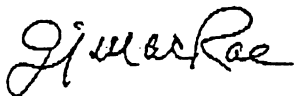
As you are no doubt aware, the civil actions brought by [REDACTED], [REDACTED] and [REDACTED] have been consolidated, for purposes of discovery, in Hillsborough County Superior Court. Chief Justice Nadeau has assigned the cases to Judge Carol Ann Conboy.

It has come to my attention that Judge Conboy serves on the New Hampshire Attorney General's Task Force on Child Abuse and Neglect with Detective James McLaughlin of the Keene Police Department, who, as you know, is investigating the allegations made in these lawsuits.

Although I am not an attorney, I am representing myself against these civil cases. I am not certain of your intentions, but I do intend to call Detective McLaughlin as a witness in this case. Detective McLaughlin is also a defendant in a lawsuit brought in U.S. District Court which is related to his investigation of these cases. I feel that Judge Conboy's and Detective McLaughlin's interactions on the Task Force may constitute a conflict of interest sufficient to file a motion to disqualify Judge Conboy from hearing these cases.

I would appreciate knowing your position in this matter.

Yours Truly,



(Rev.) Gordon J. MacRae

cc: Rev. Msgr. Francis Christian, Ph.D.
Rev. David Deibel, J.D., J.C.L.

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9922



April 20, 1994

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Mr. Raymond Dumont
Gallagher Bassett Insurance
Bedford Commons
Bedford, NH 03110

Re: [REDACTED] v. Gordon Macrae and
The Roman Catholic Bishop of Manchester --
[REDACTED]

Re: [REDACTED] v. Roman Catholic Bishop
of Manchester, et als -- [REDACTED]

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [REDACTED]

Dear Ray:

Pursuant to your request of April 14th, please be informed (as I am sure you know by reading the newspaper) that the Motion for Consolidation has been granted for the purposes of pretrial discovery only. When it comes time for actual trial, the trial judge will make the determination about whether the cases should be tried separately or together. I feel at this time they will probably be tried separately.

One Judge has been appointed to oversee discovery in the three cases. The Judge is Carol Ann Conboy and she regularly sits in [REDACTED]. I know Judge Conboy and I believe her to be an intelligent and fair judge. She has been appointed within the last fifteen months and hence does not have a lot of experience on the bench. Nevertheless, I am optimistic that discovery will proceed in an even-handed and fair fashion.

At this time we have moved to stay discovery in these matters pending Mr. MacRae's criminal trial and further pending disposition of our Motions to Dismiss based on the statute of limitations in the [REDACTED] and [REDACTED] cases.

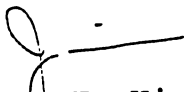
Mr. Raymond Dumont
April 20, 1994
Page 2

You have requested an update on [REDACTED] case. Other than the procedural maneuvering mentioned above, nothing much has happened on this case since my report letter to you of September 16, 1993. We have continued to collect medical records and have a fairly complete medical file.

I continue to believe that this is a case to be settled although I am not sure whether the case can be settled for a reasonable amount at this point. Peter Heed, [REDACTED] lawyer, has hitched his star to [REDACTED] counsel with the consolidation and I am sure simply intends to ride along. Recall that as things stand now, [REDACTED] has demanded \$75,000 and we have advanced \$10,000. Diocesan liability will depend upon the jury's evaluation of the Diocese's handling of MacRae at the time of and following the [REDACTED] matter.

If I can answer further questions, do not hesitate to call me.

Very truly yours,


James E. Higgins

JEH/slb

cc: Monsignor Francis J. Christian

GRIFFIN, SWANSON & GLEICHMAN, P.A. — 9924

ATTORNEYS AT LAW
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MAINE
PETER A. GLEICHMAN

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN
CHARLES J. GRIFFIN, RETIRED

April 12, 1994

Gordon J. MacRae
P.O. Box 10
Jemez Springs, New Mexico 87025-0010

RE: [REDACTED] v. MacRae, et als.

Dear Mr. MacRae:

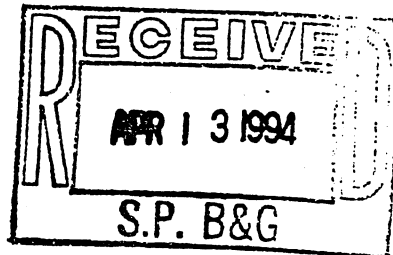
You will find enclosed an original and one copy of [REDACTED] Answers to Interrogatories that you submitted in connection with the above-referenced matter.

Sincerely,

Peter A. Gleichman

PAG:djm
Enclosures as stated

cc: James E. Higgins, Esquire
Robert B. Gainor, Esquire
[REDACTED]



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9925



April 5, 1994

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603-433-2111

[REDACTED], Clerk
[REDACTED] County Superior Court
[REDACTED]
[REDACTED]

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [REDACTED]

Dear [REDACTED]:

Enclosed please find Defendants' Reply to
Plaintiff's Second Supplemental Objection to Motion
to Dismiss for filing with the Court in the above-
captioned case.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert R. Lucic', written over a horizontal line.

Robert R. Lucic

RRL/slb
Enc.

cc: Peter A. Gleichman, Esquire
Gordon J. MacRae

GRIFFIN, SWANSON & GLEICHMAN, P.A.

ATTORNEYS AT LAW

56 MIDDLE STREET

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9926

CHARLES A. GRIFFIN
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CHARLES J. GRIFFIN, RETIRED

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MAINE
PETER A. GLEICHMAN

March 30, 1994

[REDACTED], Clerk
COUNTY SUPERIOR COURT
[REDACTED]
[REDACTED]

RE: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester, Inc.,
and Monsignor Gerard Boucher
Docket Number: [REDACTED]

Dear [REDACTED]:

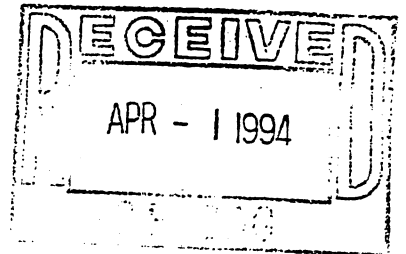
You will find enclosed for filing with the Court, Plaintiff's Second Supplemental Objection to Defendants' Motion to Dismiss, copies of which have been forwarded by mail this date to James E. Higgins, counsel for The Roman Catholic Bishop of Manchester, Inc. and Father Gerard Boucher, and Gordon J. MacRae, Defendant Pro Se.

Sincerely,

Peter A. Gleichman
Peter A. Gleichman

PAG:djm
Enclosure as stated

cc: listed above



SHEEHAN
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9927



ATTORNEYS AT LAW

March 15, 1994

1000 ELM STREET
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Mr. Raymond Dumont
Gallagher Bassett Insurance
Bedford Commons
Bedford, NH 03110

Re: [REDACTED] v. Roman Catholic Bishop
of Manchester, Gordan Macrae and Father
Boucher
[REDACTED] County Superior Court

Dear Ray:

In connection with your letter of March 6th, the first notification of a complaint by [REDACTED] came on November 21, 1983. The initial complaint differed materially from the suit recently brought, a copy of which you have.

Very truly yours,

A handwritten signature in dark ink, appearing to be 'J. Higgins'.

James E. Higgins

JEH/slb

cc: Monsignor Francis J. Christian

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9928



March 11, 1994

PERSONAL AND CONFIDENTIAL

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Monsignor Francis J. Christian
Chancellor
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

Re: [REDACTED] v. Gordon MacRae and
Roman Catholic Bishop of Manchester

[REDACTED] v. Gordon MacRae
Roman Catholic Bishop of Manchester and
Father Gerard Boucher -- [REDACTED]

[REDACTED] v. Gordon MacRae and Roman
Catholic Bishop of Manchester
[REDACTED]

Dear Monsignor Christian:

A hearing was held in Keene on Plaintiffs' Motion to Consolidate the above-three cases and have a special judge assigned to supervise discovery in connection with these matters. We objected to the Motion citing the obvious differences between the cases, both legally and factually.

While it makes some practical sense from our standpoint to roll the three cases together, we certainly do not want them tried together and we do not want to facilitate a joint assault by these publicity hungry Plaintiffs.

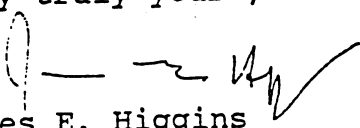
Only the Chief Judge appoints a special judge to hear a case or a group of cases. Generally Judge Nadeau is quite reluctant to do this. Judge Brennan who heard this Motion is a novice on the bench and really didn't know the procedure to follow to implement a special appointment. If the Motion to Consolidate is granted there should be a special judge appointed. I believe Brennan is leaning towards consolidating the cases for discovery purposes only, but he may run into some administrative and bureaucratic hurdles that will prevent the consolidation from taking place.

Monsignor Francis J. Christian
March 11, 1994
Page 2

9929

I have informed Plaintiff's counsel in the [REDACTED] case that we intend to put all matters on hold until after MacRae's criminal trial and after our Motion to Dismiss based on the statute of limitations is heard and decided. As you know, we filed motions to dismiss in both the [REDACTED] and [REDACTED] cases last month and I feel we have a strong position in each case.

Very truly yours,


James E. Higgins

JEH/slb
cc: Mr. Raymond Dumont

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ASSOCIATION

9930



ATTORNEYS AT LAW

March 7, 1994

1000 ELM STREET
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603-668-0300

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PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

[REDACTED], Clerk
County Superior Court
[REDACTED] g
[REDACTED] a
[REDACTED]

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [REDACTED]

Dear [REDACTED]:

Enclosed please find Defendants' Motion to
Strike Supplemental Objection to Motion to Dismiss
for filing with the Court in the above-captioned
case.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'James E. Higgins'.
James E. Higgins

JEH/slb

Enc.

cc: Peter A. Gleichman, Esquire
Gordon J. MacRae



9931

GALLAGHER BASSETT SERVICES, INC.

March 6, 1994

Attorney James E. Higgins
Sheehan, Phinney, Bass & Green, P.A.
P.O. Box 3701
Manchester, New Hampshire 03105

Re: [REDACTED] v. Roman Catholic Bishop of Manchester, et. al.

Dear Jim:

Kindly provide this writer the exact date that the Diocese of Manchester was first made aware that the plaintiff [REDACTED] or his representative, had filed a claim against it.

In addition, kindly provide all claim documentation you may have available.

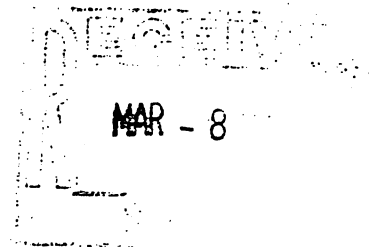
Thank you.

Very truly yours,

Raymond L. Dumont
Branch Manager

RLD:jmd

CC: Msgr. Christian



7
GRIFFIN, SWANSON & GLEICHMAN, P.A.

ATTORNEYS AT LAW

56 MIDDLE STREET

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PORTSMOUTH, NEW HAMPSHIRE 03802-0598

9932

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

CHARLES J. GRIFFIN, RETIRED

TEL 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

*Bob
Let's Talk
This Guy
danton
J*

February 25, 1994

Raymond W. Taylor, Clerk
ROCKINGHAM COUNTY SUPERIOR COURT
Administration and Justice Building
Hampton Road
Exeter, N.H. 03833

RE: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester, Inc.,
and Monsignor Gerard Boucher
Docket Number: 93-C-1243

Dear Ray:

You will find enclosed for filing with the Court, Plaintiff's Supplemental Objection to Defendants' Motion to Dismiss, copies of which have been forwarded by mail this date to James E. Higgins, counsel for The Roman Catholic Bishop of Manchester, Inc. and Father Gerard Boucher, and Gordon J. MacRae, Defendant Pro Se.

Sincerely,

Peter A. Gleichman

PAG:djm
Enclosure as stated

cc: listed above

RECEIVED

FEB 28

GRIFFIN, SWANSON & GLEICHMAN, P.A.
ATTORNEYS AT LAW

9933

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MAINE
PETER A. GLEICHMAN

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN
CHARLES J. GRIFFIN, RETIRED

February 22, 1994

[Redacted] Clerk
COUNTY SUPERIOR COURT
[Redacted]

RE: [Redacted] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester, Inc.,
and Monsignor Gerard Boucher
Docket Number: [Redacted]

Dear [Redacted]:

You will find enclosed for filing with the Court, Plaintiff's Motion to Amend Writ of Summons, copies of which have been forwarded by mail this date to James E. Higgins, counsel for The Roman Catholic Bishop of Manchester, Inc. and Father Gerard Boucher, and Gordon J. MacRae, Defendant Pro Se.

Sincerely,

Peter A. Gleichman

PAG:djm
Enclosure as stated

RECEIVED
FEB 23 1994
S.P. BSM

ATTORNEY & COUNSELOR AT LAW

February 16, 1994

James E. Higgins
Attorney at Law
P.O. Box 3701
Manchester, New Hampshire 03105-3701

Re: Gordon MacRae ([REDACTED] and [REDACTED])

Re: Dear Mr. Higgins:

Thank you for your letter dated February 10, 1994.

I hope that you are successful on your statute of limitations argument. We have not been very successful in our statute of limitations arguments in New Mexico, primarily due to Plaintiff's theory that the victims could not have discovered the true nature of the psychological injury until they received mental health treatment. As such, Plaintiff's counsel have been successful in avoiding summary judgment with this argument. Most of the cases have settled.

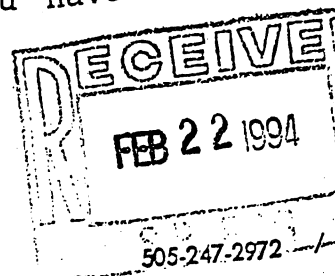
One case where the summary judgment motion, based upon the statute of limitations, was granted was in a lawsuit filed against Fr. Kirsch. Plaintiff's counsel has appealed the decision. Fr. Kirsh's attorney is Michelle Guttman, 20 First Plaza #700, Albuquerque, N.M. 87102, Ph. (505) 842-9960. You might be interested in writing her to find out the status of her case.

You might also contact Karen Kennedy, (505) 884-7114 or Arthur Beach (505) 842-6262. Art Beach represented the Archdiocese in the Kirsch case. Karen and Art are the attorneys who have been representing the Archdiocese of Santa Fe in all cases filed in New Mexico (we've had dozens). They can provide a wealth of information and materials.

I am familiar with the decisions in most of the cases against our Archdiocese for the reason that I represented several of the priests who were sued by alleged victims.

As a final matter, I would appreciate receiving any materials, which you believe are helpful, that you have relating to the [REDACTED] and [REDACTED] complaints.

Thank you for your assistance.



Very truly yours,


Ron Koch

REK:ysk

cc: Gordon MacRae

BASS
 GREEN
 PROFESSIONAL
 ASSOCIATION



ATTORNEYS AT LAW

February 22, 1994

Mr. Raymond Dumont
 Gallagher Bassett Insurance
 Bedford Commons
 Bedford, NH 03110

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 603-433-2111

Re: [REDACTED] v. Roman Catholic Bishop
 of Manchester, Gordon Macrae and Father
 Boucher;
 [REDACTED] County Superior Court

Dear Ray:

I enclose the following in connection with the above-captioned matter which I thought you should have for your file:

1. Writ of Summons dated September 22, 1993, returnable December 1993;
2. Defendants Boucher and Roman Catholic Bishop of Manchester's Motion to Dismiss and Memorandum of Law in Support thereof.

I'll keep you informed.

Very truly yours,


 James E. Higgins

JEH/slb

Enc.

cc: Monsignor Francis J. Christian

GRiffin, Swanson & Gleichman, P.A.
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9937

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MAINE
PETER A. GLEICHMAN

February 16, 1994

[REDACTED], Clerk
COUNTY SUPERIOR COURT
[REDACTED]
[REDACTED]
[REDACTED]

RE: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester, Inc.,
and Monsignor Gerard Boucher
Docket Number: [REDACTED]

Dear [REDACTED]

You will find enclosed for filing with the Court, Plaintiff's Preliminary Objection to Defendants' The Roman Catholic Bishop of Manchester, Inc., and Father Gerard A. Boucher's Motion to Dismiss, a copy of which has been forwarded by mail this date to James E. Higgins, counsel for Defendants.

Sincerely,
Peter A. Gleichman
Peter A. Gleichman

PAG:djm
Enclosure as stated

cc: James E. Higgins, Esquire
Gordon J. MacRae
[REDACTED]

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FEB 17 1994
S.P. [REDACTED]

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9938



ATTORNEYS AT LAW

February 7, 1994

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FAX 603-433-3126
603-433-2111

[REDACTED], Clerk
[REDACTED] County Superior Court
[REDACTED]
[REDACTED]

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher -- [REDACTED]

Dear [REDACTED]:

Enclosed please find Defendants' Motion to Dismiss along with their Memorandum of Law in support of the Motion to Dismiss for filing with the Court in the above-captioned case.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'James E. Higgins'.
James E. Higgins

JEH/slb
Enc.

cc: Peter A. Gleichman, Esquire
Gordon J. MacRae

JEH/slb

Enc.

cc: Peter Heed, Esquire
Mark A. Abramson, Esquire
Peter Gleichman, Esquire
George P. Dickson, Esquire
Gordon Macrae

177 BROAD STREET
P.O. BOX 598

PORTSMOUTH, NEW HAMPSHIRE 03802-0598

9940

CHARLES A. GRIFFIN
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FAX 603-433-1197
MAINE
PETER A. GLEICHMAN

January 27, 1994

[REDACTED], Clerk
COUNTY SUPERIOR COURT
[REDACTED]

RE: [REDACTED] v. Gordon J. MacRae, et als.
Docket Number: [REDACTED]

Dear [REDACTED]:

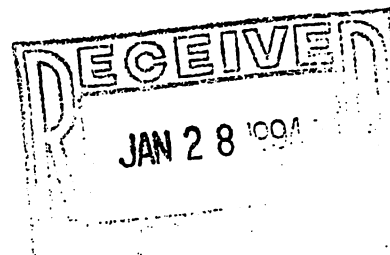
You will find enclosed for filing with the Court, Plaintiff's Rule 170 ADR Case Election Form pursuant to this Court's Order dated January 21, 1994. Copies of the enclosed have been forwarded by mail this date to James E. Higgins, counsel for Defendants Roman Catholic Bishop of Manchester, Inc. and Monsignor Gerard Boucher, and Gordon J. MacRae, Defendant Pro Se.

Sincerely,

Peter A. Gleichman

PAG:djm
Enclosure as stated

cc: James E. Higgin, Esquire
Gordon J. MacRae
[REDACTED]



9941

January 24, 1994

Stanley M. Brown
Kenneth C. Brown
Randolph J. Reis
Mark A. Abramson
Kevin F. Dugan*

[Redacted], Clerk
[Redacted] County Superior Court
[Redacted]

Re: [Redacted] v. Gordon MacRae, et al

Dear [Redacted]:

Enclosed please find Plaintiffs' Motion for Special Assignment to Superior Court Justice.

Very truly yours,

Mark A. Abramson

MAA/mc
Enclosure

cc: [Redacted] County Superior Court

[Redacted] County Superior Court

Gordon MacRae
James E. Higgins, Esq.
George Dickson, Esq.
Peter Heed, Esq.
Peter Gleichman, Esq.

*Rec
2/15/92*

[Redacted]
[Redacted]

1582-1583 9/22/93

1575-1583 9/10/93

AR
&B

*held
1/93*

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JAN 26 1994
S.P. BBA

1819 Elm Street
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PROFESSIONAL
ASSOCIATION



ATTORNEYS AT LAW

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January 4, 1994

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FAX 603-627-8121
603-668-0300

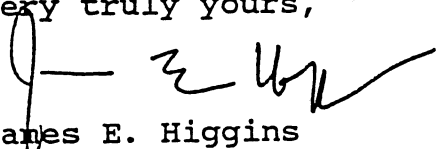
[REDACTED], Clerk
County Superior Court
[REDACTED]
[REDACTED]

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher

Dear [REDACTED]:

Enclosed herewith please find Defendants' Brief
Statement of Defenses for filing with the Court in
the above-captioned case.

Very truly yours,

James E. Higgins

JEH/edf
Enc.
cc: Peter A. Gleichman, Esquire

PROFESSIONAL
ASSOCIATION



January 3, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

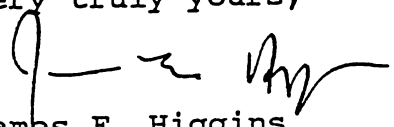
1 HARBOUR PLACE
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PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

[REDACTED], Clerk
[REDACTED] County Superior Court
[REDACTED]

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher

Dear [REDACTED]:

Enclosed herewith please find a Rule 170 ADR
Case Election Form to be filed with the Court on
behalf of The Roman Catholic Bishop of Manchester and
Father Gerard A. Boucher in the above-captioned case.

Very truly yours,

James E. Higgins

JEH/edf
Enc.
cc: Peter A. Gleichman, Esquire

PORTSMOUTH, NEW HAMPSHIRE 03802-0592

CHARLES A. GRIFFIN
DALE T. SWANSON
PETER A. GLEICHMAN

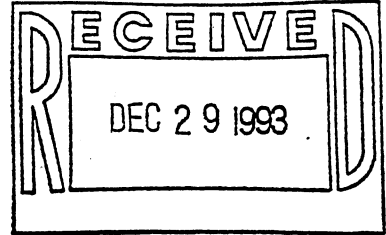
CHARLES J. GRIFFIN, RETIRED

9944

TEL 603-433-1830
603-659-2200
FAX 603-433-1197

MAINE
PETER A. GLEICHMAN

December 28, 1993



[Redacted], Clerk
COUNTY SUPERIOR COURT
[Redacted]

Re [Redacted] v. Gordon J. MacRae, et als
Docket No. [Redacted]

Dear [Redacted]:

You will find enclosed for filing with the Court Plaintiff's Motion to Extend deadline for filing A.D.R. Election Form in connection with the above-referenced matter; copies of which have been forwarded by mail this date to Gordon J. MacRae, Defendant Pro Se, and to James E. Higgins, counsel for Defendants The Roman Catholic Bishop of Manchester and Father Girard A. Boucher.

Sincerely,

Peter A. Gleichman

PAG:lpt

Enclosure as stated

cc: Gordon J. MacRae
James E. Higgins, Esquire

PROFESSIONAL
ASSOCIATION



December 6, 1993

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
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FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

[REDACTED], Clerk
[REDACTED]
[REDACTED]

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher

Dear [REDACTED]

Enclosed herewith please find our Special Appearance for The Roman Catholic Bishop of Manchester and Father Gerard A. Boucher for filing with the Court in the above-captioned case.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'James E. Higgins', with a stylized flourish at the end.

James E. Higgins

JEH/slb
Enc.

cc: Peter A. Gleichman, Esquire

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

9946



ATTORNEYS AT LAW

February 25, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Clerk

Re: [REDACTED] v. Gordon J. MacRae,
The Roman Catholic Bishop of Manchester and
Monsignor Gerard Boucher - [REDACTED]

Dear [REDACTED]:

Enclosed please find Defendants' Objection to Plaintiff's Motion to Amend Writ of Summons along with their Memorandum of Law in support of the Motion to Dismiss for filing with the Court in the above-captioned case.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'James E. Higgins'.
✓ James E. Higgins

JEH/slb

Enc.

cc: Peter A. Gleichman, Esquire
Gordon J. MacRae

9947

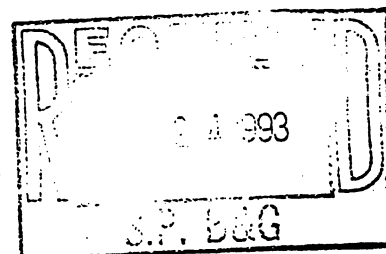
FROM THE DESK OF

Msgr. Francis J. Christian

11/23/93

MEMORANDUM

Enclosed please find the letter requesting materials on Gordon MacRae from Atty. Koch. Please be in touch with me if we need to discuss anything further in this regard.



COPY

Rev. Msgr. Francis Christian, Ph.D.
Secretary for Administrative and Canonical Affairs
Diocese of Manchester
P.O. Box 310
Manchester, NH 03105-0310

October 8, 1993

Personal and Confidential

Dear Msgr. Christian,

Thank you for your response to my earlier letter requesting information on Gordon's whereabouts during the Spring/Summer of 1983. I have written to both Father Biron at St. Bernard Parish in Keene and Father Ham at Our Lady of the Miraculous Medal Parish in Hampton. I have also written to several other priests of the Diocese who knew Gordon and spent time with him back then. Thus far, the only priest to respond voluntarily to my request has been Father Ham who sent some helpful information from his parish records.

At this time would you be so kind 'as to send to my office copies of all memos, notes, correspondence and any other materials in Gordon's personnel file, or in any other file, pertaining to the allegation of [REDACTED] in 1983. Please include all correspondence related to this matter including correspondence between Diocesan and State officials. Please also send copies of any memos, notes, correspondence, etc. regarding the second reporting of this same allegation in 1986.

I would also appreciate it if you could provide me with a list of the priests, deacons and seminarians assigned to St. Bernard Parish in Keene from 1978 to 1983.

Your continued cooperation in this matter is appreciated.

Sincerely,



Ron Koch
Attorney at Law

cc: Rev. David Deible, J.D., J.C.L.
Canonical Advocate

9949

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

October 1, 1993



ATTORNEYS AT LAW

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

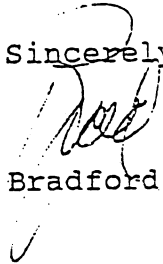
1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Msgr. Francis J. Christian
Chancellor
Diocese of Manchester
153 Ash Street
P.O. Box 310
Manchester, New Hampshire 03105

Dear Msgr. Christian:

Enclosed find an article from the Maine Sunday
Telegram of September 26, 1993 concerning the alleged
law suit against the Diocese by [REDACTED]
Please let me know if and when this suit is served on
the Diocese.

Sincerely,


Bradford E. Cook

BEC/hce

cc: James E. Higgins, Esq.

Priest, diocese sued over sex abuse



Associated Press

Gordon MacRae, a former Catholic priest, stands in St. Bernard's Catholic Church in this 1984 photo. In addition to criminal charges, MacRae faces a civil suit from some of his alleged victims.

The suit says the abuse, usually at the church rectory, included "the spider game," in which MacRae would feel one of [redacted] legs, then his other leg, and then his "middle leg." At least twice, MacRae encouraged [redacted] to play the spider game on him, it says.

It alleges MacRae stripped naked at least once and talked to [redacted] while showing him a gun. Another time, the suit says, MacRae held the gun to [redacted] head.

He has pleaded innocent. [redacted] alleges MacRae began molesting him between June and [redacted]

MacRae is charged with sexually assaulting [redacted] and two other boys under 14 in the early 1980s in Hampton and Keene. He is named in 21 indictments in Rockingham and Cheshire Counties, but three charges are expected to be dropped.

He has pleaded innocent. [redacted] alleges MacRae began molesting him between June and [redacted]

It also charges MacRae would lie on the boy while fondling him, so [redacted] "was not free to move away."

The suit alleges Monsignor Gerard Boucher, then the pastor, once saw MacRae kissing the boy and did nothing, then in the spring of 1983, dismissed a complaint from [redacted] by telling him "not to worry, ... MacRae would be leaving soon anyway."

After that conversation, and [redacted]

the suit says, MacRae assaulted the boy three or four more times. [redacted] says he tried to report MacRae a second time, in the summer of 1983, to the Rev. Jim Watson in Hampton.

"In response, Father Watson told (Carnevale) that these were very serious allegations that (he) might want to reconsider," the suit alleges.

Watson and Boucher have denied speaking to [redacted] about MacRae.

In addition to numerous charges against MacRae, the suit charges Boucher and the church with negligent supervision and inflicting emotional distress.

The church, it says, should not have ordained MacRae because it knew, or should have known, through priests familiar with MacRae, that he was "a risk to the safety and well-being" of parishioners.

Diocese officials have said they didn't hear of allegations against MacRae until five months after the date [redacted] allegedly complained to Watson.

In another lawsuit, a 27-year-old man charges MacRae molested him and once prostituted him to two priests in Hudson, before MacRae was a priest. No criminal charges have been filed in that case.

Bradford Cook, lawyer for the diocese, called the second suit irresponsible, saying the church was victimized by MacRae.

"To try to paint the church and its officials as co-conspirators or those who intentionally inflict emotional distress upon this plaintiff or anyone else is irresponsible and defames them and the good work they have

FAX

9951

Date: November 12, 2002

Number of pages including cover sheet: 6

TO: Will Delker

FROM: Sergeant Brenda M. Blonigen
Rockingham County Sheriff's Dept.
101 North Road
Brentwood, NH 03833

Phone: (603) 679-9485

Phone:

Fax Phone:

Fax (603) 679-9474

CC:

REMARKS: Urgent For your review Reply ASAP Please Comment

Will,

The first 3 of these pages appear to be notes from Judith Patterson relating to [redacted] s care. There are more notes, but these contain the information regarding Dr. Ouellette. Also, the last 2 pages indicate that some report was received from Dr. Ouellette. I'm not sure if this report was on Gordon MacRae or [redacted]

Brenda B.

Brenda

This is what I pulled out for approval.

The information in this transmittal is privileged and confidential and intended for the recipient(s) listed. If you are neither the intended nor the person responsible for the delivery of this information, you are hereby notified that the unauthorized copying or distribution of this transmittal is prohibited. If you received this transmittal in error, please inform the sender in the block and return the transmittal to this department at the address listed above.

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

9966



May 2, 1994

1000 ELM STREET
P.O. Box 3701
MANCHESTER
NEW HAMPSHIRE
03105-3701
FAX 603-627-8121
603-668-0300

Ron Koch, Esquire
Ron Koch, P.A.
503 Slate Avenue, NW
Albuquerque, NM 87102

Re: State v. Gordon MacRae

Dear Mr. Koch:

Monsignor Christian has forwarded to me your letter of March 23rd. In connection with your inquiry, we have the following responses.

1. Monsignor Christian did talk to Father Gorski. Father Gorski's response as you have reported it constitutes a misunderstanding. Monsignor Christian's conversation with Father Gorski involved non-sacramental matters, was substantially the same as the initial allegation made by [REDACTED] to Judy Patterson and reported by Monsignor Quinn to the State, and shed little new light on the subject. You are free to talk with Father Gorski about this.

2. The Diocese has no knowledge of the State of New Hampshire's actions in 1983 or subsequently concerning [REDACTED] allegations. The Diocese certainly is not aware of how a "founded" ruling was made if in fact it was.

3. The report to the State of New Hampshire in November of 1983 was made by Monsignor Quinn, not Judy Patterson. The Diocese has no knowledge concerning any interviews between State investigators and Judy Patterson or of anything she might have said to the State at that time.

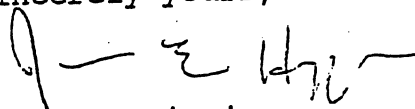
4. Your statement that Father MacRae was not part of the "process" concerning allegations which had been brought forward is not true. Mr. MacRae was personally interviewed by Monsignor Christian in regard to the [REDACTED] allegations, clearly understood what was happening, and the entire matter is contained in a memo which I believe you have.

1 HARBOUR PLACE
SUITE 325
PORTSMOUTH
NEW HAMPSHIRE
03801-3856
FAX 603-433-3126
603-433-2111

Ron Koch, Esquire
May 2, 1994
Page 2

5. Concerning the press releases, you certainly know their author through separate correspondence. The Bishop is communicating directly with Mr. MacRae in connection with these press releases.

Sincerely yours,



James E. Higgins

JEH/slb

cc: Monsignor Francis Christian
Mr. Raymond Dumont



STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION FOR CHILDREN AND YOUTH SERVICES

6 Hazen Drive

Concord, NH 03301-6522

9968

M. Mary Mongan, Commissioner

Edie Malley, Director

603-271-4451

October 27, 1988

Trooper James F. Kelly
NH State Police
Troop C
Keene, NH 03431

RE: Gordon Macrae, [REDACTED]

Dear Trooper Kelly:

I have recently been made aware of certain information regarding Father Macrae that might be of interest to you. There is speculation that Gordon Macrae has left the priesthood and confirmation that he is the President of the Monadnock Regional Substance Abuse Service, and working as a drug and alcohol counselor. (He is not currently certified to provide services to DCYS involved youths.)

Further, from a contact in the Seacoast region, I have learned that M. Macrae's arrival in Berlin, NH (prior to 1983) may have been a diocesan transfer from Florida, where two boys who Father Macrae had known there were found deceased, or badly mutilated. The contact who provided this information to me (regarding Florida) was told it by a former employee of Catholic Charities in New Hampshire, who alleged she had been admonished by her superior, Rev. John Quinn, not to disclose the information.

I am still willing and available to assist your investigation in any way it would seem appropriate, including a renewed effort to interview [REDACTED] of Fall River, MA.

Sincerely yours,

Sylvia E. Gale
Sylvia E. Gale
Investigation Specialist
(phone: 271-4691)

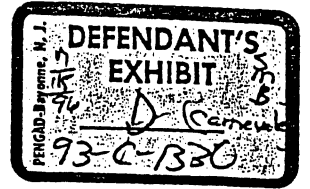
SEG/jlh

Parents: [REDACTED]

Child: [REDACTED]

Siblings: [REDACTED]

Grandmother - [REDACTED]



4/10/86

Interview at Winnacunnet High. Present were [REDACTED], Dr. Robert Brown and Elizabeth Davis, social worker, Division for Children and Youth Services.

[REDACTED] had talked to Father Jim Watson who had not believed his story. Whether he might have been "protecting his own". He had talked to Irene Brigham, a teacher, who was kind and had tried to help. He had talked to Judy Patterson in counseling and believed she had made a report.

[REDACTED] said that the first person in the world he told about this was his Dad and his Dad's response was to say for [REDACTED] not to let this happen not to be around him.

Interview with child and Dr. Brown.

Background: [REDACTED] enrolled in Winnacunnet High 2 weeks ago. He is attending the 10th grade. He formerly attended Hampton Academy and Sacred Heart in Hampton. (St. Thomas Aquinas? when attended?) UNTIL NOV 1985

The incidents of possible sexual abuse occurred during 7th and 8th grade (2 1/2 - 3 years ago) when [REDACTED] was attending Hampton Academy 7th and Sacred Heart 8th. In the summer of 1982, [REDACTED] was 12, after 7th grade and while [REDACTED] was taking CCD classes at Sacred Heart School on Sunda

- Q. Why don't you start by telling me what happened to you? . . .
- A. You mean when this priest molested me? . . .
- Q. When did you first meet this priest? . . .
- A. In 7th grade - he invited myself and 2 other boys to help with work after school. . . .
- A. What was the first upsetting thing that happened?
- A. He first asked me to sit on his lap, then he would say "give me a kiss" and I would kiss him on the cheek. Then he asked me to kiss him on the mouth - "real friends kiss on the mouth" . . . "big kisses" and hugs.

[REDACTED] visited this priest at the Rectory of Our Lady of Miraculous M in Hampton, where he had an office and a bedroom and bathroom next to the office. The priest sometimes visited at the home at 263 Mill Road Hampton, NH and the family's present residence at [REDACTED] Hampton, NH. The priest was [REDACTED] "best friend". They went to lunch [REDACTED] and to the movies [REDACTED] together [REDACTED]

[REDACTED] (cont.)

expressed anger and emotions regarding the fact that this priest did not get in touch with him again after their last meeting in the summer of 1982- per [REDACTED])

Q. What else happened?

A. Once when he was at my house he played this game where his hand was the spider and he would say first it touched your right leg and then your left leg and then your third leg.

Q. What is your third leg?

A. Well, that's obvious.

Q. Yes, but I need to hear it from you. Is that what you call your pen?

A. Yes.

(Child becoming upset and confused by questioning).

A. I got up then, I wouldn't let him do what he wanted to. That was right, wasn't it? (assured him that he was right, that priest was wrong to have put child in this position).

A. What did he want to do?

A. That's obvious, isn't it?

(child becoming angered, upset by questioning).

Dr. Brown supportive - told child that worker wanted to know if his genitals had been fondled. Worker elaborated that she needed to know exactly what happened and was the priest wearing clothes - was [REDACTED] clothed?

A. [REDACTED] stated that he was always wearing clothes and so was the priest Father Gordon.

Q. What else happened that was upsetting?

A. The things that he said. He talked about sex a lot. "He was a police officer before and carried a gun...he would let me play with his gun"

Q. Was his first name Gordon?

A. Gordon McCray that was his name - he would say "call me Gordon".

Q. Is there anything else you would like to tell me?

Interview wrapped up by answering [REDACTED]'s questions regarding "what happens next?" Social worker briefly reviewed legal process, emphasizing that the police would want a statement from [REDACTED] before they would be able to pursue allegations. In response to question regarding court process - answered that if case went to court [REDACTED] would probably be asked to testify - stated that he would have support and protection and that he could stop process at any time.

[REDACTED] asked "will they be mean to me?" (meaning the police).

Child ended interview by venting anger that he and his family had been through so much and that he was upset that Father Gordon had never got in touch with him again. He said that Father Gordon "shouldn't be allowed to be a priest". [REDACTED] a devout Catholic has concerns about being excommunicated from the church, never being confirmed, etc.

[REDACTED] (cont.)

He related that he has had suicidal thoughts. That was what was going on when he was admitted to Hampstead. (He tore up his room before that). "That was not like me". He also related that he had had thoughts of killing Father Gordon.

[REDACTED] also talked about being angry that the school and church had allowed this to go on.

E. Davis
ED/11

05/07/86

This date I met with [redacted] and their son [redacted] at their residence in Hampton, N.H. The purpose of this meeting was to provide information about the protective report received by DCYS in 11/83, and to answer any questions raised, primarily in order to assist [redacted] and his parents in bringing closure to this matter.

Mr. [redacted] spoke little, but both parents were supportive to [redacted]. Mrs. [redacted] tried to guide [redacted] discussions, especially as he attempted to control the conversations and various issues.

All three family members stated that they never had any contacts with our agency previously (in 1983), and they "assumed" that "nothing was done". Their therapist from Catholic Charities, Judy Patterson informed them that "it had been taken care of" in the church, but the family always doubted this. No official from the church (diocese) spoke to them either.

I informed the [redacted] that the incidents were reported, that the priest had admitted these difficulties, and further that a treatment plan had been developed and monitored. The [redacted] were relieved to hear this information. Each wanted to know why there were no contacts by DCYS. I explained that the therapists (Judy Patterson and staff at Hampstead Hospital) advised against this primarily due to [redacted] fragile emotional state at the time and subsequent hospitalization, as well as the priest's admission. [redacted] questioned why the priest never contacted him or apologized.

The family, particularly [redacted] is most angry with the church. There are probably multiple reasons. First, they believed that "nothing was done" by the church as they never had any proof; second, [redacted] also believes that the perpetrator should have been ex-communicated and criminally charged; and thirdly, [redacted] had such a strong identification with the priest, describing him as an idol who could do no wrong and having already decided to be a priest himself someday. He was apparently shattered by this reality, perhaps truly traumatized. Also, his family continued to be devout Catholics; most recently [redacted] discussed this history of assault with Father Watson, the current pastor of their church and according to [redacted] he was ridiculed and disbelieved by this priest, thereby intensifying his anger.

The family requested that a representative from the church talk now with them about how it was handled internally. I agreed to initiate a contact at the Diocese and make this request. If this could occur, another big piece of the conflict might be resolved. Mr. [redacted] plans to talk with the local pastor about his rejection of [redacted] re-disclosure.

[redacted] still harbors tremendous anger and hostility, inspite of having obtained information about the handling of the case. It is difficult to ascertain the reasons for such continued intense anger, 2 1/2 years later. It is also difficult to ascertain why he chose to re-disclose now; has it been simply troubling him, is it related to his discharge from St. Thomas Aquinos, or some of his emotional needs being met by re-attention to the problem, or their more sexual activity than has been disclosed thus far?

During the course of the interview [redacted] made some vague references to additional activity. He corrected my recitation of the "story", indicating that he had not told Judy Patterson of the "spider game", only Betty Davis, DCYS Case Worker. At the point, he indicated that there might be more activity, but failed to directly discuss this, saying he felt too uncomfortable. In asking different probing questions, [redacted] at one point said maybe there is more, and may be not, and why get into it now? The importance of disclosing everything was emphasized, particularly in relation to his own mental health and his family was totally supportive. It was finally agreed that [redacted] would talk further with Dr. Brown, and if there was further information, Dr. Brown, [redacted] and I would meet together. I also told [redacted] that Det Wardle would also have to be informed if there were other facts, and he understood. [redacted] specifically asked if I would contact Dr. Brown, and I agreed to do so on the following day.

The interview concluded with the following agreed upon plan:

- I will contact the diocese and request that a representative meet with the family.
- I will call Dr. Brown tomorrow and request that he explore additional information with [redacted] then arrange a meeting with the three of us, if needed.
- Follow-up old record and any other available information from Father Quinn, the psychologist, Hampstead Hospital, Catholic Charities to see if there are any clues of additional activity.
- Inform Det Wardle of family meeting.

I was impressed with the parents' supportiveness of their son. I was troubled by [redacted] intense, seemingly disproportionate emotional reaction to this level of sexual assault that occurred 2 1/2 years ago, that has recently re-surfaced. I plan to discuss this with Dr. Brown in order to sort out motivations, objective needs of this adolescent, whether or not there has been further sexual abuse, etc. Hopefully Dr. Brown can provide an objective mental health profile of [redacted]

05/08/86

Telephone call to Dr. Brown at Winnacunnet High. He is away until 05/1/86. I requested that the secretary inform [redacted] of this today, and of my call to Dr. Brown. She agreed to do so.

Telephone call to the Diocese of Manchester. Office was closed, holy day of obligation.

Telephoned Mrs. [redacted] and informed her of the results of the above calls.


05/12/86

I telephoned Reverend John Quinn this date. He remembers the [redacted] Macrae incident, and expressed surprise that the family had no knowledge of how the matter was handled, and that they now wanted to meet with him. He recalls offering to meet with them at the time, through Judy Patterson but they declined. He would be most willing to confer now with them. Please refer to correspondence to family, dated 05/12/86.

Father Quinn has no written report on the results of therapy/treatment provided by their psychologist, Dr. Henny Quertin-Ouellette. However, he recalls monitoring the case and receiving a verbal report that there had been satisfactory treatment. According to Father Quinn, no further reports against this priest were ever received and in fact, the Father has done "remarkable work", not with youth, but in the field of drug/alcohol abuse. Father Macrae is still in the Keene parish. (Father Quinn can be reached at 1-800-562-5249 or private line is 668-1662.)

I telephoned Det Wardle this date and informed him of the home visit and plan. Det Wardle indicated that [redacted] told him that the Father told "dirty stories, racial jokes, and jokes about the Pope", which was apparently not told to Betty Davis or Judy Patterson. However, Det Wardle asked specifically about any additional sexual misuse, and [redacted] answered "no". He denied any masturbation, oral sex, etc. Det Wardle commended on [redacted] emotional needs, and the attention he is receiving from these discussions. He concurred that [redacted] should be referred through Dr. Brown, and he can assist in our understanding of [redacted] current emotional make-up.

(Det Wardle believes that [redacted] was discharged from St. Thomas Aquinos for carrying a knife.)

 MEF/jag

18 (2 PAGES)



STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION FOR CHILDREN AND YOUTH SERVICES
6 Hazen Drive
Concord, NH 03301-6522

9975
M. Mary Mongan, Commission
David A. Bundy, Director
603-271-44

May 12, 1986

Ms. Joan Welch
Records Department
Eampstead Hospital
East Rd.
Eampstead, N.H. 03841

Re: [REDACTED]

Dear Ms. Welch:

Please find the enclosed release of information authorization regarding the above-referenced adolescent. Would you kindly forward a copy of the psychiatric evaluation/profile completed in 12/83, and any additional information pertaining to disclosures/assessment of possible child sexual abuse, alleged during this same time period?

A prompt reply would be greatly appreciated. Thank you for your assistance.

Very truly yours,


Marilyn E. Fraser, ACSW
Licensed Clinical Social Worker

MEF/jag

15
STATE OF NEW HAMPSHIRE

9976

INTER-DEPARTMENT COMMUNICATION

FROM  David A. Bundy, Director

DATE April 24, 1986
AT (OFFICE)

Division for Children
and Youth Services

SUBJECT Macrae Investigation

TO Geraldine O'Connor, Supervisor
Portsmouth D.O.

I have listened to the tape of the meeting you had with Roger, Marilyn, and Betty concerning the Macrae investigation. From the tape and the file it is clear we are talking about an incident of sexual abuse which occurred in the summer of 1983. It is unclear why your office treated the report from Dr. Robert Brown as a recent incident requiring collateral contacts and assignment to a social worker.

A more prudent response would have been for you or Priscilla to get as much information as possible from Dr. Brown, contact the Area Administrator, contact the State Office for historical information and coordinate efforts in completing the investigation. This procedure would have avoided the waste of valuable personnel time and probable confusion in the community.

At this time, I want the following done. Marilyn is to complete the investigation and make contact with Mr. and Mrs. [REDACTED] to inform them of what has been done. She will follow up on any contacts, you or the social worker may have made to confirm with the individuals involved in this investigation, what we have found and to determine if they have any need to pursue this further. In the future, when there is a sensitive case involving a prominent community member, religious or otherwise, I expect you to exercise good judgement in assigning staff and conducting the investigation. Notify the Area Administrator if you are in doubt about which investigations should be assigned differently.

DB/jg

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11/23/83

Rev. Gordon MacRae
St. Bernards Church
173 Main Street
Keene, N.H.

On this date, I met with Rev. John Quinn, Director of Catholic Charities. At this time Rev. Quinn reported an incident of suspected child abuse involving Rev. Gordon MacRae. During this meeting Rev. Quinn described the circumstances related to the alleged incident of child abuse:

(1) Perpetrator: Rev. Gordon MacRae
St. Bernards Church
173 Main Street
Keene, N.H.

(2) Victim: Fifteen year old male child
name of child and family unknown, but information can be acquired. The child comes from the Hampton area.

(3) Incident/Act: Rev. MacRae allegedly had the fifteen year old male child sitting on his lap and was kissing the boy. The alleged incident was discovered by the child's counselor. The child had been referred for counseling for matters other than the alleged incident of child abuse.

(4) Founded/Unfounded: Rev. MacRae has admitted the incident to his superiors.

(5) Treatment:

perpetrator: Rev. MacRae is currently in therapy with Dr. Henry Guertin-Ouellette. Apparently therapy is positive at this time.

victim: The child is currently in counseling at Catholic Charities in the Exeter office. The original presenting problem requiring treatment was not related to the alleged incident with Rev. MacRae.

The child's situation was complicated three weeks ago when he attempted suicide. The child attempted to slash his wrist. He is currently being evaluated for treatment and admittance to Hampstead Hospital.

The child's family is also involved in therapy related to a number of difficult issues. The child's family is aware of the incident between their son and Rev. MacRae.

PLEASE NOTE

For therapeutic purposes the child's therapist feels that he is vulnerable and requests that no information be shared with or discussed with the child regarding the referral of Rev. MacRae to the Division of Welfare.

- (6) Perpetrator's History: In the course of the child's therapy he advised his therapist that Rev. MacRae had also been involved with another male child in a similar situation. There is no knowledge of this other child.

Rev. MacRae has a history of involvement with other children, not necessarily deviant behavior. Previously he had supervision of [REDACTED] who was in the custody of the Division of Welfare. The child moved from Lancaster to Hampton with Rev. MacRae. Subsequent placements of the child failed and Rev. MacRae requested that the child live in the Hampton Rectory. The child is apparently not in supervision of Father MacRae at this time, but this must be verified.

- (7) Resources: Lois Webb at Catholic Charities office in Exeter is a potential resource on this situation.

(8) Recommendations:

- (a) Jeannette Gagnon further discuss situation with Rev. Quinn.
- (b) Referral to Attorney General's office
- (c) Follow-up on therapeutic care of child and family with Lois Webb.
- (d) Review the [REDACTED] situation.

Richard A. Chevrefils .
Director
11/29/83



STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND WELFARE
DIVISION OF WELFARE
PORTSMOUTH DISTRICT OFFICE
30 Maplewood Avenue

Portsmouth, NH 03801

9979
Edgar J. Helms, Jr., Commissioner
Richard A. Chevrefils, Director
George M. Kester, District Director
603-431-6180

February 9, 1983

Mr. Ronald J. Gilbert
Town Manager
Town of Northumberland
Town Office
Groveton, NH 03582

Dear Mr. Gilbert:

On February 3, 1983, I spoke with Father Gordon MacRae regarding [REDACTED] (d.o.b. [REDACTED]) who is currently residing at the home of Mr. and Mrs. [REDACTED].

During our conversation, I discussed with Father MacRae [REDACTED]'s placement in an unlicensed home and how this prevented him from being eligible for financial/medical assistance through the Division of Welfare. Father MacRae advised me that he was aware of this, however, it was the expressed wish of Mr. and Mrs. [REDACTED] that they not have dealings with the Division of Welfare.

On November 29, 1982, the [REDACTED] [REDACTED] [REDACTED] issued the following [REDACTED]:

1. That the prior order of the Court placing [REDACTED] in the custody of the Division of Welfare is rescinded;
2. That [REDACTED] is hereby ordered to be in the care and supervision of Father Gordon MacRae, 289 Lafayette Road, Hampton, NH, with placement, as arranged by Father MacRae, at the home of [REDACTED] and [REDACTED];
3. That the Town of Northumberland, as Legally Liabile Unit, shall, forthwith, commence payment to Father MacRae at the rate of \$100.00 per month and shall further bear [REDACTED]'s necessary medical and dental expenses as incurred, the Town to have its usual right of recovery as stated in the statute;
4. That the Court has this date advised the Town Manager of Northumberland of the foregoing order;
5. That a review hearing, if not sooner held on request of any interested party, shall be held at the close of the current school year, and the precise time to be set after request for same from the [REDACTED] Protection Department; and

6. That prior orders of the Court made on October 18, 1982, not changed or amended by the foregoing shall remain in full force and effect.

In view of the current Court Order, it would appear that the concerns you expressed regarding [REDACTED]'s financial/medical expenses during our telephone conversation on 2/3/83 are court appropriate and would need to be addressed at a Court Hearing from any interested party if a conflict of interest exists.

The Division of Welfare has extended it's full cooperation to Father MacRae and would also be happy to assist you in any way deemed necessary.

Please do not hesitate to call me at 431-6180 if you have any questions.

Thank you for your cooperation.

Yours very truly

Priscilla G. Casimiro
Social Worker II
Child and Family Services

PGC/11

cc: Father Gordon MacRae



9981
CONSULTATION SERVICE FOR CLERGY and RELIGIOUS
282 CONCORD STREET MANCHESTER, N. H. 03104
603-668-0014

May 28, 1986

Reverend John P. Quinn
New Hampshire Catholic Charities, Inc.
215 Myrtle Street, P.O. Box 686
Manchester, New Hampshire 03105

Dear Father Quinn:

I write to you in response to the request that you have received that I remit to the proper authorities a report of my counseling relationship with the Reverend Gordon MacRae.

I have been seeing Father MacRae weekly for more than three years. During that time, we have dealt with the incident that was reported from the East coast of New Hampshire. I feel that we have delved into this incident so as to bring about helpful insights that Father MacRae can use. Also, Father MacRae has seen fit to continue his visits here since that time to deal with matters that are not related to this incident in any way.

As regard the query you made about the "spider game", it was never brought up in therapy. Also, when presented with this query, Father MacRae said he did not know what it could mean. Having dealt with Father MacRae for a long period of time I feel confident that he is telling the truth.

I also feel confident in the growth that Father MacRae has exhibited and I feel that this matter has been dealt with and resolved on his part. I feel strongly that harm may come by the resurrection of this incident at this time.

Father MacRae is aware of the re-emergence of this matter at this time. He has given me the proper release to communicate with you, or with any other appropriate person about the status of his progress at this time.

Sincerely,

Henry P. Guertin-Ouellette, Ph.D.
Director

HG-0:ae

SHEEHAN
PHINNEY
BASS +
GREEN
PROFESSIONAL
ASSOCIATION

April 17, 1997



ATTORNEYS AT LAW

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PERSONAL AND CONFIDENTIAL

Fr. Edward J. Arsenault
Diocese of Manchester
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P.O. Box 310
Manchester, NH 03105-0310

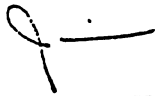
Re: [REDACTED] v. Diocese of Manchester
and Gordon MacRae
[REDACTED]

Dear Father Arsenault:

Enclosed is a letter recently received from Peter Gleichman, attorney for [REDACTED]. You recall that [REDACTED] case was dismissed last summer following the hearing on the statute of limitations. He is still asking for money, but now on a "moral" basis.

As a legal proposition, the Diocese has absolutely no obligation to [REDACTED]. As he makes the request following extensive legal proceedings and much publicity, I recommend against any assistance. However, the decision is yours and I will communicate your decision to Mr. Gleichman.

Very truly yours,


James E. Higgins

JEH/slb
Enc.