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REACHING ACROSS TIME FOR JUSTICE

John V. Doe v. Holy See

Specific Documents Requests and Questions the Vatican must Answer

The following information was prepared by Jeff Anderson and Associates to provide background on the Opinion and Order issued by United States District Judge Michael W. Mosman in the case of *John V. Doe v. Holy See*. Copies of the original Opinion and Order are available on the documents page at www.AndersonAdvocates.com. Questions regarding the following information should be directed to the attorneys listed on the last page of this document.

On April 20, 2011 the Honorable Judge Michael Mosman ordered the Vatican to respond to a number of discovery requests in a clergy sex abuse case. The Court required the Holy See answer the discovery by June 20, 2011. The requests are broken down into 3 categories – document requests, interrogatories (written questions), and requests for admission (Vatican has to admit or deny each statement).

Below are the discovery requests that the Vatican and its officials must answer. The numbers correspond to the actual number in discovery requests.

DOCUMENTS

- A. Vatican Must Produce Documents on the following**
8. **All documents which refer to Andrew Ronan**, including but not limited to correspondence to the Holy See from Ronan, correspondence from Ronan to the Holy See, correspondence to or from the Order of the Friar Servants of Mary, Ronan's admissions to abusing minors, and Ronan's placement in Ireland and the United States.
- B. Vatican Must Produce Documents on the following limited to "general policies and process" for laicization and anything specific to Ronan**

9. All documents which refer to the laicization of a Roman Catholic Priest, including but not limited to the Holy See's process for laicization, any correspondence with ordinaries in the United States regarding laicization of a priest, any correspondence with Religious Orders regarding laicization of one of its priests, and any correspondence with the individual priest.
- C. Vatican Must Produce Documents on the following limited to "general policies of the Congregation for the Doctrine of the Faith ('CDF') regarding sexual abuse" and anything specific to Ronan**
10. All documents which refer to the Congregation for the Doctrine of the Faith (CDF) and sexual abuse by clerics or allegations of sexual abuse by clerics, including but not limited to decisions made by the CDF, all correspondence to and from Ordinaries, all correspondence to and from Religious Superiors, all correspondence with any priest.
- D. Vatican Must Produce Documents on the following limited to "general policies and procedures for training, selecting, or educating priest" and anything specific to Ronan**
11. All documents which refer to the training and selection of individual priests.
- E. Vatican Must Produce Documents on the following limited to "regulation of priests' conduct in general" and anything specific to Ronan**
13. All documents which refer to the Holy See's regulation of an individual priest's conduct, including but not limited to what a priest wears, the places that a priest goes, hours a priest keeps, and where a priest lives.
- F. Vatican must Produce Documents on the following limited to "the Holy See's general authority, policies, practices, and procedures regarding sexual abuse and punishment, removal, relocation, and treatment of priests" and anything specific to Ronan.**
17. All documents which refer to the Holy See's ability to punish, sanction, or restrict a Roman Catholic priest.
18. All documents that refer to the Holy See's authority to remove a priest from an office, relocate a priest to another state or nation, and/or assign a priest to a mission anywhere in the world.
19. All documents that refer to any policies, procedures of practices for the relocation of priests, movement of priests from one country to another, or movement of a priest from one Diocese to another.

21. All documents regarding childhood sexual abuse or other sexual misconduct committed by Roman Catholic priests or officials, including but not limited to any policy, practice or procedures on this subject.

INTERROGATORIES (WRITTEN QUESTIONS)

A. Vatican must answer the following questions

2. Describe the relationship between the Holy See, the Pope, and Andrew Ronan.
4. Describe the process for the laicization of a Roman Catholic Priest as it was followed at the time Andrew Ronan served in ministry, including the role that the Holy See, Pope and the subordinate departments of the Roman Curia such as the Congregation for Religious Institutes, had in that process.
5. Describe the nature and the extent of the authority of the Holy See, Pope and the various departments of the Vatican curia have over administrative, pastoral, disciplinary and doctrinal matters within the Catholic Church.
6. Describe the authority of the Holy See, Pope and the various departments of the Vatican curia over Roman Catholic priests, including the authority of the Congregation for the Clergy, the Congregation of the Doctrine of the Faith and the Congregation for Religious Institutes over Roman Catholic Priests.
14. Describe the authority of the Holy See, the Pope, and all relevant curia congregations, including the Congregation for the Doctrine of the Faith, over sex abuse by clergy in Ireland and the United States.
15. Describe the policies of the Holy See, the Pope, and all relevant curia congregations, including the Congregation for the Doctrine of the Faith, regarding sex abuse by clergy since 1950.

B. The Vatican must answer the following as to “general policies, practices, and procedures implemented by the Holy See regarding sex abuse, and any actions taken with respect to Ronan”

16. Describe the actions taken by the Holy See, the Pope, and all relevant curia congregations, including the Congregation for the Doctrine of the Faith, regarding sex abuse by clergy in Ireland and the United States since 1950.

- C. **Holy See must answer the following as to “general policies applied to priests who committed sexual abuse and any financial arrangements, placements, and pensions related specifically to Ronan.”**
19. Describe the policies applied by the Holy See, the Pope, or any other elements of the curia, to clergy, whether bishops or priests, known or alleged to have committed sexual abuse, including financial arrangements, pensions, and placements.

ADMISSIONS

The Vatican must either admit or deny the following statements:

1. **Admit that Andrew Ronan was an employee of the Holy See.**
2. Admit that Andrew Ronan committed a tortious act while in acting within the scope of his employment with the Holy See.
3. Admit that celibacy is a requirement to be a priest.
4. Admit that the Holy See controls the training for the priesthood.
5. Admit that the Holy See is in control of the laicization of priests.
6. Admit that laicization is equivalent to the firing of an employee.
7. Admit that the Holy See regulates the conduct of individual priests.
9. **Admit that the Holy See has control over the discipline of priests accused of sexual abuse of minors.**
10. Admit that the Holy See has control over the education of priests.
11. Admit that the Pope has sole authority over each person in the Catholic Church.
12. Admit that the Code of Canon Law is binding on each Roman Catholic Priest.
16. Admit that all Roman Catholic priests are employees or officials of the Holy See.

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