



**SURVIVORS NETWORK OF THOSE
ABUSED BY PRIESTS**
PO Box 16376
Chicago, IL 60616, United States

His Eminence, Pietro Cardinal Parolin
Secretary, Secretariat of State
Palazzo Apostolico Vaticano
Citta del Vaticano 00120
Tel.: 06.69.88.39.13

March 25, 2025

Your Eminence,

I hope this letter finds you well. My name is Shaun Dougherty, and I am the president of the Survivors Network of those Abused by Priests. I am writing to you in your esteemed capacity as the Vatican Secretary of State to bring to your attention a matter of utmost importance and urgency.

Enclosed with this letter, please find letters addressed to Your Eminence, Cardinal Victor Manuel Fernández, Prefect of the Dicastery for the Doctrine of the Faith, and Cardinal Robert Francis Prevost, O.S.A., Prefect of the Dicastery for Bishops. These letters pertain to serious concerns regarding the conduct of Cardinal Kevin Joseph Farrell, Prefect of the Dicastery for Laity, the Family and Life, President of the Commission for Confidential Matters, and *Camerlengo* of the Holy Roman Church in light of the Holy Father's declaration *Vos estis lux mundi*.

In compliance with the procedures outlined in *Vos estis lux mundi*, our organization respectfully requests that you promptly and securely forward the enclosed letters to Cardinal Fernández and Cardinal Prevost at their respective dicasteries.

We kindly ask that you provide us with confirmation once the letters have been sent. Your cooperation in this matter is greatly appreciated and vital for ensuring that our concerns are appropriately addressed by the relevant authorities within the hierarchy.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Shaun Dougherty", with a horizontal line extending from the end of the signature.

Shaun Dougherty
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His Eminence, Víctor Manuel Cardinal Fernández
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His Eminence, Robert Francis Cardinal Prevost, O.S.A.
Prefect, Dicastery for Bishops
Piazza Pio XII 10
00193 Rome, Italy
Tel.: 06.69.88.42.17

RE.: *Vos estis lux mundi* reporting regarding Cardinal Kevin Joseph Farrell, Prefect of the Dicastery for Laity, the Family and Life

Dear Cardinal Parolin, Cardinal Fernández, and Cardinal Prevost,

In compliance with the Apostolic Letter *Vos estis lux mundi* promulgated by Pope Francis in March 2023 and entered into force on April 30, 2023, we the undersigned members of the Survivors Network of those Abused by Priests (SNAP) wish to report to you the conduct of Cardinal Kevin Joseph Farrell, Prefect of the Dicastery for Laity, the Family and Life, President of the Commission for Confidential Matters, and *Camerlengo* of the Holy Roman Church, consisting of actions or omissions intended to interfere with or to avoid a civil or canonical investigation, whether administrative or penal, against certain clerics of the Diocese of Dallas (*Vos estis lux mundi*, Art. 1 (b)). Cardinal Farrell was bishop of Dallas from 2007 to 2016.

Furthermore, in our opinion, this conduct of Cardinal Farrell stands as an abuse of ecclesiastical power, office, or function that has harmed the vulnerable and caused scandal, a delict addressed in canon 1378 of the *Code of Canon Law*.

The Case Against Fr. Timothy J. Heines

1. In 2015, after reading about the Diocese of Dallas' public claim that they wanted victims to come

forward and would “act in accord with the principles of truth, honesty, and justice,” John Doe reported sexual, emotional, and physical abuse committed against him by Fr. Timothy Heines over a period of 10 years, beginning in 1998 when the victim was a 12-year-old altar boy, to a Catholic priest of the Diocese of Dallas.

2. The priest reported Doe’s statement to the Dallas diocese’s Chancellor Mary Edlund. In September 2015, Doe met with Edlund and showed her over 40 “shirtless photographs that the priest had taken of him in the church rectory while [he] was in middle school and high school” (compiled in a scrapbook by Heines titled “About a boy”) and told her about the “shirtless...hot oil massages” in the church rectory when Doe was in high school where “Heines would often touch [his] penis” and a sexual assault after high school where Doe woke up “to find Father Heines’ mouth on [his] penis.”¹
3. Soon after, Doe met with Edlund and then-Bishop Kevin Farrell. In this meeting, Doe was informed that Father Heines would be immediately removed from active ministry. According to Doe’s petition against the Diocese of Dallas, “Bishop Farrell and Ms. Edlund told John Doe that the scrapbook, which contained only statements, photographs, and descriptions of John Doe from ages 13 to 18-years-old, was sufficient evidence to immediately remove Father Heines from ministry.”²
4. Heines resigned from ministry in the Diocese of Dallas on October 8, 2015.³

In response to Doe’s disclosure of his abuse to then-Bishop Farrell, available records appear to indicate that Farrell interfered with a civil investigation by failing to report Heines’ conduct to law enforcement⁴ and failing to share the victim’s report with the diocesan review board⁵ and failing to report Heines’

¹ Doe v. Roman Catholic Diocese of Dall., No. DC-18-07025, “Plaintiff’s Original Petition and Request for Disclosure,” 3-5, 9 (D.Tex. 2019)

² Doe v. Diocese of Dall., No. DC-18-07025, “Plaintiff’s Original Petition and Request for Disclosure,” 10 (D.Tex. 2019)

³ According to the Texas Penal Code, Sections 22.011 and 22.021, any sexual contact between an adult and an individual under the age of 17 is classified as statutory rape. The statute of limitations for this offense is 20 years, starting from the victim’s 18th birthday. For cases involving victims who are 18 or older, the statute of limitations is 10 years from the date the offense occurred. Additionally, consent is considered invalid if the sexual contact occurs between a person and a health care professional, member of the clergy, public servant, or an employee of a facility where the victim resides. It appears that if Farrell had reported the allegations against Heines to police immediately after Doe’s disclosure in 2015, the conduct would have been criminally prosecutable. Furthermore, Section 261.101 of the Texas Family Code requires that anyone who suspects child abuse or neglect report it immediately to the appropriate authorities. This obligation applies even to individuals whose communications are typically considered privileged, including attorneys, clergy members, and healthcare professionals. Under the Texas Family Code, it appears Farrell may have also violated state law by failing to immediately report Doe’s report of sexual abuse. Lastly, the Dallas diocese’s Sexual Misconduct Policy included a clause stating, “All Diocesan and Parochial Personnel must comply with all applicable church, federal, state and local laws regarding incidents of actual, alleged or suspected sexual misconduct, and with the procedures outlined in this Policy.”

⁴ Per “Offenses against the person” in State of Texas Penal Code, Sections

⁵ The *Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons (Essential Norms)* was approved by the Apostolic See in December 2002, and a revision was approved January 2006. These documents mandate that each bishop/eparch establish a diocesan review board to “function as a confidential, consultative body to the bishop/eparch on matters related to the response of the local church to issues surrounding the sexual abuse of minors by priests and deacons.”

conduct to the Congregation for the Doctrine of the Faith.⁶

1. On the weekend of October 10-11, 2015, the Diocese of Dallas issued a letter to parishioners at St. Joseph's Catholic Church in Richardson, Texas, reading, *"I write to you today out of pastoral concern about a difficult matter related to your Pastor, Father Timothy Heines. I recently received a complaint about his involvement in serious boundary violations with adults. These incidents occurred in 1996 and 2008 prior to his assignment at St. Joseph. We have not received information regarding any incident here in the parish. I emphasize that this involved inappropriate relationships with adults."*⁷
2. Doe alleged that after Heines' retirement, the Diocese of Dallas and Farrell became less responsive to him, Farrell referred to him as a "consenting adult," and the diocese refused to acknowledge the abuse he suffered as a minor.⁸
3. Doe felt revictimized by the way he was treated by Farrell and the Diocese of Dallas and attempted suicide and engaged in self-harm several times in the months following Heines' retirement.
4. On May 30, 2018, Doe filed a suit for fraud against the Diocese of Dallas. Doe alleged five material misrepresentations regarding the Dallas diocese's implementation of its sexual misconduct policy, concerning (i) the investigation and reporting of his claims and (ii) the way it communicated with the community about Heines:
 - i. The diocese did not act in accord with principles of "truth, honesty, and justice" when it lied about the reason for Heines' removal from ministry and when Bishop Farrell refused to acknowledge the abuse Doe suffered as a minor.
 - ii. The diocese was not "open and transparent" when it lied about the reason for Heines' removal from ministry and when Bishop Farrell refused to acknowledge the abuse Doe suffered as a minor.
 - iii. Bishop Farrell did not report Doe's abuse to the diocesan review board.
 - iv. Bishop Farrell and the Diocese of Dallas made no effort to determine whether Doe's abuse constituted abuse against a minor or vulnerable adult.
 - v. Bishop Farrell did not report the Doe's abuse by Heines to the Congregation for the Doctrine of the Faith.⁹
5. The Diocese of Dallas fought against the admissibility of the 2019 affidavit of Detective David Clark of the Dallas Police Department in support of a recently executed search warrant for abuse records in the Diocese of Dallas, who, at the time of the lawsuit, had nine years of experience in the Child Exploitation Unit. In the affidavit, Clark described "representations made by the Dallas Diocese regarding its handling of sexual abuse reports, the Dallas Diocese's failure to appropriately respond to sexual abuse reports, and its negative impact on law enforcements ability to investigate and pursue felony criminal charges for sexual abuse."¹⁰

Priests who served under Farrell after being accused of sexual abuse

⁶ The *Essential Norms* include the this mandate, "When there is sufficient evidence that sexual abuse of a minor has occurred, the Congregation of the Doctrine of the Faith shall be notified."

⁷ Doe v. Roman Catholic Diocese of Dall., No. 05-19-00997-CV, 4 (Tex. App. Aug. 11, 2021)

⁸ Doe v. Diocese of Dall., No. DC-18-07025, "Plaintiff's Original Petition and Request for Disclosure," 10 (D.Tex. 2019)

⁹ Doe v. Roman Catholic Diocese of Dall., No. 05-19-00997-CV, 5 (Tex. App. Aug. 11, 2021)

¹⁰ Doe v. Diocese of Dall., No. DC-18-07025, "Plaintiff's response to Defendant Roman Catholic Diocese of Dallas' Plea to the Jurisdiction," 17 (D.Tex. 2019)

1. Clark's affidavit describes five specific allegations of abuse against Dallas priests, including cases of priests with allegations against them who continued to minister in the Diocese of Dallas during Farrell's tenure.¹¹
 - i. Staff members met with Chancellor Edlund in 2006 to share concerns about Fr. Edmundo Paredes having minors in church offices and his residence on evenings and weekends. Paredes was suspended in 2017 for financial misconduct, and it is believed he fled to the Philippines. The Diocese of Dallas announced in 2018 that Paredes was being investigated for sexual abuse. In 2019, an arrest warrant was issued after a fourth accusation of sexual abuse.
 - ii. In 2018, a woman reported her niece had been abused by Fr. Richard Thomas Brown. Her niece had previously reported the abuse in 2004. Brown's file from the Diocese of Dallas included admissions by Brown that he had "touched" minors in Washington D.C. and Irving, Texas along with a host of allegations from other places Brown had ministered throughout the United States. Brown was eventually included on the Diocese of Dallas' list of credibly accused priests with his status defined as "absent on leave." When Brown was interviewed by Clark in 2019, he admitted to sexually abusing up to 50 children. He was eventually arrested in 2020 in Missouri at the Vianney Renewal Center, on an arrest warrant from Dallas police.
 - iii. A victim contacted Chancellor Edlund in 2015 to report abuse by Fr. Alejandro Buitrago when she was between the ages of five and seven, but said she never heard back with what, if any, action was taken. Buitrago was eventually removed from ministry in 2018. The victim reported her abuse to the police in February 2019.¹²
2. According to the *Essential Norms*, "When even a single act of sexual abuse by a priest or deacon is admitted or is established after an appropriate process in accord with canon law, the offending priest or deacon will be removed permanently from ecclesiastical ministry, not excluding dismissal from the clerical state, if the case so warrants."¹³ If the Diocese of Dallas was in possession of documents that indicated that Fr. Brown, a priest ministering in their diocese, had admitted to sexually assaulting minors, Farrell should not have permitted Brown to remain in ministry
3. When the victim of Buitrago contacted the Diocese of Dallas in 2015 to report her sexual abuse, Farrell should have immediately forwarded the complaint to law enforcement and reported Buitrago's conduct to the Congregation for the Doctrine of the Faith. Yet, the victim filed a police report herself in 2019 and Buitrago was only removed from ministry three years after the victim's report. These omissions could be interpreted as intentional interference with canonical or civil investigations.

Obviously, our concerns are based on the public information provided to the media and documents made available through the 2018 lawsuit against the Roman Catholic Diocese of Dallas. Indeed, that

¹¹ Doe v. Diocese of Dall., No. DC-18-07025, "Ex. 5, Aff. Det. David Clark" (D.Tex. 2019), https://www.bishop-accountability.org/news5/2019_05_15_Clark_Affidavit_Supporting_Search_Warrants.pdf

¹² "Dallas Police Investigation into Sex Abuse Claims by Priests Stalled While Attorneys Sort through Records." Dallas News, November 19, 2019. <https://www.dallasnews.com/news/crime/2019/11/18/dallas-police-investigation-into-sex-abuse-claims-by-priests-stalled-while-attorneys-sort-through-records/>.

¹³ CIC, c. 1395 § 2; CCEO, c. 1453 § 1; Norm 8

public information indicates that Cardinal Farrell followed a course of actions or omissions intended to interfere with or to avoid a civil or canonical investigation by failing to report the conduct of the defrocked Fr. Timothy Heines to law enforcement, failing to share the victim's report with the diocesan review board, and failing to report Heines' conduct to the Congregation of the Doctrine of the Faith. Thus, we request Vatican officials conduct a thorough investigation of the situation, with the results of the investigation being made public. Should an independent special investigator be appointed to examine Farrell's conduct, we request to be notified of this investigator's identity and qualifications.

Since the conduct detailed in this complaint, Cardinal Farrell has been appointed to prominent roles involving leadership and oversight within the Vatican, particularly concerning confidential material. Given our findings, we are deeply concerned about how issues related to sexual abuse and its management within the church hierarchy may be handled under Cardinal Farrell's oversight. Ensuring proper accountability and transparency is crucial to preventing further harm to victims of sexual abuse and the vulnerable.

We appreciate your prompt attention to our request.

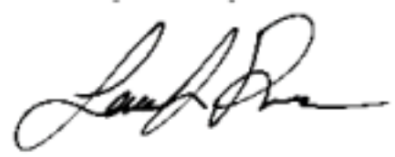
Sincerely yours,



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