

IN THE IOWA DISTRICT COURT IN AND FOR CLINTON COUNTY

JOHN DOE (I-A), )  
 )  
Plaintiff, ) Law No. LA 29513  
 )  
vs. )  
 ) AFFIDAVIT  
FATHER JAMES JANSSEN and )  
DIOCESE OF DAVENPORT, )  
 )  
Defendants. )  
 )  
 )  
 )

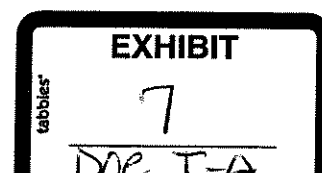
STATE OF \_\_\_\_\_ )  
 ) ss:  
COUNTY OF \_\_\_\_\_ )

I, Dr. Mark Schwartz, being first duly sworn on oath, depose and states as follows:

1. I am a psychologist and counselor licensed in the States of Missouri and Louisiana, who, for 15 years, has served as Executive Director of the Masters & Johnson Clinic in Ballwin, Missouri and New Orleans, Louisiana. A copy of my curriculum vitae is attached which provides a summary of my professional experience and publications.

2. I am a licensed psychologist and counselor and certified Sex Therapist, Sex Educator, Sexologist, and hold a Doctor of Science from the John Hopkins University. Throughout my career, I have specialized in human sexuality issues, particularly those related to sexual trauma, sexual compulsions, and paraphilias, including pedophilia.

3. I have provided consultation in cases involving sexual misconduct and



abuse by a variety of types of professionals and others, including clergy such as Roman Catholic priests. I have received appointments to various committees and commissions related to the sexual abuse and sexual compulsions of individuals.

4. I have evaluated and counseled victims of sexual trauma, assessed damages of abuse and treated sexual offenders throughout my career.

5. I have testified as an expert or been qualified as an expert in the areas of sexual trauma and sexual compulsions and deviations in multiple jurisdictions, both in federal and state courts. I have provided testimony in civil and criminal trials.

6. I have taught classes and workshops in sexual trauma and compulsions at the undergraduate level for more than 25 years.

7. In addition to my own professional training and experience, I am knowledgeable about the professional literature in a number of fields insofar as it concerns sexual abuse by priests and other clergy, and its impact.

8. I have been employed by the firm of Betty, Neuman & McMahon, L.L.P., counsel to the Plaintiff in this case, to examine the facts and provide expert opinion. The opinions which follow are based on my professional training, knowledge, experience, review of John Doe I-A's records and my interview of Doe I-A.

9. My opinions assume that the Plaintiff was a minor child at the time of all perpetrations of sexual abuse, which occurred in the late 1960's and early 1970's.

10. It is my professional opinion, to a reasonable degree of psychological certainty, the Plaintiff in this case sustained considerable damage as a result of

sexual trauma perpetrated by Father Janssen. On a scale of 1 to 10, I would describe his injury as a 10.

11. John Doe I-A stated the memories of the abuse started at age 10 or 11. Father Janssen was assigned to St. Joseph's Catholic Church in Sugar Creek, Iowa, around the same time. At the time, Plaintiff's father had died and his mother was happy to leave her son in the church's hands. Plaintiff was touched on the genitals outside his pants and Father Janssen played with his penis "in order to build trust". At puberty, Janssen would masturbate his penis and instructed the boy to masturbate him to ejaculation. This would happen frequently at any time. At around age 16, John Doe I-A was staying at Janssen's house and Father Janssen performed oral sex on John Doe I-A and asked John Doe I-A to perform oral sex on him. Afterwards, John Doe I-A threw up.

12. As John Doe I-A got older, he began to feel more guilty and disturbed. In 2001, John Doe I-A began to hear voices and took off in his car to the mountains. The police found John Doe I-A and took him to a psychiatric hospital for commitment. John Doe I-A became afraid of television and radio and turned them off. He heard voices that said he "was gay". John Doe I-A had left to find God in the mountains. He was suicidal and diagnosed with a psychiatric disorder and given medication. He was quite paranoid at the time.

13. Following the hospitalization, he became ashamed to work around people. John Doe I-A did not trust people, was withdrawing at work and would pick fights and get irritated easily. He was actively having flashbacks and continued to be

severely depressed. John Doe I-A confronted Janssen and said "why did you do this to me?" Janssen replied that "it was the 60's with 'free love'".

14. Father Janssen has severely injured this client and the molestations have been devastating in shaping his personality and left him quite dysfunctional. John Doe I-A remains chronically disturbed by psychiatric symptoms, his personality is disturbed and he is debilitated on a daily basis. He is vulnerable to future psychiatric breakdowns under stress and frequently goes into cycles in which he is unable to work.

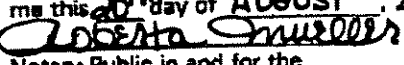
15. It is my professional opinion, to a reasonable degree of psychological certainty, that symptoms manifested by the Plaintiff John Doe I-A resulted in various coping mechanisms which prevented Plaintiff from appreciating the nature and impact of the sexual abuse. This is common with victims of sexual abuse. It is further my opinion that the passage of time, to the age of majority alone, would not bring about any greater ability to comprehend what happened and its impact, nor would the impact of such abuse be likely to diminish without the Plaintiff receiving psychological assistance. It is further my professional opinion, to a reasonable degree of psychological certainty, that the Plaintiff has manifested in the past, and currently manifests symptoms, consistent with general anxiety, major depression, avoidant personality and post traumatic stress, which is attributed to the sexual trauma perpetrated by Father Janssen. It is also my professional opinion that the Plaintiff has suffered with these mental illnesses from the time of the abuse to the

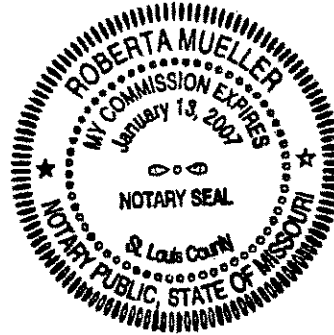
present. As a result of these conditions, the Plaintiff suffers a significant psychological disability and impairment.

16. It is further my opinion, to a reasonable degree of psychological certainty, based on my education, training, experience, interview and testing of the Plaintiff in this case and a review of Plaintiff's health records, John Doe I-A was mentally ill, disabled and unable to file his lawsuit against the Defendants from the time of the childhood sex abuse he suffered until the lawsuit was filed.

Further, Affiant sayeth not.

  
Dr. Mark F. Schwartz

Subscribed and sworn to before  
me this 20<sup>th</sup> day of AUGUST, 2004.  
  
Notary Public in and for the  
State of MISSOURI



I WITNESS THAT THE SIGNATURE  
ABOVE IS THAT OF DR. MARK  
F. SCHWARTZ