

PETITION FOR A HEARING AND CONSEQUENT DECISION
IN VIRTUE OF THE APOSTOLIC LETTER *VOS ESTIS LUX MUNDI*, ISSUED BY HIS
HOLINESS, FRANCIS, ON MARCH 25, 2023

I, Danielle Louise Lacampagne with residence in the city of San Carlos, in the Archdiocese of San Francisco in the State of California, and with my attorney, Jeffrey R. Anderson, Esq., hereby submit this complaint against the Most Reverend Salvatore Cordileone, Archbishop of San Francisco.

Archbishop Cordileone has been the Ordinary of the Archdiocese since July 27, 2012. He was appointed by Pope Benedict XVI at a time when accusations of sexual indulgence against young people of the Archdiocese of San Francisco by members of the clergy of the Archdiocese and clergy and non-ordained members of Institutes of Consecrated Life has demonstrated itself to be a severe problem for the clergy and people of the Archdiocese. Archbishop Cordileone's response to the people of the Archdiocese, but especially to those men and woman who have been victimized by clergy in the Archdiocese, has not been consistently pastoral and caring to them.

I wish to draw attention to two practices that are common in the Archdiocese. First, the repeated failure of Archbishop Cordileone to publicly acknowledge the names of those clerics and religious who are, or were, incardinated or temporarily resident in the Archdiocese and who have been accused of sexual actions against residents of the Archdiocese. Second, the regular practice of the Archbishop of treating victims of clergy sex abuse in a negative and abusive manner.

I hesitate to go into specific detail on each manner until I am assured that this matter will be treated with complete objectivity. However, pursuant to Art. 3, § 3 of *Vos Estis Lux Mundi*, and the supreme interest of the protection of minors and vulnerable persons within the Archdiocese, I submit the following information regarding the conduct by Archbishop Salvatore J. Cordileone and his predecessors Cardinal Archbishop William J. Levada, Auxiliary Bishop John Wester and Archbishop George H. Niederauer.

In 1970s, when I was approximately 8 to 9 years of age, I was sexually assaulted by then-Br. Daniel E. Carter, S.M. who was then a religious order brother and was serving the faithful at Notre Dame des Victories in San Francisco, California. Br. Daniel E. Carter, S.M. was subsequently ordained to the priesthood and was incardinated into the Archdiocese of San Francisco where he has remained for the entirety of his ministry.

In 2002, I filed a civil lawsuit against the Archdiocese of San Francisco, California arising out of Fr. Daniel E. Carter's sexual assault of me as a child. Thereafter, I became aware that the Archdiocese of San Francisco temporarily removed Fr. Daniel E. Carter for purposes of conducting an investigation into his conduct by the Archdiocese of San Francisco Independent Review Board under the purview of then Archbishop William J. Levada.

However, despite conducting an investigation, the Archdiocese of San Francisco and Archbishop Levada found that Fr. Daniel E. Carter's sexual assault of me was "not sustained." Archbishop Levada swiftly restored Fr. Daniel E. Carter's faculties and returned him to active ministry where he remained until 2023 despite there having been at least six civil lawsuits filed in California State Court by 2022 arising out of sexual abuse of minors committed by Fr. Daniel E. Carter. I also understand there to be additional individuals who were sexually assaulted by Fr. Daniel E. Carter when they were children who did not file a lawsuit, whose lives have been inextricably and permanently harmed by Fr. Daniel E. Carter's immoral conduct.

In approximately 2005, the Archdiocese of San Francisco settled my civil lawsuit against them arising out of Fr. Daniel E. Carter's sexual abuse of me in exchange for monetary payment. However, knowing that Fr. Daniel E. Carter remained in active ministry in the Archdiocese of San Francisco and with unbridled access to children, I have continued to exert significant efforts to urge the Archbishops of the Archdiocese of San Francisco to warn the laity of Fr. Daniel E. Carter's dangerous propensities and remove Fr. Daniel E. Carter from ministry—including, but not limited to, telephone calls and written correspondence to the Archdiocese in 2012, 2013, 2015, 2017, and 2018.

To that end, I have vigorously pursued personal meetings with the Archbishops of the Archdiocese of San Francisco. I did, indeed, personally meet with both Auxiliary Bishop John Wester (2005) and Archbishop George H. Niederauer (2010). Yet, despite my pleading to them to

protect the children of the Archdiocese of San Francisco and to facilitate healing with those who had already fallen victim to Fr. Daniel E. Carter, neither Auxiliary Bishop John Wester or Archbishop Niederauer took further action. Instead, both Auxiliary Bishop John Wester and Archbishop Niederauer allowed Fr. Daniel E. Carter to remain in active ministry and to maintain access to the children in the Archdiocese's care.

Further, despite repeated requests for a meeting with Archbishop Cordileone to urge that he do what his predecessors failed to do and protect the children, Archbishop Cordileone has continually and without justification refused to speak to me regarding the sexual abuse I suffered at the hands of a priest of the Archdiocese and the continual threat that Fr. Daniel E. Carter poses to children.

Indeed, it is not for my personal satisfaction, vengeance, greed, or hubris that I seek to impart the sexual assaulted I suffered. Rather, it is my past, present, and future concern for the safety of the children entrusted in the care of the Archdiocese, Archbishop Cordileone, and Fr. Daniel E. Carter. The protection of children mandates that Archbishop Cordileone halt his longstanding refusal to publicly acknowledge to the faithful in the Archdiocese of the San Francisco that Fr. Daniel E. Carter has been accused of sexually assaulting at least seven children. It is imperative that those families who comprise the laity and the public at large be aware of the dangers that representatives of the Archdiocese pose to children.

With these matters in mind I turn to the gravamen of the matter, which is the continual violation of the mandates of *Vos Estis Lux Mundi* by Archbishop Cordileone through his repeated violations of Title I, Art. 1, §1(b) and his conduct “of actions or omission intended to interfere with or avoid civil investigations, whether administrative or penal, against a cleric or a religious regarding the delicts referred to in letter a) of this paragraph.” Archbishop Cordileone's violations include, but are not limited to the following:

First, refusing to make publicly available a list of those clerics within the Archdiocese of San Francisco who have been credibly accused of the sexual assault of minors or vulnerable persons, despite Archbishop William J. Levada having publicly recognized in a 2004 edition of *Catholic San Francisco* that there have been “51 priests accused of

credible allegations of sexual abuse involving a minor from 1950 to the present” in the Archdiocese of San Francisco.

This conduct, persisting for over a decade, violates Article 6 of the Charter for the Protection of Children and Young People, which absolutely mandates “Dioceses/eparchies are to be open and transparent in communicating with the public about sexual abuse of minors by clergy within the confines of respect for the privacy and the reputation of the individuals involved. This is especially so with regard to informing parish and other church communities directly affected by sexual abuse of a minor.”

Second, allowing Fr. Daniel E. Carter, amongst other clerics, to remain in ministry despite having committed multiple acts of sexual abuse of minors in violation of Article 5 of the Charter for the Protection of Children and Young People. Article 5 mandates that “Diocesan/eparchial policy is to provide that for even a single act of sexual abuse of a minor – whenever it occurred – which if admitted or established after an appropriate process in accord with canon law, the offending priest or deacon is to be permanently removed from ministry and, if warranted, dismissed from the clerical state.”

Third, allowing clerics who have sexually assaulted children to remain in active ministry and with access to children in violation of Article 10 of the Charter for the Protection of Children and Young People which mandates that “[t]he whole Church, both at the diocesan/eparchial and national levels, must be engaged in maintaining safe environments in the Church for children and young people.”

Fourth, refusing to provide pastoral outreach to not just myself but other survivors of sexual assault as children at the hands of clerics of the Archdiocese in violation of Article 1 of the Charter for the Protection of Children and Young People. As set forth in Article 1, and as stated by Pope Benedict XVI in his 2008 address to the U.S. bishops: “It is your God-given responsibility as pastors to bind up the wounds caused by every breach of trust, to foster healing, to promote reconciliation and to reach out with loving concern to those so seriously wronged.”

The aforementioned conduct is in direct violation of Title I, Art. 1, §1(b) of *Vos Estis Lux Mundi* because it concerns an Archbishop whose actions interfere with and avoid civil or

canonical investigations arising out of delicts against the sixth commandment of the Decalogue as defined by Title 1, Art. 1, §1(a) and include the sexual assault of children. By continually presenting known-sexually abusing clerics as safe and “in good standing”, and failing to publicly acknowledge the harm they have and continue to cause, Archbishop Cordileone is avoiding and interfering with civil investigations conducted by proper civil authorities by suppressing allegations of sexual abuse committed by clerics of the Archdiocese due his continued refusal to publicly identify clerics who have been accused of “performing sexual acts with a minor or a vulnerable person.”

It is due time that the canonical process of *Vos Estis Lux Mundi*, promised to me as a victim of clergy sexual assault, affirm Pope Francis’ “conviction that everything possible must be done to rid the Church of the scourge of the sexual abuse of minors and to open the pathways of reconciliation and healing for those who were abuse.” (Letter of His Holiness Pope Francis to the Presidents of the Episcopal Conferences and Superiors of Institutes of Consecrated Life and Societies of Apostolic Life Concerning the Pontifical Commission for the Protection of Minors, February 2, 2015).

Therefore, we, Danielle Louise Lacampagne and Jeffrey R. Anderson, hereby submit a report pursuant to Title 1, Art. 3, §2 of *Vos Estis Lux Mundi* against Archbishop Salvatore J. Cordileone. As this report concerns Archbishop Cordileone, who is a person indicated in Title II, Art. 6, we submit this report to the Holy See through the Pontifical Representative, H.E. Christophe Cardinal Pierre, pursuant to Title 1, Art. 3, § 3. Finally, we demand this report be forwarded to the Holy See and the senior suffragan Bishop by promotion as mandated by Title II, Art. 8, § 2 because this report concerns the Metropolitan See.

Dated: 1/5/2025

Signed: 
Danielle Louise Lacampagne

Dated: 1/5/2025

Signed: 
Jeffrey R. Anderson, Esq.