

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
IN AND FOR THE COUNTY OF MULTNOMAH

C.B., )  
Plaintiff, ) Case No.  
v. ) 0107-07514

THOMAS D. JURATOVAC, Personal )  
Representative for the ESTATE OF )  
MAURICE GRAMMOND, Deceased; the )  
ARCHDIOCESE OF PORTLAND IN )  
OREGON, an Oregon Corporation; )  
the ROMAN CATHOLIC ARCHBISHOP OF ) DEPOSITION OF  
THE ARCHDIOCESE OF PORTLAND IN ) MARY JO STACEY

OREGON, and successors, a ) November 24, 2003  
corporation sole, dba the )  
ARCHDIOCESE OF PORTLAND IN )  
OREGON, )  
Defendants. )

WB, BC, VC, JCl, RC, JD, and PR, )  
Plaintiffs, ) Case No.  
v. ) 0105-04547

THOMAS D. JURATOVAC, Personal )  
[Continued] )

A P P E A R A N C E S

For Plaintiff C.B.:

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541/265-5377  
BY: MR. KEVIN K. STREVER

For Plaintiffs JD and JC:

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For Defendants Archdiocese of Portland  
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BY: MR. THOMAS V. DULCICH

THOMAS D. JURATOVAC, Personal )  
Representative for the ESTATE OF )  
MAURICE GRAMMOND, Deceased; the )  
ARCHDIOCESE OF PORTLAND IN )  
OREGON, an Oregon Corporation; )  
the ROMAN CATHOLIC ARCHBISHOP OF )  
THE ARCHDIOCESE OF PORTLAND IN )  
OREGON, and successors, a )  
corporation sole, dba the )  
ARCHDIOCESE OF PORTLAND IN )  
OREGON, )  
Defendants. )

THE DEPOSITION OF MARY JO STACEY was  
taken as a witness on behalf of Plaintiff C.B.,  
pursuant to Oregon Rules of Civil Procedure, at  
10:05 a.m. on Monday, the 24th day of November  
2003, at the law offices of Moberg Canessa Faber  
& Hooley, 842 Broadway, in the City of Seaside,  
County of Clatsop, State of Oregon, before Judy  
L. Hunter, RPR, Registered Professional Reporter  
in and for the State of Oregon.

I N D E X

<u>WITNESS:</u>	<u>PAGE</u>
MARY JO STACEY	
By Mr. Strever	5
By Mr. Slader	48

<u>EXHIBITS:</u>	<u>FOR IDENTIFICATION</u>	<u>MARKED/REFERRED</u>
No. 1	Memorandum #00016	12 63
No. 2	Memorandum #00020	13 --

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1                    MARY JO STACEY,  
 2 as a witness on behalf of Plaintiff C.B.,  
 3 having been first duly sworn to testify the  
 4 truth, the whole truth, and nothing but the  
 5 truth, was examined and testified as follows:  
 6  
 7                    EXAMINATION  
 8 BY MR. STREVER:  
 9        Q.        Good morning. Your name, please.  
 10        A.        My name is Mary Jo Stacey,  
 11 S-t-a-c-e-y.  
 12        Q.        Ms. Stacey, my name is Kevin Strever.  
 13 Your attorney, Tom Dulcich, just introduced us.  
 14 I'm a lawyer and I represent a young man named  
 15 Carey Bruton. This is a deposition, and it's  
 16 being taken pursuant to a lawsuit I've filed on  
 17 Carey Bruton's behalf. Have you ever given sworn  
 18 testimony before?  
 19        A.        One time in a child custody case.  
 20        Q.        Okay. Was that in a courtroom?  
 21        A.        Yes, it was.  
 22        Q.        Okay. Well, this is a little bit  
 23 like that, in that I will be asking you questions  
 24 while you're under oath. And my questions and  
 25 your responses will be taken down by our court

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1 want to take a break for any reason, please, just  
 2 let me know.  
 3                    Now, with that out of the way, could  
 4 you tell me where you live.  
 5        A.        I live in  
 6        Q.        And the address is?  
 7        A.  
 8        Q.        Do you know your social security  
 9 number?  
 10        A.        Yes, I do.  
 11        Q.        What's that?  
 12        A.        I would choose not to tell you.  
 13        Q.        Okay. Do you have any plans on  
 14 moving in the near future?  
 15        A.        No, sir.  
 16        Q.        I have seen some references to your  
 17 name in some documents that Mr. Dulcich provided  
 18 to me. And so I have a few impressions about  
 19 kind of who you are in this community. And I  
 20 want to find out if I'm right about that.  
 21                    Have you lived in Seaside or the  
 22 Seaside area for a long time?  
 23        A.        Yes, for thirty-five years.  
 24        Q.        Okay. And are you married?  
 25        A.        Yes, I am.

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1 reporter and prepared into a transcript which can  
 2 be used in trial or other judicial proceedings.  
 3 Are you aware of that?  
 4        A.        Yes, I am.  
 5        Q.        I assume you've had a chance to talk  
 6 to Mr. Dulcich about what we're going to be doing  
 7 today?  
 8        A.        About the fact that we're doing a  
 9 deposition, yes.  
 10        Q.        Okay. The rules are pretty simple.  
 11 It's a little like the testimony you gave in that  
 12 child custody matter, in that since you're  
 13 under oath and since I need to find out what you  
 14 know and what you don't know, it's important  
 15 that we communicate; therefore, if I ask you  
 16 something you don't understand, would you be kind  
 17 enough to have me rephrase the question?  
 18        A.        Yes.  
 19        Q.        Okay. And I will assume, then, if  
 20 you answer the question, that you understood it.  
 21 Fair enough?  
 22        A.        Yes.  
 23        Q.        Okay. And we're doing great with  
 24 verbal responses, and we need that so the court  
 25 reporter has a word to take down. And if you

8

1        Q.        Okay. What's your husband's name,  
 2 please?  
 3        A.  
 4        Q.        I assume that you're a participant in  
 5 the Catholic faith?  
 6        A.        Yes, I am.  
 7        Q.        Have you been a lifelong Catholic?  
 8        A.        No. I'm a convert to the Catholic  
 9 faith.  
 10        Q.        Okay. About how many years have you  
 11 been involved with the Catholic Church?  
 12        A.        In Seaside or as a faith?  
 13        Q.        Ever. Pardon?  
 14        A.        As a faith or --  
 15        Q.        Yes.  
 16        A.        I was baptized in 1968.  
 17        Q.        Are you presently employed? Do you  
 18 have a job?  
 19        A.        Yes, I do.  
 20        Q.        What do you do?  
 21        A.        I'm the Coordinator of Religious  
 22 Education for Our Lady of Victory Parish.  
 23        Q.        How long have you done that?  
 24        A.        I have been working at the parish in  
 25 that capacity since 1975.

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21

1 physically, do you teach these?  
 2 A. At parish facilities.  
 3 Q. Okay. At Our Lady of Victory or  
 4 other parishes, as well?  
 5 A. At Our Lady of Victory Parish.  
 6 Q. Back to your conversation at the Pig  
 7 'n' Pancake in the fall of '74: Do you have any  
 8 idea why Father Lienert and Kathleen Cleary  
 9 wanted to speak to you?  
 10 A. I believe you're not referring to the  
 11 fall of 1974, but to the fall of 1991.  
 12 Q. My mistake; I'm sorry. You're  
 13 absolutely right, the fall of '91.  
 14 A. Because of my position as Coordinator  
 15 of Religious Education in the parish; because I  
 16 had had a conversation with my supervisor, the  
 17 parish pastor.  
 18 Q. Father Wolf?  
 19 A. Yes.  
 20 Q. Okay.  
 21 A. Because I've been in the parish for a  
 22 long time.  
 23 Q. As you sit here today, do you recall  
 24 anything about that conversation with Father Wolf  
 25 that led to this meeting at the Pig 'n' Pancake?

23

1 Q. Okay. And if we look at Exhibit 2,  
 2 page 2, would that be the reference to  
 3 being the second full paragraph?  
 4 A. It would be the second sentence in  
 5 the second full paragraph.  
 6 Q. Okay. And that should correctly read  
 7 ' you believe?  
 8 A. I believe so, yes. I think that it's  
 9 an honest mistake on Father Wolf's part, if  
 10 indeed this is what he reported, because he did  
 11 not know the people.  
 12 Q. When you met with Father Lienert and  
 13 Kathleen Cleary, in addition to talking about the  
 14 McIlveney men,  
 15 A. Uh-huh.  
 16 Q. -- did you talk to them about rumors  
 17 that you had heard about Father Grammond?  
 18 A. Yes, I did.  
 19 Q. Okay. Tell me what you told them  
 20 about rumors.  
 21 A. I believe, if I recall correctly, on  
 22 two occasions it was mentioned to me that there  
 23 was something funny or it was heard that he was  
 24 fooling around with teenage boys.  
 25 My reaction to these rumors on both

22

1 A. As indicated in this document --  
 2 Q. Which exhibit is that?  
 3 A. -- called Exhibit 2, he recounts  
 4 being visited by a young man named  
 5 who indicated to him those points  
 6 outlined in this letter, and asking that Father  
 7 Wolf visit his mother, who was quite ill. And  
 8 Father Wolf asked if I knew this young man and  
 9 if I knew anything about his allegations.  
 10 Q. Whose allegations?  
 11 A. Mr.  
 12 Q. Okay. And what did you tell Father  
 13 Wolf when he asked you about that?  
 14 A. I told him I did not know anything of  
 15 these allegations made by Mr. He  
 16 asked me if I knew of or had heard of any other  
 17 such allegations, at which time I recounted my  
 18 encounter with Mr. and my  
 19 conversation with Mr.  
 20 And I would like to point out that on  
 21 page 2 of Exhibit 2, I believe that the person  
 22 who transcribed the notes of this interview with  
 23 Father Wolf -- or perhaps Father Wolf utilized  
 24 the name -- and it should be  
 25

24

1 occasions was that it was really a horrible  
 2 remark or something terrible to say about a  
 3 priest.  
 4 Q. Did you hear essentially the same  
 5 thing on the two occasions?  
 6 A. Essentially.  
 7 Q. And where did you hear these rumors?  
 8 A. One of them was from a woman in the  
 9 parish. And the other one I really -- I really  
 10 can't recall.  
 11 Q. Who was the woman in the parish that  
 12 was spreading this rumor?  
 13 A. It wasn't spreading a rumor. It was  
 14 just stated to me that there was something funny  
 15 going on. The woman is now deceased.  
 16 Q. What was her name?  
 17 A.  
 18 Q. Does she have any family still in the  
 19 area?  
 20 A. No.  
 21 Q. Did she have any family at all?  
 22 A. No.  
 23 Q. No children, no spouse?  
 24 A. No spouse, no children.  
 25 Q. Did you talk to her when you -- when

1 she first told you about -- well, first of all,  
 2 do you remember specifically what she said to  
 3 you?  
 4 A. She said something funny -- I know  
 5 there is something funny about the priest.  
 6 Q. And that he fooled around with  
 7 teenage boys?  
 8 A. Yes.  
 9 Q. And did you assume that meant in a  
 10 sexual way or a sexually inappropriate way?  
 11 A. I have no recollection of what my  
 12 thoughts were.  
 13 Q. Well --  
 14 A. I very vaguely knew this woman at the  
 15 time.  
 16 Q. Why -- if you didn't know what they  
 17 were referring to, why was it that you thought it  
 18 was a bad thing to say about a priest?  
 19 A. Well, it could mean any number of  
 20 things. There wasn't a specific indication that  
 21 it was any kind of abuse or anything of that  
 22 nature. But perhaps some people would have had  
 23 that connotation.  
 24 Q. Did you?  
 25 A. I suppose I momentarily thought of

1 that, which led me to think that it was something  
 2 really tacky to say about a priest. But I mean,  
 3 it could mean anything.  
 4 Q. But to you it meant that it was at  
 5 least something that you didn't think was  
 6 appropriate to say, and that it was at least  
 7 tacky?  
 8 A. Yeah. Yeah.  
 9 Q. And was it sometime after that that  
 10 you heard a second rumor of like sort?  
 11 A. I would guess that it was sometime  
 12 removed from that, but not far removed from that.  
 13 I was very new in Seaside. I was in the process  
 14 of getting acquainted with people. I went to  
 15 many different gatherings and met many different  
 16 people.  
 17 Q. And so you don't recall where you  
 18 heard this the second time?  
 19 A. No, I don't.  
 20 Q. What did you think when you heard it  
 21 the second time?  
 22 A. I didn't react to it. I just sort  
 23 of -- I have a sense that it wasn't with one  
 24 person over coffee, but that it was amid a group  
 25 of people.

1 Q. You don't recall the circumstances of  
 2 hearing it, though?  
 3 A. No.  
 4 Q. Or where the group of people might  
 5 have been?  
 6 A. No. No.  
 7 Q. Did you think, the second time that  
 8 you heard it, that it was an inappropriate thing  
 9 to say about a priest, or that it was tacky?  
 10 A. I still thought that it was an  
 11 inappropriate thing to say about a priest.  
 12 Q. Do you recall, when you heard it the  
 13 second time, whether you -- you know, any light  
 14 came on, thinking you've heard that before?  
 15 A. No.  
 16 Q. Do you recall whether, when you heard  
 17 this the second time, you volunteered to anyone  
 18 about what you had heard on a previous occasion  
 19 from Ms.  
 20 A. No. No.  
 21 Q. No, you didn't do that? Or no, you  
 22 don't recall?  
 23 A. I don't recall that I made any  
 24 comment or discussed it with anyone.  
 25 Q. On either of those two occasions, do

1 you recall considering to yourself whether or not  
 2 it might be true, these rumors about Father  
 3 Grammond fooling around with boys?  
 4 A. I think that I just took it in and  
 5 observed that was often in his  
 6 presence, never said another thing about it --  
 7 Q. She never said another thing about it?  
 8 A. Never said another thing about it.  
 9 Q. So you don't recall whether or not  
 10 you questioned whether these rumors might be true?  
 11 A. No.  
 12 Q. Okay. Other than those two times  
 13 that you heard rumors about Father Grammond being  
 14 involved or fooling around with boys, did you  
 15 ever hear any other rumors of any sort regarding  
 16 Father Grammond in any inappropriate behavior?  
 17 A. No, sir.  
 18 Q. How about any other priest? Have you  
 19 ever heard any rumors about any other priest  
 20 being involved inappropriately with children?  
 21 A. As far as a rumor-type thing is  
 22 concerned?  
 23 Q. Yes.  
 24 A. No.  
 25 Q. Was this the first time you had ever

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29

1 I heard anybody say something about a priest  
 2 fooling around with boys?  
 3 A. Yes, it is.  
 4 Q. And I may have asked you this.  
 5 Forgive me; I don't recall.  
 6 As best you can, can you tell me  
 7 approximately when it was you first heard a  
 8 rumor about Father Grammond fooling around with  
 9 boys?  
 10 A. I believe that would have been 1968  
 11 or '69.  
 12 Q. After you heard the rumors, on either  
 13 of those two occasions, did you share that  
 14 information with anybody?  
 15 A. I probably mentioned it to my  
 16 husband. But no, I didn't discuss it with anyone.  
 17 Q. Do you recall any comment or response  
 18 from your husband, ever, about Father Grammond  
 19 fooling around with boys?  
 20 A. He indicated that he hadn't ever  
 21 heard that.  
 22 Q. Why was it you told your husband  
 23 about that?  
 24 A. Because he is my husband, and I would  
 25 discuss anything of that nature that I heard with

31

1 your conversation at the Dairy Queen with  
 2  
 3 A. My son and I went there to get an ice  
 4 cream treat. And I noticed some boys scuffling  
 5 and running around the parking lot at the Dairy  
 6 Queen, and they were older kids.  
 7 And then I noticed that one of them  
 8 was who I knew from Church. And it  
 9 appeared to me that he was very drunk or high on  
 10 drugs, and he was kind of stumbling and falling.  
 11 And I got out and asked him if I  
 12 could give him a ride home. And then I asked if  
 13 I should call Father Grammond, which is when he  
 14 said, "Father Grammond screws around with boys."  
 15 And he was falling down and falling  
 16 against a vehicle. And I got my son out of our  
 17 vehicle. I went in and used the phone at the  
 18 Dairy Queen and called the police, because I  
 19 really felt that he was a danger to himself, that  
 20 he was going to fall and hurt himself.  
 21 The police came. I left.  
 22 Q. Okay.  
 23 A. And I went home and called the  
 24 family to tell them what I had done.  
 25 That's about it.

30

1 him.  
 2 Q. Looking at Exhibit 1, at some point  
 3 you had a conversation with  
 4 A. Yes, sir.  
 5 Q. Okay. And we know the document,  
 6 Exhibit 1, is 1991.  
 7 A. Uh-huh.  
 8 Q. And sometime prior to this document  
 9 being generated you spoke to and five or  
 10 six years before that you spoke to  
 11 assuming the document is accurate. Does that  
 12 sound about right?  
 13 A. Go over that again, please.  
 14 Q. Well, I just want to find out -- As  
 15 best you can, I want to put a date or a year on  
 16 when you probably spoke to and he  
 17 appeared to be intoxicated.  
 18 A. I would guess it to be in 1979 or  
 19 '80. My son was five or six years old, I  
 20 suppose.  
 21 Q. What's your son's name?  
 22 A.  
 23 Q. Where does he live?  
 24 A. In  
 25 Q. Tell me, as best you recall, about

32

1 Q. What, if anything, did you think  
 2 when told you that Father  
 3 Grammond screws around with boys?  
 4 A. He was so out of it, I just thought  
 5 it was babble.  
 6 Q. And did it seem like a strange thing  
 7 for -- well, how old was he at the time?  
 8 Seventeen?  
 9 A. I'm sure that he must have been  
 10 seventeen or eighteen. He might have been  
 11 sixteen or seventeen, but he was not a little  
 12 kid.  
 13 Q. Okay. Did it seem like a strange  
 14 thing for a teenage boy to be volunteering about  
 15 a priest?  
 16 MR. DULCICH: Objection; that's  
 17 argumentative.  
 18 BY MR. STREVER:  
 19 Q. Okay. With that objection on the  
 20 record, can you answer that question?  
 21 A. My concern was to get him some kind  
 22 of help. My concern was not what he might have  
 23 said or -- no.  
 24 Q. So it made no impression on you at  
 25 all?

33

1 A. Not until much later.

2 Q. And this would have been the third

3 time that you had heard somebody say something

4 about Father Grammond and inappropriate behavior

5 with children. Correct?

6 A. I don't know what "screws around with

7 boys" means.

8 Q. Okay. Apparently, at some point

9 much later, it had some other meaning to you.

10 Is that a -- I don't want to misstate your

11 testimony.

12 But can you tell me what later

13 happened that made you reconsider whether there

14 was some implication to what had

15 told you?

16 A. In the final paragraph on page 1 of

17 Exhibit 1, I have recounted a conversation I had

18 with And it was some time after

19 the incident with. As indicated, I would

20 guess it to be five or six years later.

21 Q. Perhaps 1984, 1985?

22 A. It was after Father Grammond had left

23 Our Lady of Victory Parish.

24 Q. Okay. And what happened then with

25

35

1 individual.

2 Q. This would be the fourth time you

3 heard something about Father Grammond and

4 inappropriate behavior with children?

5 A. Yes.

6 Q. Okay.

7 A. Yes.

8 Q. After you had this conversation with

9 did you have any reaction? Did

10 you feel that, perhaps, maybe there was

11 something that was true here?

12 A. My reaction was feeling good about

13 where was, with the situation he had told me

14 about. He was an adult person, twenty-five,

15 twenty-six. I don't know how old. He may have

16 been older than that. He wasn't a young kid. He

17 was not screaming out for help. I just -- I felt

18 good about the fact that he seemed to have worked

19 through this.

20 Q. Did you have any concerns that, in

21 fact, maybe Father Grammond had molested Frank or

22 other children, when you had this conversation

23 with

24 A. said "me and my brother." And I

25 knew of three other brothers, including

34

1 A. As indicated, had volunteered to

2 help with our high school religious ed group.

3 And I was complimenting him, because a lot of

4 young adults are not interested in being involved

5 with their church; and here he was, volunteering

6 to help out with the high school group.

7 And it indicates here teaching. I

8 don't think it was so much teaching as it was

9 sharing of his faith. He indicated to me that he

10 was still in the Church, even although Father

11 Grammond had molested he and his brother.

12 And I said, "Gee" -- and this is not

13 recounted here -- "I had this interesting

14 experience with your brother That's

15 about it.

16 Q. Did you tell him what the interesting

17 experience was?

18 A. I told him about encountering

19 when he was quite inebriated or on drugs and

20 what had said. And there really wasn't a

21 reaction on part.

22 There was no hostility, anger,

23 uncertainty in anything said. He was very

24 matter-of-fact about what he said to me, and he

25 didn't blame the Church. He blamed the

36

1 Which one he meant by "my brother," I do not

2 know.

3 Q. Did you feel any concern that, in

4 fact, perhaps Father Grammond had a history of

5 molesting children at this point?

6 A. No.

7 Q. Why -- well, did you consider whether

8 or not what said -- did you

9 consider whether or not it might be true?

10 A. No.

11 Q. Did you assume he was lying?

12 A. No, absolutely not. I believed

13 Q. At this point in time, did you have

14 any understanding about whether or not it was

15 illegal for a priest to molest children?

16 A. was an adult person telling me

17 about something in his past. And I --

18 Q. Did you have any understanding about

19 whether or not, during the time of this

20 conversation, whether it was illegal for a priest

21 to molest children?

22 A. It's illegal for anyone to molest

23 children.

24 Q. Did you understand it at that time?

25 A. I don't -- I don't think that I got

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1 into anything about illegalities, because  
 2 was so matter-of-fact about saying what he said.  
 3 Q. Given that you believed did you  
 4 think it was a bad thing if, in fact, Father  
 5 Grammond had molested and some brother?  
 6 A. I thought it was a very wrong thing.  
 7 Q. Did you take any action or  
 8 communicate this wrong thing to anyone?  
 9 A. No, I did not.  
 10 Q. Did you consider doing that?  
 11 A. No, I did not, because this was an  
 12 adult person talking to me about something that  
 13 had occurred. He did not seem to be alarmed. He  
 14 did not seem to be upset. He was extremely  
 15 matter-of-fact.  
 16 And what he said to me about still  
 17 being in the Church, not blaming the Church, it  
 18 was an individual -- I was not alarmed. I was  
 19 not alarmed, also, because this man was no longer  
 20 in a parish. He was no longer in this parish.  
 21 Q. How long had he been gone?  
 22 A. He had been gone -- I don't know.  
 23 When did he leave Our Lady of Victory? 1984?  
 24 '85? He had been gone several years. He was not  
 25 working in a parish. He was retired.

1 Q. Did that make you more comfortable,  
 2 knowing that he wouldn't be in a parish?  
 3 A. For a number of reasons that have  
 4 nothing to do with the molestations. He was not  
 5 physically a well man. He was very nervous and  
 6 short-tempered. And I don't feel -- thinking  
 7 back on it -- that he was suited for another  
 8 parish.  
 9 Q. Was the oldest  
 10 boy?  
 11 A. He's the oldest boy I know.  
 12 I don't recall how many children there are in the  
 13 family. But I know I knew his brother  
 14 I know his brother Luke, and I know  
 15 Q. Do you have any idea about the age  
 16 difference between  
 17 A. Oh, boy. is the youngest child  
 18 in the family. Gosh, has to be -- I don't  
 19 know how many years older than It's more  
 20 than just a few years.  
 21 Okay. probably was several  
 22 years younger than and then a couple  
 23 of years younger than that. I don't know.  
 24 Perhaps six, seven years.  
 25 Q. So if we went back to maybe

1 he's ten years younger than as an estimate?  
 2 A. I could not accurately say. This is  
 3 sheer guesswork on the ages.  
 4 Q. Okay. Did you have any concerns,  
 5 when told you that Father Grammond  
 6 molested himself and his brother, that perhaps it  
 7 might be a brother that's still a child that was  
 8 abused by a priest? Did that consideration cross  
 9 your --  
 10 A. No. No.  
 11 Q. You didn't consider that?  
 12 A. I didn't become alarmed in any way,  
 13 because was so matter-of-fact about his  
 14 information.  
 15 Q. So this one didn't -- when you heard  
 16 this then -- that, in fact, somebody's reporting  
 17 that Father Grammond molested him -- you didn't  
 18 view that as a tacky thing to say or an  
 19 inappropriate thing to say?  
 20 A. No.  
 21 Q. Okay. Other than these four  
 22 encounters, with two rumors and two people  
 23 stating that Father Grammond screws around with  
 24 boys or molested and his brother,  
 25 did you ever hear, prior to today, anything about

1 Father Grammond in any inappropriate contact with  
 2 children?  
 3 A. I have read reports of allegations in  
 4 the newspapers. I have heard reports of  
 5 allegations on television.  
 6 Q. As you sit here today, do you believe  
 7 one way or another whether or not Father Grammond  
 8 may have sexually abused children?  
 9 A. That isn't for me to decide.  
 10 Q. So you don't have any impression one  
 11 way or another about whether it may have occurred?  
 12 A. I believe there is a strong  
 13 possibility that there have been some occasions  
 14 when a very -- what I now think -- sick man did.  
 15 But certainly, most of the information that I  
 16 have had since my conversation -- pardon me --  
 17 with has come from the media.  
 18 Q. After your conversation with do  
 19 you know whether you shared any of that  
 20 information with anyone, including your husband?  
 21 A. I didn't discuss it with my husband.  
 22 I discussed it with Father George Wolf when he  
 23 asked me the question.  
 24 Q. And that was sometime after the  
 25 conversation with

PD 0298

53

1 Q. And is his wife the woman he had the  
2 relationship with?

3 A. No.

4 Q. Do you know what kind of work he does  
5 in Jewell?

6 A. He's retired.

7 Q. Do you know what kind of work he did  
8 after he left the priesthood?

9 A. No, I don't.

10 Q. Have you stayed in contact with him?

11 A. I see him occasionally.

12 Q. Do you see him socially or just out  
13 shopping?

14 A. I see him at church.

15 Q. You see him at church. Does he still  
16 attend Our Lady of Victory?

17 A. He has been in ill health, and I  
18 don't know that he has regularly been attending.

19 Q. Over the years since he left, has Our  
20 Lady of Victory been his parish?

21 A. I don't know if he's a registered  
22 member, but that's where I have seen him. And I  
23 don't believe that Father Ilg knew Father  
24 Grammond. I recall them meeting one time, when  
25 Father Grammond came for a cup of coffee.

54

1 I think he was here visiting some  
2 friends at the parish hall, and Father Ilg came  
3 in and made some comment about, Oh, I understand  
4 you're supposed to be in Estacada.

5 Q. Okay. What was your relationship  
6 like with Father Ilg?

7 A. He was my supervisor. He was quite  
8 good to work with.

9 Q. Was he easier to get along with than  
10 Father Grammond?

11 A. No, not particularly.

12 Q. Was he less demanding?

13 A. He was much more specific and had a  
14 better understanding of the various areas of the  
15 parish that need to be attended to and what needs  
16 to happen.

17 Q. Who was your supervisor when you  
18 first heard the -- heard the first rumor about  
19 Father Grammond messing with boys? That would  
20 have been from

21 A. Father Grammond.

22 Q. And when you heard the second --

23 A. Father Grammond. And when  
24 made the comment he did in --

25 Q. That was also Father Grammond?

55

1 A. -- the Dairy Queen parking lot, yes,  
2 Father Grammond. When indicated  
3 this to me, Father Ilg was my supervisor.

4 MR. DULCICH: Mrs. Stacey, even  
5 though you've done an excellent job in  
6 anticipating Mr. Slader's questions --

7 MR. SLADER: I'm not complaining  
8 yet, Tom.

9 MR. DULCICH: -- you might not  
10 always do such a good job. So it's important  
11 that you let him finish his questions before you  
12 give your answer.

13 THE WITNESS: I'm sorry.

14 MR. DULCICH: I know you've got a  
15 full day of work today, but this is important, so  
16 take your time.

17 BY MR. SLADER:

18 Q. Did you ever tell Father Ilg about  
19 any of the rumors you had heard from Ms. or  
20 from the other party, or about what  
21 had told you?

22 A. No.

23 Q. Did you tell Father Ilg about what  
24 had told you?

25 A. No.

56

1 Q. Why not?

2 A. I've explained to you that, as  
3 Mr. was not alarmed, didn't  
4 present a picture of someone seeking or looking,  
5 I wasn't alarmed; and therefore, it went no  
6 farther than that.

7 Q. Do you have any other reason why you  
8 were not alarmed by hearing that a priest had  
9 molested a child or two children, other than the  
10 fact that seemed to be at peace  
11 with it? Anything else you can point to?

12 MR. DULCICH: Let me object to the  
13 form, because I don't think that's an accurate  
14 recitation of her testimony, but that's an  
15 objection as to form.

16 BY MR. SLADER:

17 Q. I don't mean to be putting words in  
18 your mouth. I just want to know, as you sit here  
19 today -- You just told me that the reason you  
20 weren't alarmed is because seemed  
21 to be okay with it. Is there any other reason  
22 you weren't alarmed?

23 A. I would not say he was okay or was at  
24 peace.

25 Q. Okay. What words would you --



57

1 A. I have no way of judging that. It  
 2 just -- he was not alarmed. He was not screaming  
 3 out for help or anything. It was a very  
 4 matter-of-fact statement.

5 Q. Other than the fact that it seemed  
 6 that it was a very matter-of-fact statement to  
 7 you, were there any other reasons why you were  
 8 not alarmed by hearing that the Roman Catholic  
 9 priest in your parish had molested two boys?

10 MR. DULCICH: Let me object to the  
 11 form; asked and answered, mischaracterizes the  
 12 testimony. Those are my objections -- and it is  
 13 argumentative.

14 THE WITNESS: An adult person who  
 15 seemed to be in complete control of his life and  
 16 what he was telling me -- no. I mean, I  
 17 wasn't -- I wasn't alarmed because wasn't  
 18 alarmed.

19 BY MR. SLADER:

20 Q. So other than --

21 A. He was an adult person telling me  
 22 about something that occurred to him in his  
 23 younger life.

24 Q. You did not believe that this was  
 25 information that you should tell your supervisor?

58

1 MR. DULCICH: Objection;  
 2 argumentative.

3 THE WITNESS: The woman in our  
 4 parish who was a caseworker for CSD indicated --

5 MR. DULCICH: No. Stop. Specific  
 6 question: Could you read it back?  
 7 (Requested record read.)

8 MR. DULCICH: Answer that one.  
 9 That's what he wants.

10 THE WITNESS: I didn't feel a need  
 11 to tell my supervisor.

12 BY MR. SLADER:

13 Q. You were about to tell me something  
 14 that the CSD worker had told you that you  
 15 thought was --

16 A. She stressed that I was obligated  
 17 under law to report anything that I knew of an  
 18 allegation of abuse from a minor child with whom  
 19 I was currently working in the religious  
 20 education program.

21 Q. When you spoke to -- and sort of  
 22 jumping back in time, Mrs. Stacey, you spoke to  
 23 Mrs. -- I forgot her first name.

24 A. Miss

25 Q. Miss Was that a

59

1 fairly -- was she a close friend of yours at all?  
 2 I didn't gather that she was from your testimony.

3 A. At the particular time, she was  
 4 merely an acquaintance.

5 Q. So when she told you something about  
 6 Father Grammond messing --

7 A. Uh-huh.

8 Q. -- with teenage boys, that wasn't  
 9 said to you in confidence or anything, was it?

10 A. No.

11 Q. It was said almost as a casual  
 12 statement among acquaintances?

13 A. A casual statement in a gathering.  
 14 It was not a one-on-one meeting or anything.

15 Q. So there were other people present?  
 16 Were they people from the parish?

17 A. No.

18 Q. Do you remember the social group, the  
 19 setting that you were in when you had this  
 20 conversation with Ms.

21 A. I moved to Seaside in September.  
 22 This would have been at the high school faculty  
 23 Christmas party or Christmas dinner.

24 Q. That's a public school?

25 A. Yes. It's the first time that I ever

60

1 really talked with her in any way, exchanged any  
 2 words with her.

3 Q. At that time, were you working for  
 4 the parish or the Archdiocese in any --

5 A. No.

6 Q. -- capacity?

7 A. No.

8 Q. Were you a member of the parish?

9 A. Yes.

10 Q. Were you volunteering in any capacity  
 11 at that time?

12 A. I served mashed potatoes at a  
 13 Thanksgiving dinner.

14 Q. Did you have any regular volunteer  
 15 position --

16 A. No.

17 Q. -- like Sunday school teacher or  
 18 anything like that?

19 A. No.

20 MR. DULCICH: Mrs. Stacey, please  
 21 let Mr. Slader finish his questions. Our court  
 22 reporter is very talented, but she has a  
 23 difficult time transcribing what two people are  
 24 saying at once.

25 THE WITNESS: All right.

PD 0300

61

1 BY MR. SLADER:

2 Q. When you had heard the second

3 what we have characterized as rumor about Father

4 Grammond fooling around with teenage boys, did

5 you have a position with the parish or the

6 Archdiocese at that time?

7 A. No, sir.

8 Q. And was that also in a social-type

9 setting?

10 A. I recollect that it was. I do not

11 recall the circumstance.

12 Q. Do you recall whether it was a

13 church-related social setting, as opposed to some

14 part of your secular life?

15 A. No.

16 Q. You don't remember one way or the

17 other?

18 A. I do not recall.

19 Q. Do you recall whether the information

20 was being relayed by a member of the parish --

21 A. No, I do not.

22 Q. -- or just -- and do you remember

23 whether it was being relayed by a male person or

24 a female person?

25 A. No.

63

1 Q. Okay. Tell me a little bit about the

2 circumstances that related to your conversion,

3 why you converted.

4 A. I attended Catholic kindergarden. I

5 was very in awe of the celebration of mass, as a

6 child. Later, in high school, I attended some of

7 the CYO activities.

8 I was well acquainted and had many

9 friends who were Catholic. I spent time with

10 them, with their families. I was just very

11 drawn to the Catholic faith, primarily because of

12 the Eucharist.

13 Q. Is your husband a member of the

14 Catholic faith?

15 A. Yes.

16 Q. And was he raised as Catholic, or did

17 he also convert?

18 A. He's a cradle Catholic.

19 Q. A cradle Catholic. And when were you

20 two married?

21 A. We were married in 1968.

22 Q. About the same year that you decided

23 to convert?

24 A. I was baptized in May and then we

25 were married in June.

62

1 Q. So you really have a big blank, as

2 far as that?

3 A. I do.

4 Q. Okay. I'd like to ask you some

5 questions about your family. You mentioned you

6 had a daughter, and I think you may have

7 mentioned or I read in these exhibits that you

8 have some boys, also.

9 A. I don't recall that we discussed my

10 having a daughter. I have a son and a daughter.

11 Q. Okay. How old -- what's the date of

12 birth of your daughter?

13 A.

14 Q. And your son?

15 A.

16 Q. And what's your son's name?

17 A.

18 Q. You mentioned you were a -- that you

19 converted to the Catholic faith in about 1968.

20 Is that correct?

21 A. Yes.

22 Q. Was that part of -- did you convert,

23 in part, because you were marrying a member of

24 the faith?

25 A. No.

64

1 Q. And I take it both of your children

2 were baptized in the Church shortly after birth?

3 A. Yes.

4 Q. Now, did your son, ever go

5 on any trips with Father Grammond?

6 A. I believe, if you look at the second

7 page of Exhibit No. 1, you will see that he went

8 on some fishing activities and skiing activities.

9 But at the time he went on trips,

10 there was a Coast Guard fellow by the name of Tom

11 Gerodavac (phonetic), who was involved with the

12 Altar servers. And he, to my recollection, was

13 always present for any of these activities.

14 Q. Do you know where Mr. Gerodavac is

15 today?

16 A. I believe he lives in

17 MR. STREVER: Off the record.

18 (Discussion off the record.)

19 BY MR. SLADER:

20 Q. Mrs. Stacey, where did your son,

21 go on trips with Father Grammond?

22 A. They, on occasion, did a day trip to

23 Timberline for skiing. And then the fishing trip

24 would have been to Ollale Lake.

25 Q. Were those -- the trip to Ollale Lake

PD 0301

65

1 must have been an overnighiter. Right?

2 A. Uh-huh.

3 Q. How long were they gone?

4 A. I don't recall. It wasn't more than

5 a couple of days or just one night.

6 Q. And am I correct that on the trip to

7 Ollale Lake -- was there more than one trip to

8 Ollale Lake?

9 A. went several times, but I

10 couldn't say how many.

11 Q. About how old was he when he went?

12 What age period are we talking about?

13 A. Oh, probably nine, ten.

14 Q. Was he an altar server at the time?

15 A. Yes.

16 Q. Were these trips just for altar

17 boys?

18 A. Yes.

19 Q. And was that a tradition that Father

20 Grammond had, that it was part of the -- one of

21 the benefits of altar boy service that they

22 could go on these camping trips or ski trips with

23 him?

24 A. Yes.

25 Q. And was it your -- did you ever talk

66

1 to Father Grammond about why he would take --

2 wanted to take your son on these trips with the

3 other altar boys?

4 A. No. It was -- whoever was an altar

5 boy that was regularly serving was eligible to

6 go. There was no picking and choosing. It was

7 however many of them wanted to or could go.

8 Q. Was it your understanding that it was

9 part and parcel of their altar boy service that

10 they could get to go on these trips?

11 MR. DULCICH: Object to the form

12 of the question; that's argumentative.

13 THE WITNESS: I assume. No one

14 else went except Tom, Father Grammond, and those

15 actively serving as altar boys.

16 BY MR. SLADER:

17 Q. Did you believe it was -- it helped

18 the cohesion, the cohesiveness of the altar boy

19 group, to go on these trips?

20 MR. DULCICH: Same objection.

21 THE WITNESS: I believe that I

22 feel it was a reward for having served the

23 Church.

24 BY MR. SLADER:

25 Q. Did you have any qualms about letting

67

1 your son, go on these trips, after you

2 had heard rumors about Father Grammond and had

3 that one incident where you talked to Frank

4 McIlveney?

5 A. No, I had no reservations.

6 Q. Did you -- when you -- your son would

7 go on these trips with Father Grammond, would you

8 think about -- reflect back on what you had heard

9 about Father Grammond?

10 A. No.

11 Q. Did you just put it out of your mind?

12 A. I never observed anything that would

13 lead me to believe that there was anything

14 inappropriate, incorrect.

15 Q. I guess my question was: At the time

16 your son, was going on these trips with

17 Father Grammond, did you reflect back on the

18 information you had heard about Father Grammond

19 messing around with boys?

20 A. No. If I may --

21 Q. Uh-huh.

22 A. -- it was always a group of five,

23 six, seven. My son never went on a trip with

24 Father Grammond. It was a group of boys.

25 Q. Do you remember the names of any of

68

1 the boys that served with that also went

2 on these trips?

3 A.

4 (phonetic),

5 Q. Were those good friends of

6 A. They were people that had been over

7 to our house or that he had -- he had been to

8 their house.

9 Q. Okay. Did he ever tell you anything

10 about those trips that you have since reflected

11 back on and thought was of concern to you, or

12 should have been?

13 A. No, nothing.

14 Q. Have you discussed what you have

15 subsequently heard about Father Grammond abusing

16 children with your son, , since the

17 allegations became public?

18 A. I have not.

19 Q. Was it your understanding that during

20 these trips that Father Grammond would say a mass

21 with the boys?

22 A. No.

23 Q. No? Were there any -- do you know of

24 there being any religious services or instruction

25 during the trips?

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69

1 A. No.

2 Q. During the time that was an

3 altar boy -- Let me start from somewhere else

4 with that question.

5 You mentioned went on

6 these trips starting around age nine. Is that

7 about right?

8 A. I don't recall that he was younger

9 than that.

10 Q. Okay. So about nine to eleven? Does

11 that sound about right?

12 A. (Witness nodded.)

13 Q. And was that -- did that coincide

14 with the period when he was an altar boy?

15 A. Uh-huh.

16 Q. "Yes"? That's a "yes"?

17 A. Yes.

18 Q. And so he started being an altar boy

19 around age nine and stopped around age eleven?

20 A. No. He started being an altar boy

21 after his first communion. He would have been

22 like eight, maybe.

23 Q. Okay. And how long -- for how many

24 years did he serve? To what age did he serve?

25 A. Until he was twelve.

71

1 an altar boy, what was he taught about the role

2 of a priest? Was he taught to revere the priest?

3 A. Respect.

4 Q. Respect?

5 A. Respect the office of the priesthood.

6 Q. Is that part of the curriculum in

7 religious education for children, during the time

8 that you've been CRE, to teach respect for the

9 priesthood?

10 A. To teach respect for adults, those in

11 authority, including police officers, teachers,

12 ministers.

13 Q. And the priest?

14 A. Not specifically stated. The

15 priesthood.

16 Q. In the curriculum that you were

17 responsible for, is there any particular

18 instruction about the role of the priesthood in

19 Catholic theology? And I'm talking about the

20 curriculum for children.

21 A. The Sacrament of Holy Orders is one

22 of the Seven Sacraments of the Roman Catholic

23 Church. The Seven Sacraments are discussed at

24 most every level of religious education.

25 Q. How do you convey that sacrament of

70

1 Q. During that time, you were a --

2 involved in teaching catechism. Is that correct?

3 A. I was involved in coordinating the

4 religious ed program.

5 Q. Okay. So during the time that he was

6 an altar boy, did you have the title of -- we

7 would call it now CRE?

8 A. Yes.

9 Q. Did that title exist then?

10 A. Yeah.

11 Q. Okay.

12 A. As far as I recall.

13 Q. At some point these things change. I

14 understand that.

15 As CRE, do you also teach a class or

16 are you just, in effect, the principal?

17 A. In effect, the principal. Also

18 substitute, occasionally.

19 Q. Okay. So you fill in when --

20 A. Yes.

21 Q. -- when a teacher doesn't show up.

22 Are most of the teachers or all of the teachers

23 volunteer parish members?

24 A. Yes. Yes.

25 Q. And during the time that was

72

1 religious orders to, let's say, the early grade

2 school level, the early grades?

3 A. There is mention of the Seven

4 Sacraments in the second grade materials,

5 specifically that about preparation for

6 sacraments. I discuss it with all of the

7 children, K through six, in a group, because we

8 have a rap song about the Seven Sacraments. And

9 Holy Orders --

10 MR. SLADER: They didn't do that

11 when you were in second grade, Tom.

12 THE WITNESS: -- Holy Orders is

13 one of the Sacraments of Vocation. Another would

14 be the Sacrament of Matrimony. And it's put to

15 the children in that manner.

16 BY MR. SLADER:

17 Q. What are the children taught that a

18 sacrament is?

19 A. A sacrament is a gift from God that

20 imparts grace.

21 Q. What is the usual age of first

22 communion?

23 A. The usual age is second grade.

24 Q. So approximately seven, eight years

25 old?

73

1 A. Uh-huh.

2 Q. And prior to First Communion, do you

3 teach the children about the sacrament of

4 confession?

5 A. The major emphasis on the specifics

6 of the Sacrament of Reconciliation, as it is

7 properly called, would be in the second grade;

8 however, the other children are aware of the

9 sacrament.

10 Q. And what are the children taught is

11 the significance of the Sacrament of

12 Reconciliation?

13 A. The Sacrament of Reconciliation is

14 for the purpose of mending your relationship with

15 Christ and with your brothers and sisters.

16 Q. And what are the children taught is

17 the role of the priest in the Sacrament of

18 Reconciliation?

19 A. The priest has the role of confessor.

20 You express to him sins you have committed. You

21 seek his absolution. The priest is taking the

22 role of Christ.

23 MR. SLADER: Let me take a minute

24 here to go through my list and see if we can

25 condense this down.

75

1 he kept that pretty much to himself?

2 A. No. He had a couple of different

3 people who assisted him. But during his tenure,

4 it was the norm for the parish priest to train

5 the altar boys.

6 Q. And was it part of that norm to also

7 keep them motivated and keep them reliable and

8 keep them cohesive as a group?

9 MR. DULCICH: Objection;

10 argumentative and compound.

11 THE WITNESS: Being an altar boy

12 is not like being a member of a Cub Scout den.

13 It isn't a cohesive group. The only time there

14 is a group gathering would be for training, to do

15 the trip, or something. Other than that, it's

16 two or three people serving per mass.

17 BY MR. SLADER:

18 Q. Do you remember when you first heard

19 about lawsuit against Father

20 Grammond?

21 A. The first thing I ever saw in the

22 press or heard on television was the utilization

23 of initials..

24 Q. So you didn't know who it was?

25 A. J.E.

74

1 BY MR. SLADER:

2 Q. Did any of the other priests that you

3 worked for take the altar boys on trips?

4 A. Father Ilg, on several occasions, did

5 ski trips.

6 Q. Were there other -- in addition to

7 trips, were there any sort of motivational

8 activities that the priests and the altar boys

9 would, you know, participate in?

10 A. I don't recall specifically trips. I

11 know they went bowling. They would have ice

12 cream after stations of the cross.

13 Q. As far as you were able to see it,

14 was that part of a priest's job, to reward and

15 motivate the altar boys?

16 MR. DULCICH: I'll object to the

17 form; that's argumentative.

18 THE WITNESS: Every clergy person

19 has a different style in recruiting, rewarding,

20 dealing with, training, et cetera. After Father

21 Grammond, the laity was much more involved with

22 the altar servers and their training and their

23 rewards, et cetera.

24 BY MR. SLADER:

25 Q. But during Father Grammond's tenure,

76

1 Q. Or did you know who it was?

2 A. Not immediately.

3 Q. What was your reaction when you heard

4 that someone named J.E. had sued the Archdiocese,

5 claiming that Father Grammond had sexually

6 molested him?

7 MR. DULCICH: Objection; vague,

8 argumentative.

9 THE WITNESS: I first learned of

10 the lawsuit when a reporter for The Oregonian

11 called the parish office, wanting an address and

12 phone number for Father Grammond, which I could

13 not provide. And then I asked: This is in

14 regard to what?

15 And then when she indicated to me

16 that there was a lawsuit, or going to be a

17 lawsuit, I referred her to the Archdiocese.

18 BY MR. SLADER:

19 Q. What was your personal reaction?

20 MR. DULCICH: Same objection.

21 THE WITNESS: I really couldn't

22 speak to that.

23 BY MR. SLADER:

24 Q. Well, did she tell you that the

25 lawsuit involved allegations of child abuse?

77

1 A. No.

2 Q. When did you first -- or how did you

3 first find out that there were lawsuits that

4 alleged that Father Grammond had sexually

5 molested children?

6 A. When I saw video clips of Our Lady of

7 Victory Church on television.

8 Q. What was your reaction to that?

9 A. I was very saddened.

10 Q. Did you disbelieve the allegations?

11 MR. DULCICH: Objection; vague,

12 argumentative.

13 THE WITNESS: Saddened. That's

14 all I can say.

15 BY MR. SLADER:

16 Q. What were you sad about?

17 A. Thinking of the victims, thinking of

18 the person who may have done these things to

19 children.

20 Q. Prior to that time, had you received

21 any training or instruction or guidance from the

22 parish or the Archdiocese regarding your duty to

23 report child abuse or how to respond to child

24 abuse allegations, in any way?

25 A. No. My instruction had come from the

78

1 CSD caseworker.

2 Q. Did you know of any written policies

3 or procedures in the Archdiocese prior to that

4 time, prior to the time you saw the news reports,

5 regarding how to deal with allegations of child

6 abuse?

7 A. No.

8 Q. Have you had such training since then?

9 A. I have.

10 Q. Okay. Would you describe that for

11 us, please.

12 A. We had a very long session a year ago

13 September at our religious ed DRE/CRE fall

14 in-service. It was introduced by the Director of

15 Religious Ed for the Archdiocese and by a

16 representative from the business office. And

17 there were several other people there. I cannot

18 tell you who they are.

19 And we were told what procedure to

20 follow. We were shown a video on the reporting

21 process and, in turn, instructed to give the

22 printed material and show the video to anyone who

23 was involved with children in any parish.

24 Q. Had you had in-service training

25 beforehand? Is that a regular annual --

79

1 A. It's an annual event.

2 Q. This is the first time --

3 A. There had been materials sent out to

4 all of the parishes to be distributed to anyone

5 involved with children in parishes.

6 And no one may work with children --

7 This goes back to the year prior to the

8 in-service that I'm referring to. Anyone who

9 works with children in any capacity must have a

10 background check.

11 Q. Prior to the lawsuit, had the subject

12 of child abuse been a topic at any previous

13 in-service training that you had been to?

14 A. I don't recall it, no.

15 Q. The parish priest assigned to Our

16 Lady of Victory is also known as the

17 administrator, is that correct, administrator of

18 the parish? Or you're not familiar with that

19 term?

20 A. I'm not -- the parish administrator,

21 I thought, was someone other than the priest.

22 Q. I'll ask this a different way, then.

23 Is the parish priest your supervisor?

24 A. Yes.

25 Q. And during the whole time that you

80

1 have served in any capacity in religious

2 education, that's been the case?

3 A. Yes.

4 Q. And you have no other direct

5 supervisor, other than the parish priest?

6 A. No.

7 MR. SLADER: Do you have anything

8 else?

9 MR. STREVER: No.

10 MR. SLADER: Ms. Stacey, that's

11 all the questions I have for you today. Thank

12 you very much.

13 MR. STREVER: Thank you.

14 MR. DULCICH: I have no questions.

15 The witness would like to read and sign any

16 transcript that is prepared to her deposition.

17 And you can get that to me, and I will get it to

18 her for her review.

19 (The deposition was concluded

20 at 12:00 p.m.)

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PD 0305

1 STATE OF OREGON )

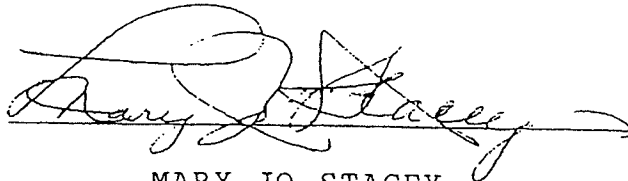
2 ) ss.

3 County of Clatsop)

4

5 I, MARY JO STACEY, do hereby certify  
6 that I have read the foregoing transcript of my  
7 deposition taken Monday, the 24th day of November  
8 2003, consisting of pages 1 to 80, inclusive,  
9 and that the said transcript is true and correct  
10 except for such corrections as I may have noted  
11 on page 81.

12



MARY JO STACEY

13

14

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16 Subscribed and Sworn to before  
17 me this 16<sup>th</sup> day of December  
18 2003.

19

20 Lisa Kay McAllister

21 Notary Public, State of Oregon

22 My Commission expires: 03-24-06

23

24



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