

Willsborough, SS.  
Northern District

Superior Court

[REDACTED]

VS

GORDON MACRAE

AND

THE ROMAN CATHOLIC BISHOP OF MANCHESTER, INC.

FIRST SET OF INTERROGATORIES PROPOUNDED BY THE PLAINTIFF  
TO BE ANSWERED BY THE DEFENDANT GORDON MACRAE

The following constitute interrogatories propounded by the Plaintiff, [REDACTED], to be answered by the Defendant, Gordon MacRae, under oath, pursuant to and within the time prescribed by New Hampshire Superior Court Rule 36. All answers must be answered in full and contain all facts and evidence which substantiate the answer as it is given and which would be presented to the Court. When a question calls for the possibility of either an affirmative or a negative answer, do not limit your answer to a simple negative or affirmative, -- explain in detail. State the facts and reasons for your answer fully and completely. If there are any documents which substantiate any answer, or any explanation to any answer, please specifically refer to them and attach copies to these interrogatories, whether or not they are requested.

These interrogatories shall be deemed continuing so as to require supplemental answers if the Plaintiff or his attorney obtains further information between the time answers are served and the time of a hearing on the merits regarding this matter.

1. Please identify yourself stating the following:
  - A. Your full name and any other names by which you have been known.
  - B. Your date and place of birth.
  - C. Your present address.
  - D. Your occupation.
  - E. Your business address
  
- A. My full name is Gordon James MacRae. I have never used another name.
- B. Date of Birth: April 9, 1953  
Place of Birth: Beverly, Massachusetts
- C. Present Address: Post Office Box 10, Route 4, Jemez Springs, New Mexico 87025-0010 Tel: (505)842-1987.
- D. I am currently unemployed due to the bringing of false charges by Plaintiff [REDACTED] and members of his family.
- E. I have no business address.

2. Please identify each and every employee, former employee which you worked with, and or lived with at the Hudson Rectory and St. Bernard's Rectory in Keene, New Hampshire.

ANSWER:

a) I have never lived or worked at the Hudson Rectory. I was, however, a resident of the Town of Hudson, New Hampshire from 1975 to 1978, but not at St. John the Evangelist Rectory. I was ordained at St. John the Evangelist Church on June 5, 1982 and had my first Mass there on June 6, 1982 as it was customary to be ordained at either the diocesan cathedral or one's home town. Since I had lived in Hudson prior to joining the Diocese of Manchester as a seminary student I chose to be ordained there. I had close friends in Hudson whom I visited each time I went to Hudson. These were Mr. and Mrs. Leo Demers (a family of three), Mr. and Mrs. Ron Houseman (a family of eight), and Mr. and Mrs. Alphonse Ratte (a family of six). When I would visit them in Hudson I would sometimes stay overnight at the Hudson Rectory so I knew the staff there well though I never lived or worked there. The following are the names of these staff whom I recall: Rev. Gerard Boucher, Rev. Norman Carrier, Rev. Leo LeBlanc, Rev. Paul Groleau, Rev. Mark Fleming, Rev. Stephen Scruton, Rev. Henry Huot, Mr. Christopher Lyons (A Hudson Police Officer who lived in the guest room of the Rectory in 1982/1983), Miss Jeanne Pinard, Mr. Wayne Thurston, Mrs. Connie St. Jean, Mrs. Diane Geehan, Mrs. Patricia Roebke, Mrs. Simone Therrien, other staff whose names I cannot recall.

b) The following are the individuals whom I lived and/or worked with at St. Bernard's Rectory in Keene, New Hampshire: Rev. Stephen Scruton, Rev. Daniel Dupuis, Rev. Michael Barrett, Rev. Gabriel Houle, Rev. Paul Pouliot, Rev. Wilfrid Bombardier, Mrs. Jeannette Barlow, Miss Lorraine Ouellette, Mrs. Bertha Houle, Mrs. Rita Suarez, Miss Pauline Chabot, Miss Andrea Hall, Mr. Robert Moynihan, Mr. Frederick Laffond, Mr. Robert Short, Mr. Michael Donnellan, One other secretary, named Gina, and her daughter, whose last name I cannot recall, also lived in the Rectory.

NB: Forty-Seven (47) of the above individuals have been contacted. Not one has ever seen [REDACTED] in either rectory, nor has any of them ever seen Gordon MacRae accompanied by [REDACTED]. All forty-seven (47) of these individuals intends to testify to this, and to other issues which demonstrate that [REDACTED] (and family) is fabricating this story. Three other individuals in the above list are deceased.

3. Please list all of those people referred to interrogatory #2 who wore a beard at any time, including both rectories, Hudson and Keene, and specify for each.

A. Of the people in which you worked with or lived with who ever wore a beard, give all the full names of each and their occupation.

B. Describe if any, in regards to those listed, any and all contacts that you are aware of between these people and the plaintiff at both the Hudson and Keene Rectories and specify.

ANSWER:

A. To reiterate, I never lived or worked at the Hudson Rectory. However, I am aware that, between 1979 (the first time I ever visited there) and 1983 there were two individuals there with beards. These were Rev. Leo LeBlanc and Rev. Norman Carrier. I do not believe they were in Hudson at the same time. As I have been away from the Diocese for a long time I do not know their current occupations. Both were short (much shorter than [REDACTED]), thin individuals in their thirties at the time. I am not aware of any other person in Hudson or at the Keene rectory who had a beard.

B. I am not aware of any contact between these individuals and Plaintiff [REDACTED] in either Hudson or Keene. Up until my ordination on June 5, 1982, I was stationed 150 miles from Hudson in the town of Groveton, New Hampshire. I went to St. John's in Hudson only the day before the ordination ceremony. Five friends from Baltimore (all five were police officers) were with me and stayed as guests there and in another nearby rectory.

One of them videotaped the ordination. I do not have this tape but I have reviewed it. [REDACTED] is clearly visible at the ordination on June 5, 1982 and first Mass on June 6, 1982 because he towers over everyone in the church. He may have seen these individuals there, but I am not aware of any other contact he could have had with them. Of course, I am making efforts to obtain this tape and have it reviewed by the forty-seven individuals mentioned in Interrogatory #2 to ascertain whether [REDACTED] is recognized by any of them.

4. Please describe in detail any and all known investigations regarding sexual assault, solicitation or any other investigations involving children, young adults and minors involving you.

- A. Describe the nature of all abuses or alleged crimes involving these children, youths and minors.
- B. Describe how you came in contact with these victims.
- C. List the dates of the alleged crimes.
- D. List all church officials who had knowledge of these alleged crimes throughout your priesthood.
- E. List names of all police officers, counselors, detectives or anyone involved in each of these investigations.
- F. Attach any letters or documents pertaining to your answers.

Answer: In November of 1983, five months after I left the parish in Hampton, NH, I was accused by a Hampton youth of having hugged and kissed him in an incident alleged to have happened before I left there in April or May, 1983. There were no other details presented about the allegation. I was seeing a therapist, Dr. Henry Guertin-Ouellette at his office in York, Maine. The youth apparently told his counselor who told my therapist who then reported it to State of New Hampshire officials. I admitted that I did hug him, and that this was inappropriate in a pastor/parishioner relationship. I was never aware of, nor involved in, any investigation of this matter. I knew this youth as he had come to me with repeated problems with being harassed in and out of school by his peers. He was never an altar boy contrary to what has been reported in the media. In May of 1986 this individual reported the incident to another counselor in apparent retaliation for having been dismissed from a Catholic high school. The new counselor reported it not knowing that it had been reported three years earlier. The youth then added a new allegation that he was fondled by me during this incident. I was not aware of the investigation, and was never approached by investigators, but I have now learned that the investigation was closed and determined to be unfounded according to documentation from the Division of Children and Youth Services. In 1988 this same youth again contacted investigators and made still further claims. In 1993, after reading the false allegations brought by your client and members of his family, this same youth again contacted police investigators with still further claims of a more serious and bizarre nature. I am not certain as to who, exactly, he contacted.

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#4 (continued)

The only church official whom I am aware was notified of the investigation by DCYS is Msgr. Francis Christian, Ph.D., Chancellor of the Diocese of Manchester.

In June of 1987 I left ministry in the Diocese of Manchester of my own accord. In November, 1988, while director of Monadnock Region Substance Abuse Services, I agreed to a guilty plea of endangering a minor, i.e. attempting a verbal solicitation of a fifteen year old male. This individual was not a client of Monadnock Region Substance Abuse Services, nor was he a parishioner of St. Bernard Church in Keene. I knew this person and his parents as friends who often called my home. The investigation was conducted by Det. James McLaughlin of the Keene, NH, police department. Because I was no longer assigned by the Diocese of Manchester I am not aware of any Church officials who were notified.

In 1993 your client and two members of his family brought false allegations of having been sexually assaulted by me and other, unnamed, priests in the early 1980's. There are no dates I can provide for these alleged crimes, or church officials who were aware of them, because the alleged crimes did not take place. The only police officer I am aware of having investigated this is Det. James McLaughlin of the Keene Police Department. I knew your client and his family first when I served a Summer internship as a graduate student in their parish for eight weeks in 1979, then as a family friend for the following several years.

5. From the first set of interrogatories, you answered that you declined to form a youth ministry at St. Bernard's Parish in Keene, New Hampshire. Why did you decline to do so?

ANSWER: I am not certain what "first set of interrogatories" this refers to however this is the answer to the question: Youth ministry was not a part of the job description of the person I was replacing. It generally involves a lot of organizing and larger parishes generally hire someone for youth ministry. Asking me to do it was a way of trying to save money. I declined because it would only have exacerbated an already overburdened work load in the parish and I did not see it as my job.

6. Please state the person or persons who offered this position to you?

ANSWER:

No one "offered" it to me. Rev. Gabriel Houle, the pastor, asked if I would consider doing it. As indicated above, I declined.

7. Please state what you recall you gave to the above named person or persons as to the reason for declining.

ANSWER:

I gave Rev. Gabriel Houle the same answer I have provided hereinabove.

8. Was your real reason for declining based on your sexual misconduct, feelings or history with the minor boys you have been in contact with throughout your priesthood?

ANSWER:

There was no allegation of sexual misconduct at the time I declined youth ministry, there were not, and are not, feelings as inferred above, there was no history as inferred above, I had been a priest for only a year at the time I declined to do this, and there is no other reason than what I have presented hereinabove.

9. Please attach a copy of every sheet of paper, notes, records, or any type of documentation relating to the Plaintiff in this case, including personal notes, correspondence, writings to or from the Plaintiff which is or was ever in your possession.

ANSWER:

I have no personal notes, correspondence or writings to or from Plaintiff [REDACTED] nor were there ever any in my possession, nor have I ever been aware of any.



10. State the name of the probation officer you claim to have given the letter, or a copy of the letter, you claim to have received from the Plaintiff in 1989.

ANSWER: I have never claimed to have received a letter from Plaintiff [REDACTED] in 1989 or at any other time.

11. Please give detailed descriptions, including when and where, any and all physical contacts and/or sexual contacts with the Plaintiff occurred, but not limited to the following:

- A. Hugging;
- B. Kissing;
- C. Touching;
- D. Fondling;
- E. Masturbation;
- F. Massages;
- G. Anal intercourse

I have never engaged in any of the above behaviors with Plaintiff [REDACTED].

12. Please describe in detail what the "spider game" is, including whom you have played this game with and when.

I have no knowledge of exactly what this refers to. Another individual used this term in an unfounded allegation against me in 1986 however the investigative report indicates that this was the individuals own terminology and not mine. I have never "played this game" with anyone.

13. Does the above stated game involve physical contact, if so what kind? Please describe in detail.

ANSWER:

As stated hereinabove, i have no knowledge of what, exactly, this term refers to.

14. State names, addresses, ages and occupations of any expert witnesses you expect to be called to the trial.

ANSWER: I am not certain what trial this question refers to. If it refers to the expected criminal trial over the allegations brought by other members of Plaintiff [REDACTED] family then I expect to have a list of expert witnesses and their credentials soon.

If this question refers to the civil trial over the allegations brought by Plaintiff [REDACTED] then I expect to use the same list of expert witnesses.

Respectfully submitted,



By his Attorneys  
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Dated: December 3, 1993

By: Mark A. Abramson  
Mark A. Abramson, Esquire  
1819 Elm Street  
Manchester, NH 03104  
(603) 647-0300

December 30th, 1993  
Dated

Gordon MacRae  
Gordon MacRae

STATE OF NEW HAMPSHIRE  
Hillsborough, SS.  
Northern District

Personally appeared the above named Gordon MacRae, who upon oath declared that the statements in the foregoing Interrogatories by him subscribed are true to the best of his knowledge and belief.

Dolores J. Malpass  
~~Justice of the Peace/Notary Public~~

MY COMMISSION EXPIRES: Oct. 30, 1996