

STATE OF ILLINOIS )  
 ) SS:  
 COUNTY OF C O O K )  
 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
 COUNTY DEPARTMENT - LAW DIVISION  
 JOHN DOE #116, )  
 Plaintiff, )  
 vs. ) No. 07 L 8781  
 THE CHICAGO PROVINCE OF THE )  
 SOCIETY OF JESUS, )  
 Defendant. )  
 The discovery deposition of FATHER ROBERT WILD,  
 taken in the above-entitled cause, before  
 Elizabeth L. Vela, a notary public of Cook County,  
 Illinois, on the 12th day of August, 2009 at the  
 time of 10:05 a.m. at 70 West Madison Street,  
 Chicago, Illinois, pursuant to Notice.

(Proceedings concluded at 2:32 p.m.)

Reported by: Elizabeth L. Vela, CSR  
 License No.: 084-003650

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1 APPEARANCES:  
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 21 Representing the Defendant.  
 22  
 23  
 24

1 (Witness sworn.)  
 2 MR. ARGAY: Sir, could you please state your  
 3 name and spell your full name for the record?  
 4 THE WITNESS: Robert, first name, Anthony or A  
 5 is the middle name, Wild, W-i-l-d.  
 6 MR. ARGAY: And how would you prefer that I  
 7 address you today? Would Father be okay?  
 8 THE WITNESS: Yeah, that would be fine.  
 9 MR. ARGAY: Let the record reflect that this is  
 10 the discovery deposition of Father Robert Wild.  
 11 It's taken pursuant to agreement, in accordance to  
 12 the Illinois Code of Civil Procedure, the Illinois  
 13 Supreme Court Rules, and all local Cook County  
 14 applicable rules.  
 15 Father, my name is David Argay. I'm one  
 16 of the plaintiffs' attorneys. I represent  
 17 John Doe 116, John Doe 117, 118, 119, 129, and 130.  
 18 There's a number of plaintiffs in this matter.  
 19 This is a lawsuit involving allegations of  
 20 sexual abuse against Father McGuire. I'm sure you  
 21 were aware of that before the deposition today.  
 22 Have you ever given a deposition before?  
 23 THE WITNESS: No.  
 24 MR. ARGAY: Then, I'm just -- I'd like to go

1 has to be appointed by the General. So there's a  
2 discussion required with the consultors, and then,  
3 a name -- a recommendation is made and the General  
4 can either say yes or no.

5 Q. Does that hold true for the acting soc --  
6 is it socii?

7 A. I don't remember and I think the answer is  
8 no, but I don't remember for certain.

9 Q. Do you recall having a role in personally  
10 selecting either Father Schaeffer or Father Baum as  
11 acting socius during those --

12 A. I did. I would have talked to the  
13 consultors and then acted.

14 Q. What was the role of a socius during your  
15 term as Provincial?

16 A. Well, the socius is supposed to be  
17 prepared if anything happens to the provincial, has  
18 the knowledge and the engagement with the business  
19 of the province to be able to take over.

20 And so the socius -- the word means  
21 companion, but it's companion in two senses, a  
22 support for the provincial and generally does the  
23 role of a COO, handles a lot of the day-to-day  
24 business that comes through the office, because the

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1 office.

2 Q. In terms of the province's files, while  
3 we're on that topic, how are the files in regards  
4 to the Jesuits -- the personnel files, how are they  
5 maintained?

6 Is there more than one file or are there  
7 multiple --

8 MR. HUEBSCH: Again, we're talking during his  
9 term as Provincial?

10 BY MR. ARGAY:

11 Q. During your term.

12 MR. HUEBSCH: Thank you.

13 THE WITNESS: During my term, there was an  
14 alphabetical file. Each individual had a separate  
15 file, but there was also -- that was the general  
16 personnel files.

17 There was also -- and I was introduced to  
18 this by my predecessor, what I always thought of as  
19 the locked file, a confidential file to keep only  
20 in the hands of the provincial and no one else that  
21 contained more sensitive materials about a  
22 relatively small number of individuals.

23 But this file was intended to be handed  
24 from provincial to provincial and was done, at

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1 provincial of necessity given the job travels --  
2 must travel, meet -- must connect with the men.

3 But the other thing is, the socius is the  
4 person with whom the provincial does and should  
5 discuss the most complicated of issues, so that the  
6 socius can offer advice and has -- if need be can  
7 take over.

8 Q. So if there was a complicated issue that  
9 faced the province, you would as Provincial have  
10 included your socius in those discussions or  
11 concerns?

12 A. Well, I tended to do that more. And  
13 some -- it varied from provincial. There is  
14 discretion given the provincial, because there's  
15 obviously issues of a certain level of confidence  
16 that certain issues might not be discussed with the  
17 socius.

18 My tendency was to do more of that, but  
19 nonetheless, there is discretion.

20 Q. Was the socius also responsible for  
21 maintaining the province files?

22 A. That's correct. Yeah. Generally ran  
23 operations and would, in fact -- was always, except  
24 on the relatively rare occasions present in the

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1 least during -- it was handed to me and I handed it  
2 on to my successor.

3 BY MR. ARGAY:

4 Q. Would you have permitted your socius to  
5 have access --

6 A. No.

7 Q. -- to your file? And those are files that  
8 would only be viewed by your eyes and your eyes  
9 only?

10 A. That's right. If the socius became  
11 provincial and needed it, then the socius would  
12 have access to that.

13 Q. The types of matters that would be  
14 contained within the confidential file, what would  
15 those include?

16 A. Well, it varied. I mean, there was -- but  
17 it would be stuff that would be deemed particularly  
18 sensitive, accusations or where we were aware that  
19 an individual -- in some cases, the individual had  
20 talked through stuff with the provincial that was  
21 of a highly sensitive nature.

22 And this is the sort of material that  
23 would go in there, assuming that I or whoever was  
24 provincial would put it there. And my bias, again,

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1 California when you were installed as Provincial?  
2 **A. Pardon?**  
3 Q. Were you aware that Father McGuire was, in  
4 fact, in California when you were installed as  
5 Provincial?  
6 **A. At the moment when I was installed, I**  
7 **wasn't -- there were lots of things I wasn't aware**  
8 **of. I'm not sure what I was aware of.**  
9 (Whereupon, Exhibit W1 was  
10 marked for identification.)  
11 BY MR. ARGAY:  
12 Q. Father, this -- I've handed you Deposition  
13 Exhibit No. 1.  
14 Do you recognize this document? This is a  
15 July 5th, 1984 letter between your predecessor,  
16 Father Klein, and Monsignor Rodin?  
17 **A. No.**  
18 Q. Okay. In this letter, it mentions that  
19 Father Klein was requesting faculties from the  
20 Los Angeles Diocese in order to permit  
21 Father McGuire to act as a consultant for the  
22 Durance Corporation and specifically Santa Fe  
23 Communications. Apparently, that's a TV channel in  
24 California. Does this refresh your recollection --

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1 **A. No.**  
2 Q. -- as to whether or not --  
3 MR. ARGAY: Let's skip to No. 704.  
4 (Whereupon, Exhibit W2 was  
5 marked for identification.)  
6 BY MR. ARGAY:  
7 Q. Father, showing you Deposition Exhibit  
8 No. 2, this is a letter from the Archdiocese of  
9 Los Angeles to Father Klein, wherein  
10 Father McGuire's faculties in California are  
11 permanently terminated as of January 1st, 1985.  
12 Does this document refresh your  
13 recollection as to whether or not Father McGuire  
14 was in Los Angeles or had his faculties permanently  
15 removed?  
16 **A. No. This is news to me.**  
17 Q. So this was not a matter that was  
18 discussed with you when you were installed as  
19 Provincial?  
20 **A. No, because -- and I suspect at the time,**  
21 **there was -- he was simply assigned out there.**  
22 Q. When you were installed as Provincial, at  
23 what point in time did you first review personnel  
24 files that were in the confidential file?

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1 **A. It probably was in the first month or two.**  
2 Q. Did you also review -- if there was a file  
3 pertaining to a Jesuit in the confidential file,  
4 would you also then review the corresponding  
5 personnel file, the nonconfidential file?  
6 **A. I would probably, depending on the matter**  
7 **at stake. Ordinarily, I did not review those**  
8 **files, because they were -- but if the situation**  
9 **called for it.**  
10 Q. Do you recall reviewing Father McGuire's  
11 confidential file during that first month when you  
12 were Provincial?  
13 **A. No.**  
14 Q. And this matter --  
15 **A. Whether -- there was no confidential file**  
16 **on Father McGuire.**  
17 Q. So when you were installed --  
18 **A. At least the material -- to the best of my**  
19 **knowledge, the first material that went into that**  
20 **confidential file was the material that I wrote.**  
21 Q. So to the best of your understanding, the  
22 confidential file pertaining to Donald McGuire was  
23 created during your term as Provincial?  
24 **A. That's correct.**

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1 Q. And there were no prior documents  
2 pertaining to Father McGuire that was labeled a  
3 confidential file?  
4 **A. That's correct.**  
5 Q. And the documents that I showed you,  
6 Deposition Exhibits No. 1 and 2, would those be  
7 documents that would be contained within the  
8 personnel file?  
9 **A. Well, all I can say is that they weren't**  
10 **in the confidential file.**  
11 Q. Fair enough. Do you remember  
12 approximately when or why you created a file for  
13 Father McGuire?  
14 **A. Yes. In 1991 after an accusation had**  
15 **been -- had come from a brother in California at a**  
16 **California retreat house concerned with a young man**  
17 **named**  
18 MR. BROOKS: We're referring to potential  
19 victims of Father McGuire's abuse by their first  
20 name and their last initial in order to protect  
21 their privacy, Father, just so you don't -- and the  
22 court reporter knows to modify that as we go along  
23 so --  
24 BY MR. ARGAY:

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11 (Pages 41 to 44)

1 the file?  
2 **A. A memo to the file to basically record the**  
3 **fact that this issue had been raised. You know,**  
4 **that was the whole purpose of it.**  
5 Q. Is this the type of document that would be  
6 placed into a confidential file or would this be  
7 placed into the ordinary personnel file?  
8 **A. You know, this particular one probably**  
9 **could go either way. I chose to put it in the**  
10 **confidential file.**  
11 Q. So at this point in time, by  
12 October 30th, 1990, there had been in existence or  
13 created a confidential file for Donald McGuire?  
14 **A. To the best of my knowledge.**  
15 Q. Do you recall when you created the file --  
16 the confidential file?  
17 **A. Well, the date is October 30th, 1990. Do**  
18 **I remember exactly whether that was the moment or**  
19 **whether there was some earlier piece, I don't.**  
20 **(Whereupon, Exhibit W21 was**  
21 **marked for identification.)**  
22 BY MR. ARGAY:  
23 Q. Father, I'm showing you Exhibit No. 21,  
24 which is a November 8th, 1990 letter from

1 whenever the file was created that it would then  
2 henceforth be handled and relied on the judgment of  
3 prior provincials or provincials who would insert  
4 or not. So I did not.  
5 Q. Also, in regards to the Bellarmine Fund  
6 issue that we discussed, as well as the Tridentine  
7 Rite matter, which -- both of which included the  
8 superior in the loop of communication, were those  
9 matters also the types of matters that would be  
10 requiring the involvement of your socius?  
11 **A. My socius probably would have seen and saw**  
12 **a variety of mail that I read but not necessarily.**  
13 **This particular matter, probably.**  
14 Q. And I'm just trying to get a feel for the  
15 level of involvement of Father Baum during the 1985  
16 to --  
17 **A. This would be Father Schaeffer.**  
18 Q. -- 1990 time frame.  
19 **A. And I corrected that to Father Schaeffer,**  
20 **because we're still in his -- that first half of**  
21 **1990 and '91.**  
22 Q. The fourth paragraph of this letter states  
23 from that it was my independent judgment  
24 after seeing him in action that he, referring to

1 to yourself regarding this issue  
2 that was referenced in Exhibit No. 20. Do you  
3 recall receiving this letter?  
4 **A. Let me read it first. I did, sure.**  
5 Q. The letter is marked confidential. Would  
6 this letter also be the type of letter that you  
7 would have placed in Father McGuire's confidential  
8 file?  
9 **A. I'm not sure. I -- it could go either**  
10 **way.**  
11 **It's a follow-up on the previous -- it**  
12 **really is saying certain things rather strongly.**  
13 **They do recognize they need to address the issues**  
14 **and -- but of course, he is honest enough to say**  
15 **there's mixed viewpoints in this -- among this**  
16 **rather conservative group.**  
17 **And then, he offers his own views. So**  
18 **I -- I'm not sure that I did anything about this.**  
19 Q. In regards to either creating or  
20 supplementing the confidential file, did you go  
21 back and review Father McGuire's personnel file to  
22 see if there were other matters that ought to be  
23 included in the confidential file?  
24 **A. No, I did not. I presumed that whoever --**

1 Donald McGuire, was divisive, manipulative, and a  
2 bit of a megalomaniac. I frankly had concern about  
3 his mental stability.  
4 Was this the first time you were hearing  
5 these sorts of comments about Donald McGuire or did  
6 this reaffirm --  
7 **A. Yeah.**  
8 Q. Let me finish the question.  
9 MR. HUEBSCH: Wait. He hadn't finished his  
10 question yet. Finish the question. Go ahead.  
11 BY MR. ARGAY:  
12 Q. Is this the first time that you were  
13 hearing these sorts of comments about  
14 Donald McGuire or is this something that reaffirmed  
15 sort of rumors that you had heard about McGuire?  
16 **A. This was -- I had not heard this sort of**  
17 **judgment about his mental stability.**  
18 **I didn't, given the report of**  
19 **Father Wisnovsky, take it all that seriously,**  
20 **because I think we had a very conservative group**  
21 **battling and a thing not that uncommon.**  
22 **So it may have said as much about**  
23 **as about -- it wasn't consistent with my**  
24 **experience of Don McGuire. So that's what I would**

1 what-have-you, whether or not he knew there was  
2 evidence that a confidential file existed.  
3 So that assumes a fact not in evidence  
4 with this witness. You can refine it to indicate  
5 '85 or '91.  
6 MR. ARGAY: I'm just going to let the question  
7 stand.  
8 MR. HUEBSCH: Don't answer it.  
9 MR. ARGAY: You're instructing him not to  
10 answer it on the basis of vagueness?  
11 MR. HUEBSCH: Absolutely. You're asking him to  
12 guess at something that didn't exist. How does he  
13 know? Ask him if existed. If he knows, he can  
14 answer the question. Lay the foundation.  
15 MR. TOOMEY: Also, we are missing the second  
16 page of this.  
17 MR. BROOKS: Perhaps you guys should go through  
18 your files and find it, since it's your document.  
19 MR. TOOMEY: Well, I mean --  
20 MR. BROOKS: We've already found enough of the  
21 documents for you guys. It's time to find your  
22 own.  
23 BY MR. ARGAY:  
24 Q. Father, this document was produced to us

1 Q. Do you understand the question?  
2 MR. HUEBSCH: Go ahead and answer if you know  
3 through some source.  
4 THE WITNESS: Yeah. And the answer is, I don't  
5 know anything of that sort.  
6 BY MR. ARGAY:  
7 Q. The document exists, however?  
8 **A. I see a document before my face. It**  
9 **exists. But where and whether it was even in the**  
10 **right -- in the building --**  
11 Q. Did you ever ask Father McGuire -- or  
12 strike that.  
13 After the . . . issue arose, did you  
14 either personally or ask your socius to review the  
15 personnel file?  
16 **A. My presumption was that the relative --**  
17 **the relevant material would be, if existing, in the**  
18 **locked files. Beyond that, I cannot remember.**  
19 Q. So you would only have instructed the  
20 socius to review the locked file?  
21 **A. No. I would have reviewed the locked**  
22 **file.**  
23 Q. Got you. Did you instruct your socius to  
24 review the personnel file?

1 in discovery in this matter from the Jesuits. It  
2 was within the possession of the Jesuits when it  
3 was produced to us. And I can represent that to  
4 you.  
5 Does it surprise you that there -- that  
6 this document would not be contained in some  
7 separate file pertaining to Father McGuire?  
8 **A. Yes. I would say yes to that, that the**  
9 **whole purpose of that file is to -- the files are**  
10 **enormous and there was -- so anyway --**  
11 Q. You were not aware of this letter?  
12 **A. I was not aware of this.**  
13 Q. Had you been aware of this letter, you  
14 would have placed it in the confidential file, is  
15 that fair to say?  
16 **A. Oh. Correct.**  
17 Q. And while you were not aware of the  
18 contents of this letter, others at the province  
19 were aware of it?  
20 MR. HUEBSCH: Objection. That calls for  
21 speculation in the mind of the others of the  
22 province. Unless there's some foundation that he  
23 talked to them about it, how would he know?  
24 BY MR. ARGAY:

1 **A. I have no recollection of what was done.**  
2 Q. Did you review the personnel file?  
3 **A. I did not.**  
4 Q. Do you know whether anyone reviewed the  
5 personnel file in the course of investigating the  
6 matter?  
7 **A. I cannot -- I have no recollection.**  
8 **(Whereupon, Exhibit W27 was**  
9 **marked for identification.)**  
10 BY MR. ARGAY:  
11 Q. I'm showing you what's been marked as  
12 Exhibit No. 27. It's a May 11th, 1988 letter from  
13 the Archdiocese of Chicago.  
14 This letter acknowledges that  
15 Father McGuire maintains faculties with the  
16 Archdiocese of Chicago that were previously  
17 granted. Do you see that?  
18 **A. Correct.**  
19 Q. And were you aware that Father McGuire had  
20 faculties with the Archdiocese of Chicago?  
21 **A. He would have had to have faculties if he**  
22 **was resident there.**  
23 Q. This letter was written to you three  
24 months after the . . . situation first arose?

1 yourself to Father McGuire, have you seen this  
2 letter before?  
3 **A. I have.**  
4 **Q.** On the second page of this letter, Father,  
5 you indicate to Father McGuire that you felt that  
6 his conduct with had been vindicated. Do  
7 you see that?  
8 **A. Where are we at?**  
9 **Q.** The second -- the only full paragraph, the  
10 middle of the page. It begins despite this clear  
11 vindication of your conduct.  
12 **MR. HUEBSCH:** Do we have the same exhibit?  
13 What number is this?  
14 **THE WITNESS:** 30.  
15 **MR. TOOMEY:** 30.  
16 **MR. HUEBSCH:** It's Bates stamped 1089.  
17 **MR. BROOKS:** 90.  
18 **MR. HUEBSCH:** 1089 or --  
19 **MR. TOOMEY:** Oh. 1089.  
20 **MR. BROOKS:** He's reading from Page --  
21 **MR. HUEBSCH:** You're reading from Page 1090.  
22 **MR. ARGAY:** That second --  
23 **MR. HUEBSCH:** I got you.  
24 **BY MR. ARGAY:**

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1 there could be weight to the allegations, is that  
2 correct?  
3 **A. Yes.**  
4 **Q.** And therefore, you left the restrictions  
5 in operation --  
6 **A. Yes.**  
7 **Q.** -- that were on at that point? And you  
8 would have left those restrictions in place -- or  
9 strike that.  
10 Did you leave those restrictions in place  
11 because you felt that Don McGuire may pose a  
12 danger?  
13 **A. Well, the situation is ambiguous. And so**  
14 **there is that possibility that we -- that while the**  
15 **parents deny it, nonetheless, something might have**  
16 **happened.**  
17 **So there is -- there's certainly the**  
18 **concern that at least we're doing what's necessary**  
19 **to protect minors and to protect everybody, protect**  
20 **society.**  
21 **Q.** And in terms of leaving the directives in  
22 place, what mechanisms did you also have that  
23 ensured that he abided by the directives?  
24 **A. Well, in some ways, it's, I suppose --**

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1 **Q.** There's a sentence that begins on the  
2 second page of this letter despite this clear  
3 vindication of your conduct. Do you see that?  
4 **A. I do.**  
5 **Q.** Did you believe that Father McGuire had  
6 been vindicated of his conduct with regards to  
7 ?  
8 **A. Well, his parents denied the situation and**  
9 **so -- but at the same time, the directives are kept**  
10 **in force.**  
11 **So I mean, there's an issue of -- my**  
12 **comment before was, the situation in California**  
13 **that Brother Palacio reported was ambiguous and it**  
14 **remained in my mind ambiguous.**  
15 **It suggested that certain things should be**  
16 **done to protect minors and to protect all involved.**  
17 **And the -- I'm -- my reference to vindication is**  
18 **the vindication comes from the parents. It doesn't**  
19 **mean that I completely agree with that point of**  
20 **view. So the directives are left in force.**  
21 **Q.** So due to the ambiguities that you felt in  
22 your mind --  
23 **A. Correct.**  
24 **Q.** -- you still had some suspicions that

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1 **it's difficult to -- the first thing was -- as I**  
2 **said before, is to have directives clearly stated.**  
3 **And we gain considerable leverage if**  
4 **there -- if another situation arises and is linked**  
5 **with this and we have some real leverage to do**  
6 **something much more substantial in terms of the**  
7 **situation or less ambiguous, we could have**  
8 **exercised a greater level of control, but we're**  
9 **still relying on the direct -- you know, he**  
10 **receives directives. He has a Jesuit response to**  
11 **those directives. Those directives are given**  
12 **seriously.**  
13 **He -- so beyond that, can you police every**  
14 **single moment of that, no, you cannot.**  
15 **Q.** And -- well, that's -- I guess that's my  
16 question.  
17 What efforts were being made to police  
18 some of his moments, if not -- if you're not --  
19 unable to police all of his moments, how are you  
20 able to police some of them?  
21 **A. Well, if you -- if there are reports of**  
22 **the sort that he's traveling with minors, he**  
23 **has a -- he then is dealing with a significant**  
24 **issue from the point of view of what his major**

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37 (Pages 145 to 148)

1 superior asked him.  
2 Q. So these are in place in the event  
3 additional information was to come to you?  
4 A. Correct, because the situation as  
5 presented was -- seemed to present ambiguities  
6 about what exactly happened.  
7 Q. And otherwise, you would trust Don McGuire  
8 to abide by the directives that you placed upon  
9 him?  
10 A. It was the first time that this sort of  
11 incident had arisen --  
12 Q. But you would trust --  
13 A. -- to my knowledge.  
14 Q. But you would trust him to abide by them?  
15 A. I would trust that he would abide by them,  
16 you know, that we were still dealing with someone  
17 who would respond to serious directives from the  
18 society.  
19 Q. Previously, you had testified that the  
20 superior or yourself would not keep track of  
21 Father McGuire's travels and his retreats and so  
22 forth. Do you recall that?  
23 A. I do.  
24 Q. Okay. After the directives were issued,

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1 was there an effort made to sort of keep an  
2 itinerary of where Father McGuire would be  
3 traveling and who he would be traveling with?  
4 A. I do not recall on that.  
5 Q. If there had been some delegation of that  
6 matter in that regard, would you have created a  
7 document or further directive that would speak to  
8 that?  
9 A. In all likelihood, if not for no other  
10 reason than Don McGuire himself be aware of this.  
11 Q. Now, this letter is dated June 19th of  
12 1991. When was your last day as Provincial?  
13 A. It was August 22.  
14 Q. So this is right as -- this is all  
15 occurring right as you were --  
16 A. Right.  
17 Q. -- on the way out the door? Did  
18 Father Schaeffer know in 19 -- late 1990 that he  
19 had been considered to be the next provincial?  
20 A. He was named in -- next provincial in  
21 January of 1991.  
22 Q. And he was not -- at that point in time in  
23 January of 1991, he was not still the acting  
24 socius, Father Baum at that point in time --

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1 A. That's correct.  
2 Q. Did you have any role in recommending  
3 Father Schaeffer as the successor as provincial?  
4 A. Well, I do. I mean, the provincial is  
5 asked to give his viewpoint and -- but of course,  
6 the consultants write to Rome separately.  
7 And so the vote is conducted -- each  
8 provincial and the consultants have an equal vote.  
9 We send over a ranked list of recommend -- of  
10 people recommended for the job. The appointment  
11 then is made in Rome.  
12 Q. Okay. And why did you recommend  
13 Father Schaeffer?  
14 A. Because he was a highly respected Jesuit  
15 in the province. He had performed extremely well  
16 on the province staff. He would be a person who  
17 could lead capably the province, and in fact, did  
18 so.  
19 Q. Do you know, was he himself a consultant at  
20 some point in time prior to becoming provincial?  
21 A. He was on the province staff. My  
22 recollection is, he was not a consultant.  
23 Q. In the months leading up to --  
24 A. I'm sorry. When he was socius -- acting

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1 socius, he would have been -- served in that role.  
2 So that would have been from roughly  
3 August or July of 1990 to -- he went on sabbatical  
4 after he -- when it was clear he was going to be  
5 named provincial. He was on sabbatical that second  
6 semester.  
7 Q. And to your knowledge, independent of that  
8 time, he was not consultant other than when he was  
9 acting socius?  
10 A. That's to the best of my knowledge.  
11 Q. During the period of time after January of  
12 '91 when he was named to be provincial and when you  
13 left in August of 1991, did you have meetings with  
14 Father Schaeffer in terms of what his duties were  
15 going to be as provincial, what the prominent  
16 issues were, and so forth?  
17 A. I did.  
18 Q. Okay. How many meetings did you have with  
19 Father Schaeffer?  
20 A. I can't tell you the number, but enough to  
21 get him -- it helped that he had already been on  
22 the province staff and was acquainted with a lot of  
23 the problems and business, but there was still a  
24 review of personnel, and you know, a hand-off of

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38 (Pages 149 to 152)



1 the sort that we discussed earlier in this  
 2 conversation.  
 3 Q. And one of the matters that you would have  
 4 handed off, would that include the locked file or  
 5 the confidential files?  
 6 A. Yes, and a discussion of -- of the  
 7 situation.  
 8 Q. So you specifically recall having a  
 9 discussion --  
 10 A. Yes.  
 11 Q. -- with Father Schaeffer about the  
 12 situation and Don McGuire?  
 13 A. Yes.  
 14 Q. Okay. What did you communicate to  
 15 Father Schaeffer in that regard?  
 16 A. Well, obviously, the directives would be  
 17 the principal thing. He would be -- he would have  
 18 to be aware of that as major superior.  
 19 And we were in a different arena with  
 20 Don McGuire at that point, because there was a  
 21 clear set of orders given and we would react quite  
 22 differently to further sorts of incidents.  
 23 Q. It was a serious matter, though, that you  
 24 conveyed to him?

1 questions.  
 2 MR. HUEBSCH: You have no further questions.  
 3 No questions. Signature is reserved.  
 4 (FURTHER DEPONENT SAITH NOT)  
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1 A. A serious matter, yeah. Ambiguous, yes,  
 2 but serious, I mean, in the sense that smoke as  
 3 smoke and fire -- we didn't have fire, but we had  
 4 smoke.  
 5 MR. ARGAY: I think I might be done.  
 6 (A short break was taken.)  
 7 BY MR. ARGAY:  
 8 Q. Father, just real quickly, in terms of  
 9 Father Schaeffer's responsibilities in regards to  
 10 this directive, you testified that you would have  
 11 expected that if he had received additional  
 12 information that he would act upon that?  
 13 A. He would have to judge the nature of the  
 14 information, of course, but the directive was  
 15 designed to facilitate his doing so.  
 16 Q. And the type of information that he would  
 17 be alerted to or that he should be concerned about  
 18 would be the type of information that's contained  
 19 in Exhibits 25 and 26 if he were to receive that  
 20 information?  
 21 MR. HUEBSCH: Take a look at them, Father.  
 22 THE WITNESS: Yeah, I better. 25, most  
 23 certainly. 26, yes.  
 24 MR. ARGAY: Okay. I don't have any other

1 STATE OF ILLINOIS )  
 2 ) SS:  
 3 COUNTY OF C O O K )  
 4 IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
 5 COUNTY DEPARTMENT - LAW DIVISION  
 6 JOHN DOE #116, )  
 7 Plaintiff, )  
 8 vs. )No. 07 L 8781  
 9 THE CHICAGO PROVINCE OF THE )  
 10 SOCIETY OF JESUS, )  
 11 Defendant. )  
 12 This is to certify that I have read the  
 13 transcript of my deposition taken by Elizabeth L.  
 14 Vela, Certified Shorthand Reporter, on August 12,  
 15 2009, and that the foregoing transcript accurately  
 16 states the questions asked and the answers given by  
 17 me as they now appear.  
 18 \_\_\_\_\_  
 19 FATHER ROBERT WILD  
 20 SUBSCRIBED AND SWORN TO  
 21 before me this \_\_\_\_ day  
 22 of \_\_\_\_\_ 2009.  
 23 \_\_\_\_\_  
 24 Notary Public