



NO. CV-96 0335986 S

JEFFREY R. KNECHT : SUPERIOR COURT

VS. : FAIRFIELD J.D.

BRIDGEPORT ROMAN CATHOLIC  
DIOCESAN CORPORATION, ET AL : JUNE 10, 1997

**AFFIDAVIT OF REVEREND MSGR. WILLIAM A. GENUARIO**

William A. Genuario of Greenwich, Connecticut, being first duly sworn, deposes and says:

1. That I am more than twenty-one (21) years of age and believe in the obligations of an oath;

2. That on February 2, 1956, I was ordained a Roman Catholic priest for service in the Roman Catholic Diocese of Bridgeport, Connecticut, and ever since the founding of the Diocese of Bridgeport on August 6, 1953, I have been a member of the Diocese of Bridgeport, which is also known as the Bridgeport Roman Catholic Diocesan Corporation;

3. That continuously between July 23, 1959 and September 25, 1987, I was employed in the central administration of the Diocese of Bridgeport in the following positions: (a) between July 23, 1959 and June 18, 1970, I served as a Vice Chancellor of the Diocese; (b) between June 18, 1970 and June 29, 1978, I served as the Chancellor of the Diocese; and (c) between June 29, 1978 and September 25, 1987, I served as the Vicar General of the Diocese;

4. That I am personally familiar with the laws and standards of the Roman Catholic Church which have regulated the conduct and job performance of all priests of the Roman Catholic Church and with the implementation of those laws and standards with respect to all

priests employed by the Diocese of Bridgeport or employed by any of its affiliated local parish churches at all times between the founding of the Diocese on August 6, 1953 and the present time;

5. That ever since the founding of the Diocese of Bridgeport on August 6, 1953, the laws and standards of the Roman Catholic Church, as well as the personal commitment to celibacy of each priest, have expressly prohibited all priests employed by the Diocese of Bridgeport and all priests employed by any of its affiliated local parish churches from engaging in any sexual activity of any kind, and for that reason, any sexual activity and any sexual contact of any kind with any person of either sex have always been out-of-bounds for all priests of the Diocese;

6. That ever since the founding of the Diocese on August 6, 1953, the Diocese of Bridgeport and each of its affiliated local parish churches have constantly taught their members and told the general public that each of their priests are prohibited from engaging in any sexual activity or sexual contact of any kind with any person of either sex;

7. That throughout all of the time between May 23, 1959, when the Reverend Walter Philip Coleman was ordained a priest for service in the Diocese of Bridgeport, and September 25, 1987, when I stopped serving as the Vicar General of the Diocese, I am personally familiar with the fact that Bishop Lawrence Shehan and his successor Bishop Walter Curtis during their respective tenures, as the Chief Officer of the Diocese of Bridgeport, did have established, and did maintain and enforce, a policy and a system of reporting, investigating and dealing with any

priests of the Diocese accused of engaging in any sexual activity or sexual contact of any kind with any person;

8. That between May 23, 1959 and July 20, 1963 Msgr. George B. Curtiss was the Diocesan official primarily responsible for assisting the Bishop of the Diocese in implementing that policy, between July 20, 1963 and September 11, 1972, Msgr. John J. Toomey was the Diocesan official primarily responsible for assisting Bishop Walter Curtis in the implementation of that policy, and between September 11, 1972 and September 25, 1987, Msgr. Andrew T. Cusack was the Diocesan official primarily responsible for assisting Bishop Curtis in the implementation of that policy;

9. That throughout all of that time between May 23, 1959 and September 25, 1987, all complaints or reported instances of sexual misconduct by any priest were directed either to Msgr. George Curtiss (before July 20, 1963) or to Msgr. Toomey (between July 20, 1963 and September 11, 1972) or to Msgr. Cusack (after September 11, 1972), and it was the task of Msgr. George Curtiss or Msgr. Toomey or Msgr. Cusack to confront the accused priest with the alleged report or complaint and thereafter to take or to recommend appropriate follow-up action which could include psychological evaluation, therapeutic treatment, removal or restriction of authorization to engage in priestly ministry activities and other disciplinary measures for the purpose of ensuring against any recurrence of the alleged misconduct;

10. That during all of that May 1959 through September 1987 time frame, the Bridgeport Roman Catholic Diocesan Corporation did not own or possess or control any of the

