John Doe IV

2. Set forth with specificity what constitutes the "repeated harmful, illegal and immoral sexual contact" with Plaintiff, specifying the dates and places of each such occurrence and the names of any witnesses or other parties who are familiar with the transaction.

ANSWER:

Beginning in 1961, the abuse by Janssen started. The first contact occurred in his gym office. He locked the door and he had me sit next to him on a couch. He put his hand on my knee and said "Do you trust me?" Yes. Then he put his hand on my crotch and squeezed with a giggle. At this point, he opened my pants and stroked me to erection. As he manipulated me, he opened his pants and put my little hand on his erect penis and showed me how to stroke it. We masturbated each other. He betrayed my trust, my faith, my love and respect for him.

In 1962, he would abuse me in the back seat of his car. He masturbated me and I him. The semen got on the seat of his car and he commented as he wiped it up that he wished semen came in powder form. At one point, Janssen took a friend and I swimming in the quarry. On the way back, we sat in the back seat of his car. Our trunks were wet and soaked the back seat of his car. Moments later, a horrible odor came up and wouldn't leave. Within one week, Janssen had traded the car. I later realized the odor came from dried semen getting wet.

In 1963, Janssen took me on a trip to St. Ambrose College. It was evening and he took me to the college pool. He had a key to a back or side door. I didn't know it, but he intended for us to swim. I told him I didn't have swim trunks and he said I didn't need them. He played with me as we both swam naked by throwing me in the air. Once he threw me and I accidentally scratched him. I have never seen someone so angry as he was at me for this. He grabbed me and shoved and held me under water in front of him as he shoved his erect penis in my mouth. He held me there until my lungs were empty. I thought he was going to kill me.

Janssen asked if I and a friend wanted to go with him to Daytona Beach, Florida. He asked my parents and plans were made to go. On the way to Florida, we stopped in Memphis, Tennessee and for some reason, we stayed at another priest's rectory, who was a friend of Janssen's. His name was Father Murphy. The first night I slept on the couch and my friend slept in a bed with Father Murphy. The next night, it was time for bed and Janssen said I had to sleep in the bed with Father Murphy. I told him I didn't want to and would sleep on the couch again. Janssen said if I didn't, then my friend would have to. I looked at my friend's face and I saw fear in his face. I didn't know what he was afraid of, but whatever it was, I didn't want him to go through it again, so I agreed. That night, under the sheets, this stranger grabbed my crotch and started fondling me. He then put my hand on

EXHIBIT

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ANSWER TO INTERROGATORY NO. 2, CONT.

his erect penis and forced me to masturbate him. The next day, we went on to Daytona. I remember Janssen checking us into this really neat hotel. He made sure he put on his cleric collar before he talked to the front desk. He told them a sad story so he could either get a room for free or at a very low cost.

During the school year, Janssen would take myself and other boys to Farmington, lowa, to another church run by Father Geerts. While there, I saw older classmates playing cards without clothes on.

In 1964, Janssen pimped me one final time. A visiting priest, Father Bass, who I did not know and who did not know me, asked me to carry something from the rectory for him. He led me to Janssen's bedroom, locked the door and made me disrobe. This scared me, but I complied. He fondled me on the bed and then took down his pants and had me masturbate him. When he was done, he took out a polaroid camera and took a picture of me naked. All of my trust, love, self-respect and self image were destroyed at that moment.

I had always thought from the beginning I was the only one this happened to. Although, once I was tuned into what was going on, I observed pollution of young minds all around me. I walked into Janssen's office one day and 6-8 boys were sitting around the edges of the room masturbating. Another time when I was in 7th-8th grade, I walked into a concealed coat room in the back of the classroom while the nun was teaching at the front and there stood a boy masturbating. He winked at me and I just walked out.

Because of previously entered Court Order, I will not disclose the identities of persons known or believed by me to have been abused by Janssen and Bass.