PETITION FOR A HEARING AND CONSQUENT DECISION

IN VIRTUE OF THE APOSTOLIC LETTER VOS ESTIS LUX MUNDI, ISSUED BY HIS HOLINESS, FRANCIS, ON MARCH 25, 2023

I, Sandra Marie Oldfield, with residence in British Columbia, Canada, 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 Archbishop John R. Quinn, Cardinal Archbishop William J. Levada, and Archbishop George H. Niederauer.

From approximately 1981 to 1990, when I was approximately 15 to 24 years of age, I was repeatedly sexually assaulted by Fr. Lawrence J. Finegan who was a cleric serving the faithful in the Archdiocese of San Francisco where I and my family were members of the faithful. In addition, in approximately 1982 to 1983, when I was approximately 16 years of age, I was sexually assaulted by Fr. Gregory Ingels who was a teacher at Marin Catholic High School in the Archdiocese of San Francisco where I was a student.

In approximately 1990, when Fr. Finegan's sexual assaults of me finally ended and with the understanding that Fr. Finegan continued to have access to children in the Archdiocese, I reported Fr. Finegan's sexual assaults of me to the Archdiocesan Chancery under the control of Archbishop John R. Quinn. Despite my report of having been sexually assaulted as a child by a priest of the Archdiocese, I was never contacted by any representative of the Archdiocese. Instead, I was left in the dark.

In approximately 2002, understanding that Fr. Finegan continued to have access to children of the Archdiocese, I contacted the Fairfax Police Department in California to report Fr. Finegan's repeated sexual assaults and abuse of me as a child. In connection to this report and criminal investigation, I conducted a telephonic conversation with Fr. Finegan in which he admitted to having sexually assaulting. This conversation containing Fr. Finegan's sexual assault of me was recorded by the Fairfax Police Department and subsequently summarized by Fairfax police in an ensuing report. Despite Fr. Finegan's admission, occurring during the tenure of Cardinal Archbishop William J. Levada, I, again, was not contacted by the Archdiocese and, again, left in the dark.

Thereafter, in approximately 2022, I commenced a civil lawsuit in California Superior Court against the Archdiocese of San Francisco arising out of the sexual assault I suffered as a child at the hands of Fr. Lawrence Finegan and Fr. Gregory Ingels. For more than a year, neither I nor my attorneys were contacted by the Archdiocese in regard to the status of Fr. Finegan and his contact with minors in the Archdiocese. Yet again, the Archdiocese, now under the control of Archbishop Salvatore J. Cordileone, left me in the dark.

In 2024, I came to understand that Fr. Lawrence Finegan remained on the Archdiocese's list of "Priests and Deacons with faculties (approved for ministry)." Decades later, despite multiple reports and an admission by Fr. Finegan, he was publicly held by the Archdiocese and Archbishop Cordileone as a priest in good standing within the Archdiocese with access to children. In late 2024, I was finally contacted by an attorney for the Archdiocese who requested an interview with me on behalf of the Archdiocese's Internal Review Board. It was not until after that interview, then over 30 years since I first reported Fr. Finegan to the Archdiocese of San Francisco, that I learned he had been removed from ministry.

However, the Archdiocese and Archbishop Cordileone have refused to publicly notify the faithful that Fr. Finegan no longer is approved for ministry in the Archdiocese of San Francisco. The recent removal of Fr. Finegan's faculties without public acknowledgement poses as grave and imminent threat to children in the Archdiocese whose families may not have had the occasion to check the updated list of priests with faculties maintained by the Archdiocese.

Indeed, this refusal by Archbishop Cordileone to publicly release a list of clerics and layperson within the Archdiocese known to have sexually assaulted minors is the gravamen of this matter. The faithful are entitled to know whom amongst them, including representatives of the Archdiocese and the Church, may pose a risk to the health and safety of the children. This is not a matter for Archbishop to decide in secret and without public acknowledgement. There are children in the Archdiocese today who are at risk of being exposed to sexually abusive clerics known to Archbishop Cordileone.

As such, Archbishop Cordileone continues to violate the mandates of *Vos Estis Lux Mundi* 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 that

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 and despite Fr. Finegan being recorded by police admitting to having sexually assaulted a child on numerous occasions.

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. Lawrence J. Finegan, amongst other clerics, to remain in ministry despite having committed multiple acts of sexual abuse of a minor 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." Fr. Lawrence J. Finegan was allowed to remain in active ministry until at least 2011 and retained faculties in the Archdiocese until 2024 despite having admitted to sexual abuse of a minor in 2002 and despite his sexual assault being reported to the Archdiocese in approximately 1990.

Third, allowing clerics, such as Fr. Lawrence J. Finegan, 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 parishioner and 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, Sandra Marie Oldfield and Jeffrey R. Anderson, Esq., hereby submit this 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, I 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

Dated:_	1/5/2025	Signed: Sandra Marie Oldfield
Dated:_	1/5/2025	Signed: Linderson, Esq.

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.