

John Doe II

INTERROGATORY NO. 2: Set forth with specificity what constitutes the "repeated, harmful, 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:

I first started to get to know Father Janssen when I was 9 or 10, after the death of my father. Father Janssen would take me to movies and have me spend the night with him. We did this a lot before any sexual abuse occurred.

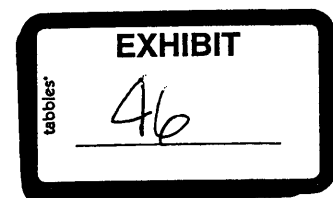
The first time Father Janssen ever touched me was in the Sugar Creek rectory. When I would spend the night, we would sometimes watch TV in his room. While watching TV, he would put his hand on my thigh and say "Do you trust me?" He would then move his hand a little closer to my genitals and say again "Do you trust me?" He continued this until he finally touched my penis. After a few times of just working up to touching and building trust, he eventually would rub my penis to the point of ejaculation. I do remember that the first few times, I was young enough that even though I could get an erection, I was not physically mature enough to actually ejaculate. Eventually, there were times that after he would make me ejaculate, he would masturbate and try and have me touch him. He took my hand and made me rub him to the point of ejaculation. When doing this, I felt like throwing up. I told him I didn't feel comfortable doing that.

On at least 5-10 different encounters, Father Janssen would take me to Newton, Iowa, to visit Father Bass. Father Bass rubbed me to the point of ejaculation two different times. The other encounters were with Father Janssen.

Father Janssen took other minor boys and myself to a xxx movie in Clinton, Iowa. He would also take us to a store called Paul's in Clinton where I tried on some boots and Father Janssen told me to walk out with them on and not pay, so I did. Another time in Knoxville, Tennessee, Father Janssen took other minor boys and myself to an open flea market and gave us plastic bags and told us to take shirts or whatever we wanted. I took a couple of shirts. I even took some cigarettes one time. I remember one time when Father Janssen rigged a raffle for a mini bike so that someone he knew would win.

Numerous times, Father Janssen would take us swimming at the YMCA in Clinton, Iowa. He would touch my penis while we were in the water.

Father Janssen also took me to Florida approximately five times. During those trips, he would rub me to the point of ejaculation.



ANSWER TO INTERROGATORY NO. 2, CONT.

The older I got, the less frequent the encounters were. I was either a junior or senior in high school when the last incident of abuse occurred. I would say Father Janssen abused me at least 50 times over those years. He would always say "Do you trust me?" and "Can I trust you?" after he would touch me.

The acts occurred whenever Father Janssen and Father Bass wanted to do it. The acts occurred in various rectories, in the YMCA swimming pools and on out of state trips that were taken. John Doe II, James Janssen and Francis Bass are familiar with the incidents.