

IN THE IOWA DISTRICT COURT IN AND FOR SCOTT COUNTY

JOHN DOE III, )

Plaintiff, )

vs. )

FATHER JAMES JANSSEN, )

FATHER FRANCIS BASS, )

THEODORE ANTHONY GEERTS )

AND THE DIOCESE OF DAVENPORT. )

Defendants. )

Law No. 101428

AFFIDAVIT OF JOHN DOE III

STATE OF IOWA )

) ss

COUNTY OF SCOTT )

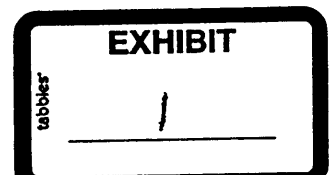
I, John Doe III, being duly sworn under oath, states as follows:

1. Growing up in Fort Madison was exciting and adventurous for me. I was born in 1952. There were woods to explore, a swimming pool at the other end of town that I rode my bike to and, of course, the Mississippi. My childhood was happy. My father worked in a security position and my mother was a stay at home mom.

2. Both of my parents were Catholic and I was baptized at St. Joseph's Church. I attended kindergarten at Jackson Public School and thereafter attended St. Joseph's School from 1st grade through 8th grade. I trained and served as an altar boy at St. Joseph's from 1964 until 1965.

3. My family life was free of any type of abuse or neglect. I felt safe with my family, my town and my church. I was able to walk to school alone and go to movies alone. Ages 10 and 11 were spent mostly fishing and hunting.

4. At church, the pastor was Father Boyle and the assistant was Father Stanger. Father Boyle was a kindly man who loved children and Father Stanger was a strict disciplinarian. Father Boyle would overlook minor trespasses such as being late for mass (if you had a good explanation) while Father Stanger would chide one for it. In 1961, Father Stanger left and was replaced by Father Janssen.



5. Father Janssen was considered by many of the parishioners as a 'modern' priest. Before the abuse I remember him quoting popular songs of the day into his sermons. The women in the parish seemed to love him and when he spoke with our moms he would address them as 'mother (last name).'

6. The first sexual abuse occurred in 1964, when I was 12 years old. It was late summer and the first sexual abuse happened in Father Janssen's office (in the St. Joseph's school basement under the stairway next to the gym). I was helping Father Janssen clean up the office (I felt so proud that he had asked me to help him). Afterwards, we sat on the couch in his office and Father Janssen put his hand on my knee and said, "Trust me?" Then he moved his hand up my leg toward my crotch and each time he moved his hand he repeated, "Trust me?" When he reached my crotch (we both were wearing street shorts) he rubbed my genitalia with pants on and made giggling sounds and said he felt something hard. He undid my button and zipper. He stroked my penis a few times and said, "Does that feel good?" Then he said we could double our pleasure and took down his pants and we stroked each other's penises simultaneously a few times. He asked me if I knew what a blow job was and I said yes, but I had never done that. "Go ahead and give it a try", he said. I didn't know how and just put my lips on his penis and literally blew air onto his penis. Janssen said to suck and move my head up and down which I did. He stretched out on the couch and grabbed two coat hooks attached to the wall above his head. After a few minutes he said it was my turn. I was on my knees on the floor and he had me sit on the couch. He then began to perform fellatio on me with him on his knees. I told him it felt scary and he said "why?" He then sat next to me and we mutually masturbated each other until ejaculation. He told me this was our "secret". I always felt if I told my parents about the abuse, my life would be ruined.

7. I knew a boy at St. Joseph's school at the time but only spoke to him briefly at Settler's Park. I knew he hung around with Janssen sometimes, but I didn't know he was being sexually abused too until he told me. In addition, he told me that if we hung around Janssen we could go places out of town and play cards in his office and smoke cigarettes (I began smoking at this time). I knew some of the older boys that were now in high school had hung around with Janssen and knew they were considered cool and tough and did go many places with Janssen. The older boys then in high school had only casual contact with Janssen.

8. Most of the sexual abuse for the next few months was in Janssen's office, the gym locker room and in his restored Model A Ford in the garage next to the school. Mostly it involved Janssen, two other boys and myself. Many times it

was group sex like mutual masturbation or fellatio, or a combination of masturbation and fellatio involving the four of us.

9. It was during this time that I was first invited to Father Geerts' rectory at St. Boniface Church in Farmington, Iowa. The first time it was Geerts, Janssen, two other boys and myself. All of us had sex in the same room at the same time (upstairs in the living room next to the master bedroom) where we played cards (hearts), a five-cent slot machine and bumper pool. We had free access to alcohol at the rectory. Geerts fondled me (my genitalia) and inserted his finger into my anus during this weekend. We also were shown pornographic movies, magazines and playing cards to get us in the mood for sexual activity. All of the pornography was kept in the basement locked in a double door cabinet. It was agreed that if anything happened to Geerts, Janssen would get rid of it. The weekend would start Friday night and end Sunday night.

10. I can't remember how many times I was at Geerts' rectory, but it was generally the same each time (Geerts, Janssen, another boy and myself). Janssen had a Polaroid instant camera and on occasion took pictures of myself and the other boys nude with erections. To this day, I worry about those pictures, if they still exist, if they've been passed around, if someone loaded them on to the internet. It's one of the haunting memories that will never go away.

11. Many times at Geerts' rectory we played strip poker followed by group sex. I participated in and witnessed mutual masturbation and mutual fellatio. Two times at Geerts' rectory, I sort of 'checked-out'. One of those times was while watching Janssen and Geerts perform mutual fellatio on one another. The other time was when I witnessed one of the boys performing fellatio on Geerts while Geerts was kissing another boy on the lips with his finger in the anus of the boy he was kissing.

12. The first time I went to Lampe's cabin on the Mississippi River (south of Montrose, Iowa), the people present were Janssen, Geerts, Bass, myself and six other boys from St. Joseph's School. The weekend consisted of the usual group and couple fellatio/masturbation in the cabin and on the Lampe's docked houseboat. During this weekend, Father Bass masturbated me while he performed fellatio on another boy.

13. I can't remember how many times I went to the cabin, but during one of the times there was a big party with Janssen, Geerts, Bass and several boys present for the weekend. That night something happened that I can't remember. I checked-out this time by completely dissociating from my body by floating outside the cabin. The next day I threw rocks at Janssen and hit him several times. Only

fragments remain of that night. Pieces come back to me in a recurring dream about that night, always crying and screaming are in the dreams.

14. There were so many instances of sex with the three priests, especially, Janssen, that I can't give an accurate number. A favorite act Janssen liked was to ask for a match and put his hand in our pockets fondling us until we were hard. Or, having us look for something in his pocket and having us fondle him until he was hard.

15. During this time, Janssen encouraged us to shoplift, lie and pull jokes on people. An example of this was at St. Joseph's church bazaar. One of the boys told me that the chili was being made in the gym kitchen for the bazaar the next day. It was in a large pot left to simmer all night. Janssen and the other boy ejaculated into the pot and laughed about it the next day while watching parishioners eat. Janssen was also brazen about his sexual activities. He had one of the boys masturbate him while he was saying mass. The altar had been moved forward and we could sit behind and underneath it during services, which we did at times.

16. Janssen encouraged us to steal things he could use. He was big into coin collecting and sponsored several coin shows in the gym at St. Joseph's School. He would go around and find out what different collectors had for sale and then tell us boys to steal those and give them to him. An especially easy target was an old man from Missouri nicknamed Kahoka Joe. He was in a wheelchair and easy to distract. We (the boys) stole many coins from him and gave them to Janssen. After church on Sundays we (the altar boys) often helped Janssen open the offering envelopes. Many times there was loose money and often times Janssen pocketed it and usually gave us some too.

17. Stealing was a double standard with the priests. Once while staying at Geerts' house (the rectory in Farmington) another boy and myself stole his antique car he kept in storage in the rectory garage. We were arrested by the Farmington police and Geerts and Janssen had to come to the police station the next morning to get us out. They were both furious. The police released us into the custody of Janssen who we needed to report to once a month for two years (part of our probation). These charges were expunged. Janssen did threaten me that if anyone further found out about this my Dad would lose his job.

18. Once while playing football with some of the other boys down at Lampe's cabin, a male neighbor came out and yelled at us that everyone knew what we were doing with those priests. He said we were queers. Another one of

the boys and I talked about it later and the other boy said we were queers. This was something I had never thought of. I never thought of how other people would view us if they knew. I never considered myself homosexual and we (the boys) even laughed at queer jokes.

19. Janssen told me I could never tell anyone, ever, because if I did no one would believe me. He also told me if I told, I would never get married (because a woman wouldn't marry me). And, if I did marry and she found out I would never be trusted around kids. An example he gave was that if I had a son and went camping, and the son and I were alone in the woods, the wife would think we were having sex. This threat scared me into silence. I always felt my life would be ruined if I told.

20. At Janssen's direction as my priest, he heard my confessions. This would be done face to face and not in the confessional. I would confess to him after abuse by him that "I blew someone" (which was Janssen). He would giggle and forgive me for my sins. He made a point of having the altar boys confess their "sins" of sexual abuse by him before he would clear them for serving mass. I was also afraid of having to explain to my parents why I would not have been fit to serve mass, so I blindly followed his directions. I witnessed Janssen, Bass and Geerts confessing their sins to each other face to face.

21. In 1967 Janssen was transferred to Sugar Creek Parish. My family had just moved to Davenport and I stayed at his rectory in Sugar Creek four different times. Three of the times I spent the weekend and the last time I was there I stayed two weeks. During the weekend visits it was Janssen and one other boy. During the two week visit it was Janssen and two other boys. It was at this time that Janssen started pushing me away.

22. During the last two weeks at Sugar Creek I helped Janssen and two of the other boys tear down an outhouse. It was surrounded by poison ivy and I broke out. Janssen took me back to my parents' house and when I left his car I didn't look back and decided that I would never hang around him anymore.

23. Since that time I have run into Janssen only two times. Once was when I was attending St Ambrose College and he was in the union with two boys, about 15-16 years of age, getting ready to go swimming. The other time was at a store called Turnstyle where we talked for awhile. When we turned to say good-bye, he gave me the finger.

24. Since that time I have thought about the abuse every day in some fashion. I was always afraid someone would find out. I went so far as to deny my religion and avoided telling anyone I was from Ft. Madison.

25. My self esteem was shot. I felt like I and the other boys were the only ones that something like this ever happened to. Many things happened to me after the abuse that I couldn't understand. I suffered from depression, a suicide attempt, alcohol and problems with authority.

26. The depression started with the first abuse and still continues. I was emotionally dependent on Janssen and when he would pick some boys over me and leave me out, I would become depressed and despondent. To further the abuse, he used favoritism amongst my peers and I would become worried and withdrawn. I remember talking to Janssen about the depression several times. One night, when he was taking the other boys home, I asked him to drop me off last because I wanted to talk to him. He drove his Model A Ford into his garage. I told him about the depression and his response was to ejaculate me in the car. "Do you feel better now?" he asked. I was about 13-14 years old at that time.

27. I did much traveling during the 1970's in Europe, Asia and the States. I figured the more travel experiences I had, the more different things I would have to think and talk about in trying to forget the abuse.

28. I attended St. Ambrose College in the 1970's. I enrolled full time for two semesters and part time other semesters.

29. I began to drink heavily during the late 1970's and this was when I tried to kill myself by taking a handful of Percodan and drinking a fifth of rum. It was during this time that I thought often of the abuse and the dreams were very scary (especially that night at Lampe's cabin).

30. In the early 1980's I suffered a complete nervous breakdown. I moved in with my parents and stayed at home for four years. I worked a few menial jobs for a few months but was unable to follow orders very well. I was afraid to leave the house and the thoughts and dreams intensified about the abuse.

31. In 1987-1989, I finally got myself together enough to return to school and finish my BA. This is where I met my wife and was married January 6, 1990.

32. It wasn't until 2003 that I realized the impact the extensive and repeated sexual abuse has had on me. Thanks to working in the mental health field, being married to a mental health professional, research and brief counseling, I have been able to begin to understand the lasting impact I have suffered and continue to suffer. If it wasn't for psychotropic medications I wouldn't be able to function now.

33. The effects these three years (1964 to 1967) have left me feeling afraid, ashamed and depressed. There hasn't been a single day when I haven't thought about the sexual abuse since 1967. Before my current marriage, relationships with women were short term (I was afraid they would find out about the sexual abuse). I have had problems with alcohol. I have problems with groups of people due to the group sexual abuse and the mean spiritedness of the abuse from the three priests during these encounters. I still experience problems with employment due to my distrust of authority figures. Authority figures who were not only adults, but also Roman Catholic Priests that everyone in the community looked-up to and trusted has shattered my ability to follow directions. The dreams and thoughts continue to haunt my waking and sleeping hours. Many times I 'space out' daydreaming and at times dissociating from my body to another place.

34. These three priests (Fathers Janssen, Geerts and Bass) took from me my religion and most regrettably my belief in God! I often look back and think, "If I hadn't been born into the Catholic religion, how different, better and healthy my life would have been." Nothing can restore the losses the Church enabled these priests to inflict on me.

35. In 1998, I consulted with a counselor at a facility called Standing Together Against Rape. I spoke with a counselor there once a week for 7-8 weeks. It was not professional psychiatric counseling or treatment. While talking to this counselor, I decided to write a letter to Bishop Franklin informing him of the abuse by Fathers Janssen, Geerts and Bass. He offered his sympathy, but nothing else. At the time I wrote this letter, I was unaware, because of my mental illness, of the extent of the sexual abuse, the causal connection between the sex abuse and my mental illness and because of my mental illness, I was incapable of acting upon my knowledge of the sex abuse to protect my legal rights. I was unable to take any further actions other than writing the letter to Bishop Franklin. When I received no encouragement, support or recommendation regarding any type of psychological treatment, I was

unable to act further to assist myself in obtaining any kind of mental health counseling.

36. I have not seen a psychologist or psychiatrist until May 4, 2004 for any type of counseling. I am under medical treatment from my family physician and am taking daily doses of psychotropic medication. This is necessary for me to attempt to function in daily life, although I have significant ongoing psychological distress. It was not until on or about November 17, 2003, I finally learned, for the first time, that the Diocese of Davenport had received complaints about Father Janssen and sexual contacts with minors before 1967. In addition, it was not until Bishop Franklin authored his public report on February, 25, 2004 that I knew there were prior complaints about Father Bass. Until that time, the Davenport Diocese concealed from me the information that these priests were sexual predators.

37. The concealment by the Diocese of Davenport that there were complaints about Father Janssen and Father Bass and sexual contacts with minors before 1962 prevented me from attempting to vindicate any legal rights against the Diocese until I filed my lawsuit. The Diocese concealed the witnesses with knowledge of the abuse from me until these witnesses died, making it more difficult for me to prove my claim and helping the Diocese avoid liability.

38. Contrary to public statements by representatives of the Diocese, including Bishop Franklin, no pastoral concern, care or offer of psychological or psychiatric treatment has ever been made to me.

39. I was baptized at the St. Joseph Church in Fort Madison, Iowa, attended catechism classes, served as an altar boy, and, with my family, attended weekly mass. Father James Janssen was my priest. Father James Janssen was an ordained Roman Catholic priest, a representative and authority figure of the Diocese of Davenport and was my spiritual advisor. So was Father Bass. Both of them were persons of great influence and persuasion as holy men and authority figures in my life.

40. I was raised, educated and trained to develop great admiration, trust, dependence, reverence and respect for the Roman Catholic Church, its agents, the Davenport Diocese, the Bishop, the Vicar General and all priests of the Diocese. Father Bass and Father Janssen identified me, sought and gained the trust and confidence of my parents to serve as a spiritual advisor, pastor, confessor and priest to me. Janssen and Bass sought and gained my parents' consent to participate in counseling and take overnight trips to a local cabin, including unsupervised swimming trips. Janssen and Bass would encourage us to swim naked.

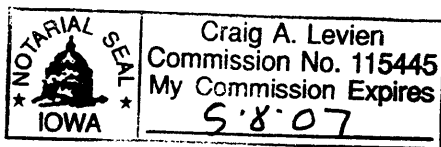


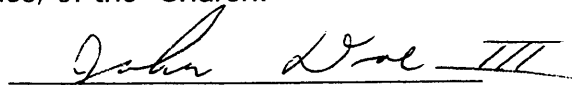
41. Defendants Janssen and Bass also sought and gained my trust, friendship, admiration and obedience and conditioned me to comply with their direction and to look to them as an authority on all matters spiritual, moral, ethical and temporal.

42. On more than one occasion, before improper sexual contacts with me, Janssen would tell me that I should "trust him" and that these actions should be kept secret. Janssen, Bass and the Diocese of Davenport conspired together to conceal from me the nature and extent of Janssen and Bass' activities and deprive me of knowledge of my legal rights. I was a member of the Davenport Diocese and relied upon, trusted, depended and was counseled in educational, spiritual, emotional and psychological matters by representatives of the Davenport Diocese at the time of the abuse.

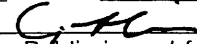
43. As a result of the sexual abuse and the concealment of the wrongful nature of it by the Diocese of Davenport, I believe I was mentally ill and developed various psychological coping mechanisms and symptoms of psychological distress. I admit that I am not an expert and do not completely understand how and to what extent my shame, guilt, self blame, depression, repression and disassociation have affected me. However, I know that I was unable to discover the nature and extent of the abuse and the causal relationship between the extent of the sex abuse and my injuries until, at the earliest, November of 2003. I am still not fully aware of the nature and extent of the abuse and the nature and extent of damages that I have suffered and it is my understanding that I am still suffering from a mental illness that dates from the time of my abuse.

44. That attached and incorporated in this Affidavit are Pages 213 and 214 from a book entitled The New Saint Joseph Baltimore Catechism. This picture and these instructions are similar and typical of the type of training and instruction I received while being raised in the Catholic Church. Specifically, I was instructed that the priest is Christ himself on earth and that the priest has supernatural powers. See also Page 79 – B. Attributes (or Qualities) of the Church.



  
JOHN DOE III

Subscribed and sworn to before me this \_\_\_\_\_  
11<sup>th</sup> day of May, 2004.

  
Notary Public in and for the State of Iowa

153. What are the effects of ordination to the priesthood?

The effects of ordination to the priesthood are:

*first*, an increase of sanctifying grace;

*second*, sacramental grace, through which the priest has God's constant help in his sacred ministry;

*third*, a character, lasting forever, which is a special sharing in the priesthood of Christ and which gives the priest special supernatural powers.

Christ is *THE ONE* priest in whom the fullness of the priesthood is found. All other priests share in the priesthood of Christ, as a mirror shares in the light of the sun. But just as a mirror really sheds light, so does the ordained priest really show forth the priesthood which he has from Christ through the priestly character.

CHRIST OUR  
HIGH PRIEST  
IN HEAVEN

"always living  
to make  
intercession  
for us."  
(Hebrews 7, 25)



THE PRIEST  
ON EARTH  
ANOTHER  
CHRIST

The faithful  
sharing through  
the ordained  
priest in the  
Priesthood  
of Christ



**454. What are the chief supernatural powers of the priest?**

The chief supernatural powers of the priest are: to change bread and wine into the body and blood of Christ in the Holy Sacrifice of the Mass, and to forgive sins in the sacrament of Penance.



The chief power of the priest is to offer the Sacrifice of the Mass. Here he exercises his office of reconciliation by applying to the people the power of the Cross of Christ to unite man to God in love.



The priest also administers the Sacrament of Penance to remove the chief obstacle to reconciliation, which is sin.

**455. Why should Catholics show reverence and honor to the priest?**

Catholics should show reverence and honor to the priest because he is the representative of Christ Himself and the dispenser of His mysteries.

"The priest is indeed another Christ, or in some way he is himself a continuation of Christ" (Pope Pius XI, Encyclical on the Priesthood)

**456. Who is the minister of the sacrament of Holy Orders?**

The bishop is the minister of the sacrament of Holy Orders.

**DISCUSSION QUESTIONS**

1. How does Extreme Unction comfort us in sickness?
2. When should we receive Extreme Unction?
3. When does Extreme Unction make sick people better?
4. Why can't babies receive Extreme Unction?
5. What qualities does a boy need to enter a seminary?
6. What does the sacramental grace of Holy Orders do for a priest?
7. Why does the human race need the priesthood?
8. What is the greatest power a priest has?
9. Why is it a great privilege to be a priest?
10. Whose work does the priest continue on earth?

## B. ATTRIBUTES (or Qualities) of the Church

161. What are the chief attributes of the Catholic Church?

The chief attributes of the Catholic Church are authority, infallibility, and indefectibility. They are called attributes because they are qualities perfecting the nature of the Church.

162. What is meant by the authority of the Catholic Church?

By the authority of the Catholic Church is meant that the Pope and the bishops, as the lawful successors of the apostles, have power from Christ Himself to teach, to sanctify, and to govern the faithful in spiritual matters.

*Authority* is the power to command others. All authority is from God, and He gives it to the Church in spiritual matters. To refuse to obey the authority of the Church is to refuse to obey Christ. He Himself said to His disciples, "He who hears you, hears Me; and he who rejects you, rejects Me" (Luke 10, 16).

163. What is meant by the infallibility of the Catholic Church?

By the infallibility of the Catholic Church is meant that the Church, by the special assistance of the Holy Ghost, cannot err when it teaches or believes a doctrine of faith or morals.

*Infallibility* does not mean that the Pope cannot commit a sin, but that in teaching a doctrine of faith or morals, he is prevented by the Holy Ghost from making a mistake. The Church teaches only truth.

164. When does the Church teach infallibly?

The Church teaches infallibly when it defines, through the Pope alone, as the teacher of all Christians, or through the Pope and the bishops, a doctrine of faith or morals to be held by all the faithful.

165. What is meant by the indefectibility of the Catholic Church?

By the indefectibility of the Catholic Church is meant that the Church, as Christ founded it, will last until the end of time.

Nations will rise and fall. False religions will come and go. But the Church will last forever.