

M E M O R A N D U M

To File
[099997.141936]

From Joshua L. Stayn

Re Laguer: 04/17/08 DeMartino Interview

Date April 18, 2008

- Q: Testing one, two, three, four, five. If you don't want to, we're happy not to, but...
- A: Okay, but maybe not, then maybe I would feel better. My stomach is in knots. Just remember, I went through this before with somebody else.
- Q: Yes and I wanted -- before we start getting into this...
- A: That was my big issue.
- Q: Okay. So what we would like to do is we want to develop a basis, if there is one, for a motion for a new trial, and the way that works, sort of, procedurally...
- A: Yes.
- Q: Is that we have to go back to court and we have to file a motion in Worcester before a Superior Court judge and we have to try to persuade the court that there are some grounds for essentially vacating the existing conviction and ordering a new trial. To make that argument on the basis that we have new facts that are relevant that should be considered by the court, we have to present them in the form of an Affidavit. Okay? And what an Affidavit is is something that is, you know, is essentially a statement that you would sign, and if we get to the point we're comfortable doing that, we would draft something and send it to you and you would have every opportunity to review it and make sure it was accurate and then sign it.
- A: Okay, yeah.
- Q: If we are not able to get an Affidavit, we really...
- A: I understand that.
- Q: Okay.

A: I understand all that. I understand that. My only question is: I got to know Lennice in a capacity as a mental health technician worker and then was with her at the trial. I was at the trial as an aide to help her. So that was the capacity. And then I worked with Lennice, stayed with her on Pleasant Street for quite awhile. Then she was moved to a rest home and I left my job and then I went to visit her at the rest home, as well, and I would go down for coffee to the local shop with her and things like that, sit out with her and bring her cigarettes and stuff like that after I left, but a lot of the stuff that I know was while I was the technician because that is when she came to us right from the hospital. She was released from Leominster Hospital right to the house and that is when I was assigned to her, because there was a man who worked with me, but because of the rape only women would work with Lennice, and that is when I met her.

Q: But you were an aide in the sense that you were there to be kind of an assistant and a companion to help her?

A: No, as a mental health technician, I ran the house. I mean I was staff -- we were called mental health technicians, aides, that's what we were called.

Q: Okay.

A: There were eight people in the house, but only a man and women on the shift. The women always took care of Lennice because she was very paranoid about men.

Q: Okay. Josh, you could help out on this today. My understanding is that you are worried about that there may be a privilege between what Lennice would tell you, and my understanding is that the privilege exists so as to protect the flow of information essentially from a patient or a client to a professional when the statement is being offered for the purpose of treatment, and my understanding of your role is that you weren't diagnosing her or prescribing treatments or medication or anything like that.

A: No, no, no. She had her own psychiatrist.

Q: Right. I think her communications with the psychiatrist would be covered by the privilege.

A: Okay.

Q: But I don't believe -- and if she chooses to open up to you and tell you things that are personal, that is not the kind the relationship that is privileged. The privilege exists and the purpose of the privilege is so the patient could feel free to tell, you know, a psychiatrist.

A: I was hired by Herbert Lipton. I was an employee of Herbert Lipton when I got all this information from her. I was a staff member. I was not somebody that just came in as an aide and took care of her physical needs. I mean, I was actually an employee. For six years I was an employee with them.

Q: But you also heard her say the same things after you were no longer working with her.

A: Yes I did. Yes I did.

Q: She said the same things to you?

A: Yes.

Q: Sorry, I mean, I think....

A: She also said them to many other people too, but to me yes she did.

Q: Right.

Q: I think to the extent that she shared them with other people...

A: She did.

Q: She disclosed them and to the extent that she said them after your caregiver/patient relationship ended and you had sort of a friendship/companionship relationship that you would be free to talk about that. To the extent that it is during the session, I think it's kind of, I think what Jim said is right, it is kind of comparable to, you know, say I had a elderly grandfather and I hired somebody to essentially live in his house in a separate bedroom and care for him physically but also be his companion and chat and talk, that the things we would say to that person would not be protected or privileged as Jim said, because they are not really treating, they are more just caring for him. There is kind of distinction in the law between a professional who is prescribing treatment versus somebody who is, even if they are hired by the state, is not actually serving as a physician or as a counselor.

A: No, we ran it as a halfway house and that is where she was living, so....

Q: I think that gives you an immunity, quite clearly.

A: I did have a legal opinion and they said it didn't, that is why I am telling you that. And they said it didn't because she told me stuff, but then the only thing that they said was she continued my friendship with her and I was no longer employed and many of the same incidents happened after I left and that is where I would like to focus in on – after I left and my friendship with her and visiting with her and during that time our conversations, but the fact is I met her through working for mental health.

Q: I am reasonably confident that the privilege does not extend to all the -- you work for a company that has a wide array of employees that do a wide array of things. Some of them are licensed and professional advisors of one kind or another, be it a psychiatrist or a doctor or some kind of a professional, but there are all kinds of employees who work there. And if the privilege does not extend – it is not every communication between everybody that works there. The privilege only covers certain relationships and it

protects those relationships when patients are offering personal information for purposes of receiving treatment. It doesn't cover all of the employees that work there.

Q: Well, she is going to feel better about it if you simply take the statements from her based on what was said to her after she left the employment. Is there any reason why that is not accurate?

Q: Uhm...

Q: It's your position that it's not necessary, from a legal standpoint, if she has an immunity and that immunity applies to the entire relationship, but if she is worried about it, but she has heard the same things after she was not longer employed, is there any reason why you can't take the deposition on the basis of what was said after she left the employer?

Q: Yes, because I think it is important for our purposes to understand what her interaction was with Ms. Plante during the time period sort of before the crime, between the crime and the trial, and I think the time frame, it is important.

A: Well, I met Lennice -- I knew of Lennice because I worked at the company, but I actually met Lennice when she came to the house. She used to go to day treatment and she was in a group, so when I would go by and see them all, we got to know them. But to get to really know Lennice, I met her when she came out of the hospital directly into the group home. And she was....

Q: After she was hospitalized from the crime?

A: After she was hospitalized, yes. She came right from Leominster hospital to us.

Q: Okay. And so at that period of time -- well, it is kind of important for our purposes between when she got out of the hospital and the trial. I think that is the time that we actually do need to ask questions about.

A: I feel uncomfortable with that because, basically, I know that I was an employee and at that time, even though she was very ill and even though she was very traumatized, I don't want to violate her or violate myself or get myself into trouble with this, but I can't see why what happened after -- I know that you need to know the transition from the rape to the hospital, from the hospital to where I was, but I'm uncomfortable with that.

Q: But did that lawyer give you any reason to think that there was a privilege because there is a fundamental distinction between what you were doing and the confidentiality arrangement between the doctor or psychiatrist and the patient. You did not have that patient-physician relationship.

A: No, I wasn't. I understand that. What I would like to do, you've come a long way, I would like to do the interview with you.

Q: Okay.

A: I want to tell you, because I have done it before and I don't want to see somebody in jail who should not be there, but I want your total honesty that if there is something, part of it in there, that is important to you and that you think that would help you get a trial before anything is done, I definitely would have to make sure.

Q: Okay.

A: So, I am not going to waste your time by coming all the way to Fitchburg, so I would like to go on with the interview. I would do better if you ask questions in an interview than ask me to tell a story.

Q: Yes, we can do it that way.

A: Yes.

Q: And you have our promise that we won't....

A: Because what happened, I was already violated by this already and it was very difficult for me because I really was very sick over it because it came out in the paper and I picked up the paper and I was very upset.

Q: Can I ask did you feel violated because you did not know that there was going to be a story?

A: No, I knew that there was a story. It was taped and I told the guy and I had a witness, Pablo, who also was in the room and I said to him do not ever release this until I give you permission to do it, and he did.

Q: Okay, I didn't know that.

A: And he did. He released -- what happened was I believe Bob Terk gave it to the Worcester Telegram, he was overzealous, the guy heard about it and he released it to Western Massachusetts. So, there was the Western Massachusetts and the Worcester Telegram together, and my kids knew nothing about it and I am driving back from Scituate one day with my son and I pick up the Worcester Telegram and thank god I picked it up and we had not been in town and I was able to hide it. My son never knew anything and somebody called him up and I -- it was terrible what happened here in Fitchburg because I am a politician and then the Leominster police and Fitchburg police were saying are you crazy, you know, getting involved in this, you know, and they even wrote something in the Worcester Telegram -- DeMartino should just concentrate on being a politician, you know. There were letters to the editor, and that is when my son said to me, "Ma, what are they talking about?"

Q: Okay.

A: And so I don't want that to happen.

Q: Alright, well you have our agreement and we'll make sure that we communicate with you about it and if you are uncomfortable we will not use it.

A: Okay.

Q: And we could do some further research for you if we think that...

A: Okay.

Q: There is a way to make it clear what the scope of the privileges are.

A: Okay.

Q: Okay. Why don't you start by telling us, and we know much about your background and your commitment to public service and all that we have seen that, why don't you start by telling us about how you first met Lennice?

A: Lennice came to Pleasant Street House after being released from the Leominster Hospital.

Q: And is the Pleasant Street house, is that affiliated with the Herbert Lipton Center?

A: Yes, it is a halfway house for mentally ill.

Q: Did you know her before she came to the Pleasant Street house?

A: I used to see Lennice in a group over at Herbert Lipton in a daily support group. She would come to this center and have a group. It was called Day Treatment Program and she would come in and she would be in the group. So we all got to know everybody. So that's how I knew of her.

Q: Okay, but then you got to know her better after she came to the Pleasant Street house?

A: Yes, I did. Yes.

Q: And did you work at the Pleasant Street house at the time?

A: Yes I did.

Q: And what were your duties and responsibilities?

A: I actually -- there were two staff on one week and two staff off and we ran the house and we took care of the people who lived in the home. We did everything from cooking, cleaning and sitting with them and making sure that they got their medication.

Q: How many people lived in the home?

A: There were nine (9).

Q: And this was -- did you understand what had happened to Lennice by reading about it? By reading about it in the papers?

A: No, no, not by reading about it in the papers. My boss told me that she had been raped and that she was coming to stay there and to be sensitive around, there may be issues.

Q: Who is your boss?

A: My boss? I don't want to even say it, because she thinks I'm -- she does not want anything to do with this.

Q: We don't need to put that in.

Q: Did you attend the trial?

A: I was at the trial with Lennice and my boss, yes.

Q: Did you just attend that one day at the trial when Lennice testified?

A: You know, it's almost like it's a blank, but I remember going with Lennice before the trial and in the court house and they were telling Lennice where she would sit and where the man would be and everything like that.

Q: The preparation for the trial?

A: Yes, I went to the preparations with her.

Q: How many times did you go to the preparations?

A: I only went that one day with her.

Q: And was that the meeting with the prosecutor and going over the case in the court room.

A: Yes.

Q: Were you there when they went over the testimony and what questions they would ask and so forth?

A: The week that I was off the other person would go, you see. It was week on week off and during the trial, when I was working, I would go with her.

Q: And did you remember if you went with her to the court more than the times that she was testifying? I mean did you go by yourself to watch to any of the trial?

A: No, no, no. I went with Lennice and my boss and then her son-in-law and her daughter. We all went down together, and I was with her the day of the conviction the last day, the day that Mr. Laguer -- I was with her that day because we came back together. That is very vivid in my mind. I was with her the day that Mr. Laguer was convicted.

Q: The day that the jury returned its verdict.

A: Yes, I was there.

Q: Were you there when she was on the stand testifying?

A: I can't remember.

Q: Do you remember if you were there when the prosecutor or the defense attorney were giving their statements standing up in front of the court?

A: No, I can't remember. I've gone blank on it.

Q: Let me try to unblank you a little bit. Do you remember actually being in the court room when there were people testifying as opposed to, sort of, being outside in the hall waiting with Lennice for the time to come for her to testify?

A: No, I never left Lennice's side from the time I left Pleasant Street House until I came back, I never left her so, when she was sitting in the court room I was sitting with her.

Q: Okay, and if she was waiting in the District Attorney's Office....

A: It was a little room...

Q: You would have been with her? You would have been with her, too -- it was a waiting room? You were always with Lennice?

A: When I was assigned and I was at the court house, I was with her all of the time.

Q: So I gathered that it was approximately a year from the time Lennice came to the house and the trial? Is that about right, Josh? February?

Q: February.

Q: End of January.

Q: January '84.

Q: Six months?

Q: The crime was July of '83 and the trial was January '84.

- Q: Okay. So during that six months, from the time Lennice came until the time of the trial, you were working at the halfway house one week on and one week off?
- A: Yes.
- Q: And the week on, I would imagine you just lived there.
- A: Yes, I did.
- Q: And so it was pretty much around the clock.
- A: Yes it was 24/7. We moved in for a week and then my other counterpart would do the same way – Flo.
- Q: So you would interact with Lennice, obviously, on a daily basis?
- A: Definitely.
- Q: During those weeks. And was she one of the needier people at the house?
- A: No, she was the most high functioning. She was very bright. She had been an Army nurse and she was very bright. She was well educated and she was high functioning, but she was very -- she stayed in her room a lot, so she did not mix in with the other people much. For a few months she did not mix much at all, but she was very high functioning.
- Q: Ah...
- A: Intellectually, I mean.
- Q: Right. There has been some suggestion we have seen that she was what you might have some symptoms of being delusional.
- A: She was delusional.
- Q: What did you observe?
- A: She was very delusional. She used to say that Kennedy was coming to visit with her, Mr. Kennedy the dead president. She would show her education when she talked about the army and the war and everything, but she was very delusional.
- Q: Could you think of any other examples of her being delusional besides the reference to the president -- did she refer to any other famous people in that kind of a way?
- A: No, Kennedy. It was always Kennedy. She knew how to pick them. It was Kennedy. She had money, she came from money, she came from a very good family and she was a sweet lady, a very sweet lady.
- Q: Did she have a college education?

- A: Oh yes. She was a head nurse in the army, army background.
- Q: When she talked about her visits from Kennedy, was that all she said or did she, sort of, round out the picture and tell what she was doing?
- A: Oh no, just Kennedy, you know, I met Kennedy and he is coming to visit. Stuff like that. Very delusional.
- Q: Did anyone point out to her that, you know, ...
- A: No, the whole house, we worked with mental health issues. They all had mental health issues.
- Q: Right.
- A: Delusions were not unusual for us to deal with. We would just go on and listen and that was it.
- Q: Right, sort of go with the flow.
- A: Yes, go with the flow, yes.
- Q: This was after Kennedy was dead.
- A: Of course.
- Q: Yes, twenty (20) odd years or so.
- A: Oh yes. He was dead.
- Q: Based on your experience, you had familiarity with recognizing the signs of delusion?
- A: Oh yes, oh yes. We were working with paranoid schizophrenics, psychotic people, everything. That's what it was, so nothing bothered me.
- Q: Any memorable incidents or events with Lennice that you recall during that time period?
- A: The biggest thing that I remember with Lennice was that we had to be careful when we used to go on day trips. We had to be careful because she would say that, to be very honest with you, she was afraid -- and I have to use the word very clearly -- she was afraid of black people.
- Q: Is that how she would put it?
- A: Yes. You could actually see it. She was afraid of them and she would say, you know, "he's looking at me, that's the one that raped me, that's the one that raped me" and she

would look at them and I would say "No, Lennice, no. The fellow that raped you is locked up and he's not going to get out in a long time". I just used to say that to her, but she was very paranoid about black and Hispanic people. She was prejudiced in a way.

Q: She was?

A: Yes.

Q: You saw her do this on a number of occasions?

A: Yes, we were used to it.

Q: Whenever you went out and she saw a black or Hispanic person...

A: I would not say every time she went out, but it was very common.

Q: Did she distinguish between when somebody was African American versus Hispanic?

A: No, Spanish and black.

Q: So, it was all kind of the same to her?

A: Yes, it was all the same. I reassured her that, you know, when we see somebody, I would reassure her that was not him, that the fellow was gone.

Q: Because, she was afraid?

A: She was very much afraid. She would have panic attacks and she would shake.

Q: And this particular characteristic of being paranoid and being afraid of blacks and Hispanic people, did that characteristic continue after the trial?

A: Yes.

Q: And did sort of consistently all of the time that you...?

A: Yes.

Q: So, in fact, even after the trial and even after the conviction, her behavior on that issue did not change?

A: Didn't change.

Q: She was afraid and she was constantly saying that's the guy that raped her?

A: Yes.

Q: So, at that point, you can say that he's going to be locked up for the rest of his life, right?

A: I used to say that and she would you say "Are you sure?" And I would say, "Yes, I am sure Lennice, you're okay you're safe," and I would give her a hug then when we would go out the next time it would happen again. I was not the only one, I mean, I was only one person this whole -- I mean any staff at that point that went out with her would have seen the same thing it was the thing that happened with her all the time.

Q: Was her eyesight good?

A: No, she wore glasses and she was diabetic. Very bad diabetic, because she used to cheat and her sugar would go up to 370 and, you know, she would to off a little because of the sugar and she would get real rosy in the cheeks, but we always knew when she was cheating. We used to chastise her for that.

Q: Did you view this habit of, sort of, thinking people were her assailant, was this a part of her being delusional, did you think? Or was it a different thing?

A: I thought she was delusional, because, I mean, how many times could you go out and see different people and they were all the rapist.

Q: Right, so every black male that she saw pretty much or...

A: Yes, yes. We had a black male at the house. A man that lived at the house and he was black and she always made sure that she never was in the room where he was. And he used to always try to be friendly with her. He is a very nice man. And she would have nothing to do with him.

Q: This was kind of -- it seems it was a kind of a combination of part racism and part delusional?

A: Yes, yes.

Q: We also seen that she talked about a Hispanic guy that she was friendly with at her apartment house.

A: Yes. There was a woman, a Spanish woman that lived on the first floor. She lived in the basement from what I can gather, and her son would come, this Spanish woman's son would come and ring the bell. He had a drinking problem, so sometimes when the woman would not let him in, she did not want to answer the door bell and Lennice would let him in. And then Lennice used to sit, now this is what she told me, she'd sit in the park, and now remember I am believing all this time the rapist is gone he is in jail end of story to me. So she said to me that he would go get her cigarettes for her and they sit and they would have a cigarette, she smoked very heavy, and they would sit on the park bench near where she lived and he would come and sometimes she'd let him into the apartment when the mother would not let him in.

Q: When he'd been drinking?

A: Yes, because he was drunk. He was her friend because he used to go get her cigarettes for her and stuff like that.

Q: And she said that he was a Hispanic guy?

A: Yes.

Q: Did she call, did you know the term she used? Was it Spanish or...?

A: Well he was Spanish, she said that he was -- she used the word "spic".

Q: Okay, that's okay. And it was clear that she was friendly with this fellow?

A: Oh, yes. He used to sit on the park bench and he used to get her cigarettes and she used to let him in when he would ring the door bell and the mother did not want him to be in there, so he would come in and visit with her.

Q: Did she ever say anything on whether he had, whether she would leave the keys out for him or anything like that?

A: No. You know what she told me once, she told me that she used to leave the key in the door and she would always be losing her keys because she would leave it in the door. And I think the management even chastised her a little for it because she would forget and leave the key in the door.

Q: Okay.

Q: You know if she ever let him into her apartment?

A: He used to come in and visit.

Q: Not just in the building, but she let him into her apartment?

A: Yes, she would let him in and when she'd let him in through the buzzer he would come and sit with her, but he was her friend.

Q: Do you recall if she ever mentioned his name?

A: No, no.

Q: No, you don't recall or no she'd never mentioned his name?

A: No, she never mentioned his name. You must remember, this whole time we thought, we all believed we had the right man in jail so when she would tell us things we took it with a grain of salt...

Q: Right.

A: Because as far as we were there to take care of her she was protected, she was safe. So, we did not think anything of these stories only that we would visit and we would talk, and she'd tell me that he used to come in and the mother lived in the building and the mother did not like him sometimes and I would say, "Why?" And she would say "I thinks he drinks," you know, but we are putting this to rest that she is safe now and that's why.

Q: Right, and she says things that are kind of crazy sometimes anyway, so you just kind of you kind of rolled with it?

A: Yeah, yeah, roll with the punches.

Q: And when she talked about, this is a fellow we believe is a guy named José Gomez, as you probably know.

A: Yes, I know who he is now.

Q: So, when she talked about this guy were these discussions about this guy, were these between the time, around the time when you first got to know her when she came back to the hospital as well as after?

A: After. When she came, I believe, the trial was over when she started talking more about her other -- she missed her apartment -- and then she was independently living with supervision, you know.

Q: Right.

A: Yeah, and she missed her old apartment and she, she missed... She told me, she told me the night, the night of the rape and I can't get this clear with anybody, but she told me that the night of the rape she was ironing, and I never heard anyone talking about that because there would have been, the ironing board would have been up in the apartment, it would have been set up because she loved to iron and she was ironing that night. And then she said she put on her housecoat. She had a housecoat on her and she could clearly remember ironing that night and I and, you know, I often try to ask everybody that knew anything about it, I said was the ironing board up or put in. And she also had a bed that she pulled down into a couch she told me. She had a couch, which was a bed that she pulled down.

Q: That's where she slept?

A: That's where she slept. And then, but she was ironing that night and she had her housecoat on and I don't know when she was found if she had the housecoat on her that night, but she had told me she put on her housecoat that night, pink housecoat. See, I can remember that and I can't remember actually....

Q: It's funny how the memory works like that.

A: But I can't remember the trial, but I remember that.

Q: Did you talk to her about what happened that night, Annie?

A: Sometimes she told me. Like it would come days like you could go weeks and nothing and then she would tell me she was ironing, that that night, she was telling me, she was ironing that night and she'd say, "You know, I was ironing that night and I had my housecoat on", and I said "Well, that's good Lennice, you like to iron".

Q: Yeah.

A: She'd iron, you know, again.

Q: Did you say anything else about that night that you remember?

A: No, she told me that a telephone cord -- she told me that there was a telephone cord and that he tied her up with her telephone cord.

Q: Right.

A: She told me that. He tied her up in a telephone cord. Put her hands behind her back like that [demonstrating]. She'd done that, showed me that.

Q: She showed you that?

A: Yes. And I said it must have been very uncomfortable.

Q: Was she sitting in a chair when she was talking about her hands being tied behind her back?

A: Yes.

Q: That's all you can remember that she ever said about that night?

A: Yes, I mean, you know, I often, I mean, I heard some people say she was tied up for a long time. Some people said -- it was never she just don't remember it. She said she just, that's what she told me, she was tied up with a cord and she was ironing prior to that.

Q: Okay. Did you ever...

A: Alright, no wait, no wait. She told me he put a sock in her mouth, a white sock.

Q: Okay. And these are just little details that would pop up once in a while, just kind of random. And you would just say, you know, just try to move on?

- A: Yes, random. Remember the trial, you know, it was, you know, he was in jail, she was safe and that was my job to keep her safe. And I'd say yeah, and she'd ramble and I'd say yeah, yeah, don't worry, he's no good he's gone, you know.
- Q: Right.
- A: And that, but yes.
- Q: Did you visit her in her apartment or did you only see her when she came?
- A: I never visited her in her apartment, no.
- Q: Okay. How long did she stay at the Pleasant Street House, approximately?
- A: Well, she was there before the trial, then she was there two years after the trial, because I worked there for six years so she was with us for a good two years.
- Q: And where did she go when she left?
- A: She went to the rest home on Prospect Street.
- Q: Okay, so you had this kind of interaction with her for a two year period?
- A: Oh, yes.
- Q: And your counterpart, I suppose, would have had the same interaction, as well?
- A: Yes, Flo would have.
- Q: Is Flo still around?
- A: I was just talking to Dr. Silber. I had started to relocate her and I believe, I believe she's in Leominster, so I'm working and getting her for two reasons, to sit and visit with her and ask her does she remember these things, too, so that I'm not the only one that remembers them. So I have, and my boss, I did meet with my boss, which she told me I'm crazy to be involved and she wants nothing to do with it because she loved Lennice and she said, "The rape was violent, Annie." I said, "I know that and I understand that, but say he didn't do it," and she said "Well, that's a different issue, but don't get involved in it. Don't put your nose in the noose," she said to me. So, I am relocating the other couple to see if when they took day trips, if they went out with her, did they hear the same thing as I did.
- Q: Yeah. It sounds like it would have been a pretty consistent behavior.
- A: It was, it was, it was a consistent thing. And it was definitely, wherever she went, I was not the only one, anyone who had dealt with Lennice, they would have heard the same things as I did.

- Q: And, Annie, tell me how have you come to know José Gomez since, you know, currently?
- A: Through Pablo, another man. Pablo is a brother of the other detective, what's his name? He called me, Gilberto Riviera, his brother. I worked with him at the Spanish Center and I knew him, and Pablo said that this man used to come into the Spanish Center.
- Q: Okay, and you now believe this José Gomez was the fellow who Lennice was talking about?
- A: I have reason to believe it because... The only reason I have to believe it is that the mother of José lived in the building. And that was done through -- Pablo put that together. Pablo put that together.
- Q: He got her the housing?
- A: No, he knew the mother.
- Q: Oh, I see.
- A: And he knew José, because he worked the Spanish Center. And then there was a priest that used to, a Spanish priest also, that knew the mother. And they all know each other. It's a small circle.
- Q: Now, but while Lennice was staying at the Pleasant Street House, was she being seen by doctors, psychiatrists that were with the center?
- A: Yes, yes she was.
- Q: How would that work? Would she get over there by herself? Would one of you take her over there? Would they come to the house? What was the procedure?
- A: Well, the procedure was that they used to go to day treatment every day because the house was closed during the day. So, Lennice would go over to the day treatment program and while she was there she would see Dr. Bonnar, that was the doctor.
- Q: Dr. Bonnar?
- A: Yes.
- Q: And what kind of a doctor was he?
- A: Psychiatrist.
- Q: Psychiatrist. Was he the doctor for all at the halfway house?
- A: Yes, yeah, he was the psychiatrist at, yeah.

Q: And do you know, would she ever tell you about what she would talk to Dr. Bonnar about?

A: No.

Q: So you don't know....

A: No. Sometimes when Dr. Bonnar was there, Dr. Kahn used to come and that was the other psychiatrist. There's two. Like if Dr. Bonnar had a vacation, Dr. Kahn took over.

Q: Okay.

A: And she didn't like Dr. Kahn because he wore a big brimmed hat.

Q: Okay.

A: And that's the only thing she would say. The other fellow was on today, she'd say to me. But no, she never discussed them.

Q: Do you know what she was being treated for specifically?

A: Well, she had medicine. She was taking medicine, so the medicine would indicate that it was either schizophrenia or very depressed. She was on medicine, a lot of medicine.

Q: Do you know what kind of medicine she was on? Again, you would have to watch over the medicine at the house?

A: I think she was on Haldol and I wouldn't quote myself on that. She was on heavy duty meds.

Q: Okay.

A: When she first came she was on heavier, but as time went, you know, they got different ones, but she was on Haldol, I believe.

Q: And you, what is Haldol? Is that for schizophrenia?

A: It's for schizophrenia, yes.

Q: Okay. Now we wouldn't want to quote you on any of this, to the best of your memory, she was on heavy duty medicines.

A: At first.

Q: At first, and...

A: After the rape.

- Q: Okay. Do you know whether she had any medical issues or psychiatric issues before the rape? And based on things that she said....
- A: Well, she had to have, because she was in the day treatment program and the apartment she was in was part of, connected to Herbert Lipton. See when you go, you live independently with supervision and people come to visit you, so she would have had to be.
- Q: And did you know what her issues were prior to the rape? Did she ever talk about that?
- A: Delusions. A lot of delusions.
- Q: And how do you know that?
- A: Grandiose, she was very grandiose and very, very commanding grandiose, like money, you know, like she came from a very rich family, very grandiose, definitely.
- Q: Where those things true?
- A: I don't know.
- Q: But that was her?
- A: That was her, but if you're dealing with eight people, some who have grandiose, some are not, you know, you just take everything -- you just go along.
- Q: Right, you don't know whether it's true or not.
- Q: Was she taking that drug for schizophrenia prior to the trial?
- A: I have no idea, I have no idea.
- Q: Was she on heavy duty medication prior to the trial?
- A: I have no idea. I know she was on it when she came to us.
- Q: And at some point, it became less heavy duty, but you don't recall exactly when?
- A: As time goes by. After the trial, it would be, you know, be weaning down, but when she went to the rest home she was still taking medication, because I was with her sitting and she was having cigarettes and we were on the porch and it was med time and the nurse came and gave her her meds. She was having meds then, as well, when she was in the rest home. But surely, you can call get all these records from Mental Health. They have them.

- Q:** Yeah. The problem is you have to, to get records like that you actually have to have a live case.
- A:** Oh, I see, okay.
- Q:** That's part of what we're trying to do here.
- A:** Okay, okay.
- Q:** I mean even if we file a motion, even if we don't get a new trial right away, we hope that we can at least get some authority from the court to get certain records that might be helpful in trying to establish the basis for a new trial.
- A:** Yes.
- Q:** So she spoke to you after she came to the Pleasant Street House about what her conditions had been even before the rape and you learned about them that way?
- A:** Yes.
- Q:** So you said there were other kinds of delusional behavior besides just the Kennedy thing. It was...
- A:** Yes, she was delusional. They call it grandiose. She was grandiose.
- Q:** Okay, it can fit into that?
- A:** Yes, but it wasn't just anybody.
- Q:** No, the President of the United States was coming to see her, right?
- A:** Yeah. And then she'd talk about her Army. She was the head nurse of the Army. I mean, I believed her, so I have no reason not to because, remember, we're all there and that's what we do. And I have no reason to believe it, but I do know she was an educated woman.
- Q:** You could tell by the way she spoke?
- A:** The way she spoke, her diction, the way she wrote and the books she liked to read. She didn't just read like everybody else was reading romance stories, you know, hers was all this about government and very, very complicated books.
- Q:** Yeah. So it was, you could tell this from your personal observation that she was educated and intelligent and interested in things?
- A:** Yes.
- Q:** But as far as whether she actually was an Army nurse or whether she came from money?