

AFFIDAVITS IN SUPPORT:

These affidavits were written by David Robitaille and mailed from prison to their respective recipients with instruction to make any and all modifications, and then sign or don't sign. No modifications were made. All were signed.

They demonstrate the true character of David Robitaille.

NOTE: The intention, at one point during incarceration and a particularly emotionally painful period, David decided to begin work on a civil action against the alleged victim and his mother. While nothing became of this, the Affidavits of both mother Margret Robitaille and sister Marlene Plant are relevant to this case as they both demonstrate that no sexual assault or rape of any kind could have occurred at Margret Robitaille Stonina Drive address as alleged due to the 24/7 manned nonprofit stationed there; or police and social services. The Commonwealth did not question anyone other than Richard Ventura and his mother Virginia. Otherwise, they would have avoided alleging a false criminal activity at a time and place it could never have occurred.

QUESTIONS TO BE ASKED TO MARGRET ROBITAILLE
FOR PLAINTIFF'S DEPOSITIONS

1. Are you the plaintiff, David Robitaille's, mother?
2. Do you know the defendants, Richard Ventura and his mother Virginia (Houlla) Ventura?
3. Were you a member of the Chicopee, Massachusetts chapter of an organization known as Societies League Against Molestation (SLAM) in the early part of 1986?
4. Was the head quarters of this chapter of SLAM located at your Stonina Drive address in Chicopee, Massachusetts in 1986?
5. Was the head quarters' office located in the living-room of you Stonina Drive address in Chicopee, Massachusetts?
6. Was this office equipped with two 24 hour "hot-line" phones which were maned at all times, as well as an oke desk and chair??
7. Were you one of the members of SLAM designated to answer these two phones?
8. Did you share this job with anyone else?, and if so, who?
9. Did the head quarters of SLAM at your Stonina Drive address have an open-door policy where anyone could come visit the organization at any time?
10. Was the plaintiff, David Robitaille, your son, living with you in early 1986?
11. Was the plaintiff, David Robitaille, involved in this organization?, and if so what was his job?
12. In doing his duties, was the plaintiff, David Robitaille, ever allowed to answer the two "hot-line" phones, or be at the desk alone at any time?
13. After your son was arrested for the alleged crime of rape of a child by force, which was to have been committed against the defendant, Richard Ventura, did you ever have the chance to speak with or be in the presents of the defendant, Richard Ventura?
14. What were your impressions of the defendant, Richard Ventura, at those times as to his having allegedly been the victim of forced rape?

15. Did the defendant, Richard Ventura, ever tell you that he had been sexually abused by his uncle?
16. Did he tell you that he told his mother of this abuse?
17. Did he tell you that his mother told him not to tell anyone about this abuse because his uncle was family?
18. Did you personally know of, or have you ever been told of the defendant, Richard Ventura, having been sexually active with a young girl in the low income housing project where you lived in Chicopee, Massachusetts in 1986, prior to the plaintiff, David Robitaille, having been arrested?, if yes, explain.
19. Have you ever heard of the plaintiff, David Robitaille, becoming sexually involved with any child prior to allegations made by the defendant, Richard Ventura?
20. Did the plaintiff, David Robitaille, have a girl or lady friend named Mary Kentfield, age 27, during the early months of 1986, when he was 18 years old?
21. In the early weeks of April, 1986, was the plaintiff, David Robitaille, "kicked out" of your apartment/home by you - or did he leave your apartment/home at that time and move to his sister's home in Springfield, Massachusetts?
22. Concerning the SLAM organization, when you held your weekly meetings at your Stonina Drive apartment/home, would you allow the children of members and friends to sit in on them?
23. Did the defendant, Richard Ventura, ever sit in on these meetings?, if so, was this often?
24. Was your son, the plaintiff, David Robitaille, known to be a passive person or violently aggressive person in 1986?
25. What type of activities did your son, David Robitaille, plaintiff, like to do in 1986, for fun?
26. Did anyone from the Springfield or Chicopee police, District Attorney's Office, or the plaintiff, David Robitaille's, attorney ever question you about the allegations of rape filed against the plaintiff, David Robitaille?
27. Was your son David Robitaille, plaintiff, being seen by a psychologist at the Holyoke - Chicopee Area Mental Health Ctr., in 1985 and 1986 after a suicide attempt in 1985 when he was 17 years old?
28. Do you personally believe that your son David Robitaille, plaintiff, in any way molested, raped, or in a sexual manner touched

the defendant, Richard Ventura?

Dated: 1-14-94

Respectfully submitted,

David Robitaille pro se
Plaintiff
Southeastern Correctional Ctr.
12 Administration Rd.
Bridgewater, Massachusetts
02324

X Margant Robitaille

I MARGARET A ROBITAILLE, HEREBY DEPOSE AND STATE UNDER THE PAINS AND PENALTIES OF PERJURY, THAT THIS DEPOSITION WAS ANSWERED BY ME.

1. YES
2. YES
3. YES
4. YES
5. YES
6. YES
7. YES
8. YES, MARY KENFIELD, + MARLENE PIANT
9. YES
10. YES, PASSING OUT FLYERS AT DIFFERENT LOCATIONS
10. YES
12. NO
13. YES
14. HE DID NOT ACT AS THOUGH ANYTHING HAPPENED TO HIM.
15. YES
16. YES, HE SAID HIS MOTHER KNEW
17. YES
18. YES, RICHARD (12) AND THE LITTLE GIRL (8) WERE UN DRESSED
19. NO
20. YES
21. YES, I TOLD HIM TO LEAVE.
22. YES
23. 3 OR 4 TIMES OR MORE
24. PASSIVE
25. KARATE AND EXPLORERS SCOUTS
26. NO, I SAW NO ONE

27. YES

28. NO

Margaret A Robitaille

MARGARET A ROBITAILLE
88 DEBRA DR.
CHICOPEE MASS 01020

MARY KENNEDY & MARGARET PIANT

YES, PASSING OUT FLYERS AT DIFFERENT
LOCATIONS

HE DID NOT ACT AS THOUGH ANYTHING HAPPENED
TO HIM.

YES, HE SAID HIS MOTHER KNEW

RICHARD (IS) AND THE LITTLE GIRL (S) WERE

ON DRESSER

YES, I TOLD HIM TO LEAVE

3 OR 4 TIMES OR MORE

QUESTIONS TO BE ASKED TO MARLENE PLANT
FOR PLAINTIFF'S DEPOSITIONS

1. Are you the plaintiff, David Robitaille's, sister?
2. Do you know the defendants, Richard Ventura and his mother Virginia (Houlla) Ventura?, and if so, how do you know them?
3. Were you the president of the Chicopee, Massachusetts chapter of an organization known as Societies League Against Molestation (SLAM) in the early months of 1986?
4. Was the head quarters of this chapter of SLAM located at your mother Margret Robitaille's Stonina Drive - Chicopee, Massachusetts address?
5. Was this head quarter's office located in the living room of your mother's Stonina Drive - Chicopee, Massachusetts address?
6. Was this office equipped with an oke office desk and chair, and two 24 hour "hot-line" phones which were maned at all times, seven days a week?
7. Who were the people designated to answer these phones?
8. Weren't the people designated to answer these phones there all the time?
9. Did this head quarters at your mother's Stinina Drive address have an open-door policy where anyone could visit the organization at any time?
10. Was the plaintiff, David Robitaille involved in this organization?, and if so, what was his job?
11. When you held your weekly SLAM meetings at you mother's Stonina Drive address, would you allow the children of members and friends sit in on them?
12. Did the defendant, Richard Ventura, ever sit in on these meetings?, and if so, was this often?
13. What would be the general subject matter spoken of at these SLAM meetings?
14. Do you have three children, and were two of them, a boy and a girl, sexually abused?
15. After your brother, the plaintiff, David Robitaille, was arrested for the alleged crime of rape of a child by force, which was alleged to have been

committed against the defendant, Richard Ventura, did you ever have the chance to speak with or be in the presents of the defendant, Richard Ventura?

16. What was your impression of the defendant, Richard Ventura, at those times as to his having allegedly been the victim of forced rape?

17. To the best of your knowledge, did the defendant, Richard Ventura attend any counseling for this alleged abuse?

18. Do you personally know of, or have you ever been told of the defendant, Richard Ventura having been sexually active with a young girl who lived in the low income housing projects of Stonina Drive and Plant Circle in Chicopee, Massachusetts?, this being in 1985.

19. What type of person was the plaintiff, your brother, David Robitaille, when he was living on Stonina Drive in Chicopp, Massachusetts with your mother in 1986?

20. Have you ever heard of the plaintiff, David Robitaille, becoming sexually involved with any child prior to the allegations made in 1986 by the defendant, Richard Ventura?

21. In the early wees of April, 1986, was the plaintiff, David Robitaille, "kicked out" of your mother's apartment/house on Stonina Drive in Chicopee, Massachusetts?

How do you know this for sure?

22. Did anyone from the Springfield or Chicopee police department, District Attorney's Office, or the plaintiff, David Robitaille's, attorney-or someone from his office ever question you or any member of your family about the allegations of rape by force as alleged by the defendant, Richard Ventura?

23. Was your brother, David Robitaille, plaintiff, know to be a passive or violently agresive person in 1986?

24. What type of activities did your brother, David Robitaille, plaintiff, like to do in 1986, for fun?

25. Do you personally believe that your brother, David Robitaille, plaintiff, in any way molested, rapped, or in a sexual manner touched the defendant, Richard Ventura?

Dated: 1-14-94

Respectfully submitted,

David Robitaille pro se
Plaintiff
Southeastern Correctional Ctr.
12 Administration Rd.
Bridgewater, Massachusetts 02324

Marilyn A. Plant

January 14, 1994

I Marlene A Plant, hereby depose and state under the pains and penalties of perjury, that this deposition was answered by me.

1. yes
2. yes, the family was friends of my mothers
3. yes
4. yes
5. yes
6. yes
7. My mother, (Margaret Robitaille), Mary Kentfield + myself
8. yes
9. yes
10. yes, to pass out flyers and hang them up in different offices
11. yes
12. yes, three or four meetings
13. Reporting of sexual abuse, police involvement ~~etc.~~ etc.
14. yes
15. yes
16. I found it odd, that Richard did not act like a person who had just been through a bad ordeal.
17. No
18. yes, the people lived two doors down from my mother. The woman told me and my mother that she had just caught Richard who was 12 years old and her daughter who was 8 years old with their pants down in her daughter's bed room.
19. quite, but very active in explorers and into ~~not~~ martial arts.

20. No
21. Yes
22. NO
23. NO
24. Camping, Explorers Scouts and Martial Arts
25. No, I do not

Marlene A Plant

Marlene A Plant
Basket St HC63-7E
Huntington, MA 01060

10-27-92

To whom it may concern:

% David J. Robitaille

I Larry D. Keizer currently
residing at 5-7 Springfield St

Chicopee MA 01013 apt 310

as Foster Brother & friend of David Robitaille
currently residing at N.E. Correctional Center,
will open up my home to him upon release
from said facility.

Sincerely

Larry D. Keizer

COMMONWEALTH OF MASSACHUSETTS

DAMPDEN, SS

SUPERIOR COURT
DOCKET No.
86-3252, 53, 54, 55

COMMONWEALTH

V.

DAVID ROBITAILLE
Defendant

AFFIDAVIT OF LARRY KEIZER IN SUPPORT OF
DEFENDANT'S RELEASE ON PERSONAL RECOGNIZANCE

1. I, Larry Keizer, hereby depose and say the following:
2. I am the foster brother of the above-named defendant, David Robitaille.
3. I write this affidavit in support of the defendant's release on his personal recognizance to the best of my knowledge.
4. I first met David Robitaille when he was a foster child living with my mother and I in Springfield, MA.
5. As time passed, David and I became good friends, both while he was staying with us and after he moved on. I can say that I know him better than most people.
6. I first learned of David's crime situation when he called me from the police station the night of his arrest. He called me for his one phone call.
7. David's charges are not consistent with his personality. David hates violence. He has never been in a fight in his life. Although he was interested in the marshal arts for a while, he never used the little he knew to harm anyone. For the most part, David staid to himself.
8. I know that David has had problems resulting from abuse while in foster care throughout his life, but he is not the type of young man who would force anyone to do anything.
9. The court should allow David to be released into my custody. He would be living with me until the outcome of this matter, and for as long as is needed. I am deeply concerned for David and his well being, and feel that my moral support will be of great help to him at this time.

10. It is my understanding that David himself got his case back into the court, so it would be consistent with his personality to see this matter through until the end. David always finishes what he starts.

11. I am willing to take responsibility for David and will make sure he makes all of his court appointments. He has several civil cases in court, so I will make sure that he he makes those appointments as well.

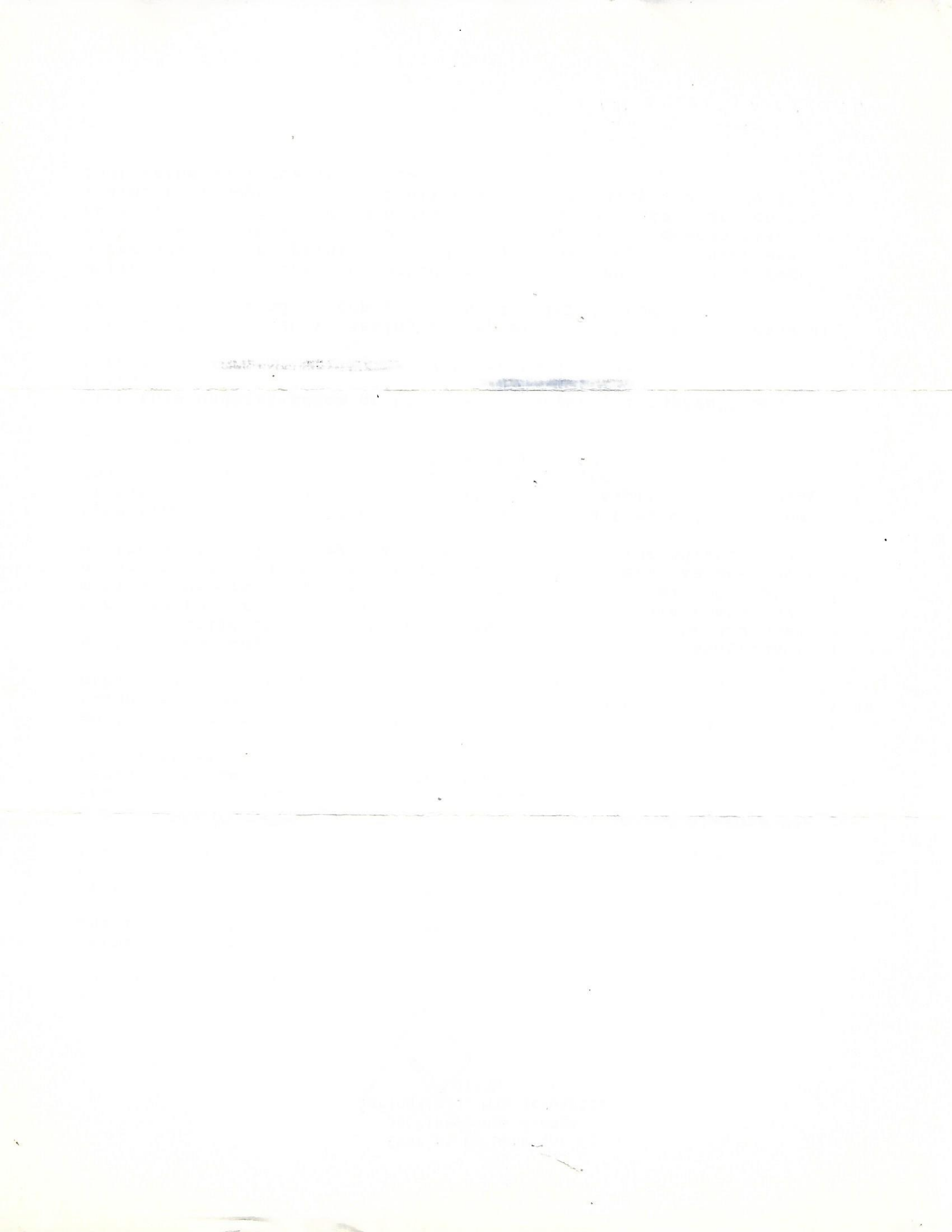
12. I don't feel that there is any chance of David trying to leave the state. I am the only family he has, and all of his friends live in Chicopee, MA. Also, David does not know how to drive. He has no money, except for what he saved while in prison.

13. I ask this court to release David Robitaille on his own personal recognizance, and in my custody.

Dated: 11-12-92

Signed,

Larry P. Keizer
Larry Keizer -- Foster Brother
715 Dwight Street.
Apt # 814
Springfield, MA 01103
Home Phone: (413) 788-7350



COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, SS

SUPERIOR COURT
DOCKET No.
86-3252,53,54,55

COMMONWEALTH

V.

DAVID ROBITAILLE
Defendant

AFFIDAVIT OF CHARLES F. DEBARGER IN SUPPORT OF
DEFENDANT'S RELEASE ON PERSONAL RECOGNIZANCE


1. I, Charles F. DeBarger, hereby depose and say the following:
2. I am a friend of the above-named defendant, David Robitaille.
3. I write this affidavit in support of the defendant's release on his personal recognizance to the best of my knowledge.
4. David and I met one summer's day in 1981, while I was restoring the clay tennis courts in Springfield's Forest Park. David was passing by and stopped to ask me if I needed any help. I said I was just about finished for the day, but that I had a group coming the next day to work on the courts with me, and if he wanted to come back I'd be glad to have his help. He did come back.
5. For the next three or four years, David helped keep up the courts. He did this of his own free will, and without pay. I found that surprising-- it's so seldom you find a kid who volunteers to help with anything. David worked hard during some pretty hot weather, too.
6. When I learned of David's offense, I couldn't believe the charge. I knew he had been in foster homes and had had some personal problems, but it was not in his character to force anyone to do anything the person didn't want to do. David didn't like violence.
7. Over the years, we had talked many times, about many things. I had suggested once that he go into the military, where they would train him in a skill that would help him get a good job. He didn't like the idea: he didn't like the possibility of being trained to kill.
8. I believe that David has matured since those early days when he committed the transgression for which he has spent five years in jail. I believe he is committed to avoiding situations that could lead to trouble. I believe he is ready to begin a new chapter in the rest of his life.

13 November 1992

Charles F DeBarger
Charles F. DeBarger - A friend
1708 West Combs Drive
Raymore, Mo. 64083

9. I have spoke with David's brother Robert, and from what he has told me about him, I feel that David is telling the truth about not having forced the boy into anything. I do not know the boy, but I do know David, and I feel that there is more to this situation than meets the eye.
10. Concerning David's employment upon release, I own a construction company in Hartland CT., and am willing to have David as an employee. He would be under constant supervision by me during work hours. Our work does not involve working with or around children, so the court should have no concerns in that respect.
11. David would have the opportunity to attend church with my family, if allowed release by this court, and I feel that this would help him to reintegrate into society.
12. The longer David is institutionalized, the worse off I feel he will be. He needs the love and support of the church community, and a feeling of belonging.
13. I know that David has been going to counseling right from the start. He has made many attempts to obtain specialized counseling from a psychologist friend of mine. However, the prison would not allow it.
14. I have seen this young man go from a confused child, to a head strong adult who knows his purpose in life, and who has hopes, dreams, and goals. Also, I see David as someone who has a lot to offer society if given the chance.
15. I feel that David would see this criminal case through without making any attempts to evade the law. He has worked hard on his case and has told me that he wishes to see it through until the end. I support his release on personal recognizance, and have provided him with some money to be used for bail if needed. I do not consider him at risk of flight.

Signed,


Arne Nielsen -- Friend
Nielsen Rd.
East Hartland, CT. 06027
Phone: (203) 653-2268.