

AFFIDAVIT

I, Thomas Patrick Michael Doyle, of _____, being first duly sworn upon his oath, deposes and says that:

1. This affidavit is made of my own personal knowledge.
2. I am over the age of eighteen (18) years.
3. I believe in the obligations of an oath.
4. In August 1964, I entered the Dominican novitiate at Winona, Minnesota and was given the religious name of Thomas.
5. On August 16, 1965, I pronounced my simple vows and on August 16, 1968 I pronounced my solemn vows.
6. My graduate studies in philosophy and theology took place at the Aquinas Institute of Philosophy, River Forest, Illinois and the Aquinas Institute of Theology, Dubuque, Iowa where I received my B.A. in Philosophy in 1966 and my M.A. in Philosophy in 1968 and in Theology in 1971.
7. I pursued further graduate studies and political science at the University of Wisconsin from where I received my M.A. in Political Science in 1971 and graduate studies in Canon Law at the Gregorian University, Rome, University of Ottawa from where I received

my M.A. in Canon Law in 1977, St. Paul's University, Ottawa from where I received my Pontifical Licentiate in Canon Law (J.C.L.) in 1977 and Catholic University of America from where I received my M.Ch.A. in Administration in 1976 and my Pontifical Doctorate in Canon Law (J.C.D.) in 1978.

8. I was ordained a Catholic Priest in the Dominican Order on May 16, 1970 in Dubuque, Iowa.

9. After completing graduate work in theology and several months of clinical pastoral training, I was assigned as associate pastor in River Forest, Illinois.

10. In 1974, I was appointed an advocate for the Metropolitan Tribunal of the Archdiocese of Chicago.

11. In 1978 I was appointed a judge in the same Tribunal.

12. In 1981 I was asked to serve as secretary canonist at the Vatican Embassy in Washington, D.C., a post that I held until early 1986.

13. I have had extensive teaching experience in Canon law as a visiting lecturer at the Catholic University of America and the Chicago Theological Union.

14. I have been a lecturer at Matrimonial Tribunal Institutes of the Catholic University of America and Mundelein Seminary as well as the Institute for Spirituality in River Forest, Illinois.

15. As a member of the Canon Law Society of America, I have served one term as member of the Board of Governors and three terms as chairman of the marriage research committee.

16. I was asked by the society to author a commentary prepared on the Revised Code of Canon Law which is the body of law that governs the universal Roman Catholic Church.

17. I was asked by the Commission for the Authentic Interpretation of the Code of Canon Law of the Holy See to prepare the footnotes on marriage for the annotated edition of the Code of Canon Law.

18. From 1983 through 1985 and in 1988 through 1990 I served as a consultant to the Canonical Affairs Committee of the National Conference of Catholic Bishops.

19. In 1984, I became involved with the issue of sexual abuse of children by Catholic Clergy while serving at the Vatican Embassy.

20. Since that time I have developed an expertise in the canonical and pastoral dimensions of this problem.

21. I have worked with victims of abuse and their families, priests accused of abuse, bishops and superiors of religious institutes on this issue.

22. I have developed policies and procedures for dealing with cases of sexual abuse by the clergy for diocese and religious orders in the United States, Canada, Australia and New Zealand.

23. In the capacity of expert in this area, I have delivered lectures and seminars for the clergy and lay groups throughout the United States.

24. In 1989, I appeared as an expert witness before the legislature of the State of Pennsylvania concerning the state's child protective legislation.

25. I have served and continue to serve as a consultant/court expert in cases of alleged sexual abuse by clergy in California, Ohio, New Mexico, Arkansas, Arizona, Texas, Massachusetts, Wisconsin, Illinois, Pennsylvania, Minnesota and Connecticut.

26. I have been retained as an expert in cases which have been brought against the Bridgeport Roman Catholic Diocese, Bishop Walter Curtis, Bishop Edward Egan and Monsignor Andrew Cusack by the Law Firm of Tremont & Sheldon, P.C. as an expert. I have had an opportunity to review the pleadings and depositions which have occurred in this matter.

27. Under Canon law, from the beginning of a seminarian's education, he is to be continuously educated regarding celibacy.

28. Throughout his priesthood, a cleric must be celibate.

29. It is the power and duty of the bishop to lay down specific rules which further the premise of celibacy including preventing priests from associating with persons under which scandal may be caused.

30. Canon law itself forbids sex with children.

31. Under Canon law the bishop has specific duties to see that priests remain celibate.

32. Pursuant to Canon law, the bishop has a duty to seek out and investigate complaints of sexual abuse by clergy members. These investigations must occur whether or not the complaints are deemed to be truthful.

32. Based on the information revealed in the present case, it is my opinion that the defendant Bishop Curtis and the defendant Bridgeport Roman Catholic Diocese violated the standard required under Canon law and these violations of the standard directly and causally resulted in the sexual abuse, sexual assault and sexual exploitation of the minor plaintiffs. These violations include the defendants failure to investigate complaints of sexual abuse made by persons against priests; the failure to have a policy that required persons including priests working under the Bishop to report directly to the Bishop such complaints; the failure to promulgate standards, rules and policies within the church to insure the celibacy of its priests

