

AFFIDAVIT

STATE OF IOWA)
) ss:
COUNTY OF SCOTT)

I, Donald J. Green, D/O/B: 11-15-66, first being duly sworn under oath, states as follows:

1. Father James Janssen served as pastor of my parish, SS Philip & James in Grand Mound, Iowa, from 1980-1990. I was a baptized member of this parish, attended catechism classes, and served as an altar boy for Father Janssen. With my family, we attended weekly mass. Father James Janssen was an ordained Roman Catholic priest, a representative and authority figure of the Diocese of Davenport and was my spiritual advisor. He was a person of great influence and persuasion as a holy man and authority figure in my life. I developed great admiration, trust, dependence, reverence and respect for the Roman Catholic Church, its agents, the Davenport Diocese, its Bishop and Vicar General.

2. Father Janssen identified me and sought and gained the trust and confidence of myself and my parents to serve as a spiritual guide, pastor, confessor and priest to me. Janssen also sought and gained my parents' consent to participate in counseling and other activities, including an out of state trip and an unsupervised overnight stay at the rectory.

3. Defendant Janssen also sought and gained my trust, friendship, admiration, confidence and obedience and conditioned me to comply with his



direction and to look at him as an authority on all matters spiritual, moral, ethical and temporal.

4. I was taught by the representatives of the Davenport Diocese, and did not consider myself to be the equal of Father Janssen. I depended upon him as a source for my spiritual, moral and ethical guidance.

5. As a result of the sexual abuse and the concealment of the wrongful nature of it by the Diocese of Davenport, I believe I was mentally ill and developed various psychological coping mechanisms and symptoms of psychological distress. I admit that I am not an expert and do not completely understand how, and to what extent, my shame, guilt, self-blame, anxiety and repression has affected me. However, I know that I was unable to discover the nature and extent of the abuse and the causal relationship between the extent of the sex abuse and my injuries until, at the earliest, 2003. I am still not fully aware of the nature and extent of the abuse and the nature and extent of the damages that I have suffered and it is my understanding that I am still suffering from a mental illness that dates from the time of the abuse.

6. In the summer of 1982, Father Janssen invited me and two other young men to attend the World's Fair in Knoxville, Tennessee, and to continue traveling with him to Florida. I was 15 years old. Because there were four of us going on the trip, Father Janssen persuaded my parents to let him take our family car on the trip. He left a convertible car for my family to drive.

7. The night before we departed for Knoxville, we stayed at Father Janssen's sister's home in Davenport. When we arrived in Knoxville, we stayed

with relatives of Father Janssen. Their home was a large mansion. Although there were many bedrooms, Father Janssen insisted that all four of us sleep in one room with two double beds. Each night, one of the young men had to take turns sharing and sleeping in the bed with Father Janssen.

8. The night I shared a bed with Father Janssen, I awoke in the morning with Janssen curled up behind me with his body pressed against me. He wore nothing but his underwear briefs. His arm was draped over my body and he had his hand inside my underwear, holding my penis. When he realized I was awake, he asked "Do you trust me?" Shortly after that, he removed his hand from my penis.

9. We continued traveling to Florida. On our first day there, we visited the beach. I was badly sunburned and as a result of my sunburn, stayed up and watched television the entire night. I then slept the next day inside while everyone else went out. The remaining nights of the trip, I slept on the couch.

10. Father Janssen would also have unsupervised sleepover parties for the altar boys at the rectory of SS Philip & James. During this sleepover, with no other adults present, Father Janssen would remove all of his clothes, but his underwear, in the presence of the boys. I was older at the time and he did not try anything with me at these sleepovers.

11. On the instance when Father Janssen sexually abused me, Janssen solicited my "trust". Janssen and the Diocese of Davenport conspired together to conceal from me, and my parents, the nature and extent of Janssen's perverted activities and deprived me of the knowledge of my legal rights.

12. The Davenport Diocese either knew, or should have known, that Janssen needed to be closely supervised in his contact with boys under the age of 18. I was a member of the Davenport Diocese and relied upon, trusted, depended and was counseled in educational, spiritual, emotional and psychological matters by representatives of the Davenport Diocese at the time of the abuse. I looked to the representatives of the Davenport Diocese and placed confidence in them and depended upon them for my educational, spiritual and emotional guidance.

13. I was under the age of 18 and all of my contacts with representatives with the Diocese of Davenport were with adult authority figures. These adult authority figures, including, but not limited to, Father Janssen from the Davenport Diocese, had and exercised a great deal of influence over me.

14. I was unaware of Father Janssen's improper sexual contact with other children of the Diocese until I read about the first lawsuits against him in the newspaper in 2003. Before that time, the Davenport Diocese had concealed all information from me that they knew, or should have known, that Janssen had dangerous sexual perversions and proclivities. My parents also were not advised by the Davenport Diocese of the information and complaints the Diocese had received about Father Janssen.

15. I believe that I have had a mental illness since I was abused as a child. I have sought and been treated for this mental illness. I am still undergoing psychological assistance for the mental difficulties I have had as a result of the abuse by Father Janssen. Although some things in my life I have been able to

accomplish successfully, I was disabled mentally from being able to vindicate my legal rights against Janssen and the Diocese.

16. I first disclosed the abuse to my wife. I also reported it to representatives of the Davenport Diocese, including Bishop Franklin, Vicar General Monsignor Morrissey and Chancellor Irene Prior Loftus. None of the Diocese representatives ever told me of the horrible history of abuse known to the Davenport Diocese. They kept this secret.

17. One of the counselors I have seen, Dr. Carole Dillon, was a Professor at St. Ambrose College. She supports my opinion that I suffered from a mental illness from the date of the abuse. It is my understanding that Bishop Franklin is in charge of St. Ambrose University. In addition, Dr. Dillon has a theology degree from Marquette University, which is a Roman Catholic University. I think she is an expert the Court can consider as unbiased.

18. The fraudulent concealment by the Diocese of Davenport about Father Janssen and sexual contacts with minors before I was abused prevented me from attempting to vindicate any legal rights against the Diocese until I filed my lawsuit. The Diocese concealed the witnesses with knowledge of the abuse from me until these witnesses died, making it more difficult for me to prove my claim and helping the Diocese avoid liability.

19. An example of the Diocese's concealment of Janssen's abuse is the attached article from the Quad City Times dated August 5, 1998 where David Montgomery announced an abuse class for priests in Davenport. The Diocese


publicly announced that no such incidents have occurred in Davenport. I read this article and now know it is not true, although I believed it at the time. (Exhibit A)

Further, Affiant sayeth not.



DONALD J. GREEN

Subscribed and sworn to before me
this 26th day of July, 2004.



Notary Public in and for the
State of Iowa

