

STATE OF \_\_\_\_\_ )  
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 )  
PARISH OF \_\_\_\_\_ )

**AFFIDAVIT C**

The Affiant, being duly sworn, deposes and states as follows:

1. I was born in Louisiana and moved to Chicago when I was in the second grade. My date of birth is April 2, 1961. I currently live in \_\_\_\_\_.
2. I grew up as an only child. My father was not present in my life.
3. I attended St. Sabina from second grade through eighth grade and graduated from there.
4. I then attended high school at the De La Salle Institute for two years. I then attended Quigley South High School where I graduated.
5. I attended Niles College for about 1 and ½ years. After attending Niles College, I returned to Louisiana for four years.
6. I first met Father Michael Pfleger in 1976 or 1977. I called him Mike.
7. I viewed Mike as a mentor and big brother.
8. After the summer after eighth grade, I worked at a summer program at St. Sabina called CETA. CETA was a youth program. I continued to work in the CETA program through high school.
9. I occasionally went with Mike to Our Lady of Perpetual Help in Glenview, Illinois.
10. I started drinking with Mike in 1976 or 1977. Mike took me to jazz clubs like Rick's Café and Showcase with other adults. Though I was underage, I frequently drank alcohol with him at these jazz clubs, in his room at the Rectory at St. Sabina and elsewhere.

11. In 1979, Illinois raised the drinking age from 18 to 20. Mike knew that I had obtained a fake identification card, but nonetheless continued to take me to jazz clubs in Chicago where I continued to drink while underage. I also frequently got high with Mike in his room at the Rectory. Mike usually had a 1/4 pound of marijuana in his room.

12. On one occasion, in the summer of 1979, I was in Mike's room at the Rectory. I watched television with him and smoked marijuana. I then fell asleep. I woke up and had a feeling that Mike did something inappropriate, but I did not witness anything.

13. Approximately two weeks later, I again visited Mike in his room at the Rectory. We smoked marijuana again and I pretended to be asleep. Mike came up to me and called my name a couple of times to see if I was asleep. I did not move and then Mike grabbed my penis over my clothes. I did not consent for Mike to touch me in a sexual manner. I then pushed his hand away. Though I occasionally saw Mike after that incident, my relationship with him ended. While I encountered him during the performance of my duties during the CETA program, I no longer socialized with him.

14. During my visits to St. Sabina, I occasionally saw [redacted] talked about becoming a police officer.

15. Around Christmas in 1980, I moved to [redacted]

16. I returned to Chicago in 1985 and saw Mike at St. Sabina. I expected to get an apology from Mike for sexually assaulting me, but he never apologized.

FURTHER AFFIANT SAYETH NAUGHT

Subscribed and sworn to  
before me this 11<sup>th</sup> day  
of February 2021.

Diana Reeder  
Notary Public

