

AFFIDAVIT

I, A. W. Richard Sipe, of Lutherville, Maryland, being duly sworn upon his oath, deposes and says that:

1. This Affidavit is made of my own personal knowledge.
2. I am over the age of eighteen (18) years.
3. I believe in the obligations of an oath.
4. I enrolled in 1946 at St. John's Preparatory School, Collegeville, Minnesota, and graduated in 1950.
5. In 1955 I received my B.A. from St. John's University in Collegeville, Minnesota.
6. From 1955 through 1957 I attended the Collegio Sant' Anselmo in Rome, Italy.
7. From 1957 through 1959 I attended St. John's Seminary in Collegeville, Minnesota at the end of which I was ordained a Roman Catholic Priest.
8. From 1964 through 1965 I trained in counseling and obtained a certificate from the Menninger Foundation in Topka, Kansas.
9. From 1965 through 1967 I was a resident in the counseling of religious at the Seton Psychiatric Institute in Baltimore, Maryland, and received a certificate from that JCAOH accredited hospital.
10. I received a Masters Degree from Loyola College in Baltimore, Maryland in 1980.

11. I am a National Certified Counselor and member of the National Academy of Certified Clinical Mental Health Counselors and a Psychiatrist Assistant in the State of Maryland.

12. I served as an adjunct associate, assistant and professor on the faculty of three major Catholic Seminaries from 1967 to 1984, and continue to lecture to Catholic priests, nuns and seminarians on celibacy and sexual abuse.

13. From 1993 through 1994 I served as a consultant for the Task Force on Sexual Abuse at St. John's Abbey and University in Collegeville, Minnesota; and from 1994 to 1996 I served as Chair of the Board of the Interfaith Sexual Trauma Institute.

14. From 1965 through 1969 I was Executive Director of St. John's University, Institute for Mental Health.

15. In 1969 I was a consultant to the Program of Psychiatry and Religion, Spring Grove State Hospital in Baltimore, Maryland; and have served as a visiting lecturer to the faculties of psychiatry at two medical schools.

16. From 1972 until the present time I have held an appointment as a part-time instructor in psychiatry at Johns Hopkins University School of Medicine, Department of Psychiatry in Baltimore, Maryland, where I served as supervisor and lecturer in the Child and Adolescent Fellows Program from 1989 to 1993.

17. I have written numerous articles and three books on the sexual/celibate practice, process and achievement of Roman Catholic Priests, and the celibate system and its abuse; and have lectured extensively on the topic of clergy sexual abuse and boundary violations.

18. I have been retained by the law firm of Tremont & Sheldon, P.A. as an expert in cases against the Bridgeport Roman Catholic Diocesan Corporation and its bishops.

19. In this capacity I have had an opportunity to review both the pleadings and the depositions conducted in this case.

20. Seminarians studying for the Roman Catholic Church are required to be educated for celibacy. [*Code of Canon Law 247*].

21. Priests of the Roman Catholic Latin rite must be celibate. [C. 277].

22. Celibacy of a priest requires perfect chastity (continence). [C. 599].

23. The Bishop of the Diocese has the duty to see that his priests maintain celibacy. [C. 277 #3]

24. My review of the transcripts indicate that the Diocese of Bridgeport failed to properly educate its priests regarding issues of celibacy.

25. My review of the transcripts also indicate that the Diocese failed to responsibly protect the faithful from priests who violated their celibacy and appropriate sexual boundaries.

26. My review further indicates that the Diocese's system of reviewing complaints of clergy sexual abuse as evidenced by the testimony of Monsignor Cusack and Bishop Curtis was negligent, inconsistent and slipshod. Information regarding such complaints was withheld by diocesan officials from other diocesan officials as well as from diocesan employees and parishioners; and records were arbitrarily destroyed concerning such prior complaints.

