

AFFIDAVIT

STATE OF IOWA)
) ss:
COUNTY OF SCOTT)

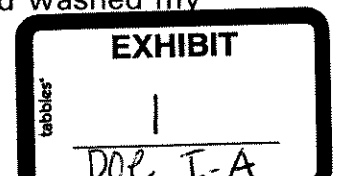
I, John Doe I-A, being first duly sworn under oath, states as follows:

1. In 1967, at the age of 10 or 11, Father James Janssen started sexually molesting me. He started by touching me in the genital area outside of my pants and would tell me "this is how we build trust".

2. Within a year, he would unzip my pants and start touching me directly on my penis and again saying he wanted to build my trust.

3. At age 13, Father Janssen started to fondle my penis and masturbate me to ejaculation. Father Janssen would then take my hand and put it on his penis and instruct me to do the same thing to him. He did this frequently and whenever he felt like it. These acts occurred in the rectories at Sugar Creek and St. Anthony's Parishes. It occurred one time in a swimming pool at the home of one of Janssen's friends.

4. At age 16, I was invited to spend the night with Father Janssen in the rectory. I was with him and we were watching television in his bedroom. Janssen reached over and started fondling my penis. He took my hand and made me fondle his penis. He then put my penis in his mouth and performed oral sex on me. When he was done, Janssen forced me to perform oral sex on him. I did it for awhile. I tried to stop and lifted my head up. He forced my head back onto his penis until he finished. It made me sick and I ran to the bathroom and threw up and washed my



mouth out. The oral sex happened just one time. The touching and masturbation continued while I was under the age of 18. He continually would ask me if I trusted him and told me that the sexual acts were how I could show my trust.

5. He also took out of state trips with me, including trips to Florida and California while I was a minor. He took me to a pornographic movie while I was under the age of 18 in Clinton, Iowa. He also instructed and encouraged us to shoplift.

6. It wasn't until 2002 that I realized the impact the extensive and repeated sexual abuse has had on me. The effects of the sex abuse have left me feeling afraid, ashamed and depressed. I am distrustful of any authority figures and have lost all belief in the Catholic religion. I did not see a psychologist or psychiatrist until 2002 for any type of mental health counseling. I am under medical treatment from a psychiatrist and take daily dosage of psychotropic medication. This is necessary for me to attempt to function in daily life, although I have significant ongoing psychological distress.

7. The concealment by the Diocese of Davenport that there were complaints about Father Janssen and sexual contacts with minors before my abuse and the continued concealment until February of 2004 prevented me from attempting to vindicate 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.

8. I was baptized at St. Joseph Parish in Sugar Creek, Iowa, I attended catechism classes, served as an altar boy, and, with my family, attended weekly mass. Father Janssen was my priest. Father James Janssen was an ordained Roman Catholic priest and was a representative and authority figure of the Diocese of Davenport and was my spiritual advisor and teacher. He was a man of great influence and persuasion as a holy man and authority figure in my life. I placed confidence in his abilities as a religious and spiritual leader. He dominated me both by his age and his religious position and I depended upon him as a spiritual advisor and as a second father. He was aware that my father had passed away and my mother paid him to babysit me during the time he abused me.

9. 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, Vicar General and all priests of the Diocese. Father Janssen identified me, sought and gained the trust and confidence of my mother to serve as a spiritual advisor, pastor, confessor and priest to me. Father Janssen sought and gained my mother's consent to participate in counseling and take overnight trips with him, including unsupervised swimming trips. Defendant Janssen sought and gained my trust, friendship, admiration and obedience and conditioned me to comply with his direction and look to him as an authority on all matters spiritual, moral, ethical and temporary. Defendant Janssen and the Diocese of Davenport conspired together to conceal from me the nature and extent of Janssen's activities and deprived me of my 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.

10. 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 from the time of the abuse. I admit that I am not an expert and do not completely understand how and to what extent my shame, guilt, self blame, depression and repression have effected 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, the date I filed my lawsuit. 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.

11. While receiving instructions from the Catholic priest in my parish, I was instructed that the priest is Christ himself on earth and the priest has supernatural powers.

Further, Affiant sayeth not.



Subscribed and sworn to
before me this 14th day
of August, 2004.

C. Levien
Notary Public in and
for the State of Iowa

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JOHN DOE I-A