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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

JOHN DOE 20,)
)
Plaintiff,)
)
v.)
)
CATHOLIC BISHOP OF CHICAGO,)
A corporation sole, a/k/a the ROMAN)
CATHOLIC ARCHDIOCESE OF)
CHICAGO,)
Defendant.)

Case No. **2026L012379**

PLAINTIFF DEMANDS TRIAL BY JURY

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COMPLAINT AT LAW

NOW COMES the Plaintiff, JOHN DOE 20, by and through his attorneys, HART
MCLAUGHLIN & ELDRIDGE, LLC, and hereby makes this Complaint against the Defendant,
CATHOLIC BISHOP OF CHICAGO, a corporation sole, commonly known as the ROMAN
CATHOLIC ARCHDIOCESE OF CHICAGO (hereinafter, the “Archdiocese of Chicago” or the
“Archdiocese”), and pleading at times hypothetically or in the alternative, support the Complaint
as follows:

SUMMARY OF THIS ACTION

1. This action is brought against the Archdiocese of Chicago on behalf of one of the
likely hundreds of victims of child sexual abuse committed by priests assigned to the Holy Angels
Parish (“Holy Angels,” the “Parish”) between 1969 and 2002, particularly Father George Clements
(“Fr. George Clements,” “Fr. Clements,” “George Clements,” or “Clements”), Father Paul Smith
(“Fr. Paul Smith,” “Fr. Smith,” “Paul Smith,” or “Smith”), Father John Calicott (“Fr. John
Calicott,” “Fr. Calicott,” “John Calicott,” or “Calicott”), and Father Kenneth Brigham (“Fr.
Kenneth Brigham,” “Fr. Brigham,” “Kenneth Brigham,” or “Brigham”).

2. In spite of the Archdiocese of Chicago's efforts to conceal it, substantial evidence overwhelmingly proves that one of the most famous and controversial priests in its history, George Clements, was the spearhead of a decades-long surge of relentless child molestation by a small, close-knit community of Archdiocesan priests assigned to several predominantly Black, inner-city parishes – with Holy Angels being its epicenter.

3. The uniquely appalling and enduring tragedy manifested at Holy Angels was entirely predicated on the Archdiocese of Chicago's deliberate and unspoken abdication of virtually all responsibility to the Parish, its parishioners, and the students at its Catholic grammar school ("Holy Angels School," the "School") for an entire generation.

4. As a consequence of that deliberate abdication of responsibility the Archdiocese of Chicago knowingly permitted Fr. George Clements and Fr. Paul Smith to take unbridled control of Holy Angels and go completely rogue, with the two of them leveraging their status as Archdiocesan priests, positions of unmatched authority, and Parish assets to perpetuate a child exploitation enterprise lasting more than 20 consecutive years.

5. Despite its willful blindness, the Archdiocese of Chicago nonetheless became aware of substantial amounts of Fr. Clements's and Fr. Smith's profound misconduct as well as conspicuous red flags and hazards that the Archdiocese had a duty to address, but never did.

6. In failing to do so, the Archdiocese of Chicago wantonly disregarded the safety, wellbeing, and innocence of the overwhelmingly poor, Black boys who studied or preyed at Holy Angels and were sexually molested by Fr. Clements or Fr. Smith on an almost daily basis.

7. The relevant history begins with George Clements, the second-ever Black priest ordained by the Archdiocese of Chicago, who would go on to establish local and international fame through his civil rights activism, the superficial success story that was Holy Angels School, his

campaigns against drugs and gangs, and most notably, his unprecedented adoption of four boys under the guise of his “One Church, One Child” initiative.

8. Described by journalists as “media-wise” and a “master at attracting publicity,” Clements successfully cultivated such popularity and idolatry that NBC produced a made-for-TV biopic movie called *The Father Clements Story* depicting his undaunting heroism in adopting his “first” child and defying his imperious and racist Archbishop.

9. The truth is that George Clements started committing child sexual abuse no later than his first appointment as associate pastor at St. Ambrose in 1957, where he spent an extraordinary amount of his time pursuing access to and authority over children before he was reassigned to St. Dorathy parish in 1962.

10. In the immediate wake of Martin Luther King Jr.’s assassination in 1968 Clements seized the political moment and fomented a highly coordinated rebellion against the then-Archbishop of Chicago, Cardinal John Cody (“Cardinal Cody”), in an effort to accelerate his promotion to head pastor of a predominantly Black parish.

11. With the Black Panthers and plenty of other nascent civil rights groups agitating in his support, in 1969 George Clements ultimately prevailed over Cardinal Cody, who appointed Clements as head pastor of an asserted “flagship” Chicago parish amongst those predominated by a Black congregation, Holy Angels.

12. Upon arrival, George Clements immediately began reorganizing the leadership of the Parish, eventually including the installations of Father Paul Smith and Sister Helen Strueder (“Sr. Helen Strueder,” “Sr. Helen,” “Helen Strueder,” or “Strueder”) as school principal and assistant principal, respectively.

13. Together Fr. Clements, Fr. Smith, and Sr. Helen aggressively instituted a tyrannical regime of control over the massive student body of Holy Angels School, backed by draconian corporal punishment and extensive sexual molestation.

14. From almost the moment he arrived in 1970, Father Smith associated with, imported, and “hired” drug addicts, criminals, and his own victims to act as his stooges at Holy Angels School, most often as part of an overtly transactional sexual relationship. That includes a convicted rapist that Fr. Smith invited to Chicago from his hometown of Baltimore shortly after his arrival at Holy Angels and another devotee whose profound drug addiction Fr. Smith knowingly sponsored for 20 years after Smith began sexually abusing him at the age of 16. Agonizingly, in addition to shuttling student victims directly to Fr. Smith’s office, several of these Holy Angels “employees” also sexually exploited the students there. The reality of this self-selected milieu is also most consistent with the circumstances of Fr. Smith’s debilitating car accident in 1994 and sordid murder in 1996.

15. Sr. Helen Strueder, who effectively ran the day-to-day operations of Holy Angels School and spent the majority of her career working at a desk just outside of Fr. Smith’s office, was well aware of at least most of that and compounded the suffering of her charges by running interference for Smith and facilitating his sexual abuse through the enforcement of her strict code of conduct, silencing of victims, undying loyalty, and frequent disciplinary referrals for unsupervised beatings with custom-made wooden paddles. Her recent and steadfast denial of any manner of corporal punishment or a single instance of any of the Holy Angels priests being alone with a student during her 47-year tenure marks an astonishing display of consciousness of guilt.

16. In parallel to Fr. Smith’s and Sr. Helen’s implementation of social totalitarianism at Holy Angels School, Fr. Clements diabolically and successfully divorced both himself and Holy

Angels from everything but the public semblance of subordination and obedience to the Archdiocese of Chicago.

17. This came by way of a calculated provocation by Clements, when shortly after his appointment to Holy Angels he substituted a traditional Catholic statue in the Church with a shrine to Martin Luther King, Jr., knowing that doing so would draw the ire of Cardinal Cody and incite another direct confrontation with the Archdiocese.

18. Gambling that his recent show of force and public relations victory over Cardinal Cody would be sufficient to prevent the Archbishop from following through on any threat to formally suspend him, but that a display of overt defiance would result in a cancellation of Archdiocesan subsidies, Clements ginned up a congregational backlash founded on notions of racial self-determination in order to justify his refusal to remove the MLK shrine and formally cut the Parish's financial ties to the Archdiocese.

19. The Archdiocese duly obliged, and fearful of George Clements's political potency on matters of race-relations at a particularly volatile point in time, was pleased to acquiesce to his Parish's near-total administrative separation.

20. With no budgetary dependence on the Archdiocese, no responsiveness to its Chancery Office, no engagement with its Office of Catholic Education, and no Holy Angels Parish council or School board to reckon with: from at least 1970 to 1991 both Fr. George Clements and Fr. Paul Smith were accountable to no one.

21. These conditions were tailor-made for what developed into a continuous, decades-long child sex ring at Holy Angels, as George Clements surrounded himself with prodigious child molesters and Smith organized a steady stream of young male victims into the Holy Angels Rectory (the "Rectory"). Together, George Clements and Paul Smith employed textbook methods

to systematically isolate, abuse, and silence victims at scale. Worse yet, under George Clements's stewardship, Holy Angels also became an incubator for child molesters and enablers who would go on to propagate their child exploitation techniques at other parishes, including St. Dorathy, St. Columbanus, and St. Charles Lwanga.

22. George Clements and his publicist, George O'Hare, concocted various schemes to grab media attention and aggrandize Fr. Clements, culminating in Clements's boldest and most alarming move: becoming the first American Catholic priest to adopt a child.

23. He would go on to adopt at least three more boys that he personally hand-selected from as far as Maryland and Nigeria, and the many lies that George Clements perpetuated to the public about the circumstances of these adoptions should have been deeply disconcerting.

24. Meanwhile, from its inception, Clements's "One Church, One Child" program served as cover for other Archdiocesan priests at predominantly Black parishes to commit rampant child sex abuse against vulnerable boys that they would regularly house in their rectories with the Archdiocese's tacit condonation.

25. Ultimately, George Clements retired from Holy Angels in 1991 under highly suspicious circumstances, and although he never truly returned to active ministry, he still committed more child sexual abuse at Holy Angels and elsewhere.

26. The substantially parallel histories of the Archdiocese's awareness of and response to child sexual abuse allegations against the likes of John Calicott, Kenneth Brigham, and Fr. Victor Stewart, as reflected in public fragments of their Archdiocesan personnel files, confirm a reprehensible institutional pattern of accommodation of overt child molesters and indifference to their victims at predominantly Black parishes in particular.

27. When an organization like the Archdiocese of Chicago has a duty to protect children from sexual abuse, discriminatory indifference to victims based on race is a form of malice.

28. Due to its utterly indifferent, outrageous, wanton, willful, and malicious failure to supervise or intervene against George Clements, Paul Smith, Kenneth Brigham, and John Calicott, the Archdiocese of Chicago effectively condoned and caused catastrophic physical and psychological trauma to be inflicted upon a veritable generation of male Black Catholics in the city of Chicago, to whom it is liable.

GENERAL ALLEGATIONS

THE ROMAN CATHOLIC CHURCH AND THE ARCHDIOCESE OF CHICAGO

29. The Roman Catholic Church is a Christian religious organization that, for over a thousand years, has claimed to be the sole legitimate successor of religious doctrine and authority bestowed by Jesus Christ, who is essentially believed by Christians worldwide to have been the divine and immaculately conceived son of an omnipotent god.

30. In much of the Western world the Roman Catholic Church as an institution served as the predominant social structure for centuries, and to date claims more than one billion followers.

31. The organization of the Roman Catholic Church is headed by the Pope, who is popularly elected by Cardinals worldwide and regarded by Catholics as the divine successor to St. Peter, who governs from St. Peter's Basilica in Vatican City – a self-governed sovereign enclaved within Rome, Italy.

32. Throughout the world, Roman Catholicism is administered by bishops who are selected by the Pope to manage the affairs of nearly 3,500 jurisdictional dioceses and archdioceses across the globe.

33. Within the dioceses and archdioceses themselves, the ultimate responsibility and authority for managing their internal affairs – including the management of local parishes and property, the recruitment, training, ordination, and assignment of diocesan priests, and the operation and supervision of Catholic schools – rests with the appointed bishop or archbishop, as the case may be.

34. For many centuries through the present, an unwavering tenet of Roman Catholicism has been its commitment to the celibacy of its diocesan priests. Indeed, for much of its history sexual activity was regarded as inherently impure even amongst the laity and justified only in service of procreation. Because Catholic priests were expected to devote themselves wholly to religious affairs, even the “act” of conceiving of sexual matters was strictly forbidden.

35. Notwithstanding the clarity and consistency of these principles, however, Catholic priests have demonstrated a long-standing and continuous history of failing to adhere to their oaths of celibacy.

36. Sexual activity by Catholic priests of heterosexual, homosexual, and pedophilic varieties was known at all relevant times to have been widespread.

37. The disproportionately high prevalence of sexual exploitation of boys by Catholic priests, facilitated by their inherent religious authority, has been known by Roman Catholic authorities at all relevant times.

38. To be sure, an astounding amount of authoritative, Catholic ink has been spilled regulating and setting forth damning punishments for the sexual activity of Catholic priests, which is itself reflective of the extensive knowledge of such misconduct by Catholic authorities.

39. Reputable historical interpretation suggests that for centuries prior to the Protestant Reformation sexual abuse by Catholic clergy was not only internally, but also publicly, known to

occur and would be prosecuted regularly by state authorities in alignment with Roman Catholic Church procedures.

40. Following the Reformation, however, the Roman Catholic Church began to disentangle from the primary terminals of state power, and the institution became increasingly relegated to social and religious affairs. It similarly grew image-conscious and began to cloak its knowledge and handling of sexually abusive clergy behind a veil of strenuous secrecy.

41. The Diocese of Chicago was established on November 28, 1843, and in 1845 the State of Illinois passed legislation for it to be established as a “corporation sole,” whereby it could operate as a single legal entity consisting of a single incorporated office (bishop of the Diocese), occupied by a single person (*the* bishop of the Diocese).

42. The Diocese of Chicago was eventually elevated to an *Archdiocese* in 1880, reflecting the tremendous growth and size of the ecclesiastical jurisdiction by that time.

43. Every Archbishop of Chicago since George Mundelein in 1924 has been designated as a Cardinal by the Pope.

44. The Archbishop of Chicago from August 24, 1965, through April 25, 1982, was Cardinal John Cody.

45. The Archbishop of Chicago from August 25, 1982, through November 14, 1996, was Cardinal Joseph Bernardin.

46. The Archbishop of Chicago from May 7, 1997, through November 18, 2014, was Cardinal Francis George.

47. At present, the Archbishop of Chicago is Cardinal Blase Cupich.

48. Serving nearly 2 million Catholics within its juridical boundaries, the Archdiocese of Chicago is reputed to be the third largest Roman Catholic diocese in the United States by

congregant population and one of the wealthiest in the world. It manages approximately 216 separate parishes, over 150 schools, and a seminary school system with a flagship campus in Mundelein, Illinois. It has numerous departments, sponsors universities and hospitals, and is widely believed to control liquid assets valued in excess of \$1 billion.

49. The Archdiocese has exclusive ownership of and exercises absolute dominion over parish property, including all real property and the churches, facilities, and improvements constructed upon it.

50. All power rests with the Archbishop, who delegates authority over various departments and subdivisions to functionaries, who administer the complex operations of the Archdiocese of Chicago.

51. On the local level, parishes are generally designated by their association with a specific Catholic church, which may or may not also be supporting and administering a Catholic school.

52. Each parish is assigned usually one experienced priest designated as the “pastor,” who has almost complete authority over the parish, and may be supported by one or more associate pastors.

53. The assigned pastors generally reside in a semi-communal living structure known as a “rectory,” which is typically outfitted comfortably and maintained by cleaning, laundry, secretarial, and cooking staff.

54. Occasionally, a visiting or retired priest may also reside in a designated rectory and is then regarded as being “in residence” at the parish.

55. Many Catholic priests ordained in the Archdiocese of Chicago follow a similar path of Catholic grammar school, seminary high school, and either directly or following a religious

bachelors degree ultimately study at St. Mary of the Lake Seminary in Mundelein, Illinois – all under the eye and stewardship of the Archdiocese of Chicago.

56. After successfully completing their course of study, upon the recommendation of the faculty, and ultimately upon the acceptance of the Archbishop, these aspirants may then be “ordained” as a priests specifically under the auspices of the Archdiocese of Chicago.

57. As a mandatory condition of ordination, each candidate for priesthood must swear perpetual obedience to the Archbishop and his successors.

58. That was the same path taken by George Clements, who went on to become the most pernicious and despicable priest in the history of the Archdiocese of Chicago.

THE “REAL GEORGE CLEMENTS” STORY

59. Born on January 26, 1932, George Harold Clements was the fourth of six children raised by his Catholic parents, Samuel and Aldonia Clements (née Peters), on the south side of Chicago. George Clements was baptized and enrolled in a Franciscan-led Catholic school called Corpus Christi Grammar School on Chicago’s south side, where he quickly developed a strong admiration for the “perfect” nuns and the “even more perfect” priests.

60. By 5th grade, George Clements had entered service as an altar boy at Corpus Christi, and in 7th grade Clements was rewarded for his extraordinary faithfulness by being designated as the leader of the altar boys. In 8th grade George Clements became captivated by a particular priest named Maurice Amann (hereinafter, “Fr. Amann”) who had recently been assigned to Corpus Christi and was integral to Clements becoming the first Black student enrolled at Quigley Preparatory Seminary (“Quigley Prep”), a seminary high school organized by the Archdiocese of Chicago to prepare teenagers to become diocesan priests.

61. The typical tenure at Quigley Prep was five years, and near the end of Clements's tenure one of his close childhood friends, Kenneth Brigham, also enrolled.

62. George Clements graduated from Quigley Prep at Holy Name Cathedral in 1950 before moving on to "major seminary" at St. Mary of the Lake, which is located on a private campus ensconced in Mundelein, Illinois, and continues to serve as the primary institution for developing priests to be ordained by the Archdiocese of Chicago.

63. St. Mary of the Lake was a decidedly strange place for a young man to develop socially in the 1950s, where rigid normative rules and regimented routines were rigorously enforced. Social interaction was systematically limited both internally and externally. Most courses were taught exclusively in Latin, and from 9 p.m. until after breakfast each day there was no talking permitted at all. Seminarians stayed in residence year-round and every necessity was provided on the sprawling compound specifically to isolate them from the secular world. The seminarians were not permitted access to phones, television, newspapers, or magazines.

64. Though he and his classmates enjoyed a high standard of living there, George Clements experienced a great deal of loneliness at St. Mary of the Lake – it was, in his words, a "beautiful, majestic, awesome prison."

Fr. Fitzgerald on the Psychological Fitness of Priestly Candidates and Seminarians

65. Around 1947, a Catholic priest named Fr. Gerald Fitzgerald ("Fr. Fitzgerald") finally found a sponsor (the Archbishop of Sante Fe) for a religious community center that he hoped would primarily serve ailing Catholic priests, especially those struggling with alcoholism. Under the banner of the newly formed congregation of the Servants of Paraclete, Fr. Fitzgerald established the "Via Coeli Monastery" in Jemez Springs, New Mexico, which inadvertently

became probably the first “treatment center” for Catholic clergy who had committed child sex abuse.

66. Although Fr. Fitzgerald stated in 1948 that his Via Coeli Monastery would categorically refuse to accept priests afflicted with pedophilia, history proves that the policy was short-lived.

67. In the years that followed, Fr. Fitzgerald corresponded with numerous bishops regarding the pedophiles they had sent to him and steadfastly maintained that such “rattlesnakes” and “vipers” were as cunning as they were incorrigible, and that the only appropriate remedies were: (1) laicization and a dispensation from celibacy or (2) monastic seclusion, preferably on an uninhabited island.

68. His views were most definitely at odds with the prevailing sentiments of U.S. bishops, who consistently attempted to launder their problem priests through Via Coeli Monastery over Fr. Fitzgerald’s vehement objections.

69. On August 26, 1963, Fr. Fitzgerald had an audience with his Holiness, Pope Paul VI, and expressed these views as well as a plea that greater effort be applied to evaluating the moral fitness of clerical aspirants before ordination.

70. In 1964, Fr. Fitzgerald also specifically shared his views on sexually abusive priests with Cardinal John Cody, just one year before he was appointed Archbishop of Chicago.

71. Shortly after his meeting with the Pope, in a letter to the then-Coadjutor Bishop of the Diocese of Nashville, Joseph Durick, Fr. Fitzgerald commented:

“Bishop do not quote me because this is given you in strictest confidence, but we know of several seminaries that have been deeply infected and this of course leads to a wide infection. Therefore there should be a very strict discipline of dismissal and a very clear and printed teaching in the moral theology course that mutual masturbation is a mortal sin. Priests develop a blind-spot on this matter which in my opinion involves very likely the fixation of impenitence. Seldom will you find these men evidencing consciousness of the

gravity of what they have done. And this apparently is reflected in the strange attitude of Bishops who place these men after reactivation in assignments where they are most exposed to a recurrence of a vicious habit which the majority of experts consider practically incurable.”

72. On information and belief, throughout the 1950s St. Mary of the Lake Seminary in Mundelein, Illinois, was “deeply infected” in the sense used by Fr. Fitzgerald.

73. The culture and curriculum at St. Mary of the Lake also actively promoted the priestly candidates’ ambition for the power, status, and quality of life held by bishops.

74. Achieving the title of “bishop,” however, generally required decades of complete and utter devotion and subservience to the inherently conservative and often petty hierarchy of the Archdiocese of Chicago, with the Archbishop maintaining supreme authority.

75. When George Clements was ordained on May 3, 1957 – as only the second Black man ever ordained in the Archdiocese of Chicago – he was intent on pursuing this traditional pathway to personal advancement.



Fr. Maurice Amann (left) with recently-ordained George Clements

St. Ambrose Parish (July 6, 1957 – July 6, 1962)

76. George Clements's first assignment, as associate pastor, was at St. Ambrose parish, located at 1012 E. 47th St. in Chicago, effective July 6, 1957.



Young George Clements

77. Following his appointment, George Clements wasted no time ingratiating himself with the youth of St. Ambrose parish and beyond. He taught religion and offered private lessons to the students of St. Ambrose's grammar school, which had approximately 350 pupils, and established basketball and football teams there. Clements became a member of the committee that selected youth scholarship recipients for the Chicago Interracial Council and founded a St. Ambrose Youth Club that provided activities, staged events, and supported athletic teams for the nearly 300 local teenagers that joined. He was also heavily involved in training prospective altar boys and was a member of the board of the Better Boys Foundation, a community services organization based out of North Lawndale that focused its engagement on particularly vulnerable boys.



Fr. Clements Awards High School Scholarships on Behalf of the Interracial Council of Chicago (1959)

78. During his tenure at St. Ambrose, George Clements also molested at least two male students at the grammar school, each of whom was less than 10 years old at the times of the abuse, which variously involved acts of genital fondling, oral sex, and digital penetration.

79. As Clements later wrote of his time at St. Ambrose: “The youngsters were very close to me and I thoroughly enjoyed them.”

80. Near the end of George Clements’s tenure at St. Ambrose he began engaging with civil rights matters publicly, starting with a series of lectures and debates on race relations and integration with his longtime friend, Fr. Daniel Mallette.

81. Still, Clements remained circumspect about distinguishing himself in a manner inconsistent with the norms and expectations set by the generally old and exclusively white monsignors and bishops who he sought to impress.

82. Notwithstanding his sexual abuse of children, George Clements had a smooth and superficially respectable term at St. Ambrose.

St. Dorathy Parish (July 7, 1962 – June 19, 1969)

83. On June 29, 1962, the *Chicago Tribune* reported the reassignment of 122 clerics within the Archdiocese of Chicago, including George Clements's reassignment to St. Dorathy parish, with July 7, 1962, being his first day as associate pastor.

84. St. Dorathy parish, in the Chatham neighborhood of Chicago, had a congregation stocked with well-established and upwardly mobile Black families, which George Clements intended to leverage in an effort to accelerate his career advancement.

85. St. Dorathy's head pastor at the time, Fr. Gerald "Jerry" Scanlan, was himself notably progressive on matters of civil rights and Black empowerment.

86. This permitted Clements to quietly engage with racially-oriented social issues, including cultural exchange initiatives at St. Dorathy school and through his work with the Friendship House organization, for which he was a member of the steering committee.

87. According to Clements, it was Martin Luther King, Jr.'s assassination on April 4, 1968, that served as the personal catalyst for his transformation from an obedient and unassertive associate pastor to a potent civil rights and humanitarian activist.

88. Even though George Clements's florid descriptions of his prior civil rights engagement and close relationship with Martin Luther King, Jr. appear almost entirely unsubstantiated, it is indisputable that Clements sought to capitalize on the void Dr. King's death left behind.

Fr. Clements's Ostentatious Power Play for Pastorship

89. In the months following King's death, Clements propelled the establishment of the Black Catholic Clergy Caucus and the Afro-American Patrolmen's League, and in the wake of

Chicago's 1968 race riots ingratiated himself with Fred Hampton and the Illinois Chapter of the Black Panther Party, earning the moniker of "chaplain" for the Black Panthers.

90. Although priests typically needed 15-20 years of experience as an associate pastor before being considered for a head pastor position in the Archdiocese of Chicago, with just over 11 years since his ordination, George Clements grew impatient. Having carefully cultivated the support of vocal parishioners and several civil rights groups over the course of preceding months, George Clements plotted a hostile takeover of St. Dorathy parish.



George Clements (left)



George Clements

91. By August of 1968 another associate pastor at St. Dorathy, Fr. Francis McGrath, and 5 of the 12 nuns assigned there – *including the principal of the School* – publicly resigned in explicit protest of George Clements's "harsh and unethical treatment" of them.

92. George Clements simultaneously organized an elaborate and multi-pronged campaign to force out the head pastor (Fr. Scanlan) and pressure Cardinal Cody to install him in his place.

93. By December 16, 1968, George Clements successfully coaxed the spokesman of St. Dorathy's Parish Council to issue a statement to Cardinal Cody, published in the *Chicago Tribune*, that in relevant part read:

"We demand that when the position is available, Father George Clements be appointed pastor of St. Dorathy church [...] If Father Clements is not named as pastor or administrator, this will be considered as an affront and slap in the face to all black people [...] Therefore, if you [Cardinal Cody] fail to heed our demands, you will leave us no choice than to boycott the church, withdraw our children from St. Dorathy school, and then, use whatever other means we deem necessary to dramatize to the whole world that you did not want to promote Father George Clements because he is black."

94. As part of this coordinated effort between Clements and his loyal supporters, an ultimatum was quietly communicated to Fr. Scanlan, and on December 18, 1968 – just two days after the *Chicago Tribune* published the statement from the St. Dorathy Parish Counsel – Scanlan obligingly announced his retirement.

95. Clements's machinations were clearly recognized by Cardinal Cody and his closest advisors, and the duplicitous manner in which Clements attempted to usurp control at St. Dorathy could not have been perceived as anything other than an affront to the authority of the Archdiocese generally and Cardinal Cody in particular.

96. As such, rather than appoint George Clements as head pastor at St. Dorathy, Cardinal Cody promptly selected the only Black priest in the Archdiocese with greater seniority than Clements, Fr. Rollins Lambert ("Fr. Lambert").

97. One week later the St. Dorathy Parish Council publicly praised Cardinal Cody's decision, referring to Fr. Lambert's appointment as a "beautiful Black Christmas present."

98. George Clements was undeterred, moved out of the parish rectory, and promptly began fomenting a mutiny.

99. On January 3, 1969, a group of St. Dorathy stakeholders referring to themselves as the “Concerned Black Catholics” held a meeting in the gymnasium of St. Martin. The loudest voices came from those on a “campaign” for Clements, who expressed the view that Fr. Lambert was an “Uncle Tom” and a pawn of Cardinal Cody’s – and for good measure Fred Hampton, the leader of the Black Panthers, and a cohort of his enforcers arrived to intimidate attendees of a different viewpoint and endorse Clements on behalf of “Black Power.”

100. Two days later, on Sunday, January 5, 1969, the so-called “Concerned Black Catholics” staged a dramatic protest against Fr. Lambert that they ironically called a “Unity Mass” at St. James Church (where Fr. Lambert had briefly presided just prior to his reassignment to St. Dorathy) along with five Black Panthers occupying the vestibule.

101. Following the demonstration at St. James the protestors travelled back to St. Dorathy, with some reportedly contemplating a physical confrontation with Fr. Lambert following his inaugural afternoon mass there. Tempers flared, but at George Clements’s direction, the group settled on a walkout during the sermon, leaving Fr. Lambert “visibly shaken by the whole thing.”

102. Fr. Lambert and George Clements quickly made a truce, and on January 10, 1969, Fr. Lambert held a press conference where he referred to Cardinal Cody as an “unconscious racist” and threatened his own resignation unless Clements was appointed as a head pastor – though *not at St. Dorathy* – “immediately.”

103. On January 12, 1969, another so-called “Unity Mass” was held at St. Dorathy that included Fr. Lambert as well as nine other prominent Black priests from across the country. It was reportedly quite the scene, with Fr. Clements and Fr. Rollins donning gowns with traditional

African designs, employing traditional African tapestries and sculptures, and singing songs in a manner that was decidedly not traditional in the Archdiocese of Chicago.

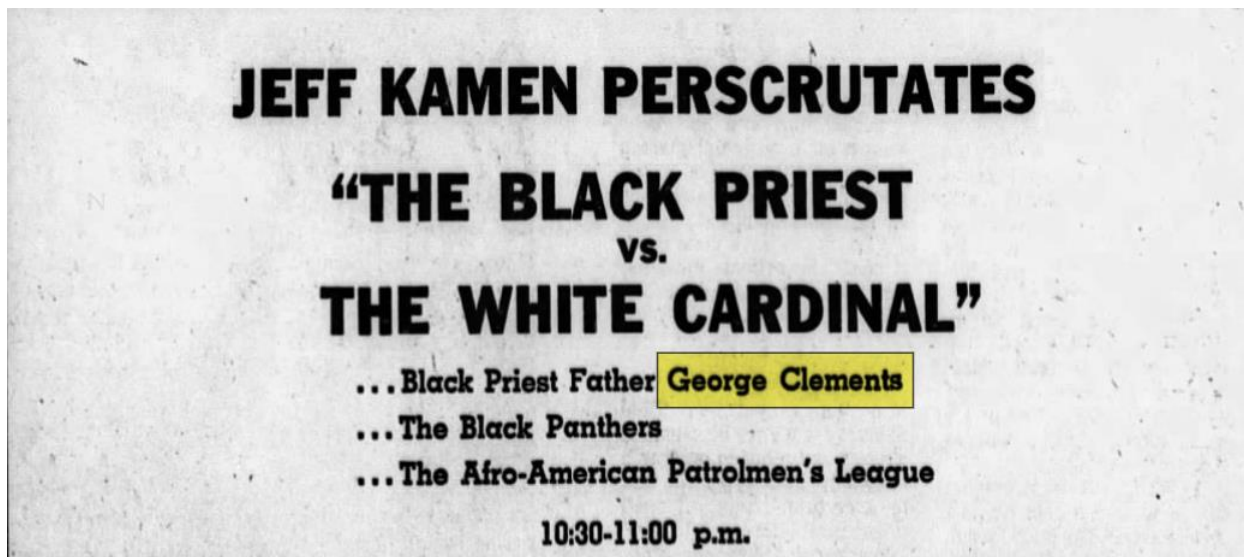


(From left) George Clements, Rollins Lambert, Jesse Jackson at Unity Mass

104. At that “Unity Mass,” Fr. Lambert reiterated his threat to resign unless George Clements was appointed to a pastorphism, somewhat expanding his demands to the advancement of Black Catholic priests in the Archdiocese of Chicago generally. Fr. Lambert was quoted as saying that he and 14 other “Negro organizations” would “take no action against the archdiocese while progress is being made. If progress stops, I will resign as I said I would.”

105. Reportedly, “Clements was exulting in the taste of sweet victory, for it had become obvious that [Cardinal] Cody’s game of ‘division politics’ hadn’t worked.”

106. That evening, a 30-minute radio program on WCFL was advertised as follows:



107. Clements and his adherents continued their strong-arm tactics to manufacture the appearance of organic popular support for Clements and apply further pressure on Cardinal Cody, including on January 20, 1969, when the “Concerned Black Caucus” (“CBC”) crashed a meeting of Chicago’s Inner City Priests Conference (“ICPC”) to demand sterner support.

108. The next day, fifteen representatives of the ICPC spoke to the press formally endorsing the CBC.

109. The Archdiocese attempted to push back, and on January 24, 1969, an editorial published in the Archdiocese’s flagship publication, the *New World*, charged that the rebellion over George Clements was part of a broader, national assault against organized religion, further exclaiming: “It is part of the over-all black power challenge to so-called white racist institutions [...] Organized religion just happens to be under the gun now.”

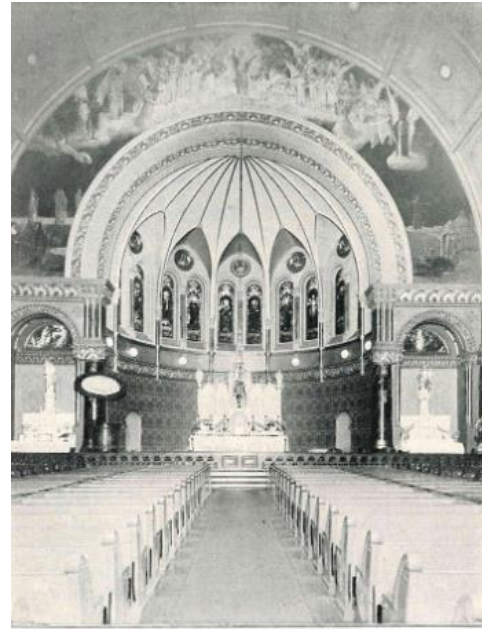
110. In the end, Cardinal Cody folded and by April it had been quietly communicated to Clements that he would be appointed pastor of Holy Angels Parish in the Bronzeville neighborhood of Chicago; and not just that, Clements’s old friend, Fr. Kenneth Brigham, would also be appointed administrator of Our Lady of Perpetual Help Vicariate.

111. Cardinal Cody formally announced George Clements's appointment as pastor of Holy Angels Parish on June 13, 1969.

Holy Angels Parish (June 20, 1969 – September 1, 1991)



**(From Left) Holy Angels Rectory,
Church, and School**



INTERIOR OF CHURCH

112. Holy Angels Church (the “Church”), previously¹ located at 607 E. Oakwood Boulevard in the Bronzeville neighborhood of Chicago, was established in 1896 to serve the growing Irish population in the area. The following year the Sisters of Mercy founded Holy Angels School, a grammar school previously located next to the Church at 545 E. Oakwood Boulevard.

113. Coincident with the “Great Migration” the demographics of the Bronzeville neighborhood changed dramatically and Black residents in the area came to predominate. In 1946 Cardinal Samuel Stritch (Archbishop of Chicago from 1940–1958) mandated that Holy Angels,

¹ On July 1, 2021, Holy Angels Church merged with four other churches – St. Ambrose, St. Anselm of Canterbury, Corpus Christi, and St. Elizabeth of Hungary – and renamed “Our Lady of Africa,” where it continues to operate at the site formerly known as Holy Angels Church.

including its School, open its doors to Black parishioners. That same year saw the arrival of Sister Mary Hortensia (“Sr. Hortensia”), who would become the School’s principal and chief architect of its Black integration, which generated an increase in enrollment from 325 in 1946 to 1,123 in 1957.

114. Under the stewardship of Sr. Hortensia and head pastor Fr. Joseph C. Richards (“Fr. Richards”), by 1969 Holy Angels School had peaked at an enrollment over 1,300 – reportedly making it the largest grammar school in the Archdiocese of Chicago and the largest “Black Catholic School” in the country.



Holy Angels Catholic School Building
Formerly Located at 545 E. Oakwood Blvd.

George Clements Strategically Disentangles Holy Angels from the Archdiocese of Chicago

115. In Clements’s eyes, Holy Angels was the “‘flagship’ of the Black parishes in the Archdiocese,” and having effectively lost all prospects of being promoted to bishop by virtue of

his very hostile and public confrontation with Cardinal Cody, Clements turned his attention to consolidating his authority over the Parish and fortifying himself against the Archdiocese of Chicago.

116. When George Clements took over for Fr. Richards as head pastor at Holy Angels Sr. Hortensia had only just retired. Upon arrival George Clements quickly pushed out Sr. Hortensia's replacement as school principal, Sr. Bernadine, and per Clements, other "[n]uns were leaving Holy Angels wholesale."

117. Having just recently established his dominance over Cardinal Cody in the court of public opinion, Clements sought to extricate himself from the Archdiocese's next most potent tool of influence over him: the threat of withholding budgeted Archdiocesan funding.

118. Although Holy Angels was purportedly in such financial peril that Clements felt he had been set up to fail by Cardinal Cody, George Clements successfully executed a clever and calculated scheme to provoke the Archdiocese into terminating its subsidies to the Parish while simultaneously soliciting donations in national advertisements and chicaning his destitute parishioners into fully supporting his financial desires.

119. Although George Clements almost immediately announced his intention to reject Archdiocesan subsidies at yet another "Unity Mass" held at Holy Angels Church on June 29, 1969, he recognized that unilaterally refusing substantial financial handouts from the Parish's supreme patron without provocation would be hard to justify to the congregation.

120. So, the following Monday George Clements began plotting how to realize his personal goal of cutting off Holy Angels' financial reliance on the Archdiocese of Chicago in a manner that appeared externally imposed, and ideally implicating "Black Power" sentiments.

121. The ultimate scheme employed by Clements involved the replacement of one of the five pre-existing “side altars” dedicated to various saints, specifically the one depicting St. Anthony of Padua, with a shrine dedicated to Martin Luther King, Jr. In order to ensure the Archdiocese of Chicago’s immediate attention, George Clements also invited the media to cover the story and encouraged his parishioners to celebrate it by lighting vigil candles and depositing flowers.

122. Predictably, Cardinal Cody promptly ordered Clements to remove the MLK shrine and threatened that failure to comply would result in Clements’s suspension and the elimination of Archdiocesan funding for Holy Angels.

123. Given Clements’s recent victory over Cardinal Cody and his relative strength of hand, George Clements was willing to wager that Cardinal Cody would not follow through on the threat to suspend him, but the termination of the Archdiocesan subsidies was a virtual certainty.

124. So Clements purportedly convened a meeting with Holy Angels parishioners, students, and parents to convince them that they should defy Cardinal Cody’s directive as a matter of black self-determination, and enlisted several Holy Angels officials to vocally support the concept of economic independence as a critical means to secure and maintain their civil rights.

125. In a contradictory and apocryphal narrative provided by Clements, when confronted face-to-face by Cardinal Cody over the edict to remove the MLK shrine, Clements instinctively declared: “Your Eminence, I am not about to take that shrine down. However, if you want the shrine down, I suggest you send someone out to Holy Angel[s] to take it down. Of course, I cannot ensure their safety when they begin dismantling the shrine.”

126. Regardless of how Clements's blatant insubordination was communicated, his ruse worked, and Cardinal Cody cancelled Archdiocesan funding to the Holy Angels Parish and School.



George Clements Speaks to Parishioners at Holy Angels Church

127. Although Clements achieved his immediate goal of establishing Holy Angels' financial independence from the Archdiocese of Chicago, he still had to take on the greater challenge of establishing its financial self-sufficiency. In order to do so, Clements not only initiated an expansive fundraising campaign that garnered national attention and many allies in the process, but he also drilled down directly on his parishioners.

128. Per Clements, at one of his early masses at Holy Angels he both inspired his congregation with an historical narrative about the Parish's legacy of self-sufficiency and castigated his parishioners over the inadequacy of their contributions. After purportedly counting

that Sunday's tithes before the entire congregation and shaming them over the "paltry sum," Clements exclaimed: "I will resign before I go down there to those white folks on my knees begging. We will take up another collection. Don't come to me talking about poverty. You find poverty in Haiti and Bangladesh and Eritrea. You will not pull a snow job on me. *I intend to get mine off the top.*"

129. With the Church exits locked behind them, Clements then purportedly directed the parishioners to pass the collection baskets a second time, then a third, and then a fourth time, until Clements was satisfied. As he later explained: "Fortunately, I never had to repeat that bizarre performance because our collection became more than adequate to sustain our needs."

130. Indeed, between the elevated contributions from Holy Angels parishioners and his independent fundraising prowess, the revenue generated by Holy Angels Parish was so adequate that George Clements was able to and did perpetually siphon off substantial funds for his own personal and indecent ends, including the sponsorship of his adolescent lovers.

131. Having established sufficient support from the Black Catholic community in the city of Chicago politically and his assigned congregation financially, Clements effectively immunized himself from the Archdiocese's influence and coercion. And having repeatedly and flagrantly tested the Archdiocese's resolve to reign him in and found it wanting, Clements effectively established for himself and others that he could operate with impunity. In other words, as Clements himself so eloquently put it, "[t]he anchor was gone."

132. And yet, Clements characterized the split like so:

"Giving George Holy Angels was akin to a slave ship that has left Africa and is crossing the Atlantic Ocean. In the middle of the ocean the ship suddenly develops severe nautical problems. The captain realizes that the ship is about to sink. He brings his captive passengers up on board, and says, 'Boys, we are going to give you this ship,' and the crew members take off in lifeboats."

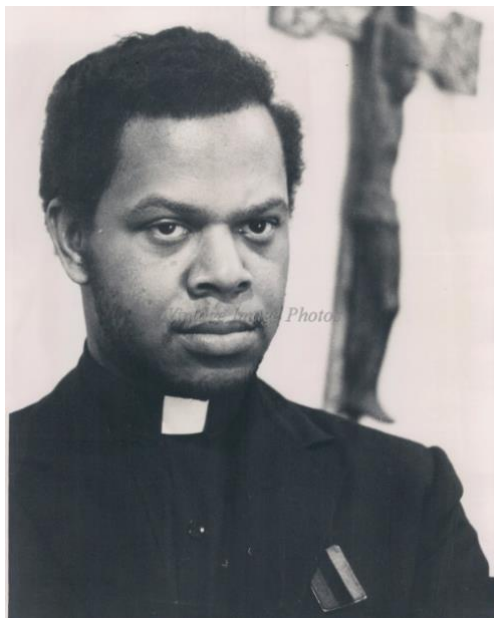
133. Regardless of how the dynamic arranged itself, it is certainly apparent that George Clements was under the impression that he was operating entirely independently of the Archdiocese of Chicago and its oversight, and history proves that he acted accordingly and was in fact correct.

134. The Archdiocese's consent to and facilitation of that mutually understood arrangement of reciprocal non-aggression was not just objectively unreasonable, it was an invitation for misconduct. And when combined with the knowledge that during Fr. Clements's tenure Holy Angels maintained no parish council or school board to supervise or manage him, the School, or the Parish writ large, even the Archdiocese's mere acquiescence to that arrangement was reckless and wanton.

THE UNHOLY ANGELS

135. Having promptly and successfully pushed out the recently appointed principal of Holy Angels School and with nuns fleeing towards the convent exit, George Clements sought to replace the prevailing hierarchy of the Parish with loyalists who would facilitate his goals, including his intentions to sexually exploit children.

136. Although George Clements promptly hired then fired a new principal for the School, Eldridge Freeman, in 1970 Clements recruited and installed a Black educator and Catholic priest named Paul Bernard Smith, who Clements had previously known.



Fr. Paul Smith

137. Fr. Paul Smith was born and raised Catholic in Baltimore, Maryland, on September 29, 1931, eventually attending St. Pius V Catholic School. Smith went on to become one of the first Black graduates of Loyola College in Baltimore, and after numerous rejections from other diocese, became the first Black man from Baltimore to become a Catholic priest when he was ordained to the Diocese of Alexandria, Louisiana in 1962.

138. By 1970, when Clements travelled down to Louisiana to recruit him, Smith was working at Holy Savior Menard Central High School, and evidently involved in some manner of controversy with the school administration.

139. Fr. Smith accepted Clements's offer and the two quickly discovered that they "were of like mind on virtually every issue."

140. On information and belief, upon Fr. Smith's arrival at Holy Angels he and Fr. Clements initially shared a sexual relationship.

141. Reflecting on their shared pedagogic philosophy, Clements explained: "We decided that far from going the liberal route with the creativity and do-your-own-thing and all that, we

were going to make this place a bastion of strict, conservative rules and regulations.” By all accounts, this involved “unabashedly old-fashioned” methods, including exacting social standards and rigorously enforced discipline that included corporal punishment and high rates of expulsion.

142. One of Fr. Smith’s first official acts was appointing Sister Helen Strueder, whose reputation for strict classroom discipline preceded her, as his assistant principal.



143. Sister Helen was born in 1939 to German immigrants in a farm community outside of Milwaukee, Wisconsin. She attended a Catholic school administered by the School Sisters of St. Francis, and after joining that community herself in 1957 and then earning a Master’s Degree in Counseling and Administration from DePaul University, Sr. Helen was formally assigned to Holy Angels in 1960.

144. Sr. Helen would later describe her relationship with Fr. Smith as “hand-in-glove,” and with the shared adherence to “conservative” and “old-school” methods, together they set about establishing a totalitarian administration at Holy Angels School.

145. Clements later explained that, under Fr. Smith and Sr. Helen, “Holy Angels school definitely became the apple of [my] eye.”

146. Their School embraced large class sizes of 30-50 students each, a “chalk-and-talk” style of instruction reminiscent of the religious instruction provided to missionaries, and rote exercises involving “a relentless series of drills both in reading and in math.”

147. They also imposed a notoriously draconian regime of discipline, involving frequent summons of pupils’ parents, exceptionally low thresholds for suspension and expulsion, imposition of stress positions and acts of humiliation, and beatings with custom-made wooden paddles – one of which was ironically inscribed “I love you.”

148. Fr. Smith liked to describe his approach as the “ketchup bottle method” – “When all else fails, hit it on the bottom.” As many describe, getting beaten with a paddle – in the early years, mostly by Fr. Smith and Fr. Clements – was so routine and arbitrary that many students employed multiple layers of clothes or magazines stuffed into their trousers to mitigate their suffering, and the sounds of children’s screams emanating from Fr. Smith’s office were essentially unremarkable.

149. Fr. Smith also extolled the virtues of the School’s “daddy-policy,” whereby the father or “male guardian” (e.g., mother’s boyfriend) of a student was “responsible for all school business,” and that a student subject to disciplinary action could not “return to school except [if] the father brings them.” Fr. Smith explained the rationale: “Daddy has to take off from work, so he’s mad at me when he comes. Mother emotes and dawdles and talks about ‘her baby’ being suspended. Daddy is no-nonsense. We have no further trouble with the child.”

150. During such paternal summons by Fr. Smith it was common and encouraged for the father or male guardian to inflict their own corporal punishment upon the Holy Angels student on the spot, and often in front of that student’s peers to compound the humiliation.

151. Although the methods employed by Clements, Smith, and Sr. Helen were not without controversy, they discovered that their adherence to strict social control, backed by corporal punishment, was attractive to a significant Black parent population in the crime-infested neighborhood where they operated.

152. Fr. Smith, Fr. Clements, and the Archdiocese were well-aware that the Holy Angels students in their charge were uniquely vulnerable due to their socio-economic status.

153. The area immediately surrounding Holy Angels was heavily concentrated by “housing projects,” including the infamous Ida B. Wells Homes, and infested with gang activity.

154. A grossly disproportionate amount of Holy Angels students came from broken homes, lived in public housing, and survived on public aid. For the parents, grandparents, and foster parents that raised these children, and the boys in particular, Holy Angels represented a lifeline and oasis within a community plagued by poverty, drug addiction, and street-level criminality.

155. Meanwhile, Smith and Clements also fully appreciated and actively leveraged the strength of their authority and influence over the Holy Angels students, who they could and did summon, discipline, suspend, and expel at will and without accountability.

156. Against this backdrop, George Clements and Paul Smith began sexually molesting Holy Angels students almost immediately upon their respective arrivals.

157. Even prior to Fr. Smith’s appointment as principal, George Clements had already anally raped a boy younger than 10 multiple times in the Holy Angels rectory (“the Rectory”), located at 615 E. Oakwood Blvd., right next to the Church. On one such occasion, the victim was notified over the School’s P.A. system that his father had been involved in a car accident as a pretense to being directed to see Fr. Clements in the Rectory. The brazen falsity of Fr. Clements’s

pretext was made all the more obvious by the fact that only the victim, and none of his siblings in the school, was notified of the gravely troubling news concerning their father.

158. Around the same time, George Clements also began grooming another student at Holy Angels School who was a foster child under the age of 10 at the time of the abuse. In a similar manner, Fr. Clements would visit the victim's classroom to summon him under false pretenses in order to force the victim to perform oral sex and submit to anal penetration.

159. Promptly upon arriving Fr. Smith also began sexually molesting boys inside and outside of the Holy Angels School, and a student's isolation in the context of a disciplinary referral to Fr. Smith's private office was a consistent means for opportunistic sexual abuse.

160. For example, one victim's solitary sexual encounter with Fr. Smith followed a referral to Fr. Smith's office for disciplinary reasons, where instead of administering corporal punishment Smith directed the victim to remove all of his clothes, and after ogling the young boy for several minutes, performed oral sex on him.

161. Shortly thereafter, Fr. Smith began sexually exploiting another prepubescent boy around the time that he began his training as an altar boy. Smith's lecherous pursuit of this victim began in the confessional, where Smith would solicit disclosures about masturbation and other sexual acts. From there, Smith began consistently summoning the victim to the Holy Angels Church for the stated purpose of assisting with the preparations for regularly scheduled Wednesday mass, but in actuality seeking to perform oral sex on or otherwise sexually abuse the victim in an isolated setting. In total, this particular victim was subjected to sexual abuse by Fr. Smith on over 100 occasions across several years.

162. Fr. Smith also solicited and sexually exploited local boys who were not students at Holy Angels School.

163. One such victim was a minor who lived nearby and became personally acquainted with Holy Angels in the early 1970s when he began receiving lessons from a blind music instructor in the Rectory. Fr. Smith began making regular appearances during these lessons, and after a few instances of rudimentary genital fondling in the Rectory halls Fr. Smith began soliciting the victim to perform odds jobs around Holy Angels and endure Smith's casual groping in exchange for a tidy sum of cash. The relationship ultimately developed to the point where Fr. Smith began arranging to visit the victim at his home while his parents were at work for more mature sex acts, involving mutual masturbation, oral sex, and anal sex. In total, this victim had around 100 sexual encounters with Fr. Smith over about two years

164. This method of luring neighborhood boys into the Rectory with overpaid odd jobs serving as pretext for opportunities to sexually exploit them was widespread, and a close neighbor who had a direct line of sight to the Rectory throughout the early 1970s reports seeing innumerable young boys – *always* boys – entering and exiting the Rectory after brief periods and at odd hours. Occasions have been witnessed when altercations between Fr. Smith or Fr. Clements and a male youth would bleed out into the street, garnering attention from those living nearby, including the nuns in the nearby convent.

165. A similar dynamic of obvious concern that developed early and continuously was Paul Smith's employment of various criminals, drug addicts, and local reprobates to do his bidding in and around Holy Angels School.

166. This certainly included the likes of M.R., who acted as Smith's personal assistant, chauffeur, and on-call inamorato in exchange for Fr. Smith's sponsorship of M.R.'s drug addiction for nearly two decades from the point Fr. Smith began abusing M.R. as a teen in the mid-1970s.

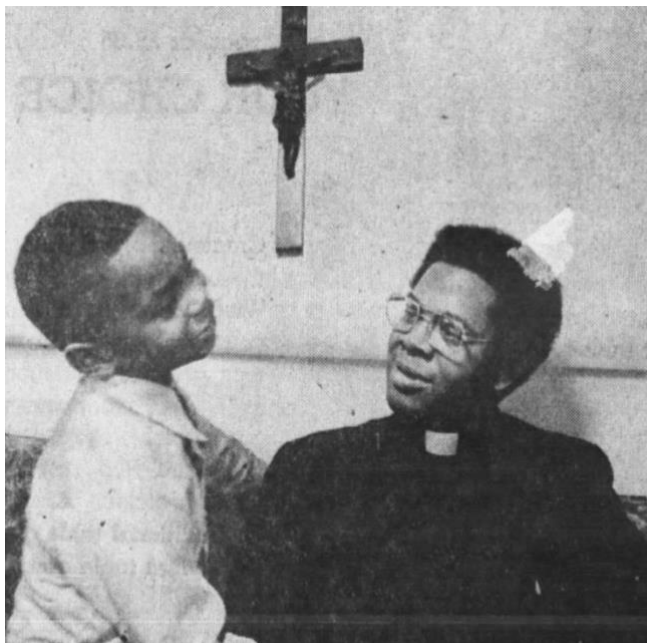
167. It included the perpetually and visibly intoxicated George Tucker, a close companion of Fr. Smith's from his hometown of Baltimore who Smith summoned to Holy Angels shortly after his own arrival. George Tucker's ostensible duties appeared custodial, but in practice were largely devoted to creepily leering at students during recess, inflicting notoriously harsh "disciplinary" beatings, and shuttling young boys to Fr. Smith's office until the early 1980s when Tucker was convicted and sentenced to prison for rape. Fr. Smith's appreciation for George Tucker's loyalty and devotion was clearly reflected by his special inclusion in a Last Will and Testament executed by Smith while Tucker was serving time for his rape conviction.

168. It also included twins A.C. and L.C., who are suspected of having been victimized by Smith since their teenage years and whose employment at Holy Angels was arguably the most overtly founded on transactional sex.

169. Fr. Smith's capacity to generate these relationships was significantly enhanced by the fact that, after only the first few years residing in the Holy Angels Rectory, Smith purchased and moved into a private condominium located at 4828 S. Dorchester Ave. where he was able to maintain a private life subjected to less visibility.

170. The personal residence also provided an additional means for Fr. Smith to exploit Holy Angels students, and he did so.

171. For example, Fr. Smith surreptitiously recorded a student (who did not just coincidentally live near Smith's condominium) confess to committing property damage and threatened to disclose the recording to the student's abusive father in a successful effort to coerce the student to present himself to Smith's condo, wherein Fr. Smith anally raped him.



Fr. Paul Smith

George Clements Welcomes Another Child Molester to Holy Angels

172. In 1972, around the time that Fr. Smith and Sr. Helen were transitioning Holy Angels School to a year-round, 218-day class schedule, George Clements's long-time friend Fr. Kenneth Brigham ran into some (likely familiar) trouble at Our Lady of Perpetual Help Vicariate, to which Brigham had been appointed Administrator (functionally equivalent to Pastor) at the same time that Clements had been appointed to Holy Angels.

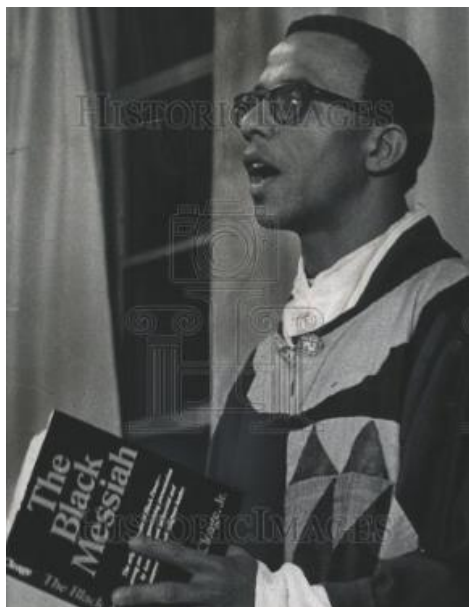
173. Like George Clements, Kenneth Brigham was born and raised in Chicago and attended Quigley Prep and St. Mary of the Lake for seminary school, and in 1961 Brigham was ordained and assigned as associate pastor to Our Lady of Solace, located at 6214 S. Sangamon St. in Chicago, Illinois.

174. Although the standard appointment term was six years, less than five years in Fr. Brigham requested an urgent appointment with then-Archbishop Cardinal Cody. Fr. Brigham ultimately met with Cardinal Cody on April 14, 1966, and Archdiocesan records reflect that

Brigham was transferred from Our Lady of Solace to St. Clotilde, located at 8400 S. Calumet Ave., *that same day.*

175. On information and belief, that extraordinary transfer was compelled by Fr. Brigham's acute need to distance himself from the consequences of a complaining victim of Brigham's sexual abuse.

176. Notwithstanding whatever concerns should have been raised by that transfer, in June of 1969 Fr. Brigham was appointed administrator of Our Lady of Perpetual Help Vicariate, located at 1300 S. St. Louis Ave., Chicago., making him one of the youngest priests given control of a parish in the entire Archdiocese of Chicago.



BRIGHAM, Kenneth M.		Date of birth	Ordained
			May 1, 1961
Nationality Negro-Negro-German			
Date Appointed	Assignment	Change	Date Left
7-5-61	Our Lady of Solace	Asst.	4-66
4-66	St. Clotilde	Asst.	6-20-69
6-20-69	Our Lady of Perpetual Help Vicariate-Administrator		8-2-72
8-2-72	Holy Angels Parish, Chicago, Ill	Associate	Eff: 1-1-78
Ltr: eff: 1-1-78	St. Helena of the Cross Chicago	Associate	7/9/80
7/9/80	St. Columbanus, Chicago	Pastor	
7/1/86	St. Columbanus, "	2nd Pastorate	7/1/92
7/1/92	Our Lady Help of Christians	Pastor	11-30-05
7/1/98	Our Lady Help of Christians	Pastor	
	extended for 2nd term		
05/24/00	St. Angela	Temp. Adm.	9.16.01
09/20/00	Dean of Deanery III-D		
07/01/01	Dean of Deanery III-D	Dean	06/30/04
09/17/01	St. Martin De Porres & St. Angela Parish (while retaining duties at O. Help of Christians)	Pastor/Pro R.	
5/1/05	Our Lady Help of Christians	Pastor Emeritus	
6/13/05	new Add. 6675 W. Tropicana Ave. Apt. 1036 Las Vegas NV 89103		
5/25/06	Deceased		



Kenneth M. Brigham
Extraordinary Appointment

Fr. Kenneth Brigham

177. While at Our Lady of Perpetual Help Vicariate Fr. Brigham sexually abused multiple young boys, including one student and altar boy who Fr. Brigham overpowered and anally penetrated in the church.

178. On February 28, 1972, on "Holy Angels Church" letterhead, Fr. Clements wrote directly to Cardinal Cody to advise of his imminent plans to travel with Kenneth Brigham to the scenic and serene campus of St. Augustine's Monastery at Nassau in the Bahamas – and to seek reimbursement for his and Brigham's out-of-pocket expenses in doing so.

HOLY ANGELS CHURCH
907 OAKWOOD BLVD
CHICAGO, ILLINOIS 60653
PHONE 312 OAKLAND 4-5375

Feb. 28, 1972

Your Eminence,

This is to inform you that I am accompanying Fr. Kenneth Brigham on Tuesday, Feb. 29th, to St. Augustine's Monastery at Nassau in the Bahama Islands. Fr. Brigham asked me to travel with him because he feels he needs to get away from many pressures that he is under here in Chicago. It is my understanding that you spoke with him today, Feb. 28th, and that you are aware of his plans and of his condition.

I spoke with Bishop Dempsey on Feb. 27th and informed him of Fr. Brigham's plans. He stated that in all likelihood Fr. Brigham "would be treated just like any other Priest who is sick in the Archdiocese". I am using my funds to pay for the airfare and to give Father enough to live on while he is down there. The round trip fare is \$188.00. I plan to give Fr. Brigham \$300.00. The total amount is \$676.00.

Since my funds are extremely limited I sought advice from Fr. Rollins Lambert and he suggested that I take this step of writing to you for reimbursement. Thanking you for your kind attention to this matter, I am,

Sincerely yours in Christ,

COPY
of an original document housed in the
ARCHIVES OF THE
ARCHDIOCESE OF CHICAGO
This is a red ink stamp!
DO NOT COPY

Fr. George Clements
Fr. George Clements

179. Evidently Fr. Brigham was feeling "many pressures" in Chicago and had reported these plans and "his condition" to Cardinal Cody that same day. Just one day prior, February 27, 1972, Fr. Clements seemingly consulted auxiliary Bishop Michael R. Dempsey, the coordinator of

the Archdiocese's Inner-City Apostolate, regarding the matter and was assured that "in all likelihood Fr. Brigham 'would be treated just like any other Priest who is sick in the Archdiocese.'"

180. This language, combined with an understanding of the process and commentary regarding Brigham that followed, unequivocally reflects a hallmark pattern employed by the Archdiocese of Chicago, as well as dioceses throughout the United States, to conceal the guilt of its sexually abusive priests and reassign them to a new parish with an unsuspecting congregation.

F) Ken Brigham - In residence at Holy Angels, will not return to Our Lady of Perpetual Help Vicariate. This is a very complex situation. At this point Bishop Dempsey recommends that we do not do anything. Ken is under many pressures -- family, parish, cluster, etc. Ken will be seeing a Doctor, and until we have some reports, we will not do anything.

Notation from May 19, 1972, Personnel Board Meeting Minutes

181. By mid-May of 1972, Fr. Brigham was in residence at the Holy Angels Rectory with no apparent plans of returning to Our Lady of Perpetual Help Vicariate.

182. At that point in time the Holy Angels Rectory briefly housed *four* serial child molesters, which in addition to Clements, Smith, and Brigham, also included Fr. Thomas Swade, whose handling by the Archdiocese of Chicago is well documented and serves as a case study for the Archdiocese's horrendous mismanagement of sexually abusive priests of the era generally, and at predominantly Black parishes particularly.

183. On July 12, 1972, Fr. Brigham spoke directly with Cardinal Cody, and on the following day Brigham offered his resignation as the administrator of Our Lady of Perpetual Help Vicariate in a handwritten letter to Cardinal Cody on Holy Angels letterhead.

184. Cardinal Cody specifically suggested to Fr. Brigham that he continue his ministry at Holy Angels Parish, and in a letter to Cody from Fr. Brigham dated July 18, 1972, he specifically stated, "In gratitude to Father Clements and respecting your opinion, I respectfully request to be assigned to Holy Angels."

185. In a letter from Cardinal Cody to Fr. Brigham dated July 20, 1972, the then-Archbishop acknowledged Brigham's "illness" and formally accepted his resignation from Our Lady of Perpetual Help Vicariate, before further explaining: "In accordance with our conversation *and the request of Father Clements*, I am appointing you as a Vicarious Cooperator at Holy Angels Church." (Emphasis added).

186. Indisputably, both George Clements and the Archdiocese of Chicago clearly understood that Fr. Brigham was a risk to children, and despite the fact that the Archdiocese also knew that Brigham was a close friend of Clements's, the Archdiocese evidently had no reservations about placing him solely under Clements's control and employing no additional means of supervision or restriction.

187. Fr. Brigham did not waste much time before he began committing child sexual abuse at Holy Angels, including at small, spontaneous "parties" held in the Rectory during the school day that typically included treats and soft drinks, a small group of select students, and Fr. Smith, Clements, and Brigham.

188. Invariably each of the priests at these "parties" could be observed luring a child away to a private place with promises of gifts or by demonstration of authority and therein sexually abuse at least one student who was subjected to similar abuse by more than one of those priests under similar circumstances – which most would characterize as a "child sex ring."

189. Kenneth Brigham also directly contributed to this cooperative effort of child sexual abuse at Holy Angels. For example, because of his extraordinary passion for Catholicism and the fact that his mother was a childhood friend of Brigham's, one victim was given the special privilege of participating in major Holy Angels-sponsored attractions, such as outings with the School basketball team, field trips, and special events like visits to amusement parks and concerts at major

venues. On such occasions the victim would often stay overnight at the Rectory either the evening before or after the event, which is when the sexual abuse would occur. Most commonly it was George Clements who would enter the room where this victim was sleeping and explain that he was there to provide “spiritual guidance,” i.e. fondling his genitals and encouraging the victim to reciprocate. Other times it would be Paul Smith who would enter the room and engage in substantially similar behavior. Eventually this progressed to oral sex, and across approximately three years Fr. George Clements and Fr. Paul Smith collectively abused this victim more than 20 times.

Sources and Methods

190. George Clements and Paul Smith used every conceivable method to isolate children in order to sexually abuse them while attempting to maintain a false pretense of legitimacy, and in doing so perpetuated a multidimensional sex ring operation out of Holy Angels Parish that endured for more than 20 uninterrupted years.



Fr. Paul Smith



Fr. George Clements

191. Naturally that involved exploiting the altar boys, who would be excused from class to assist in School mass preparations or expected to provide similar work before and after weekend services.

192. One such victim who was horrendously victimized started as an altar boy for Sunday mass around his 6th grade year, which generally involved arriving at the Church between 7:00 and 7:30 a.m. each Sunday to clean and prepare the Church, change into the altar boy garments, and perform the customary rituals. In a room behind the altar was a dedicated space for the altar boys to change into their mass garb and is where Clements's grooming began, initially involving casual genital groping under the pretext of arranging the victim's altar boy uniform, then to reaching under his clothes without any ostensible justification. Eventually Clements directed the victim to get on his knees and assume a praying position while Clements stuck his finger in the victim's mouth and slowly swept across its inner contours. Of course, George Clements ultimately forced the victim to perform oral sex on him dozens of times, as did other priests assigned to Holy Angels, including Fr. Smith.

193. Such victims were often selected and recruited to serve as altar boys, and George Clements in particular regularly tested his altar boy candidates' responses to his sexual advances before they were formally enlisted.

194. That was the case for one Holy Angels student who began his altar service studies in the 3rd grade, which typically involved 1-2 training sessions each week with 3-4 other trainees. Clements groomed the boy progressively, first with a casual genital grope over the clothes, escalating to lengthy, direct genital fondling while Clements masturbated himself, to the point where Clements ritualistically performed oral sex on him several times a month for approximately

three years. And once the regular abuse by Clements finally ceased, the victim was then subjected to further sexual molestation at the hands of Fr. Smith.

195. Another student suffered similar abuse during his altar service at Holy Angels, though his abuse was exclusively at the hands of Fr. Smith. It began slowly, with the familiar pattern of casual groping, escalating to direct genital fondling, and ultimately taking the form of some manner of sodomy.

196. Disciplinary action, often occurring in Fr. Smith's or Fr. Clements's private offices and typically involving a major academic penalty or a beating with a paddle, served both as (1) a seemingly random and opportunistic occasion for casual sexual abuse and (2) as an unfounded pretext to summon carefully selected victims for abuse at the priests' personal convenience.

197. The first category included a plethora of students groped or fondled in an overtly sexual manner by Fr. Smith – typically alongside bare-bottomed beatings with a paddle – in the course of routine disciplinary referrals.

198. The second category included a student who, along with two or more other boys, would be randomly summoned to see Sister Helen, who would beat them all with a paddle as corporal punishment for unspecified offenses. Following the beatings, Sister Helen would then refer the group of boys directly to the Rectory, who upon arrival would be separated into distinct private areas by Fr. Clements and various other priests, occasionally including Fr. Smith. This particular victim was always selected by George Clements in these instances and was most commonly subjected to having his bare genitals fondled by one of George Clements's hands while Clements masturbated through climax with the other.

199. On some occasions of fundamentally similar abuse the dynamic was more carrot and less stick. Rather than involving a disciplinary pretext, the signature elements of this pattern

would begin with the same victim and a couple more boys being spontaneously granted special privileges (such as free snacks from the commissary) shortly before the victim would find himself being summoned to the principal's office, where Fr. Smith would casually grope him in passing before promptly redirecting the victim to see Fr. Clements in the Rectory.

200. In many instances the victims of Fr. Smith's sexual abuse in the disciplinary context were escorted directly to his office by Sister Helen, who would personally close the office door behind her as she left Fr. Smith alone with the victim.

201. For the majority of their approximately 25 years working in tandem at Holy Angels School, Fr. Smith and Sister Helen worked out of the "old" Holy Angels School building on Oakwood Blvd., right next to the Church. During those years, Sister Helen's desk sat just outside of Fr. Smith's private office, where she could clearly hear the common screams of Holy Angels schoolboys emanating from the interior.

202. Sister Helen has since recently and repeatedly denied that any Holy Angels personnel beat students with paddles, despite the fact that there are likely hundreds – if not *thousands* – of living alumna who have personally experienced it.

203. When a beating, threat of expulsion, or verbal coercion was not sufficient to compel a victim to submit to his sexual advances, Fr. Smith overtook them by force.

204. One example of this involved a student who, within the context of a disciplinary referral, attempted to resist Fr. Smith's abuse by explicitly challenging the propriety of Smith's conduct, only to be met with a beating so severe that the victim collapsed to the ground before Fr. Smith inserted himself into the victim's mouth and anus.

205. In another disciplinary encounter, a separate victim managed to flee Fr. Smith's office in response to sexual abuse, but when the victim was found hiding in the bathroom Fr. Smith then and there forcibly grabbed the victim's head and forced him to perform oral sex.

206. Holy Angels-sponsored extracurricular activities, particularly the Little Angels choir group and the after-school program, were prominent sources of George Clements's and Paul Smith's young victims.

207. The Little Angels choir group was the pride of the entire Parish. They were so popular that they were regularly tape-recorded for weekend reel on local television stations, reportedly won no less than four local TV Emmy awards, and even sang the national anthem at Super Bowl VII in Los Angeles, California on January 14, 1973.

208. George Clements repeatedly raped one of the Little Angels after choir practice in the Church, in Fr. Clements's office, and a classroom coat closet amid threats, degrading comments, and polaroid photography.

209. George Clements took a special interest in yet another Little Angel after the boy was beaten and robbed by an unknown hoodlum outside of the School. What started out as superficial empathy for the victim's traumatic experience quickly evolved into a tortured pretext for genital fondling and ultimately to regular summons to George Clements's offices where Clements would penetrate the victim's rectum with his fingers and penis. On several of those occasions the victim urinated on himself during the course of the rape in an effort to disgust and dissuade Clements from continuing, and on one occasion in particular, George Clements held the victim in his office and raped him repeatedly over the course of an entire school day.

210. The after-school program, which kept custody of some of the Holy Angels students after class each day until their parents could retrieve them after work, was typically held in the

lower section of the Rectory (at least through 1986), where a game room would keep the kids occupied under limited supervision. It was also a great opportunity for George Clements, and particularly Paul Smith, to isolate and sexually abuse young boys.

211. In one instance, a student fell ill and after he reported to the after-school program was shepherded into a Rectory office by Fr. Smith, given a cup of some sort of orange juice, and directed to lie down. Fr. Smith then departed briefly before returning to the office, at which point the student grew nauseous and began to vomit. Seeking to capitalize on his weakened and vulnerable condition, Fr. Smith rushed the student to the bathroom and anally raped him.

212. For some of their victims at Holy Angels, George Clements or Paul Smith would exploit contexts whereby they could secure private access on a frequent, regular basis.

213. For Clements this prominently included private counseling/mentorship sessions with especially struggling boys, whereas Fr. Smith was more likely to designate his student-victims as special assistants subject to regular summons or make arrangements to drive them to or from school in order to molest them on an almost-daily basis.

214. George Clements's informal "mentoring program" was one of his primary means of getting exposure to especially vulnerable boys who weren't Holy Angels students.

215. For example, one victim was barely out of kindergarten and struggling emotionally when after a Sunday service at Holy Angels his grandmother first introduced him to Fr. Clements, who agreed to meet with the victim regularly and privately in order to provide counsel to her ailing grandson. These regular meetings quickly lost all pretense of mentorship once the two got behind closed doors in the Rectory, and it only took a few weeks before Clements was compelling the victim to perform oral sex on him. For roughly a year thereafter Fr. Clements anally raped the boy – who was not yet eight years old – on an almost weekly basis.

216. The experiences of two other victims were strikingly similar, in that each of them was taken under Clements's wing as part of a purported "mentorship program," where they would meet one-on-one with Clements and get anally raped by him on a roughly weekly basis for approximately two substantially overlapping years.

217. By contrast, Paul Smith would more typically enlist special helpers that he could summon at will for casual sexual stimulation.

218. One such victim would frequently be called upon by Fr. Smith to participate in various tasks, both on and off Holy Angels property. For example, this particular victim would occasionally be called down to an office to lead the morning prayer over the School's P.A. system, during which Smith would touch the student's bare genitals with his hands and mouth. The same victim was also frequently summoned from class to travel with Smith offsite to run various errands, occasionally alongside one of Smith's henchmen, George Tucker. These trips would occasionally involve visits to a private residence seemingly controlled by Smith, where the victim once discovered a handgun while left alone in the dwelling in the middle of the school day.

219. Another victim's dynamic of abuse at the hands of Fr. Smith began with the victim's unofficial designation as a "courier" – a group of male Holy Angels students that would be spontaneously summoned during the school day to perform various odd jobs approximately two or three times each week. Once the boys assembled Fr. Smith would select those desired for whatever tasks needed handling and dismiss the remainder of the boys to return to class. This particular victim was always selected by Fr. Smith, but not to do any work. Although Fr. Smith would occasionally take the victim offsite in order to execute an actual errand, whether it occurred in a Holy Angels van or the basement of a School building, the universally consistent feature of

these encounters was that Fr. Smith would lure the victim to a private, secluded space and fondle his genitals for extended periods of time.

220. Yet another victim had a particularly unfortunate arrangement with Fr. Smith, who drove the victim to and from School almost every day for more than a year. On the overwhelming majority of these school days Fr. Smith would fondle the victim's genitals as he drove, and on a couple occasions Fr. Smith deviated from the usual dropoff route home in order to stop at Smith's condo and anally rape the victim.

221. Some of Paul Smith's relationships with his victims involved a dimension of intimacy beyond just the sexual. For example, what began near the end of one victim's tenure at Holy Angels as an early daily release from class to feed the dogs living in the Rectory quickly progressed to solicitations for other odd jobs, including on Saturdays when the victim would be enlisted to help Smith wash his Cadillac and spend most of the day with him. The sexual abuse was initiated early in that evolution, starting with unilateral fondling and progressing to mutual masturbation, and occurred on a roughly weekly basis over the course of approximately two years. Along the way Smith took the victim to major concerts, comedy shows, sporting events, and even an overnight trip to Milwaukee that included a stop at a brewery.



Much of the later abuse occurred at Smith's private condominium, and by the time this victim was preparing to graduate from Holy Angels School Smith earnestly solicited his mother about adopting him.

222. There is no doubt, however, that the vast majority of Paul Smith's and George Clements's victims were viewed and treated by them as mere sexual objects to be exploited at their personal convenience.

223. Such was the dynamic involving a particular student at Holy Angels School who expressed an interest in becoming an altar boy, which led Fr. Smith and Fr. Clements to separately summon him to the Rectory for the ostensible purpose of addressing that interest and the process of achieving that role. In reality this was a pretense for their familiar model of grooming and progressive escalation of abusive behavior, starting with the unilateral fondling of the victim's genitals until Paul Smith or George Clements (as the case may be) eventually insisted on performing oral sex on the victim multiple times a month for nearly three years.

ONE PRIEST, AT LEAST FOUR CHILDREN

224. George Clements had an uncanny and Machiavellian talent for grabbing the spotlight and manipulating the media. Clements knew which issues were hot with the press and which side of those issues was more popular, so he would carefully calculate whether he could leverage his position as a Black Catholic priest to add bounce to the story by his engagement and how to do so.

225. Often this involved political stunts, like when Clements purportedly led the African-American Police League to dye the lagoon in Washington Park *black* on St. Patrick's Day as a "counter-demonstration" against racial discrimination by the Chicago Police Department.

Then there was the time in April 1972 that George Clements awarded his good friend and personal spokesperson, George O'Hare (a Caucasian advertising executive), with Holy Angels' "Black Man of the Month Award."

226. Clements made headlines when he abruptly suspended about 200 Holy Angels students because their parents had failed to attend Sunday mass, when he held a press conference to publicly turn down the role of President of the Chicago Board of Education (despite the fact that the job had never been offered to him), and when he presided over a hastily prepared faux-wedding for Mike Tyson and Robin Givens.

227. Then, of course, Clements made quite the stir when he teamed up with his good friend Fr. Michael Pfleger to form "Chicago's Drug-Busting 'God Squad,'" with the two of them engaging in numerous spectacles as part of their campaign to eliminate the sale of drug paraphernalia and occasionally getting arrested in the process.

228. George Clements offered hot takes on controversial issues to anyone with a microphone or a column, was a prominent speaker at various conferences and rallies, and supported numerous political candidates; but all of this public attention paled in comparison to his most significant media exploit.

229. Through 1980, things had gone quite favorably for George Clements at Holy Angels. He had turned the Parish into a financially-sustainable personal fief with less than zero oversight from the Archdiocese, he was a Chicago celebrity, and amongst the credulous his personal reputation and that of the School had never been held in higher esteem.

230. Clements also had direct lines to his favored journalists and media outlets and a thick rolodex of famous and influential people to call upon in time of need. Still, the overwhelming

majority of priests within the Archdiocese of Chicago were not permitted to remain in the same parish for more than 12 years, which for George Clements and Holy Angels would have been 1981.

George Clements Seeks to Adopt a Child

231. That's around the time that George Clements initiated his most audacious idea yet: he was going to adopt a child – which by a Catholic priest anywhere in the United States was completely unprecedented.

232. According to George Clements, the idea occurred to him almost spontaneously and his announcement was made hastily amidst a Sunday sermon in late November of 1980, but that's not even remotely true.

233. In fact, the entire ordeal was calculated by George Clements to generate public spectacle, and to his feigned bemusement, the story grabbed headlines in the local media, who Clements directly solicited for coverage.

234. The Archdiocese did not support this adoption effort by Clements, but the matter continued to generate an immense amount of media attention, with publications seeking comment from Clements nationally and internationally.

235. A subsequent statement released by the Archdiocese only went so far as to suggest that “it may be more appropriate for a priest to leave adoption to those who are less encumbered by pastoral responsibilities.”

236. Even though George Clements publicly declared that he would abandon the idea if ordered to do so by his Archbishop, given the absence of any specific prohibition from Cardinal Cody, George Clements moved forward and submitted his adoption application the first week of December 1980.

237. In George Clements's account, by this point he was totally disoriented by the whole ordeal that had quickly and unintentionally unraveled and, in his words, "I had no idea who I would be adopting or when or where or anything else. All I knew was I had shot my mouth off in a fit of frustrated rage and now here it is, the morning after, and I have to try and pick up the pieces."

238. Per Clements, there was no urgency in moving forward with the adoption, and Clements felt that he might initiate the process in the spring of 1981. It just so happened that Clements promptly received a call from his "old friend," Joseph P. Munday, who was the executive director of the Uhlich Evangelical Lutheran Orphan Asylum (hereinafter, "Uhlich Children's Home") at 3737 N. Mozart. "Joe said he had a youngster at Uhlich that I just might want to consider meeting. He said each Christmas all of the kids got invited out for Christmas dinner with some family. This particular child had not been selected by anyone because of his belligerent attitude. The kid was obnoxious, had a chip on his shoulder, and was 11 years old." Though initially defiant, the orphaned child in question – J.S. – eased his natural defensive posture and by Christmas he was joyfully celebrating with George Clements and his family at the Holy Angels Rectory.

239. This narrative, as repeatedly perpetuated by Clements, is strikingly and disconcertingly inaccurate in ways that should have been apparent to many, including those at the Archdiocese, in real time.

240. For one thing, credible evidence indicates that Fr. Clements had been regularly engaging with J.S., as well as other boys at the Uhlich Children's Home, for over a year before he publicly announced his intentions to adopt. On these occasions, which were frequent, George Clements would often arrive unannounced on weekends to spend time alone with various of the boys residing at Uhlich Children's Home, including on off-site trips. Often these encounters involved familiar grooming techniques to establish trust, incentivize with gifts, and test the

boundaries of the boys' tolerance to sexual abuse; as if closely testing and scrutinizing the aptitude of prospective adoptees.

241. Contrary to Clements's assertion that he was not motivated to expedite his adoption, contemporaneous reporting published around the time that Clements formally submitted his adoption application in the first week of December 1980 quotes Clements as saying that he wanted to take custody of "a son or a daughter" within a month, remarking further: "I think it would be a pretty nice Christmas present that I'd like to give myself."

242. At the time he made those statements, and in an effort to maximize his personal popularity, George Clements had already developed designs for a national campaign in support of Black adoption down to its name: "One Church, One Child."

243. The initiative was uninspiringly simple: campaign volunteers would put on brief presentations to church congregations in support of black adoption and describe the process, and if a family in any given church adopted a black child then the name of that church would be included on a published "One Church, One Child" list.

244. The Director of DCFS, Gregory Coler, and his deputy, Gordon Johnson (who would later become Director) were effectively co-founders of the "One Church, One Child" program and much of their careers were ultimately devoted to promoting it.

245. Gordon Johnson later recalled the pressure that his agency was under to meet Clements's demand for child custody within 30 days, as DCFS leadership had a major interest in capitalizing on the media attention to Clements's story and wanted to prove that under its new management it had developed a nimble system that would substantially reduce the friction typically associated with adoption processes.

246. It should come as no surprise then, that by January of 1981 Clements announced that he had taken custody of a 12-year-old boy, J.S., in the Holy Angels Rectory and announced their intentions of going on a nationwide tour to promote black adoption and find adoptive homes for 100,000 Black orphans “within the next year.”

247. The next few months must have been incredibly disorienting, particularly for J.S., as the pair travelled extensively and fielded endless interviews.

248. George Clements, described by reporters as “media-wise” and “a master of attracting publicity,” was acutely aware of the need to manage the news cycle, and smoothly delivered rehearsed answers to oft-repeated questions, such as “how does it feel to be a father,” to which Clements typically replied: “I do my feeling with my fingers.”



J.S. (left) and George Clements

249. J.S. clearly resented this new reality, and his ill-concealed disdain for the perpetual invasion of privacy invited by George Clements from the media was obvious to journalists, George Clements, and the Archdiocese.

George Clements Conceals a Second Boy in the Rectory

250. On information and belief, while all of this was ongoing and for several years thereafter, George Clements managed to conceal from the public that he was also harboring another boy, believed to be S.A.R., in the Holy Angels Rectory.

251. There is no reporting on the relationship between S.A.R. and George Clements until he finally adopted S.A.R. as a freshman in college in 1984, despite considerable news coverage of George Clements's other adoption exploits in the interim.

252. George Clements has asserted in detail, including in his posthumously published autobiography, *Just Don't Ignore Me*, that amongst his four formally adopted sons the last that he was introduced to was S.A.R.

253. S.A.R. and George Clements publicly agree, however, that S.A.R. began to reside in the Holy Angels Rectory around the time of his freshman year of high school, which was 1980-1981.

254. Clearly those working at Holy Angels, including the School administrators, the Rectory staff, and any priest that would have spent significant time at the Holy Angels Rectory – and there were plenty during this time – were aware that George Clements was harboring an undisclosed boy in the Rectory for an extended period of time without making any efforts to actually adopt him.

255. That this matter escaped the attention of the media can only be adequately explained by a considerable amount of active concealment by George Clements, however there is no benign explanation for how the Archdiocese could have failed to discover the existence of an additional minor living in the Holy Angels Rectory for years immediately after George Clements's unprecedented decision to adopt.

George Clements Brokers Adoptions

256. Although he already had *two* boys living in the Rectory and his travel itinerary was intensive, George Clements could not get enough. In mid-November of 1981, a struggling mother purportedly delivered an unwanted newborn to Clements, and shortly thereafter, Clements's personal spokesperson pre-announced that Clements would be formally declaring his intention to adopt the two-week-old girl at a Thanksgiving mass to be held on November 26, 1981.

257. Clements, however, did an almost immediate about-face, notifying the public via a statement made by DCFS chief Greg Coler on November 25, 1981, that Clements would not be seeking to adopt the child.

258. The following day, Clements leveraged the misfire by telling his parishioners that, although his "heart told him to adopt" the child, he had successfully been able to arrange for a couple to take custody of the newborn girl.

259. That was not the only instance in which George Clements was personally involved in facilitating an adoption, including that of V.D., J.S.'s former roommate at the Uhlich Children's Home.

"One Church, One Child" Exploited by Other Abusive Priests

260. George Clements's instincts to rapidly expand his custody of minors at the Holy Angels Rectory should have raised obvious concerns within the Archdiocese, particularly as Clements's normalization of priestly adoption represented an obvious opportunity for the Archdiocese's ordained child molesters.

261. On the back of the still-favorable reporting, on December 1, 1981, a fundraising dinner was announced to support the "One Church, One Child" program and was slated to include Governor James Thompson.

262. At the dinner on December 2, 1981, two more Catholic priests – including Kenneth Brigham – announced their intentions to follow Clements’s lead in adopting, with one of the priests being introduced to his “prospective adoptee” at the dinner, despite the fact that neither of the priests had even initiated their required home study classes.

263. Unlike George Clements, the Archdiocese at least had the nerve to specifically direct Brigham not to adopt.

264. But that did not stop Brigham, who as head pastor of St. Columbanus throughout the 1980s regularly sheltered his child victims under the label of “provisional adoptee.”

265. What’s more, at least two other serial offenders, Fr. Victor Stewart and Fr. John Calicott, ultimately harbored boys in their rectories as “adoptees” under the cover of the “One Church, One Child” initiative and specifically cited George Clements as precedent.

266. That any of these Catholic priests were effectively able to identify and hand-select multitudes of vulnerable, desperate boys and shelter them in the private quarters of these Archdiocesan rectories was as obviously outrageous then as it would be today.

267. By January of 1982, Clements was reportedly in Hollywood negotiating a film deal with Universal Pictures, with Bill Cosby suggested for the role of Clements, and in June “One Church, One Child” had been granted \$150K by the Department of Health and Hunger Services to promote the campaign.

George Clements Targets and Imports More Boy for Adoption

268. Despite Fr. Clements’s acknowledgement of the immense difficulty he had encountered managing J.S. that left Fr. Clements “truly depressed,” in April of 1983, during a trip to Lagos, Nigeria, George Clements became “captivated” by a young boy there, F.N. In a stomach-churning account in his autobiography, George Clements describes his interest in bringing the

young man to live with him. George Clements wasted no time, advising his host and former Holy Angels co-resident, Fr. Babatunde, of his interest in taking F.N. to the United States before he departed.

269. F.N. landed at Chicago's O'Hare airport and moved into the Holy Angels Rectory on or about October 30, 1983, and the boy was unveiled publicly on January 17, 1984.

270. The last son that George Clements formally adopted was S.C.

271. According to George Clements, he was introduced to S.C. on a Baltimore talk show called "People Are Talking" on WJZ-TV hosted by the burgeoning Oprah Winfrey. The episode, which supposedly focused on the issue of adoption, included an appearance by the 13- or 14-year old S.C., then a resident at a Methodist orphanage in Towson, Maryland. When Stewart disclosed on air that he was resigned to the fact that he was too old to maintain hope of being adopted himself, George Clements recognized the opportunity and purportedly announced: "Well, if no one wants you, son, I'll take you." Per Fr. Clements, local authorities disclosed to him that S.C. was a "special needs child" and stonewalled Clements's efforts to make good on his on-air promise to adopt him. "I finally decided that it was time to play hardball," Clements details in his autobiography, "I made an appointment to see Governor James Thompson." As Clements further describes:

"Governor Thompson had been extremely helpful to me in the process of establishing 'One Church, One Child.' I told him that I needed a big favor. 'Father, what can I do for you?' I began telling him about all the trials and tribulations I was going through in regards to [S.C.]. The Governor said, 'Father, are you sure you can handle another son? After all, you have two [actually *three*] already.' I said, 'Governor, I would not be in your office if I did not feel perfectly capable of doing this. I promised that lad, and I am not going to let him down.' The governor picked up the telephone and called the Governor of Maryland. When he hung up, he said, 'Father, pick up your son tomorrow at O'Hare.'"



(From left) Fr. George Clements, Gov. James Thompson, Fr. Michael Pleger

272. S.C. reportedly lived in the Holy Angels Rectory “for about a year” before his adoption by Fr. Clements became official on September 23, 1986, when Stewart was 17.

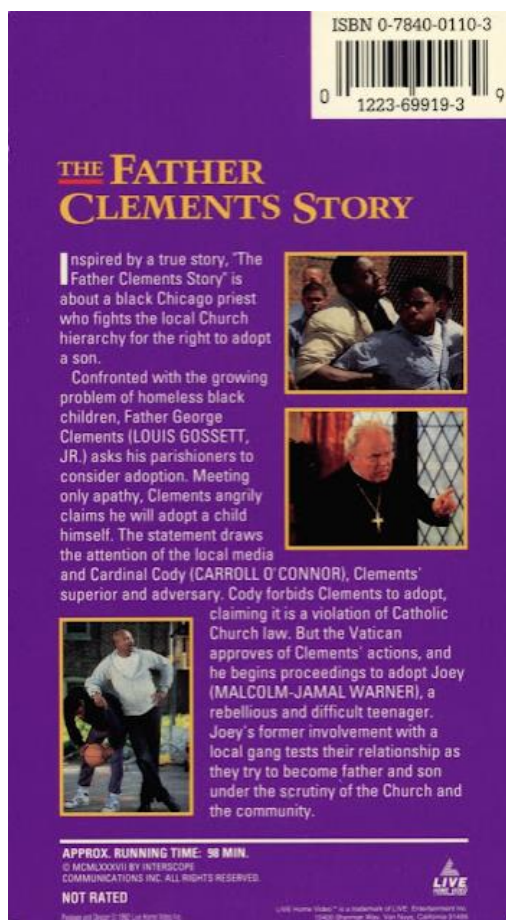
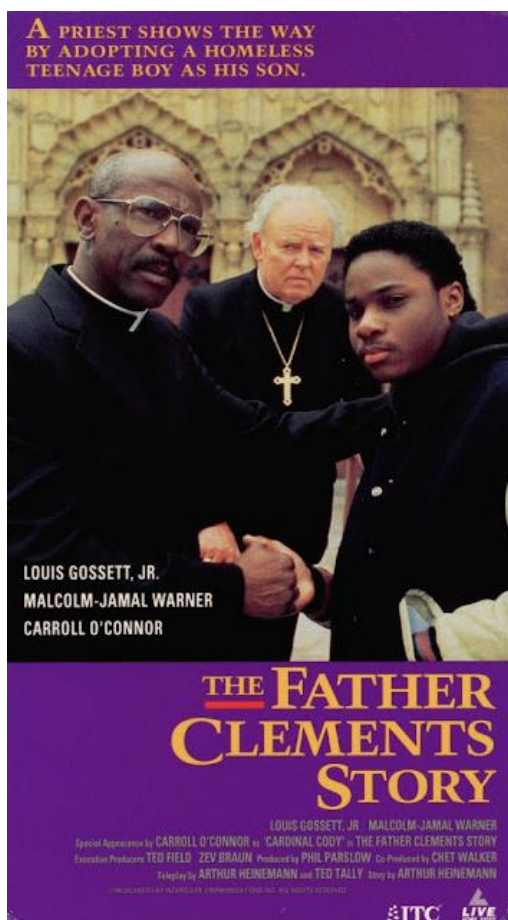
273. On information and belief this narrative about S.C., as provided by George Clements, is preposterously false. And for anyone supervising him, including the Archdiocese of Chicago, it should have been apparent that George Clements lazily concocted an evolving story of increasing grandeur to cover for the fact that he specifically identified yet another highly vulnerable youth and housed him in the Holy Angels Rectory for an extended period of time before formally taking legal responsibility for the child.

274. On information and belief, the Archdiocese of Chicago still has never engaged with any of Fr. Clements’s adopted sons to interview them about the circumstances of their adoption or their experiences with Fr. Clements.

275. Although George Clements legally adopted four boys, they were not the only “sons” that resided with him in the Holy Angels Rectory for an extended term.

276. In fact, in remarkable demonstrations of both George Clements's brazenness and the Archdiocese of Chicago's utter indifference, in the 1980s at least two such "sons," M.C. and P.C., were openly paraded in front of the news media and published as such in the *Chicago Tribune*.

277. On December 13, 1987, NBC premiered the made-for-TV movie *The Father Clements Story*, starring Emmy-winner Louis Gossett Jr. as George Clements, which unduly glorified Clements in his campaign to defy Cardinal Cody and adopt J.S.



278. But by this point even casual local observers of George Clements were not fooled by that depiction, and in a published review of the film, *The Father Clements Story* was lambasted because "the still-pervasive criticism that [George Clements] is a publicity-seeking grandstander is glossed over."

George Clements Consorts with Other Custodial Child Molesters

279. It should have also captured the attention of the Archdiocese that George Clements had developed associations with child molesters outside of the Archdiocese, including those like “Reverand” Paul Hall and Kojo Odo – each of whom took custody of and molested scores of children before and after George Clements became the first Catholic priest in America to adopt.



Paul Hall



Kojo Odo (left) speaking with George Clements

280. It is noteworthy that George Clements’s very close friend, Paul Hall, acquired his foster care license in 1979, and likely served as inspiration for Clements to announce his intent to adopt the following year.

281. By 1989, when Paul Hall was on trial for sexually abusing one of his wards, it should have alarmed the Archdiocese of Chicago that George Clements voluntarily testified as a character witness on Paul Hall’s behalf and publicly denounced the victim as inherently untrustworthy.

A Wake-Up Call Ignored

282. A major wake-up call to all US bishops came in October of 1984 when Fr. Gilbert Gauthé, a Catholic priest based out of Lafayette, Louisiana, was indicted on 34 counts of sex crimes against minors. The criminal proceedings were closely watched by national media and the Diocese of Lafayette agreed to pay \$4.2 million to just nine of Gauthé's many victims before his criminal trial commenced. This sent shockwaves through the Catholic hierarchies across the United States and led to the development of a confidential report published to US bishops in 1985 entitled: "The Problem of Sexual Molestation by Roman Catholic Clergy: Meeting the Problem in a Comprehensive and Responsible Manner." As part of the Forward to the document – which would come to be informally referred to as "the Manual" – the authors explained:

"Some extremely serious issues have arisen which issues presently place the Church in the posture of facing extremely serious financial consequences as well as significant injury to its image [...] The Criminal Considerations, Civil Considerations, Canonical Considerations, and Clinical Considerations are of such magnitude, not to mention the other substantial considerations such as Insurance and Public Relations, that it was decided that the presentation of these extraordinary issues necessitated an extraordinary response, a response which would affirmatively and aggressively attack the problems. This is a very new and narrow area of legal jurisprudence which is developing with a very adverse effect upon the Church's interests."

The Document went on: "The necessity of protecting the confidentiality of this document cannot be overemphasized [...] The national press has an active interest in items discussed herein, and therefore, an abundance of caution is required. It is requested that each reader return the document to the person from whom they received same, without copying."

283. The authors were clear as to their purpose: "this document has largely been restricted to a discussion of what has been perceived as the pressing problem, the possible cost to the Catholic Church of many millions of dollars and the potential devastating injury to its image as a result of inappropriate or felonious sexual activity between Priests and parishioners."

284. The National Conference of Catholic Bishops declared its intention to establish a committee to study and address the issue, but that did not happen.

285. It was not until 2002, under immense public pressure, that such an august, national Catholic authority would begin to pay serious attention to many of the Manuals' suggestions.

HOLY ANGELS BURNS



**Firefighters Extinguishing Flames
at Holy Angels Church**



George Clements Poses in Scorched Church

286. On June 9, 1986, a spectacular fire engulfed Holy Angels Church, purportedly due to faulty wiring in the basement, razing the entire structure.

287. George Clements immediately began soliciting contributions to a Holy Angels rebuilding fund, and although the Archdiocese subsequently directed such contributions to be sent

to First National Bank of Chicago to administer the Fund, there is ample evidence that Clements continued to process contributions made directly to the Parish.

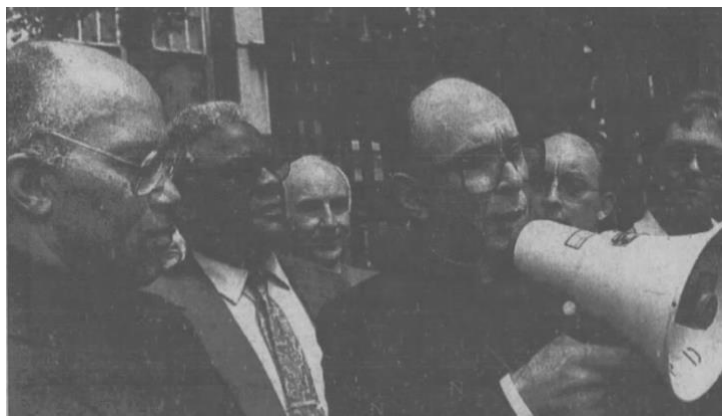
288. Later in 1986 it was also announced that a large, abandoned, former public school around the corner formerly called “Oakland Elementary” had been leased to Holy Angels for \$1.00 by the Chicago Board of Education, at the behest of Mayor Harold Washington.

289. George Clements described his connection to Mayor Washington, who he tirelessly supported as a candidate, as follows:

“Here in Chicago I feel very good, very free, cocky almost, about having a black mayor. I didn’t feel that way when Jane Byrne or Richard Daley was here. I feel like now, if there’s something Holy Angels needs, all I got to do is just contact Harold, and Harold will say, ‘Yeah, yeah, okay, George.’ It’s an ‘old boys’ deal like what white people have. You know, ‘good old boys.’”



**Mayor Harold Washington (left),
George Clements, Paul Hall**



**(From Left) George Clements, Harold
Washington, George O’Hare, Cardinal Bernardin**

290. The availability of the abandoned school building itself, located at 750 E. 40th St. and which still houses the vestiges of Holy Angels School (with its student population of under 300), proved to be extremely convenient for George Clements and Holy Angels, because as it turned out the Archdiocese did not have the Church adequately insured, so the building ended up

functioning both as an expansion to the School (affectionately referred to by students as the “Annex”) and as a Church facility for years.



The “Annex” Located at 750 E. 40th St.
Abandoned School Building Leased to Holy Angels After 1986 Fire

291. Over the course of the next 18 months following the fire George Clements gave dramatically inconsistent accounts on the status of his fundraising efforts and intentions for the construction project. What to make of the varying figures is not plainly apparent, but the projected rebuilding costs that Clements provided could not have been well-tethered to any specific building plan because he had not yet hired the architect.

292. Going into 1988 George Clements had not made any tangible progress in terms of actually preparing for the construction project, but he remained very active in his efforts to raise money.

293. For example, in November of 1988, the Chicago chapter of Frontiers International – a “fledgling” group of just 13 people, including George Clements – held a \$150/plate fundraiser for the Holy Angels Fund where Fr. Clements awarded himself the Chapter’s (likely inaugural) “Chicagoan of the Year Award.”

294. On information and belief, it was about this time that George Clements was personally advised of an IRS investigation “centered on payments to Clements that went to rebuilding Holy Angels Church.”

295. For reasons that George Clements could never credibly defend, he also stopped filing tax returns following the Holy Angels Church fire up through the near-completion of the rebuilt Church. Clements would later describe the matter as follows:

“My critics, however, escalated their vicious attacks. I was accused of salting away millions of dollars in Swiss banks by stealing the contributions of my benefactors [...] The Archdiocesan Office appointed auditors to Holy Angels to check the monies that were coming in to rebuild the church. These people even checked my own personal account to ascertain if I had funneled any of those funds into my own pocket. The Archdiocesan director of Financial Services stated that he knew I had certificates of deposit. He contacted the Internal Revenue Service and advised that they investigate my alleged financial holdings.”

George Clements did not provide any description of how these matters were resolved.

296. In any event, it appears that Clements eventually convinced a prestigious Chicago architecture firm, Skidmore, Owings & Merrill, to assign a junior architect to design the new Church free of charge and also managed to get the general contractor, McHugh Construction, to provide most or all of its services gratuitously.

297. In his autobiography, George Clements describes the circumstance of his retirement from Holy Angels as follows:

“I made up my mind in early 1991 that I would be leaving Holy Angels. I would resign on the day of the dedication of the new church, June 9, 1991. I contacted Cardinal Bernardin, expressed to him my plans and he tried to dissuade me. However, when he realized that I was adamant, he said I would be leaving with his blessing and that he would do everything that he could to smooth over the transition.”

298. While the formal dedication of the nearly completed Church building did take place on June 9, 1991 – five years exactly from the day of the fire that burned down its predecessor – that is not when Clements announced that he was leaving Holy Angels.

299. In fact, it was nearly two weeks later, on June 21, 1991, that George Clements abruptly announced his imminent retirement from the Parish, which the *Chicago Tribune* described as follows:

“Clements’ announcement came as a shock to friends, employees and parishioners, who said they found out he was leaving through the news media. ‘I’m hurt,’ said Sam Derrick, Clements’ barber and friend for 25 years. ‘I thought I was real close to him. **There has to be something behind this.**’” (Emphasis added).

300. News reporting began to circulate regarding the ongoing IRS investigation into Clements, and although he asserted that these matters had nothing to do with his decision to leave Holy Angels, Clements nonetheless claimed that “the attacks were probably instigated by his critics within the church.”

301. Clements announced that he would be leaving by July 1, 1991, but at the comparatively young age of 59, did not appear to have much of a plan in place for his future ministry.

302. George Clements left Illinois and spent most of the next three years officially registered at St. Augustine’s Monastery at Nassau in the Bahamas – the same place where he shuttled Kenneth Brigham while plainly running from child molestation allegations way back in 1972 – for what Clements described as “an extended Sabbatical.”



Holy Angels Church Mural of George Clements

303. Clements spent some time in Washington, D.C., organized derivative programs called “One Church, One Addict” and “One Church, One Inmate,” and ultimately returned to Chicago – even being “in residence” for a couple years in the mid-1990s with his good friend and repeatedly alleged child molester Fr. Pfleger at St. Sabina.

304. Although George Clements never truly returned to parish ministry after he left Holy Angels in 1991, when he returned to Chicago he still made visits to Holy Angels in order to promote his “One Church, One Addict” program and commit more child sexual abuse, which he did.

305. Even after retirement from “active” ministry George Clements still leveraged his collar and reputation to commit child sexual abuse off of Archdiocesan property, including at his suburban home located in Evergreen Park, which several of his victims specifically recall for its pool and white front pillars.

306. It was not until early 2019 that George Clements, aged 87, was ever sanctioned for committing child sex abuse, and even then only in the form of a prophylactic suspension pending the investigation of a new allegation.

307. As a consequence of his death on November 25, 2019, however, under both Archdiocesan and DCFS policies there was no mandate to complete their investigations.

308. To this day, the Archdiocese of Chicago has not publicly recognized that George Clements has been credibly accused of child sexual abuse.

309. Although the undersigned has reviewed substantial amounts of Archdiocesan records pertaining to George Clements, in accordance with terms of currently effective confidentiality agreements this Complaint contains only that information that Plaintiff’s counsel has been able to develop independently.

310. There is information contained within those Archdiocesan records that is extremely relevant to the merits of this action.

“Men who sin repeatedly with little children certainly fall under the classification of those who ‘it were better had they not been born.’ [...] sooner or later he will kill or be killed.”

Fr. Gerald Fitzgerald, Servants of Paraclete

311. Disaster struck Paul Smith on an evening around June of 1994 when he got into a serious car accident that cost him the use of his legs, the fluency of his speech, and a bit of cognitive bandwidth and sexual inhibition.

312. The driver of the car was Fr. Smith’s long-time drug-addicted lover and sidekick, M.R., who on information and belief caused the accident when he dozed off due to heroin consumption.

313. M.R. was also seriously injured, but substantially recovered.

314. Fr. Smith was forced to formally retire, which finally elevated Sr. Helen to School principal.

315. As previously discussed, Paul Smith congregated closely with low-lives and degenerates from nearly the point of his arrival in Chicago up through his car accident in 1994 and continued until his death.

316. Everyone at Holy Angels was aware of this, because during his tenure as principal Fr. Smith would routinely employ them at the School in visible roles like janitor or cafeteria attendant.

317. After his accident Fr. Smith became substantially dependent on others to satisfy his basic needs and seems to have theoretically had around-the-clock care.

318. This appears to have involved a daytime shift covered by a professional, and two other shifts where Smith basically hired his reprobate cronies to keep him company, assist with his mobility limitations, and get him a glass of water when he was thirsty.

319. So, when Fr. Smith returned to Holy Angels following his 1994 accident – which he did often – he was always surrounded by one or more of these flunkies and even ensured that some stayed on the School payroll.

320. Just a few of these associates include A.C., M.R., and Burrell Geraldts, Jr.

321. By his own admission, A.C. was a “long time friend” and employee at Holy Angels who engaged in homosexual acts with Fr. Paul Smith for years up to and including the week of Smith’s death in November of 1996. He was also a convicted drug dealer that was under indictment for another drug-related offense as of July 2, 1996.

322. M.R., who Fr. Smith had begun exploiting as a teenager in the 1970s, maintained his sexual relationship with Fr. Smith (in exchange for cash to support his drug addictions) more or less continuously until Smith’s death in November of 1996. He was similarly employed in various low-level capacities at Holy Angels by Fr. Smith.

323. Burrell Geraldts, Jr. (“Geraldts”), who also used the aliases John Neal, Gerald Labouche, and Gerald Brown, was a felon, drug addict, and homosexual prostitute. Naturally he was hired as a “caretaker” for Fr. Smith following his car accident in 1994.

324. By his own admission, Geraldts also maintained homosexual relationships with another of Fr. Smith’s “caretakers,” R.H. (who was a Catholic High School student at the time), and Frederick Carter.

325. Biological twins Frederick and Freeman Carter were born on December 11, 1963, to their single, teenage mother, Rose Marie Capps, who also became a felon and a drug addict. Frederick and Freeman Carter never really knew their father, James Neely, but they did have nine other siblings.

326. On November 23, 1996, Fr. Smith was found dead in his condominium at 4828 S. Dorchester Ave. by one of his professional health aids. His wrists were tied with tape and wire; his nostrils and mouth stuffed with tissue paper; and his face had been thoroughly duct-taped from his chin to his forehead. He died of suffocation, which was indisputably a homicide.

327. Three men – Burrell Gerald, Jr., Frederick Carter, and Freeman Carter – were charged with the murder of Paul Smith. Though these Defendants disputed pertinent aspects of the narrative, the evidence substantially demonstrated that the three men – amidst a multi-day, cocaine-fueled frenzy – visited Fr. Smith at his condominium at 4828 S. Dorchester Ave. in the late evening of November 22 or early morning of November 23, 1996, with the intention of stealing from Fr. Smith in order to finance more drugs. With Freeman Carter acting as lookout, Frederick Carter and Gerald entered the condominium, hog-tied Smith, removed the key to the safe hanging from Smith's neck, and made off with some cash, a wireless phone, and Fr. Smith's 1988 Oldsmobile Regency.

328. The three were undeniably guilty of this, though given Freeman Carter's relative attenuation from the crimes committed inside the apartment, he ultimately pled guilty in 1998 to a 10-year sentence for residential burglary and receiving stolen property related to the murder, in exchange for the dismissal of the murder charges against him.

329. Burrell Gerald Jr. and Frederick Carter were tried together in September of 2001.

330. The official position of Frederick Carter and his defense team was that he was not familiar with Fr. Smith prior to the evening of Smith's death, but that Frederick Carter had nonetheless been recruited to engage in homosexual acts with Smith at that time. Though they were not permitted to admit this evidence at trial, defense counsel for Frederick Carter and Gerald

repeatedly sought to prove that Fr. Smith had a history of engaging in aggressive homosexual acts, including bondage, in an effort to portray Smith's death as a consensual encounter gone awry.

331. Burrell Gerald, Jr. and Frederick Carter were ultimately convicted of intentionally murdering Paul Smith and each was sentenced to 114 years in the Illinois Department of Corrections.

332. Sister Helen was present every day of the trial and in the wake of Smith's murder the *Chicago Tribune* reported as follows:

"The tragic end to Smith's life was something many at the school said they had feared for years. Smith extended himself to the downtrodden, but his eagerness to extend himself often strayed into the dangerous, said friends at Holy Angels. He often allowed homeless people to stay in his apartment when they had nowhere else to go. 'If you asked for something—anything—he would give it to you,' said Sister Helen Strueder, principal at Holy Angels School. 'We would try to talk him out of things, but he wouldn't listen,'" added Sister Catherine Culp, a 6th-grade teacher at Holy Angels School. 'He never gave up on people, even if it was a threat to his life.'" (Emphasis added).

333. Let there be no misunderstanding: Paul Smith was not the victim of his own naivete or generosity – he was *guilty* of systematically corrupting vulnerable Black youths, cultivating their dependence on him in exchange for sexual favors over the course of years-to-decades by and through the position he held at Holy Angels School, and it was only a matter of time before that predictably manifested in Smith's serious injury and premature death.

ALLEGATIONS OF MALICE

334. Although highly relevant information contained in Fr. George Clements's and Fr. Paul Smith's respective Archdiocesan personnel files may not yet be available for dissemination, compelling information already in the public domain is clear and convincing as to the Archdiocese of Chicago's actual malice towards their victims.

335. In addition to the preceding allegations, this comes in the form of Archdiocesan personnel file fragments pertaining to Fr. John Calicott, Fr. Kenneth Brigham, and Fr. Victor Stewart that were published in 2014.

336. Independently and especially in the aggregate what is reflected in these files persuasively leads to several notable conclusions:

- (1) That for more than a decade following George Clements's unprecedented 1981 adoption of a child other priests at predominantly Black parishes were permitted by the Archdiocese of Chicago to house multitudes of desperate, Black boys in their rectories openly and without restriction;
- (2) That the Archdiocese of Chicago was excessively susceptible to allegations of racial discrimination against *its priests*, but not their victims;
- (3) That the Archdiocese of Chicago discriminated against the credibility of Black victims based on their race; and
- (4) That even Caucasian accusers of child sex abuse at predominantly Black parishes were more likely to be ignored or retaliated against by the Archdiocese than the predatory priest was to face any penalty for his crimes.

337. To the extent that its concern for or willingness to believe sexual abuse victims was dependent on their race, such prejudicial discrimination by the Archdiocese of Chicago reflects actual malice.

Father John Takes Over at Holy Angels

338. John Walter Calicott was a product of Holy Angels School who followed a customary path of seminary education leading to his priestly ordination to the Archdiocese of Chicago in 1974.

339. Fr. Calicott's first assignment as associate pastor was at St. Ailbe parish, where he spent a great deal of his time working with kids, including altar boys and Boy Scouts, some of whom Fr. Calicott sexually abused. Suspiciously, Fr. Calicott also became the financial sponsor of so many boys that, out of absolute desperation, Calicott solicited the Archdiocese of Chicago for

a loan to cover his accumulated debt of \$16,000 – more than Calicott’s entire annual salary at the time.

340. After a standard 6-year term, as of June 9, 1980, Fr. Calicott was assigned to Holy Name of Mary Parish, located at 11159 S. Loomis St., where Calicott spent the next 11 years under the exclusive guidance of Fr. Anthony Vader, a notorious child molester. While there, Calicott similarly acted as the parish’s Youth Minister, as well as the chief organizer of the altar boys, Boy Scout troop, and “several teen and young adult groups.”

341. With active cover from Fr. Vader for both his sexual molestation of boys and extended sexual and romantic relationship with at least one adult female, and as demonstrated by his appointment to multiple part-time administrative positions with both leadership and supervisory responsibility, by the end of his tenure at Holy Name of Mary John Calicott was viewed by the Archdiocese as a rising star with almost unlimited potential.

342. It therefore came as no surprise that Fr. Calicott was appointed pastor of Holy Angels upon George Clements’s spontaneous retirement from the Parish in 1991.

343. Fr. Calicott secured access to many of his victims due to his familiar role as the *de facto* leader of Boy Scout Troop 484, which Fr. Calicott founded and chartered at Holy Angels for the primary purpose of sexually abusing boys in and around weekly Scout meetings and on long-distance camping trips to places like Kentucky and Canada. And Calicott did so.

344. On information and belief, one of Fr. Calicott’s victims from his time at St. Ailbe, D.L., confronted him about the sexual abuse no later than March of 1993. This confrontation was promptly shared with officials of the Archdiocese of Chicago, including its Vicar for Priests, and Calicott retained legal counsel paid for by the Archdiocese.

345. For at least a year Calicott and the Vicar for Priests, Fr. Patrick O'Malley, kept D.L.'s allegations quiet in the hope that he could be placated, and in the interim Calicott was appointed to the Archdiocese's Pastors Review Board.

346. This handling of allegations of child sex abuse was definitely inconsistent with official Archdiocesan policy.

The Professional Fitness Review Board and the One-Strike Policy that Wasn't

347. In 1991 a major scandal broke loose in the Archdiocese involving one of its priests, Fr. Robert Mayer. The Archdiocese had known of Fr. Mayer's predilection for plying minors with alcohol and sexually abusing them for nearly a decade and he was repeatedly transferred in the interim to escape reports stemming from various parishes. Eventually the Archdiocese pulled Fr. Mayer from St. Odilo in Berwyn, citing "personal reasons," however the parish eventually found out the real reason for his withdrawal, which led to uproar.

348. Cardinal Bernardin had to take some action in response to the scandal. That took the form of a Commission that Bernardin appointed on October 25, 1991, to examine the problem of child sexual abuse by clergy in the Archdiocese, to review a select portfolio of cases involving specific priests, and to make recommendations for future policies and procedures with regard to such matters.

349. On June 11, 1992, a report entitled "The Cardinal's Commission on Clerical Sexual Misconduct with Minors" was sent to Cardinal Bernardin, which described some of the history of the Archdiocese's treatment of sexual abuse allegations.

350. The Commission summed up its assessment of the Archdiocese's management of such allegations succinctly when it stated: "Very often, allegations of child sexual abuse have not

been handled well in the Church because the overriding concern has been to do everything possible to protect the rights of the priest.”

351. The Commission also made a number of recommendations for a new process for addressing allegations of child sexual abuse, which Cardinal Bernardin substantially endorsed in the form of the Professional Fitness Review Board.

352. The Professional Fitness Review Board (the “PFRB” or “Board”) became a 9-member committee assigned the task of reviewing allegations of clerical sexual misconduct and making recommendations to the Archbishop, who retained final authority over all decisions concerning the priests under his leadership.

353. The PFRB was dependent upon an Administrator to the PFRB, who would conduct victim interviews, collect relevant documents, advise the PFRB, maintain official documents related to its activities, and generally liaise with Archdiocesan officials.

354. Upon the presentation of an allegation the PFRB was expected to conduct a “First Stage Review,” and if the PFRB determined as a consequence of its initial, summary review of the allegation that there was “reasonable cause” to believe that the priest had engaged in sexual misconduct with a minor the Board would immediately recommend his withdrawal from active ministry.

355. In principle, the Board, with the assistance of the Administrator, would conduct and review a further investigation of the matter as part of a “Second Stage Review,” at the conclusion of which the Board members would vote on recommendations concerning the priest to the Archbishop, which could range from conditions of a possible return to ministry up to permanent removal.

356. Cardinal Bernardin's next most significant reform was the Archdiocese's adoption of the policy that *no* priest found guilty of a substantiated allegation of sexual abuse against minors would ever be returned to parish ministry.

357. As it turned out, those policies and procedures were inconsistently and informally applied, the Archdiocese did not cooperate with the PFRB in good faith, and Cardinal Bernardin's commitment to permanently withdrawing credibly accused priests proved hollow.

358. Because Fr. Calicott was unable to pacify D.L., Fr. Patrick O'Malley reported the allegation to Cardinal Bernardin and thereafter alerted the Administrator of the PFRB on March 31, 1994.

359. The Administrator of the nascent PFRB, Steven Sidlowski ("Sidlowski"), and the head of the newly-created Victim's Assistance Ministry, Ralph Bonaccorsi, sprang into action and interviewed D.L. that same day.

360. The victim detailed his allegations against Calicott along with the further allegation that the victim had previously reported his abuse to at least two other Archdiocesan priests, who obviously did nothing.

361. D.L.'s allegations were deemed "extremely credible."

362. Unlike the majority of Calicott's victims, D.L. was not Black.

363. Given the recent public scrutiny of and official policy changes by the Archdiocese of Chicago regarding clergy sex abuse, at that time Cardinal Bernadin felt he had no choice but to immediately place Calicott on "administrative leave" on April 7, 1994, which Calicott only superficially went along with.

364. Bernardin *really* did not want to do this, and in response Calicott and his old friends George Clements and Fr. Anthony Vader carefully choreographed a multi-pronged campaign of pressure and manipulation in an effort to return to Holy Angels.

365. Part of that effort included calls to arms amongst members of several prominent, predominantly Black parishes, including an aggressive letter writing and petition signing drive directed towards Cardinal Bernardin and the PFRB directly.

366. It also included a strenuous effort by Calicott, in apparent coordination with the Archdiocese, to expose D.L. and hard-press him to recant his allegations.

367. That effort was successful to the extent that D.L., at Calicott's behest, did seemingly everything he possibly could to persuade both the Archbishop of Chicago and the PFRB to have Calicott reinstated, except D.L. refused to recant.

368. Not everyone actively supporting Calicott was convinced that he was innocent of the allegations, including Calicott's brother, who mostly complained that Fr. Calicott's penchant for sexually abusing children should have been kept confidential by the Archdiocese – not that Calicott wasn't a child molester.

369. Rex Alexander, Calicott's childhood friend and Holy Angels Parish Council member, was merely "neutral" as to whether Calicott had engaged in sexual misconduct with minors.

370. What was most consistent amongst Calicott's supporters and the Archdiocese of Chicago is that none of them really cared.

371. On information and belief, Calicott spent approximately six months at a concealed, in-patient facility before relocating around November of 1994 to the Cardinal Stritch Retreat

House (a.k.a. “Koenig Hall”) – a residence in Mundelein that was specially designated for credibly accused Catholic priests.

372. At that point Calicott was, on paper, subject to a multitude of liberty restrictions and verification requirements as part an “Individual Specific Protocol” (ISP), which explicitly required him to prepare daily itineraries to account for his whereabouts, call in every four hours while away from the residence in Mundelein, and obviously to never be alone with minors.

373. Calicott never abided by the ISP and it was never enforced, and all the while Calicott was able to get away with petulant fits of rage, threats, and false indignation.

374. Despite the PFRB’s unmistakable reluctance to recommend Calicott’s reinstatement to active ministry and his advisors being acutely aware of both the risks of doing so and its inconsistency with unambiguous policy, Cardinal Bernardin sought to move forward and pressure the Board to let Calicott return to Holy Angels.

375. Indeed, just a few days after Cardinal Bernardin was formally advised of the PFRB’s March 18, 1995, decision to continue – seemingly indefinitely – Calicott’s Second Stage Review, Fr. Pat O’Malley was already devising a strategic plan of action for Calicott’s return. Several of the risks considered included:

- a. “risk to the reputation of the Church (i.e. **it could be said that it does not value the safety of Afro-American children as much as it values that of White children**)” (Emphasis added);
- b. “The reputation of the Cardinal himself is on the line since he has said he would not return child abusers to pastoral ministry;”
- c. “The credibility of the policies and procedures of the archdiocese (including the whole PFRBD) is on the line;” and
- d. “No insurance company will cover future liabilities.”

376. Pat O'Malley further advised that, "[i]f the Cardinal decides to accept these risks," then the following process should be implemented: (1) Calicott would first need to draft, with the assistance of the Archdiocese, a statement to be made to the Holy Angels Pastoral Council containing a "clear and unambiguous declaration of the truth;" (2) there must be some means for those "who do not want John to return" to make their sentiments known to Bernardin; and (3) Bernardin would then "take the information back to the PFRB to reassure them that the people know the facts and still want John back." Following receipt of the PFRB's "input," Cardinal Bernardin could then return Calicott to Holy Angels, but only with certain non-negotiable conditions, including that Calicott could not be alone with minors, would be subject to active monitoring (including a specially designated "on-site monitor" who would live and work at Holy Angels), and would have his ISP periodically evaluated by the Vicar for Priests (i.e., Pat O'Malley) and the PFRB.

377. The terms of this memorandum would inevitably become Cardinal Bernardin's proverbial deal with the devil, and clearly manifested Bernardin's intent to return Calicott to Holy Angels irrespective of the final conclusions of the PFRB's Second Stage Review.

378. In the end, Bernardin was ultimately able to pressure the Board into providing the political cover needed for him to permit Calicott to return to Holy Angels.

379. Around this time, the Archdiocese's inaugural Administrator for the Professional Fitness Review Board, Stephen Sidlowski, resigned – at least in part due to frustrations over the Archdiocese's concealment of relevant information and failure to heed his concerns and recommendations.

380. Fr. Calicott's return to Holy Angels "officially" took effect on October 15, 1995, although Calicott both visited and moved back into the Parish prior to that in blatant violation of his ISP – and the Archdiocese knew that.

381. Barely a week later an "anonymous caller from Holy Angels" reported to the Archdiocese that they had witnessed Calicott embracing children outside of the Rectory and leading one of those children alone to a locked location in the Church basement. This caller also reported that Holy Angels was insisting that parents sign corporal punishment "contracts" with the School, that "[a]ll teachers have paddles in hand" and that a preschool teacher had struck an entire class of about 30 preschoolers on their heads.

382. Concerningly, that same day those at Holy Angels were already telling the Archdiocese that "they don't need 'training in monitoring,'" and reported that they were already getting training from Helen Strueder, an "internal consultant."

383. During Fr. Calicott's official absence from Holy Angels Fr. Robert "Bob" Miller ("Fr. Bob Miller," "Fr. Miller," or "Miller") was appointed "Parochial Administrator" of the Parish to fill the void.

384. Though Fr. Bob Miller's transition out of Holy Angels upon Calicott's reinstatement appears to have been genuinely contemplated, on October 19, 1995 – less than a week after Calicott formally returned – he was soliciting Pat O'Malley to move into the Holy Angels Rectory and to extend his stay "at Holy Angels longer than anyone (including myself!) expected."

385. Evidently Miller and Calicott had already "established a good working relationship," and it appears as though Miller's suggested extension at Holy Angels was specifically requested both by Calicott and Bishop George Murry.

386. In any event, there was a well-established understanding of the allocation of responsibility between Miller and Calicott, whereby Miller handled the Parish's administrative functions, while Calicott focused his attention on the youth. As Fr. Miller explained: "I run the parish, [Fr. Calicott] the school."

387. Initially, Fr. James "Les" Mollohan ("Mollohan") – a retired priest who had previously served at Holy Angels and already had a good relationship with Calicott – was Calicott's designated on-site monitor. And on October 24, 1995, he was specifically asked about the incident involving the boy that Calicott had allegedly taken to a locked basement, with Mollohan explaining that Calicott's whereabouts on that particular date may not have been logged. Mollohan also reported that Holy Angels School had suspended 23 students due to their parents' failure to attend mass, and also that a 22-y.o. man who was "a good friend of" Calicott's was staying at the Holy Angels Rectory.

388. In January of 1997 Mollohan was relieved of his duties as Calicott's on-site monitor and he was replaced by Fr. Miller, who was open about the fact that "I have a problem with this whole concept of zero tolerance" for child sex abuse. Fr. Miller would later relate his perspective on his role at Fr. Calicott's monitor as follows:

"I consider the process Fr. Calicott went through a real travesty of justice and insensitivity. After being here at Holy Angels nearly 5 years now, I feel the very fact that monitoring continues on at all (or even began in the first place) in this case is a sad statement on how heavy-handed and unadaptable this Archdiocesan process is [...] Fr. Calicott is one of the most remarkably gifted, pastorally wise and prudent people I have ever met in my 23 years of priesthood. There has never been the remotest shadow, nor even hint of any shred of a shadow, of suspicion in action, word, gesture or speech either private or public. This entire process against him should be ceased and halted and resolved immediately. In the interim, I will file the required monthly forms – but only because it is part of the legal gymnastics required to allow this remarkable man to continue ministry here."



John Calicott (left) with Robert “Bob” Miller

389. For the remainder of his tenure at Holy Angels Calicott continued to brazenly disregard his ISP, aided by the fact that Sister Helen, the School principal, and Calicott’s designated on-site “monitor,” were flagrantly hostile to enforcing it.

390. To make matters worse, the mass exodus of parishioners who objected to Calicott’s reinstatement meant that those that remained were a distilled group of self-selected, diehard Calicott supporters – the ones who believed that the sexual abuse allegations were not true, that the protocol was unfair, that the Archdiocese was racist, and that Calicott deserved their protection.

This dynamic was subsequently described by a member of the PFRB as follows:

“Outside this board, I happen to know a lot of people at Holy Angels. Most of those people don’t believe he did anything wrong. So I think there’s such immense denial over there that while I agree that this [monitoring protocol] is a good model and we can use it, I don’t think it fits in [Calicott’s] case. I’m not convinced that children are not in danger because people don’t believe over there, for the most part, that he did anything wrong, and they aren’t watching him. What they’re watching is to protect Fr. Calicott *from us*. They’re not watching to protect kids from Fr. Calicott. And I think that’s a very serious concern. They consider the whole monitoring a joke. They talk about it, oh so-and-so, but they’re not there. And there’s this, ‘Oh we’ll be careful if anybody asks if somebody was there.’”

391. Although Calicott remained its leading organizer and *de facto* Scoutmaster, it seems that Fr. Calicott asked his ardent supporter and supposed monitor, Fr. Bob Miller, to be the officially registered “Executive Director” of Troop 484, while Calicott does not appear to have been formally associated with the Troop in any manner.

392. And even though Miller admitted that Calicott was still assisting with the Scouts, continued to go on trips with the Scouts, and that the weekly Scout meetings were in the “open visibility” of the Rectory on Friday nights, he nonetheless swore “on a stack of bibles that JC has never been alone with the scouts.”

393. To the contrary, Fr. Calicott’s unrestricted access to Troop 484 provided his predominant means of abusing more boys, which he did regularly.

394. Indeed, the Boy Scout Troop that Calicott established also became the source of an undisclosed and notably taciturn pre-teen boy that Calicott informally “adopted” and housed in the Holy Angels Rectory for years, which somehow went unreported and unnoticed by Archdiocesan leadership despite the fact that Calicott had multiple on-site monitors.

The “Dallas Charter”

395. On January 6, 2002, the *Boston Globe* published its first of a lengthy series of exposés regarding child sex abuse committed by Catholic priests and the efforts of Church authorities to protect the priests and silence victims. The magnitude of the ensuing scandal and media attention was unprecedented and finally served as the primary catalyst for uniform, nation-wide reform.

396. At a closely followed meeting of the U.S. Conference of Catholic Bishops (“USCCB”) in Dallas held in June of 2002 Bishop Wilton Gregory led the charge to secure approval of the “Charter for the Protection of Children & Young People” (informally known as the

“Dallas Charter”) which included a number of notable precepts, many of which were already substantially in place within the Archdiocese of Chicago – at least on paper – as a consequence of Cardinal Bernardin’s establishment of policies and procedures concerning child sexual abuse in 1992. However, a few distinctive measures were new and controversial, in that the Dallas Charter required that:

- (1) Dioceses must report allegations of abuse to and cooperate with civil authorities;
- (2) Even a single act of substantiated sexual abuse of a minor would require that the priest be removed from *all* ministry – not merely *parish* ministry; and
- (3) “In every case” the accused priest was to be adjudicated through the Catholic Church’s internal, canonical process.

397. It was, however, the second principle – the “one-strike” policy, which essentially barred credibly accused priests from ministry – that proved to be most controversial.

398. The bishops at the conference were almost evenly divided on the Dallas Charter initially, but under pressure stemming from the *Boston Globe* reporting and ensuing public outcry the USCCB ultimately endorsed it by a lopsided 239-13 vote.

399. Although the Dallas Charter was brief and in some ways ambiguous, Cardinal George clearly understood the implications for certain priests in the Archdiocese of Chicago, including John Calicott, who Cardinal George personally called promptly after the final vote on June 14, 2002.

400. On June 24, 2002, Cardinal George signed the decree adopting and incorporating the “Dallas Protocols” as official Archdiocesan policy.

401. On June 25, 2002, Fr. Calicott was formally advised in writing that he was being withdrawn from Holy Angels, effective immediately, and would be sent back to Koenig Hall in Mundelein.

402. Calicott resisted, but for this particular battle he elected to change tack: rather than obscure his admission of guilt, Calicott openly took responsibility (this would not last) and pleaded for sympathy and Christian charity. He even went so far as to claim that he (John Calicott) had been sexually victimized by a priest in his youth. He also implied to the press that his parishioners would rebel, he encouraged a letter writing campaign, and initially refused to leave Holy Angels as ordered.

403. In Fr. Bob Miller's sermon to the Parish the following Sunday, June 30, 2002, he elaborated on his outrage at the new "Dallas document" and referred to Calicott as "a sacrificial lamb being led to the slaughter."

404. In contradiction to everything the Archdiocese knew to be true about Calicott and his history of child molestation, Miller stated:

"Far more importantly – the blunt bottom line is that **John has done nothing to warrant this unjust treatment.** I have been Fr. John's 'monitor' for 6 years, and I personally know all the facts of his situation. Fr. John has not been able to speak freely or openly about what specifically happened because of confidentiality issues. He knows things from confidential confessional conversations that cannot be revealed publicly because of his priestly commitment to God! So I want to say clearly to all Holy Angels membership – Fr. John Calicott has committed no sexual misconduct, no act of any sexual abuse, no act of molestation, is not a risk to children anywhere or anytime, is not a pedophile or ephebophile or abuser or ANY WORD you want to use for sexual impropriety! Fr. John is a man of absolute integrity and immense faith! He is a model of Christian kindness and priestly dedication."

405. In a further act of brazen defiance, Fr. Miller exclaimed: "as long as I remain Administrator at Holy Angels, no matter what any Dallas document says, no matter what any Cardinal says, John will be free to minister here however he wants or chooses."

406. As of July 9, 2002, Calicott was still residing at Holy Angels, leading one Archdiocesan official to lament: “I am at a loss to understand why Father Calicott is allowed to remain at Holy Angels Parish [...] I am astounded by our collective inability or unwillingness to implement this explicit direction given to us by Cardinal George last week.”

407. This outright disobedience was framed as legitimate by a dubious and complex canonical legal theory as to Calicott’s right to effectively stay Cardinal George’s orders to leave Holy Angels by engaging in a series of direct appeals to the Pope. After a few weeks, however, Calicott at least agreed to start spending some nights and eating some meals in Mundelein.

408. Calicott and his most devoted supporters attempted to renew a pressure campaign against the Archbishop to make an exception to its policy, but the Parish outcry most certainly did not match that of Calicott’s original withdrawal in 1994.

409. The media was closely following the story, Cardinal George stood by (where Bernardin did not) his commitment to the principle that credibly accused priests could not minister, and so the writing was on the wall for all but the most blindly loyal or culpable Calicott supporters.

410. The remainder of John Calicott’s long, sordid, and pathetic history does not merit much further attention, but a worthy synopsis would go something like this:

411. After “leaving” the Parish, Calicott pursued every conceivable right to appeal over a period of several years, but lost at every turn.

412. Along the way he began planning for life after laicization, including with a personal website promoting some wellness products (the “most lucrative RISK FREE business in America”) that had many hallmarks of being an undeveloped multi-level marketing scheme.

413. Calicott frequently violated his ISP – by preaching at a funeral, refusing to maintain daily logs, and returning to Holy Angels on a regular basis – most probably with little risk under

the oversight of the designated Mundelein monitor, Fr. Anthony Talarico, whose poor performance caused “great concern” amongst the PFRB.

414. Despite the monitoring, the daily logs, and the widely understood (amongst Holy Angels parishioners) orders from Cardinal George that he could not be present on Holy Angels’ property, it required a local NBC journalist to point out publicly that Calicott had not only been maintaining an active presence at Holy Angels, but was openly permitted to teach lessons to its School children on topics including sex education.

415. Several of his victims have independently reported that they were subjected to such lessons and specifically recall Calicott demonstrating how to apply a condom to a banana.

416. As the Archdiocese later learned, Calicott had been visiting Holy Angels almost every day, spent most nights in the Holy Angels Rectory, and was actively “mentoring” various young men.

417. “Everyone” at Holy Angels was aware of Calicott’s “highly visible” presence, specifically including two secretaries stationed at the Holy Angels Rectory, a retired policeman that worked with the Scouts, the regional Director of the Boy Scouts, and all of the nuns living across the street who could clearly see Calicott’s car parked at the Rectory.

418. Cardinal George threatened, and apparently ordered, a series of salary reductions (10%, 20%, then 50%) to Calicott as a consequence of his disobedience, but the 50% reduction somehow “slipped through the cracks” and was never actually implemented.

419. It took until September 18, 2009, for Calicott to fully exhaust all of his rights to appeal, which confirmed the finding that Calicott was guilty of sexual abuse and the penalty of “dismissal from the clerical state” which became immediately effective.

420. Calicott was required to take an “Oath of Secrecy” and execute an “Agreement of Confidentiality” in order to review the final decision, which despite terminating “all the rights of the clerical state,” preposterously did *not* include “a dispensation from celibacy.”

421. John Calicott died on May 14, 2024.

Fr. Brigham’s Departure from Holy Angels and the Tragedy at St. Columbanus

422. Having been effectively demoted to an associate pastor at Holy Angels following his flight from Our Lady of Perpetual Help Vicariate in 1972, Fr. Kenneth Brigham departed Holy Angels on January 1, 1978, when he was assigned to another associate pastor position at St. Helena of the Cross, located at 10121 S. Parnell Ave. Brigham kept a low profile during his time at St. Helena of the Cross, securing himself an appointment to a head pastor position at St. Columbanus, located at 331 E. 71st St., in July of 1980.



Fr. Kenneth Brigham

423. Although George Clements’s assignment to Holy Angels in 1969 was intended to resolve his power struggle with Fr. Lambert, before the end of 1970 Fr. Lambert still left St. Dorathy and never returned to parish ministry. This left absolutely no doubt that George Clements was the unrivaled leader of the still burgeoning “Black Ministry” by that point in time, and after a full decade of his rampant child sex abuse at Holy Angels, overt misconduct and hostility towards the Archdiocese, and his unopposed public adoption of a hand-selected male orphan, by 1981 the

coast appeared to be quite clear for other Roman Catholic pedophiles to exploit a particular class of victims: prepubescent boys attending or living within close proximity of predominantly Black, southside of Chicago parishes.

424. Fr. Peter J. Mikalajunas, who was assigned to St. Columbanus alongside Fr. Brigham from approximately 1981 to 1986, was contemporaneously aware of many, frequent male visitors (aged pre-teen to adult) who stayed overnight with Fr. Brigham at the St. Columbanus rectory.

425. Some of those boys appeared to have been harbored as “prospective adoptees” under the banner of George Clements’s “One Church, One Child” program, while others were participants in a weekend “religious” program that catered to boys who would often sleep in the rectory.

426. Fr. Mikalajunas reported hearing the screams of some of these male visitors emanating from Fr. Brigham’s bedroom, leading to the conclusion that Fr. Brigham was engaging in “flagrant and regular sexual activity, both of a homosexual and a pedophile nature.”

427. Some of these boys were questioned by Fr. Mikalajunas, who then suspected that the boys had also visited other parish rectories and were “part of a sex-ring in which Rev. Brigham was a participant with other priests in the African American ministry.”

428. These concerns were specifically reported to Fr. Howard Tuite, Msgr. Ignatius McDermott, “and to a number of other priests” while Mikalajunas was stationed at St. Columbanus.

429. No adverse action against Fr. Brigham was taken.

430. For his troubles, Fr. Mikalajunas was prematurely appointed pastor of a foundering church in an area suffering from irredeemable economic and demographic decline, Our Lady of

Lourdes, located 1444 S. Keeler Ave., before he prematurely retired from active ministry around 1992 at the age of 40.

431. Around that time Fr. Mikalajunas personally reported his concerns regarding Fr. Brigham's behavior directly to then-Archbishop Joseph Bernardin, who similarly took no adverse action against Fr. Brigham.

432. In fact, he granted Fr. Brigham the prestigious designation of Dean of Vicariate III for three years.

433. On May 24, 1994, a formal allegation was made to the Archdiocese by a "Victim L" who claimed to have been abused by an unknown African-American priest who was assigned to St. Clotilde and "worked with youth" there in the late 1960s – which could only have been Kenneth Brigham.

434. "Victim L," however, evidently demonstrated confidence at that time that the abuser was named "Father John," but also claimed to have identified him many years after the abuse on a bus owned by St. Columbanus at the same time that Kenneth Brigham was assigned there.

435. "Victim L" would later request that the Professional Fitness Review Board provide him with a photograph of Brigham, leading the Board to not only decline that request, but resolve to make it official policy that they would not provide photos of priests to victims.

436. That said, "[t]he Board also directed the Administrator to inform [Victim L] that it of course respects his right to proceed however he chooses on his own to attempt to identify the name of his alleged priest perpetrator."

437. "Victim L" did so, tracking down Brigham at Our Lady Help of Christians, and calling him on the phone, which immediately led to a definitive identification. "Victim L" reported his conclusion to the Archdiocese in or around September of 1994, however the Professional Fitness Review Board dismissed the allegation out of hand at its meeting on October 15, 1994.

10/15/94 Review Board Mtg.

Re: Kenneth Brigham - 1ST Stage Review

Based on questionable identification of K. Brigham, the Pr. Bd. unanimously concluded that there is no reasonable cause to suspect; case closed.

438. The historic assembly of the U.S. Conference of Catholic Bishops in Dallas that resulted in the approval of the Charter for the Protection of Children and Young People commenced on June 13, 2002, which presumably inspired the following correspondence received by both the Professional Fitness Review Board and the Archbishop, Cardinal Francis George:

June 13, 2002

Archdiocese of Chicago
Office of Professional Fitness Review
Chicago, IL

Dear Members of the Fitness Review Panel:

The following information has previously been shared with the Archdiocese of Chicago and also with the Cook County States Attorney's Office, but I am forwarding it to you at this time so that it might get a fresh look, and more appropriate action than that taken previously. This information is second-hand, but may be useful in obtaining further facts to address a number of great injustices.

██████████, an inactive Chicago priest ██████████ reported the following to me on several occasions, from the 1980s to the present. I have been friends with ██████████, a classmate, since 1965. I presently work as ██████████, where I can be reached at the above work number. As a Catholic father and grandfather, I am bound to report this information again in the hopes the Archdiocese takes definitive action in the case of the alleged misconduct of the Rev. Kenneth Brigham.

During the 1980s, ██████████ spoke with me of the many frequent male visitors kept overnight by then St. Columbanus pastor Rev. Kenneth Brigham at the same rectory. The ages of the visitors ranged in age from pre-teen to adult male. One child was a pre-teen provisional adoptee of Rev. Brigham, placed by the Illinois Department of Children and Family Services under the "One Church, One Child" program for a very short period. Some had been sent to the rectory, according to ██████████, by a certain ██████████ and by others. By questioning the boys sent to St. Columbanus, the then Rev. ██████████ surmised that these same boys had been visitors at several other rectories, and were part of a sex-ring in which Rev. Brigham was a participant with other priests in the African American ministry.

To make a long story short, based upon ██████████'s account, which included descriptions of the screams of the visiting males that came from Rev. Brigham's bedroom, Rev. Brigham was engaged in flagrant and regular sexual activity, both of a homosexual and a pedophile nature. The then Rev. ██████████ reported his concerns at the time (1980s) to the then dean, Rev. Howard Tuite, and to Msgr. Ignatius McDermott, and to a number of other priests, who according to ██████████ did nothing. ██████████

██████████ At the time of his departure from the active priestly ministry ██████████, the then Rev. ██████████ informed Cardinal Bernardin personally and directly of Rev. Brigham's behavior. Cardinal Bernardin assured then Rev. ██████████ that he would take action, but subsequently Rev. Brigham was promoted for a time to dean, so appropriate action was not taken.

Rev. Brigham's alleged compromise of the "One Church, One Child" adoption program to meet his own sexual desires indicates that an investigation into the integrity of that program is warranted. Every grown child adopted by or placed in foster care with the Revs. Brigham, ██████████ and others, should they still survive (some are dead), should be interviewed. It appears that the late Cardinal Cody's opposition to priests adopting children was absolutely right in the case of Rev. Brigham.

If the accounts of ██████████ are true as I suspect them to be, Rev. Brigham's flagrant sexual activity, and the inaction by Cardinal Bernardin himself, helped to destroy the priesthood of a fine man, ██████████. If found to be true, the brazen and continuous nature of Rev. Brigham's actions make him most unworthy of representing the Catholic priesthood.

Please contact me should you need further information.

Thank you for the time you are spending on this important work.

Sincerely in Christ,

✓ ██████████
Cc. Cardinal Francis George

439. The following month the same “Victim L” that had originally made his allegations against Brigham in 1994 contacted the Archdiocese to reaffirm his allegations and demand further review. Once again, the Professional Fitness Review Board summarily rejected the allegations. “Victim L” would reaffirm his allegations several more times to the Archdiocese and demand reconsideration of the Professional Fitness Review Board’s decision to decline reopening the claim against Brigham, but no such action was taken.

440. Despite Brigham’s untimely departure from St. Clotilde, “Victim L’s” repeated allegations against Brigham while stationed at St. Clotilde, his swift departure from Our Lady of Perpetual Help that was presumptively related to sexual abuse allegations, his immediate efforts to adopt a child under the guise of “One Church, One Child,” the contemporaneous and repeated reports of rampant child sexual abuse by Fr. Mikalajunas, as well as the 2002 letter exhibited above, in February of 2005 the Archdiocese nonetheless certified that it was “able to state without qualification that Reverend Kenneth M. Brigham is of good character and reputation and qualified to perform his priestly duties in a ministerial position in any diocese that welcomes him.”

441. Fr. Kenneth Brigham was never sanctioned for his crimes, and died on May 25, 2006, in Las Vegas, Nevada of conditions aggravated by AIDS. The Archdiocese of Chicago knew that a primary cause of Fr. Brigham’s death was AIDS, yet described his terminal malady as “brief.”

442. That is, despite: (1) that knowledge; (2) the detailed, repeated, and contemporaneous whistle-blowing by Fr. Mikalajunas; (3) the repeated, vociferous, and eloquent recapitulations of those remonstrations by an obviously thoughtful and conscientious Catholic professional; and (4) an adamant victim, who never solicited pecuniary compensation and whose

identification of Kenneth Brigham was not subject to credible dispute: the official celebrant at Brigham's May 31, 2006, public funeral at St. Malachy Church in Chicago was the then-Cardinal and then-Archbishop of Chicago, Francis George.

443. In short, at the time of his death, Fr. Kenneth Brigham was celebrated by the highest and defining authority of the Archdiocese of Chicago as a distinctively honorable and beneficent priest despite its knowledge of overwhelming evidence that Brigham was a serial child molester, caused immeasurable harm, and congregated closely with multiple other child molesters, including George Clements.

Fr. Victor Stewart: A Case-Study in Archdiocesan Indifference and Discrimination



Fr. Victor Stewart

444. The Archdiocese's pattern of indifference towards Black victims of child sexual abuse, as nakedly revealed in the published personnel files of Kenneth Brigham and John Calicott, is further corroborated by the Archdiocese's contemporaneous mismanagement of another Archdiocesan priest assigned to predominantly Black parishes, Victor Stewart ("Fr. Stewart," or "Stewart").

445. Victor Edward Stewart was born in Chicago on August 22, 1939. He attended Holy Cross Elementary School, St. Ignatius College Prep, and Loyola University before completing seminary school at the University of St. Mary of the Lake in Mundelein. While at St. Mary of the Lake, Stewart developed a friendship with Phillip Kiley (“Fr. Phillip Kiley,” or “Fr. Kiley”), a student in his class. Both of them were ordained on May 10, 1978.

446. Stewart’s first assignment as associate pastor was at St. Catherine Genoa, located at 640 W. 118th St. While there, Stewart developed a lot of “friendships” with minors, including two boys in particular, and a third who was a student at Mendel High School (where Stewart taught on the side) that Stewart sexually abused regularly.

447. Fr. Phillip Kiley’s first assignment was at Holy Angels, where he received a first-class education on looking the other way on clergy sexual abuse in the Black community.

448. The pair reunited at St. Charles Lwanga, a Black parish located at 153 W. Garfield, in 1982, when with only four years of priestly experience Fr. Stewart was appointed head pastor.

449. Fr. Stewart and Fr. Kiley were the only priests assigned to the parish, and Stewart wasted no time setting up his primary victim procurement operation: a Charles Lwanga-based basketball program, with him acting as one of the coaches and its lead sponsor.

450. Stewart employed the textbook techniques you would expect of someone in Fr. Stewart’s position if they intended to sexually abuse underprivileged minors at maximum scale, including buying the basketball players fresh Nikes and expensive leisurewear and offering regular work assignments at the parish rectory for markedly excessive compensation.

451. But Fr. Stewart had something else to offer: a shelter for boys. On the back of “the success George Clements, Kenny Brigham, and Mike Pflager [sic] had when they extended

themselves to adopt a child” (Stewart’s words), Fr. Stewart converted the rectory into a veritable boarding house for desperate teens.

452. As a contemporaneous student would later report to Leah McCluskey, the Professional Responsibility Administrator: “all the boys were at the rectory ‘all the time’ including at night, staying overnight, and on Saturday morning [...] at the time all knew that something was not right with Fr. Stewart spending so much time with only the boys and buying them expensive things.” (Paraphrasing).

453. In total, no less than 13 different boys resided at the St. Charles Lwanga rectory with Fr. Stewart during his tenure – some intermittently, and some continuously and for extended periods of time. Somehow, and despite the fact that he also lived in the St. Charles Lwanga rectory on the floor below Fr. Stewart, Fr. Phillip Kiley maintained that this escaped his attention. And although Fr. Kiley acknowledged that there was a “steady stream” of the parish’s boys basketball players climbing the stairs to meet Stewart in his suite on the third floor of the rectory, that Fr. Stewart “was accustomed to roughhousing with some of the boys,” and *at least* four of Fr. Stewart’s victims specifically alleged that Fr. Kiley personally observed their sexual abuse taking place (while at least five more declared their belief that Fr. Kiley “knew” that abuse was taking place), Fr. Kiley nonetheless maintained that he saw nothing untoward. In the paraphrased words of Fr. Phillip Kiley in 2008:

“[I]t was a different time when [Victor Stewart and Phillip Kiley] lived at St. Charles Lwanga. In those days a few priests were actually adopting children and finding other ways to keep them off of the street. Rectories were much more open than they are now [...] Phil indicated that today, if he were living with a pastor who was acting in a manner in which Stewart did, he would blow the whistle on him.”

454. On information and belief, it appears that Fr. Stewart’s misbehavior was so flagrant and brazen that three Catholic priests, including John Calicott of all people, felt compelled to

confront Stewart. In any event, when Fr. Stewart failed to adjust his behavior, these priests referred the matter directly to Archbishop Joseph Bernadin.

455. No action was taken, however, until 1985 when the Archdiocese of Chicago was alerted to the fact that a check drafted by Fr. Stewart (from the parish stipend account, no less) for one of his victim's driving lessons had bounced.

456. Under pressure from above concerning the fact that he was clearly misappropriating parish funds to groom and buy the silence of his sexual abuse victims, Fr. Stewart offered his resignation to Archbishop Bernadin (which was accepted) and even drafted open letters to parishioners and "Friends and Colleagues" announcing and explaining his abrupt resignation, which he variously attributed to "struggling with my own weaknesses" and "ministry burnout."

457. Fr. Stewart, however, promptly had second thoughts, and wrote to Archbishop Bernardin on May 26, 1985, in an effort to keep his position at St. Charles Lwanga. Therein Fr. Stewart acknowledged that he had harbored a boy in "desperate circumstances" at the rectory for about two years and asserted that "[m]y role as been so strongly parental that he identifies with me as his 'real father' and the parish also identifies this situation as such."

458. Additionally, Fr. Stewart was apparently "sponsoring" five boys at Catholic high schools by offering "to teach a few courses to schools where these kids would attend in lieu of tuition."

459. After detailing the unique difficulties that Fr. Stewart attributed to the parish and emphasizing his importance to the community as an "indigenous" priest, Stewart revealed his primary proposition: "I am absolutely convinced that the only pastoral approach to this parish [that] will bear success is TEAM MINISTRY," whereby "Father Kiley would be concerned with

financial and fiscal concerns, while Father Stewart would concern himself with pastoral and spiritual, Youth concerns.” Fr. Stewart concluded:

“I do not ask your approval because it solves all ‘my’ problems and difficulties but because of the unusual nature of the circumstance and ministry [...] I believe it is the one solution which addresses all the problems and difficulties of this complex ministry.”

460. Ultimately, Father Stewart and Father Kiley remained at St. Charles Lwanga, and although the Archdiocese’s Chancery office began supervising the parish’s finances and several others were brought into the parish, including a pastoral associate and three deacons – presumably to keep an eye on Fr. Stewart – nothing changed in terms of Stewart’s sexual molestation practices.

461. By 1990, the house of cards finally appeared to be falling around Fr. Stewart. He had driven the parish into the ground, having taken on increasing debt despite massive funding from the Archdiocese, and by January of that year the decision was made to close the parish permanently.

462. Up to that point Fr. Stewart had molested no less than 42 boys in his car, the church, the rectory, the gym, the locker room, and on group trips out-of-state. Notwithstanding clear concerns of those within the Archdiocese hierarchy and the preference of some that Stewart retire from parish ministry, Stewart’s preference to the contrary prevailed.

463. Fr. Stewart was ultimately offered the pastorate at St. Ailbe, located at 9015 S. Harper Ave., which Stewart accepted on the conditions that he have unrivaled authority over the parish and that two of the priests already residing there be reassigned. In a clear reflection of the Archdiocese’s well-founded concerns over Stewart’s pastoral fitness generally and risk to children in particular, the Priest’s Personnel Board recognized that stipulations would need to be attached to his appointment at St. Ailbe as well as the need for someone to:

“[M]eet with Vic as a friend and try to impress Vic with the need for prudence in whatever he does at St. Ailbe’s. He needs to be urged to establish his credibility before any changes take place in the parish or rectory. **He should be urged not to bring young people from another neighborhood to St. Ailbe’s until he has the confidence and respect of the people.**” (Emphasis added)

464. It appears as though one of Fr. Stewart’s victims reported the abuse to police around 1989, and the following year made a separate report to the Archdiocese of Chicago.

465. As a consequence, in October of 1990 Raymond Goedert, the Vicar for Priests at the time, asked Fr. Stewart to provide the contact information for six specifically alleged victims so that Goedert could interview them “just so that we will have fulfilled our end of the procedures.”

466. Stewart promptly went about contacting the boys to facilitate their interviews and persuade them to deny the abuse they had suffered, except for one of the boys who “flat refused” to be interviewed because “[h]e did not think anyone had any right to ask him any questions.” Fr. Goedert called Fr. Stewart “to give him some reassurance” and reported that “Vic is willing to cooperate in order to do whatever is necessary to put this whole thing behind him.”

467. If anyone expected that Victor Stewart would have been chastened by this inquiry, they were mistaken. Promptly upon arrival at St. Ailbe in July of 1990 Fr. Stewart “sealed” the second floor of the parish rectory and moved in five boys from St. Charles Lwanga, along with eight poodles. The boys living with Fr. Stewart had keys to the parish facilities and could be seen “going in and out of the rectory day and night,” leading at least one Archdiocesan official to suspect that Fr. Stewart was “running a crack house.”

468. Once again, however, it was not the child molestation that proved problematic for Fr. Stewart, it was his misappropriation of parish funds for personal benefit that got the Archdiocese’s attention.

469. Despite the fact that in February of 1991 one of Fr. Stewart's victims provided a detailed account of the abuse he endured while Fr. Stewart was appointed to St. Catherine of Genoa, which Fr. Goedert found credible, Fr. Stewart's denial of the allegations was effectively dispositive. In the end, Fr. Goedert determined that "our hands are tied. It's one person's word against the other's," and therefore "we are finished with our investigation."

470. While that "investigation" was ongoing trouble was brewing in the parish, with the St. Ailbe Parish Counsel becoming alarmed about a report of almost \$22,000 missing from the parish accounts and "because they see boys coming and going at all hours in the rectory."

471. By June 9, 1991, Fr. John Calicott – now conveniently on the Priest's Personnel Review Board – called Fr. Goedert to report "that things were really coming to a head and people are getting very upset" about Fr. Stewart and they "really want him thrown out." Calicott further noted that "people are also starting to talk again about all the kids that come and go at the rectory all the time."

472. Eventually the St. Ailbe Parish Counsel began threatening to report the matter to police, and on June 16, 1991, sent a report directly to Archbishop Bernardin detailing the suspicious activity relating to the financial accounts, including several thousand dollars that Stewart paid *himself* for expensive and unnecessary musical equipment that he had acquired from St. Charles Lwanga. The implications of that report were damning, and with the parish's congregation up in arms over the matter, the Archdiocese had no alternative other than to commission a financial audit.

473. On June 27, 1991, Bishop Gregory met with St. Ailbe parish representatives to discuss their concerns and report on the anticipated audit, which led him to conclude that "it will be essential to remove Victor."

474. Evidently Fr. Stewart saw the writing on the wall and offered his resignation on July 5, 1991, which Cardinal Bernardin accepted, effective July 31, 1991 – a date strategically timed to permit Stewart to participate in the audit while protecting him from the expected determination that he was guilty of malfeasance.

475. Victor Stewart never did cooperate with the auditors, perhaps partially because he and his “children” were busy moving out furniture and VCRs from the rectory while causing damage in the process.

476. After a preliminary report from the auditor was disclosed to the Archdiocese – a report which Bishop Gregory felt contained “matters that we might not want to report” – the Archdiocese had to seriously consider changing the locks or adding a security system to prevent “further losses.”

477. The results of the audit essentially established what many suspected: that Fr. Stewart had been overpaying himself, paid rent and wages to the boys in the rectory for maintenance work that they did not perform, sold his own property to the church, and even purchased a nearly \$2,000 “bejeweled chalice” in memory of his deceased mother – all from parish funds.

478. Despite all this, by September of 1991 Fr. Goedert was already trying to find another parish for Fr. Stewart and affirmatively denied that he was on any “sort of leave of absence.”

479. However, by March 25, 1992, the Archdiocese pivoted and began looking for a nursing home it could assign Fr. Stewart to as a chaplain. They ultimately settled on Mercy Rehabilitation Center, located at 19000 S. Halsted St. in Homewood.

480. By June 22, 1992, the Archdiocese also determined that, in principle, Fr. Stewart could not be in the presence of minors without another adult being present, would need to get “some kind of ongoing therapy,” and would need to be monitored.

481. All of this was primarily because Fr. Stewart had been anonymously identified in “The Cardinal’s Commission on Clerical Sexual Misconduct with Minors” report that was issued on June 11, 1992 – presumably as one of the six priests that the Commission determined should not return to parish ministry.

482. That did not stop Fr. Stewart from continuing to have sex with at least one minor (who Stewart had been abusing continuously since his time at St. Charles Lwanga) at hotels on at least 10 occasions.

483. Despite his absence, controversy still surrounded Fr. Stewart at St. Ailbe, where private investigators were making inquiries to parishioners about Stewart. Stewart’s replacement at St. Ailbe, Fr. John S. Breslin, was “very worried that this thing might pop its head up again and scandal would hit the parish and put them in a more difficult position.”

484. The Archdiocese’s advice to Breslin was clear: “I told him to instruct his people that they did not have to cooperate in any way with the private investigators and in fact should not do so.”

485. Victor Stewart died at about 4 a.m. on June 10, 1994, purportedly as a result of a subdural hematoma.

486. Victor Stewart’s victims began reporting their abuse to the Archdiocese en masse shortly after his death, with Victim Assistance Minister Ralph Bonaccorsi describing at least one of the claims as sounding “similar to situations that recently have come to [Bonaccorsi’s] attention

from other African-American men basically who were unemployed and in some need of cash apparently.”

487. As the claims rolled in, the Professional Fitness Review Administrator, Steve Sidlowski, didn’t know what – if anything – he and the Professional Fitness Review Board were supposed to do since Fr. Stewart was deceased.

488. As of October 3, 1994, Sidlowski felt that “it appears as if this is clearly a 4.7(c) situation and that the Board would not ever be able to conduct a formal review of this situation. Thus, in such situations it is not clearly settled as to whether I, as the PFRA, need to proceed forward formally in any way.”

489. It did not help that the Archdiocese of Chicago failed to inform Sidlowski of the prior allegations of sexual abuse against Stewart.

490. Financial settlements were reached with several of Stewart’s victims, but the claims of many were not taken seriously by the Archdiocese.

491. A 2009 investigative report commissioned by the Archdiocese to specifically disclaim allegations of racism nonetheless determined that the Archdiocese “employed a higher scrutiny to claims brought against Stewart.”

492. The Illinois Attorney General’s 2023 “Report on Catholic Clergy Child Sex Abuse in Illinois” further explained:

“The Attorney General’s investigators pressed the archdiocese to explain these findings. Its general counsel provided information suggesting plausible and nonracial reasons to evaluate some (but not all) claims against Stewart with heightened scrutiny. The general counsel also insisted the archdiocese did not act with the intent to discriminate against Stewart’s survivors on the basis of race [...] Nevertheless, **the general counsel recognized Black survivors were disproportionately affected by the archdiocese’s decision to apply heightened scrutiny to claims against Stewart – even if that was not the archdiocese’s intent. The disparate impact of the archdiocese’s approach is likely to have sowed distrust in Black communities and caused harm to Black survivors who**

justifiably perceive they have been, or will be, treated differently because of their race. Some may even have decided not to report their abuse because of the indignities they expected to face if the archdiocese ‘employed a higher scrutiny to [their] claims.’ **The archdiocese now understands – and has expressed to the Attorney General’s investigators – that it has work to do to ensure Black survivors feel as comfortable sharing their experiences and seeking justice for their abuse as survivors of other races. It must continue to be conscious of – and take actions to address – the particular ways in which Black communities, and others, have been affected by the scourge of priests who prey on children.** *The Attorney General anticipates the archdiocese’s renewed commitment to providing compassion and healing to all survivors of child sex abuse.”* (Emphasis added)

493. As a consequence of the foregoing, it should surprise no one that Black participation within the Archdiocese of Chicago has suffered tremendously in the wake of the peak years of child sexual abuse occurring at their most prominent parishes in the 1970s and 1980s.

494. Following the closure of St. Charles Lwanga in 1990, as part of the Archdiocese’s “Renew My Church” initiative, in 2018 St. Ailbe was consolidated with St. Felicitas and St. Joachim parishes to form St. Katharine Drexel Parish.

495. By 2021, the Archdiocese could only expect about 6,000 Black parishioners to attend mass on any given Sunday, while only 24% of that figure actually attended predominantly Black parishes.

496. Yet in 2021 St. Dorathy and St. Columbanus were still consolidated with St. Clotilde to form St. Moses the Black parish while Holy Angles was simultaneously consolidated with St. Ambrose, St. Anselm, Corpus Christi, and St. Elizabeth to form Our Lady of Africa Parish.

497. In 2022 Holy Name of Mary was consolidated with St. John de la Salle and SS. Peter and Paul to form Our Lady of Kibeho parish.

498. Plaintiff’s counsel has reviewed voluminous internal files and information from the Archdiocese pertaining to Fr. George Clements, Fr. Paul Smith, Fr. John Calicott, and Fr. Kenneth Brigham, which are extremely relevant to the issues raised by this action.

499. Due to contractual conditions occasioned by that review Plaintiff and his counsel are not presently at liberty to disclose that extremely relevant information.

500. Due to the overwhelming weight of legitimate public policy, equitable, and moral considerations, the public ought to have access to the full truth of this unparalleled institutional and historical tragedy.

501. If the Archdiocese of Chicago is worthy of the Black participation that it hopes to keep and foster, then its prevailing priority ought to be finally acknowledging its immense failures and standing by the commitments it has repeatedly, recently, and publicly made to treat its Black victims of child sexual abuse with dignity, respect, and fairness.

COUNT 1

(NEGLIGENCE)

502. Plaintiff, JOHN DOE 20, hereby incorporates by reference paragraphs 1 through 501 as if fully stated herein.

503. JOHN DOE 20, a male born in the late 1960s and a resident of Illinois, was a student at Holy Angels School for several years between 1977 and 1982 and dually attended Holy Angels Church services during this time frame.

504. JOHN DOE 20 would often participate in altar boy activities in the Church.

505. JOHN DOE 20 was raised as a Catholic by his parents, with whom he resided, and for more than a decade was dutifully inculcated by his parents, teachers, nuns, and priests, to honor and respect Catholic dogma and its ecclesial representatives, including its ordained priests.

506. By virtue of his religious involvement and enrollment at Archdiocesan schools, including Holy Angels School, JOHN DOE 20 had a “special relationship” with the Archdiocese, akin to a fiduciary relationship, whereby he reposed trust and confidence in the Archdiocese, thereby placing the Archdiocese in a position of influence and superiority over JOHN DOE 20.

507. The Archdiocese accepted the trust and confidence reposed upon it by JOHN DOE 20, thereby giving rise to an affirmative duty to disclose to JOHN DOE 20 material facts concerning the Archdiocese's own culpability for the harm suffered by JOHN DOE 20 and/or the existence of a potential cause of action by JOHN DOE 20 against the Archdiocese.

508. The Archdiocese knew that it had exercised negligently and wantonly deficient supervision, evaluation, and control of Holy Angels Parish, Holy Angels School, and its personnel, including Fr. George Clements and Fr. Paul Smith, prior to the time that Fr. George Clements and Fr. Paul Smith committed the acts of sexual battery against JOHN DOE 20 as described herein.

509. The Archdiocese knew and reasonably should have known of Fr. George Clements's and Fr. Paul Smith's propensity and risk of committing acts of sexual exploitation against minors, including students at Holy Angels School, prior to the time that Fr. George Clements and Fr. Paul Smith committed the acts of sexual battery against JOHN DOE 20 as described herein.

510. As a student at Holy Angels School while Fr. George Clements and Fr. Paul Smith worked for or was affiliated with Holy Angels, JOHN DOE 20 was within the reasonable scope of persons to whom the Archdiocese should have recognized as possible victims of Fr. George Clements's or Fr. Paul Smith's sexual exploitation.

511. At some point between 1977 and 1982, JOHN DOE 20 volunteered to be an altar boy for Sunday Mass services, which typically involved showing up to the Church between 7 – 7:30am to clean, prepare, change into altar boy garments, and perform the routine pre-mass rituals. It was during this pre-mass altar boy sessions, that Fr. George Clements first began grooming JOHN DOE 20.

512. Fr. George Clements's abuse began with casual over the clothes fondling under the pretext of fixing JOHN DOE 20's altar boy robes. This progressed to Fr. George Clements fondling under JOHN DOES 20's clothes and later escalated to Fr. George Clements forcing JOHN DOE 20 to get on his knees and hold his hands in a praying position while Fr. Clements stood in front of him and proceeded to stick his finger inside of JOHN DOE 20's mouth and probe its contours.

513. Fr. George Clements later escalated the abuse further by forcing JOHN DOE 20 to perform oral sex on him on many occasions. Eventually, JOHN DOE 20 would be regularly shepherded by other priests at Holy Angels, including Fr. Paul Smith, to perform oral sex on them as well.

514. In total, JOHN DOE 20 was sexually exploited by Fr. George Clements or Fr. Paul Smith nearly 100 times.

515. At all relevant times, JOHN DOE 20 had no reason to believe or suspect that the Archdiocese established and abided by a deliberate and knowing policy of willful blindness and non-intervention with respect to Holy Angels Parish, Holy Angels School, and their respective facilities and personnel, including Fr. George Clements and Fr. Paul Smith.

516. At all relevant times, the Archdiocese has remained silent and fraudulently concealed the existence and circumstances of that deliberate and knowing policy of willful blindness and non-intervention, and instead held out Holy Angels Parish, Holy Angels School, Fr. George Clements, and Fr. Paul Smith as being subjected to uniform and customary means of the Archdiocese's supervision, evaluation, concern, and intervention.

517. At all relevant times, JOHN DOE 20 had no reason to believe or suspect that the Archdiocese was aware of or would ever countenance Fr. George Clements's or Fr. Paul Smith's propensity for sexually abusing minors.

518. At all relevant times, the Archdiocese has remained silent and fraudulently concealed its knowledge and/or awareness of Fr. George Clements's and Fr. Paul Smith's risks of committing sexual abuse of minors and/or prior allegations of such behavior by Fr. George Clements or Fr. Paul Smith, and held Fr. George Clements and Fr. Paul Smith out to Holy Angels' parishioners, students, and parents as respectable and trustworthy priests, whereby Fr. George Clements and Fr. Paul Smith were able to obtain access to vulnerable minors, including JOHN DOE 20.

519. Due to the Archdiocese's silence and fraudulent concealment of its own culpability in the sexual abuse of students at Holy Angels School, JOHN DOE 20 had no reasonable basis to have investigated the Archdiocese's potential culpability and, even if he had made such inquiries, it would have been impossible for him to have discovered his cause of action against the Archdiocese.

520. As a direct consequence of the fraudulent concealment of JOHN DOE 20's cause of action against the Archdiocese, JOHN DOE 20 did not become aware of facts sufficient for a reasonable person to have discovered said cause of action until he consulted with his present attorneys in 2024. Therefore, the Archdiocese is estopped from asserting any affirmative defense(s) founded on any statute of limitations or repose applicable to JOHN DOE 20's claims against the Archdiocese by virtue of (a) the doctrine of equitable tolling; (b) the tolling provisions contained in the Childhood Sexual Abuse Act (735 ILCS 5/13-202.2); (c) the fraudulent concealment statute (735 ILCS 5/13-215); and (d) the application of fraudulent concealment principles developed by Illinois common law.

521. At all relevant times, the Archdiocese, by and through its agents, servants, and employees, knew and should have known of Fr. George Clements's and Fr. Paul Smith's dangerous and exploitative propensity for committing acts of sexual misconduct against minors.

522. At all times relevant herein, the Archdiocese:

- a. Determined and controlled the parish/school assignment of Catholic priests within its operational jurisdiction, including Fr. George Clements and Fr. Paul Smith;
- b. Had direct and supreme authority and control over the position and/or role that Catholic priests, including Fr. George Clements and Fr. Paul Smith, had within the Archdiocese's operational jurisdiction; and
- c. Had the direct and supreme authority to terminate the employment of Catholic priests, including Fr. George Clements and Fr. Paul Smith.

523. At all times relevant herein, the Archdiocese permitted Fr. George Clements and Fr. Paul Smith to be appointed as and remain priests at Holy Angels without any meaningful supervision, evaluation, or oversight, despite the Archdiocese's knowledge and reasonable suspicion that Fr. George Clements and Fr. Paul Smith posed a danger to students.

524. At all times relevant herein, the Archdiocese owed JOHN DOE 20 a duty to:

- a. Credibly investigate reports of malfeasance by priests granted diocesan faculties and assigned to parish ministry, including reports of financial misappropriation, sexual misconduct, harboring children in parish residence, child trafficking, illegal adoption, and malicious prosecution;
- b. Report priests assigned to parish ministry, including Fr. George Clements and Fr. Paul Smith, to civil authorities upon learning that they had engaged in sexual misconduct with minors, child trafficking, or illegal adoption;
- c. Supervise and periodically evaluate its employees and priests granted diocesan faculties and assigned to parish ministry, including Fr. George Clements and Fr. Paul Smith;
- d. Supervise and periodically evaluate its parish facilities, including Holy Angels Church, Holy Angels School, and the Holy Angels Rectory;
- e. Exercise reasonable care so as to control priests assigned to parish ministry, including Fr. George Clements and Fr. Paul Smith, even while acting

outside of the scope of their employment so as to prevent them from intentionally harming others while upon premises, including Holy Angels Parish facilities, in the Archdiocese's possession or to which said priests are only privileged to enter as priests granted diocesan faculties and assigned to that specific parish ministry;

- f. Terminate the employment of its priests assigned to parish ministry, including Fr. George Clements and Fr. Paul Smith, known or reasonably suspected to pose a danger of sexual exploitation of minors, including JOHN DOE 20; and
- g. Warn Holy Angels parishioners, students, and their families, of its knowledge and/or reasonable suspicion that Fr. George Clements or Fr. Paul Smith posed a risk of sexually exploiting minors.

525. At all times relevant herein, the Archdiocese breached its duties to JOHN DOE 20 by committing one or more of the following acts and/or omissions with utter indifference to or conscious disregard for the safety of Holy Angels students and parishioners:

- a. Failure to create, adopt, and/or implement adequate policies and/or procedures to prevent Fr. George Clements and Fr. Paul Smith from having access to children and/or adolescents;
- b. Failure to remove Fr. George Clements and Fr. Paul Smith from parish ministry, school administration, or from work that would permit them to access minors;
- c. Failure to alert the faculty/staff at Holy Angels Parish and Holy Angels School that neither Fr. George Clements nor Fr. Paul Smith should be alone with minors and/or requiring the faculty/staff to report instances where Fr. George Clements or Fr. Paul Smith was alone with a minor;
- d. Failure to recognize and/or adequately act upon the predatory and sexually exploitative tendencies of Fr. George Clements and Fr. Paul Smith while they were in the Archdiocese's service and employ;
- e. Failure to adequately investigate reports of malfeasance, including financial misappropriation, sexual misconduct with children, harboring children on parish property, child trafficking, illegal adoption, and malicious prosecution by Fr. George Clements and Fr. Paul Smith while they were priests assigned to parish ministry within the Archdiocese;
- f. Failure to exercise any supervision of its priests and parish facilities, specifically including Fr. George Clements, Fr. Paul Smith, Holy Angels Church, Holy Angels School, and the Holy Angels Rectory;

- g. Failure to review or evaluate Fr. George Clements or Fr. Paul Smith during their entire tenures at Holy Angels;
- h. Failure to exercise any care or implement any intervention so as to control Fr. George Clements and Fr. Paul Smith, even while acting outside of the scope of their employment, so as to prevent them from intentionally harming others while upon Holy Angels premises;
- i. Failure to report allegations of sexual misconduct involving Fr. George Clements or Fr. Paul Smith and minor(s) to governmental law enforcement;
- j. Failure to warn the public, including JOHN DOE 20 and his family, that Fr. George Clements and Fr. Paul Smith had engaged in sexual misconduct with minors and were dangers to others;
- k. Allowed Fr. George Clements and Fr. Paul Smith to have unsupervised contact with JOHN DOE 20, a minor, by which Fr. George Clements and Fr. Paul Smith were able to sexually abuse JOHN DOE 20; or
- l. Was otherwise careless or negligent.

526. At all times relevant herein, it was foreseeable to the Archdiocese that sexual exploitation could occur in school, parish, and extra-curricular programs that provided Catholic priests, including Fr. George Clements and Fr. Paul Smith, with unsupervised access to children and/or adolescents.

527. At all times relevant herein, the Archdiocese knew that Fr. George Clements's and Fr. Paul Smith's positions as priests at Holy Angels involved direct and unsupervised access to children and/or adolescents.

528. As a direct and proximate result of the Archdiocese's negligent, reckless, wanton, willful, intentional, and malicious acts and/or omissions, JOHN DOE 20 suffered and will continue to suffer great physical pain as well as great pain of mind and body, severe and permanent emotional, psychological, and spiritual distress and injuries, embarrassment, loss of self-esteem, humiliation, lost wages, and other injuries or damages.

WHEREFORE, the Plaintiff, JOHN DOE 20, prays for judgment against the Defendant, CATHOLIC BISHOP OF CHICAGO, a corporation sole a/k/a THE ROMAN CATHOLIC ARCHDIOCESE OF CHICAGO, in an amount substantially in excess of fifty-thousand dollars (\$50,000.00), plus costs, disbursements, interest, and such other and further relief as is deemed just and equitable.

COUNT 2

(VOLUNTARY UNDERTAKING AND PREMISES LIABILITY)

529. Plaintiff, JOHN DOE 20, hereby incorporates by reference paragraphs 1 through 528 as if fully stated herein.

530. The Archdiocese, through its own policies and procedures, and by permitting and/or encouraging its priests, including Fr. George Clements and Fr. Paul Smith, to serve in a position of authority over minors within Holy Angels Parish and Holy Angels School and to have unsupervised contact with minors on the Archdiocese's premises, voluntarily undertook and assumed the duty to provide a safe environment for minors without parental supervision; establish a security, investigation, and prosecution program; to deter sexually exploitative misconduct by priests, including Fr. George Clements and Fr. Paul Smith; and to protect parishioners, students, and others in the community, including JOHN DOE 20, from harm by sexually deviant priests who were in service to the Archdiocese.

531. The Archdiocese failed to exercise reasonable care in carrying out this voluntary undertaking, and the failure to exercise reasonable care increased the risk of harm to minors, including JOHN DOE 20, from predatory and sexually exploitative priests under its discretion and control, including Fr. George Clements and Fr. Paul Smith.

532. The Archdiocese had a special relationship with JOHN DOE 20, in that the Archdiocese of Chicago acted as voluntary custodian of JOHN DOE 20 as protectee.

533. The Archdiocese also owed a duty of care to JOHN DOE 20 under the Restatement (Second) of Torts § 314A(3), (4), and § 320, as the Archdiocese held its premises out to the public as a sanctuary and safe place for minors to visit, study, and stay without parental supervision and held out its priests, including Fr. George Clements, as safe and trustworthy guardians of minors within Holy Angels Parish and Holy Angels School.

534. JOHN DOE 20 and his parents relied on the Archdiocese's holding out of Holy Angels Parish as a safe environment and its priests as trustworthy, honorable, and celibate, and forwent other protective measures and alternative options for education and religious engagement.

535. At all times relevant herein, the Archdiocese breached its duties to JOHN DOE 20 by committing one or more of the following acts and/or omissions:

- a. Failure to create, adopt, and/or implement adequate policies and/or procedures to prevent Fr. George Clements and Fr. Paul Smith from having access to children and/or adolescents;
- b. Failure to remove Fr. George Clements and Fr. Paul Smith from parish ministry, school administration, or from work that would permit them to access minors;
- c. Failure to alert the faculty/staff at Holy Angels Parish and Holy Angels School that neither Fr. George Clements nor Fr. Paul Smith should be alone with minors and/or requiring the faculty/staff to report instances where Fr. George Clements or Fr. Paul Smith was alone with a minor;
- d. Failure to recognize and/or adequately act upon the predatory and sexually exploitative tendencies of Fr. George Clements and Fr. Paul Smith while they were in the Archdiocese's service and employ;
- e. Failure to adequately investigate reports of malfeasance, including financial misappropriation, sexual misconduct with children, harboring children on parish property, child trafficking, illegal adoption, and malicious prosecution by Fr. George Clements and Fr. Paul Smith while they were priest assigned to parish ministry within the Archdiocese;

- f. Failure to exercise any supervision of its priests and parish facilities, including Fr. George Clements, Fr. Paul Smith, Holy Angels Church, Holy Angels School, and the Holy Angels Rectory;
- g. Failure to review or evaluate Fr. George Clements or Fr. Paul Smith during their entire tenures at Holy Angels;
- h. Failure to exercise any care or implement any intervention so as to control Fr. George Clements and Fr. Paul Smith, even while acting outside of the scope of their employment, so as to prevent them from intentionally harming others while upon Holy Angels premises;
- i. Failure to report allegations of sexual misconduct involving Fr. George Clements or Fr. Paul Smith and minor(s) to governmental law enforcement;
- j. Failure to warn the public, including JOHN DOE 20 and his family, that Fr. George Clements and Fr. Paul Smith had engaged in sexual misconduct with minors and were dangers to others;
- k. Allowed Fr. George Clements and Fr. Paul Smith to have unsupervised contact with JOHN DOE 20, a minor, by which Fr. George Clements and Fr. Paul Smith were able to sexually abuse JOHN DOE 20; or
- l. Failed to remedy a known dangerous condition on its premises by failing to supervise or in any other respects protect young children from a known sexual predator.
- m. Was otherwise careless or negligent.

536. As a direct and proximate result of the Archdiocese's intentional, reckless, and negligent acts and/or omissions, JOHN DOE 20 suffered and will continue to suffer great pain of mind and body, severe and permanent emotional, psychological, and spiritual distress and injuries, embarrassment, loss of self-esteem, humiliation, lost wages, and other injuries and damages.

WHEREFORE, the Plaintiff, JOHN DOE 20, prays for judgment against the Defendant, the CATHOLIC BISHOP OF CHICAGO, a corporation sole a/k/a THE ROMAN CATHOLIC ARCHDIOCESE OF CHICAGO, in an amount substantially in excess of fifty-thousand dollars (\$50,000.00), plus costs, disbursements, interest, and such other and further relief as is deemed just and equitable.

COUNT 3

(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

537. Plaintiff, JOHN DOE 20, hereby incorporates by reference paragraphs 1 through 536 as if fully stated herein.

538. As described herein, the Archdiocese's conduct in, amongst other things: (a) holding Fr. George Clements and Fr. Paul Smith, known or suspected child molesters, out to the community as priests in good standing and placing them in positions where they had unsupervised access to minors; (b) deliberately and completely failing to exercise any degree of supervision, evaluation, and intervention with respect to Fr. George Clements, Fr. Paul Smith, Holy Angels Parish, and Holy Angels School; (c) failing to engage in reasonable inquiries or investigations in response to reports of Fr. Paul Smith's and Fr. George Clements's reprehensible and illegal behavior; (d) actively concealing information pertaining to Fr. George Clements's and Fr. Paul Smith's predatory and sexually exploitative tendencies and risks; (e) facilitating sexual abuse of minors by its active concealment; and/or (f) knowingly exposing minors to sexual abuse or the unreasonably high probability of abuse, was extreme and outrageous.

539. At all times relevant herein, the Archdiocese was aware and should have been aware that its conduct created an unacceptably high probability of minors at Holy Angels Parish and Holy Angels School being sexually abused by Fr. George Clements and Fr. Paul Smith.

540. At all times relevant herein, the Archdiocese was aware that sexual abuse of a minor is likely to cause severe emotional distress upon the victim.

541. At all times relevant herein, the Archdiocese knew and suspected that reasonable supervision, evaluation, investigation, or inquiry would have revealed compelling evidence of Fr. George Clements's and Father Paul Smith's reprehensible and illegal behavior, including financial

misappropriation, sexual misconduct with children, surreptitiously harboring children on parish property, child trafficking, illegal adoption, and malicious prosecution.

542. At all times relevant herein, the Archdiocese intentionally and/or recklessly disregarded the high probability that its conduct would result in the infliction of severe emotional distress upon JOHN DOE 20.

543. At all times relevant herein, the Archdiocese's conduct did and continues to cause JOHN DOE 20 severe emotional distress and mental anguish.

544. As a direct and proximate result of the Archdiocese's intentional, reckless, and negligent acts and/or omissions, JOHN DOE 20 suffered and will continue to suffer great pain of mind and body, severe and permanent emotional, psychological, and spiritual distress and injuries, embarrassment, loss of self-esteem, humiliation, lost wages, and other injuries and damages.

WHEREFORE, the Plaintiff, JOHN DOE 20, prays for judgment against the Defendant, the CATHOLIC BISHOP OF CHICAGO, a corporation sole a/k/a THE ROMAN CATHOLIC ARCHDIOCESE OF CHICAGO, in an amount substantially in excess of fifty-thousand dollars (\$50,000.00), plus costs, disbursements, interest, and such other and further relief as is deemed just and equitable.

Respectfully Submitted,

/s/ Sean O'Malley

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

JOHN DOE 20,

Plaintiff,

-vs-

CATHOLIC BISHOP OF CHICAGO,
A corporation sole, a/k/a the ROMAN
CATHOLIC ARCHDIOCESE OF
CHICAGO CATHOLIC BISHOP OF
CHICAGO,

Defendants.

No. 2026L012379

JURY DEMAND

The undersigned demands a jury trial.

Dated: October 14, 2026

Respectfully Submitted,

/s/ Sean O'Malley

One of the Attorneys for Plaintiff

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

JOHN DOE 20,	)	
	)	
<i>Plaintiff,</i>	)	
	)	No. 2026L012379
-vs-	)	
	)	
CATHOLIC BISHOP OF CHICAGO,	)	
A corporation sole, a/k/a the ROMAN	)	
CATHOLIC ARCHDIOCESE OF	)	
CHICAGO CATHOLIC BISHOP OF	)	
CHICAGO,	)	
	)	
<i>Defendants.</i>	)	

RULE 222(b) AFFIDAVIT OF DAMAGES

The undersigned verifies, pursuant to Rule 222(b), that the total damages sought by Plaintiff exceeds \$50,000.00.

Dated: October 14, 2026

HART MCLAUGHLIN & ELDRIDGE, LLC

By: /s/ Sean O'Malley

One of the Attorneys for Plaintiff

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