

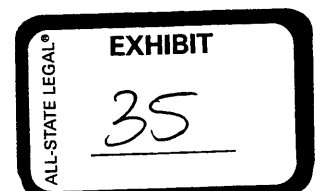
INTERROGATORY NO. 11: Did you, your agents, attorneys, representatives or employees have knowledge at any time of any complaints or claims against Defendant Father James Janssen for misconduct or attempted misconduct with any minor(s)? If the answer is in the affirmative, please state separately for each claim:

- a) identify all persons who informed you of these complaints or claims;
- b) the date(s) the misconduct was purported to have occurred;
- c) the nature of the acts or act of misconduct Defendant Father James Janssen was purported to have committed or attempted;
- d) the date the Diocese of Davenport became aware of the allegations, complaint or the claim, identifying the particular person who became aware of the allegations, complaint or the claim;
- e) identify and describe any letter, document, memoranda, report, or other tangible evidence relating in any manner to Defendant Diocese of Davenport's knowledge of misconduct or allegations of misconduct, allegedly committed by Defendant Father James Janssen; and
- f) describe any disciplinary or preventative actions any representative of the Diocese of Davenport took or considered taking in response to its above described knowledge.

ANSWER: Yes. Defendant objects to this Interrogatory until an appropriate Protective Order has been entered protecting the confidentiality of this answer and information and the privacy of victims and reporters. Defendant further objects to the extent this Interrogatory seeks information that post dates 1972 and that is not relevant to this lawsuit and not reasonably calculated to lead to the discovery of admissible evidence and further records are protected by the First Amendment, Code of Canon Law and Iowa Code § 622.10.

SUPPLEMENTAL ANSWER:

In the records of the Diocese of Davenport ("Diocese"), there is a note from Bishop Ralph Hayes dated September 30, 1954. He had received a report that a fourth year student at St. Ambrose Academy (Involved Person, hereinafter "IP #1") had been "solicited to acts of impurity" by Father Janssen. Bishop Hayes noted: "This is the first accusation of this nature brought to my attention."



SUPPLEMENTAL ANSWER NO. 11 CONTINUED:

Diocese documents include a letter from Father Dingman to Bishop Hayes dated October 14, 1955. The pastor in Burlington had been called by the chief of police about a letter he received from the Newton police regarding a "morals charge" associated with the YMCA in Newton.

On November 9, 1956, Bishop Hayes relieved Father Janssen of his appointment in Newton and granted him an indefinite leave from the Diocese. He was directed to leave the Diocese immediately. On November 2, 1956, a man from the Newton YMCA wrote to Father McCann, the pastor at Newton. The letter referenced a conversation he had with someone from the Clinton YMCA at a conference. The Clinton person told him that Father Janssen had been moved out of Clinton because of "homosexual tendencies". The gentleman from Newton believed that this substantiated their actions regarding Father Janssen's "homosexual activities".

In December, 1956, Father Janssen requested that the Bishop allow him to enroll at Loyola University during his leave, which was granted. On April 26, 1957, Bishop Hayes wrote to Reverend William Devlin, SJ MD. Father Janssen had informed the Bishop that he was under Dr. Devlin's care. Bishop Hayes expressed that he was most anxious to help this young priest, "but sometimes I wonder whether my approach has been the proper one." He requested any information the doctor could give him about Janssen's problems, as the Bishop was most anxious to do anything he could to help straighten him out. Dr. Devlin responded on May 31, 1957.

EXCISED UNTIL COURT MAKES
IN CAMERA REVIEW OF
JANSSEN DOCUMENTS

Father Janssen was assigned as substitute pastor at St. Michael's in Holbrook beginning June 6, 1958. In August, 1958, Dr. Stewart at Loyola again wrote to Bishop Hayes, requesting a progress report on Father Janssen and wondering if his prognosis had been correct. Dr. Stewart stated that he felt Father Janssen was capable of a very good adjustment. Bishop Hayes responded and advised that as far as he could judge at present, Father Janssen was developing properly.

In the files of the Diocese is a letter dated September 29, 1958 from a priest at a parish near to Loyola University. He included copies of correspondence believed to be between Father Janssen and a 14-year-old boy ("IP #2"), which contained apparent references to sexual acts. These had been intercepted by the boy's mother. Bishop Hayes also received a letter from the boy's father, who stated that his son had already experimented "this act", felt that Father Janssen had benefited their family over all and hoped that Father Janssen would be a stronger and wiser priest.

SUPPLEMENTAL ANSWER NO. 11 CONTINUED:

The Diocesan files also include notes dated October 3, 1958 from an apparent meeting involving Father Janssen and Bishop Hayes. The notes state that Father Janssen "confessed his guilt". Bishop Hayes issued a decree of suspension from all acts of priestly ministry. The suspension was stated to be vindictive and indefinite and Father Janssen was forbidden from the city in Illinois.

At his suspension, Father Janssen went to the Abbey of Our Lady of New Mellerey for counseling. On December 11, 1958, Father Janssen wrote to Bishop Hayes and pleaded for mercy, begging for the privilege of offering Mass again. Father Janssen stated: "First of all, I am truly repentant of my past sins. Again, I am sorry for those relapses into sin which I admitted to you at your home. Only God knows how sorry I am." Bishop Hayes wrote to the Abbott at New Mellerey asking if Janssen had made sufficient progress to warrant his recall to the Diocese. On January 17, 1959, the Abbott replied favorably and expressed his earnest prayer and hope that Father Janssen had learned his lesson. On January 19, 1959, Bishop Hayes appointed Father Janssen as administrator, a temporary position, at St. Patrick's in Delmar. In the files is a January 22, 1959 note from Bishop Hayes about this appointment that imposed conditions that Father Janssen have no contact with the boy in Illinois and that he refrain from visiting in Clinton and Newton.

Father Janssen was assigned as an assistant at St. Mary, Davenport, in June, 1959. Notes from Bishop Hayes in the files dated September, 1959, indicate that he conferred with Father Janssen, who admitted to picking up boys in his car and taking them to a pool and outdoor movies. Bishop Hayes gave him strict orders never again to pick up boys and he was warned that he would receive severe punishment. In December, 1959, Father Dingman wrote to the Bishop about a report that one of the sons of (Involved Person #3) had been rubbed on the chest by Father Janssen while standing in front of St. Mary. IP #3 reported again within a couple of weeks that Father Janssen had invited his son to his room in the rectory. IP#3 told his son that the priest was too busy and not to go. The notes indicate that Father Janssen denied these reports.

The Diocesan files also contained a report in 1960 from (IP#4). IP#4 reports "imprudent priestly conduct" and concern about influence on her boys, but no specific allegations are made.

The Diocesan files also include a letter from Father Dingman to Bishop Hayes. He reported that a doctor (IP#5) told him that a mother had come to him in tears about Father Janssen spending too much time with her son, her son sitting on Father Janssen's lap in the back seat of her car while she was driving and she was worried about access to a cottage. File notes from Bishop Hayes indicate that Father Janssen denied the allegations. Bishop Hayes forbade Father Janssen from having boys in his car, taking boys to a cabin or attending any dances.

SUPPLEMENTAL ANSWER NO. 11 CONTINUED:

The Diocesan files include notes from Bishop Hayes from December, 1960, about reports from (IP#6). She reported embraces and car rides involving her son, (IP#7) and a questionable note being found. Notes from Bishop Hayes indicate that Father Janssen denied improper acts, although admitted that he wrestled with the boys. Father Janssen admitted disobeying his orders about car rides, but Janssen said he did not think the order was fair.

The records include a February, 1961 letter from Father Dingman to Bishop Hayes. Father Hopkins at St. Mary reported that IP#7 was having trouble in school, which brought the problem to a head again. Father Hopkins reported that he had no proof of wrongdoing, but "circumstantial evidence" was available, but it did not add up to "anything definite".

On June 14, 1961, Bishop Hayes relieved Father Janssen from his assignment at St. Mary and assigned him as an assistant at St. Joseph's, Fort Madison. The only file entries that could be interpreted as complaints or claims against Father Janssen for misconduct or attempted misconduct with any minor while at St. Joseph's in Fort Madison are correspondence from a family with whom Father Janssen was involved in an estate dispute. The persons disputing Father Janssen's share of the estate made some allegations about "wild rumors, having boys to the house (in Davenport)" and shooting fireworks until 2:00 a.m. on July 4. The estate contest was settled out-of-court.

Father Janssen was appointed pastor at St. Joseph at Brown's (Sugar Creek) effective February 1, 1957. During his tenure at Sugar Creek he was given an additional appointment to the church of St. Mary in Bryant from August, 1972 to October, 1978. There are notes in the Diocesan file from November, 1977, about a meeting with the "Bryant Group". Complaints are made about the Masses given by Father Janssen and money concerns. There were also complaints that Father Janssen taught kids to be dishonest: jump fences to movies, steal from pop machines. In September, 1979, Father Janssen was relieved at Sugar Creek and assigned as co-pastor at St. Anthony, Davenport, with Monsignor Feeney. In September, 1980, he was re-assigned to SS. Philip & James in Grand Mound. In January, 1988, Monsignor Michael Morrissey sent a memorandum to Bishop Gerald O'Keefe. Monsignor Morrissey had received a surprise visit from James Wells, Father Janssen's nephew, who stated that he had been abused by Father Janssen from ages 5-18. Mr. Wells did not want anything except to warn the Diocese and his psychiatrist had recommended that he report this to keep others from harm. Four days later, the mother of James Wells wrote to Monsignor Morrissey asking him to send the results of his investigation to James in Arizona.

Monsignor Morrissey wrote to Father Janssen on January 13, 1988 and instructed Father Janssen to resign from the Personnel Board. Monsignor Morrissey also wrote to James Wells on the same date asking Wells what type of investigation he wanted Monsignor to perform. Wells responded on March 14, 1988 by sending Monsignor Morrissey an exchange of letters between Wells, Father Janssen and Janssen's attorney, Ned Wehr, from 1987. In his correspondence, Wells told Father Janssen that his problems were the direct result of abuse by Father Janssen. Wells threatened involving a lawyer and the Bishop if Janssen's reply was not

SUPPLEMENTAL ANSWER NO. 11 CONTINUED:

satisfactory. Janssen responded through his lawyer, who denied the allegations and threatened to sue Wells. Wells stated to Monsignor Morrissey that he hoped the investigation would bring pressure on Father Janssen to recover his care expenses. Wells said: "I honestly do not want to litigate this matter, but unless something is done, I have no other option."

Except for a complaint by a parishioner about some political activity by Father Janssen, the next relevant document in the files is dated July 23, 1990, authored by Father McAleer who was serving at that time in Ft. Madison. The memorandum sets out facts about accusations against Father Janssen that had been presented to him during the past months. The parents of (IP#8) voiced concerns about their son's "preference of homosexuality" and their "inability to forgive" Father Janssen. (Involved Person #9) came to Father McAleer with marriage problems and he reported that past experiences with Father Janssen, which he had repressed well, were quite likely the base cause of his family problems. (IP#9) made reports of various actions of sexual abuse. Friends (IP#10 and IP#11) had been involved. (IP#9) informed Father McAleer that these activities occurred in various places, including the home of (IP#12). (IP#12) was informed of this by Father McAleer and he was outraged. Father McAleer further reported the following: "Also mentioned as priests were Father Bass and Father Geerts."

As a result of the investigation of Father Janssen, Bishop O'Keefe demanded and received Father Janssen's resignation as Chaplain for Scouting and placed him on indefinite leave effective August 15, 1990. Bishop O'Keefe authorized Father Janssen's retirement from active pastoral ministry effective November 5, 1991.

Diocesan records also show that a report was made by (IP#2) in correspondence between April 30, 1993 and October 31, 1993. (IP#2) requested that Father Janssen meet with him and his therapist to help him cope with the abuse from 35 years prior. (IP#2) stated that it was not his intent to litigate, but to deal with his abuse. (IP#2) also stated that there were two other priests, which he did not name, involved at various times.

In 1993, there was a Matrimonial Tribunal regarding (IP#9). Described in the Tribunal materials is the abuse of (IP#9) and other unnamed boys in Fort Madison. (IP#9) and his advocate both requested strict confidentiality in the investigation.

Diocesan records include a letter from (Involved Person #13), a woman from Clinton to Bishop O'Keefe on June 24, 1993. She stated that relatives in Sugar Creek were talking about Father Janssen bringing boys from Davenport for long weekends, that these boys were talking about it and it was "shocking".

In April, 1996, a report was received from Ann and Don Green that he was traumatized by abuse from Father Janssen during Janssen's tenure at SS Philip & James Parish in Grand Mound. Father Janssen was confronted with this accusation, which he denied, but he was sent for counseling that had been demanded by the Greens. Father Janssen was also instructed that he stop assisting Father Mannhardt at Genesis Hospital and cease any public activity of a

SUPPLEMENTAL ANSWER NO. 11 CONTINUED:

church nature. Monsignor Morrissey sent a letter to all active priests which indicated that Father Janssen was not available for any duties.

Diocesan records include a letter dated July 27, 1998 from litigant John Doe III to Bishop O'Keefe. In that letter, he reported that he had been molested by Father's Janssen, Geerts and Bass at St. Joseph's in Fort Madison and at Farmington in the 1960's and that this conduct involved several boys. He informed the Bishop that it had taken him that many years and professional therapy for him to be able to divulge this information. He asked the Bishop to please remove these men from any positions that would bring them into contact with boys. Bishop Franklin wrote to John Doe III expressing his sincere apology and informing him that the priests have no assignments.

On August 30, 2000, Bishop Franklin issued a PRECEPT, which bound Father Janssen with specific obligations to avoid minors and all places and situations of temptation for reasons most serious: past allegations of immoral sexual activities which violated celibacy and may have violated the Sexual Misconduct Policy of July 3, 1998.

In March, 2002, "IP#14" contacted the Diocese and reported that Janssen molested him in the 1950's in Newton, Iowa.

In 2003, "IP#15" reported that her brother, "IP#16", was molested by Janssen in the 1960's in Ft. Madison. She reported that "IP#16" is deceased.

In 2003, "IP#17" reported that he had been abused by Janssen in the 1950's in Newton, Iowa.

In 2003, "IP#18" reported that he had been abused by Janssen and Bass in the 1970's.

In 2003, "IP#11" reported that he was abused by Janssen in Ft. Madison in the 1960's.

In 2002, an anonymous person appeared on TV Channel 8. No names were mentioned on the air but the Diocese learned that he reported that he had been abused by Janssen and Bass, believed to be in the 1970's.

See also, the lawsuits against Janssen.

The Diocesan Review Board has recommended that Father Janssen be laicized and the Diocese has commenced laicization procedures with the Vatican.