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*Proposed Counsel for the Debtor
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**SUPPLEMENTAL DECLARATION OF
PAUL BONGIOVANNI IN SUPPORT OF
DEBTOR’S MOTION FOR INTERIM AND
FINAL ORDERS AUTHORIZING THE
DEBTOR TO (I) PAY PREPETITION
EMPLOYEE WAGES, SALARIES,
BENEFITS AND OTHER RELATED ITEMS,
(II) REIMBURSE PREPETITION
EMPLOYEE BUSINESS EXPENSES, (III)
CONTINUE EMPLOYEE BENEFIT
PROGRAMS, AND (IV) PAY ALL COSTS
AND EXPENSES INCIDENT TO THE
FOREGOING**

Judge: Hon. William J. Lafferty

Date: June 20, 2023

Time: 9:00 a.m.

Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

1 I, Paul Bongiovanni, hereby declare as follows:

2 1. I am the chief financial officer of the Roman Catholic Bishop of Oakland (“the Debtor”).
3 I make this declaration in support of the *Debtor’s Motion For Interim and Final Orders Authorizing The*
4 *Debtor to (I) Pay Prepetition Employee Wages, Salaries, Benefits and Other Related Items, (II) Reimburse*
5 *Prepetition Employee Business Expenses, (III) Continue Employee Benefit Programs, and (IV) Pay All*
6 *Costs and Expenses Incident to the Foregoing*, dated May 8, 2023 (the “Wages and Benefits Motion”).¹

7 2. I am familiar with the Debtor’s day-to-day operations, financial affairs, and books and
8 records. Except as otherwise noted, all facts set forth in this Declaration are based upon my personal
9 knowledge. If called upon to testify, I could and would testify competently to the facts set forth herein.

10 3. In or around 2019, the Debtor prepared and published a list (the “Credibly Accused List”)
11 of priests and former priests as to whom the Debtor determined a credible accusation of sexual abuse of a
12 minor had been made. The names of these priests and former priests and the criteria the Debtor used to
13 assess whether an accusation was credible can be found on the Debtor’s website,
14 <https://oakdiocese.org/credible-accusations>.

15 4. The Credibly Accused List contains information relating to 21 priests of the Diocese of
16 Oakland, including their names, dates of ordination, assignments within the diocese, dates when the
17 individual’s alleged abuse occurred and when they were removed from active ministry, and whether they
18 are living, deceased, retired, laicized, or excommunicated.

19 5. The Debtor is not currently paying wages to any of the 21 individuals identified on the
20 Credibly Accused List.

21 6. Of the 21 individuals identified on the Credibly Accused List, 15 are deceased. Neither
22 the deceased individuals nor their estates receive any payments on account of the Benefit Programs.

23 7. Two living individuals identified on the Credibly Accused List – Stephen M. Kiesle and
24 Hector David Mendoza Vela – do not receive any payments on account of the Benefit Programs.

25 8. The other four living individuals identified on the Credibly Accused List – Jeffrey N.
26 Acebo, Thomas Duong Binh-Minh, Ronald J. Lagasse, and Francisco Tarcisio Lanuevo – receive pension

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28 ¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Wages and Benefits Motion.

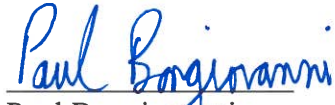
1 payments from the Diocese of Oakland Priests' Pension Plan (the "PPP"). Payments from the PPP do not
2 come from the Debtor's estate or any assets controlled by or maintained for the benefit of the Debtor.
3 Based upon information supplied from the PPP, I have determined that these men receive the following
4 monthly payments from the PPP:

- 5 • Mr. Acebo – \$2,715.30;
- 6 • Mr. Binh-Minh – \$605.00;
- 7 • Mr. Lagasse – \$1,381.44; and
- 8 • Mr. Lanuevo - \$1,452.81.

9 9. Additionally, the Debtor pays \$341.26 per month on account of Mr. Acebo's health and
10 dental coverage, \$543.25 per month on account of Mr. Lanuevo's health and dental coverage, and \$500.00
11 per month to Mr. Lanuevo as part of the SERP.

12 I declare under penalty of perjury under the laws of the United States of America that the foregoing
13 is true and correct to the best of my information, knowledge, and belief.

14 Executed on June 15, 2023, at Oakland, California.

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16 Paul Bongiovanni
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