

IN THE IOWA DISTRICT COURT FOR SCOTT COUNTY

JOHN DOE III,

Plaintiff,

vs.

FATHER JAMES JANSSEN, FATHER
FRANCIS BASS, THEODORE ANTHONY
GEERTZ, and THE DIOCESE OF
DAVENPORT,

Defendants.

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Law No. 101428

AFFIDAVIT OF DR. MARK F. SCHWARTZ

STATE OF MISSOURI

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COUNTY OF ST. LOUIS

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Dr. Mark F. Schwartz, being first duly sworn upon oath, deposes and states as follows:

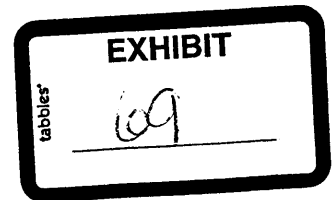
1. I am a psychologist and counselor licensed in the State of Missouri and the State of

Louisiana who for 15 years has served as the Executive Director of the Masters and Johnson Clinic in Ballwin, Missouri, and New Orleans, Louisiana. A copy of my Curriculum Vitae is

attached which provides a summary of my professional experience and publications.

2. I am a certified Sex Therapist, Sex Educator, Sexologist, and hold a Doctor of Science from the Johns Hopkins University. Throughout my career I have specialized in human sexuality issues, particularly those related to sexual trauma, sexual compulsions, and paraphilias, including pedophilia.

3. I have provided consultation in cases involving sexual misconduct and abuse by a variety of types of professionals and others, including clergy such as Roman Catholic priests. I



have received appointments to various committees and commissions related to the sexual abuse and sexual compulsions of individuals.

4. I have evaluated and counseled victims of sexual trauma, assessed damages of abuse, and treated sexual offenders throughout my career.

5. I have testified as an expert or been qualified as an expert in the areas of sexual trauma and sexual compulsions and deviations in multiple jurisdictions, in both federal and state courts. I have provided testimony in civil and criminal trials.

6. I have taught classes and workshops in sexual trauma and compulsions at the undergraduate and graduate level for more than 25 years.

7. In addition to my own professional training and experience, I am knowledgeable about the professional literature in a number of fields insofar as it concerns sexual abuse by priests and other clergy, and its impact.

8. I have been employed by the firm of Betty, Neuman & McMahon, L.L.P., counsel to the Plaintiff in this case, to examine the facts and provide expert opinion. The opinions which follow are based on my professional training, knowledge and experience.

9. My opinions assume that the Plaintiff was a minor child at the time of all perpetrations of sexual abuse, which occurred in the mid to late 1960s, or thereabouts.

10. It is my professional opinion, to a reasonable degree of psychological certainty, that the Plaintiff in this case sustained considerable damages as a result of the sexual trauma perpetrated by Fr. Janssen, Fr. Bass and Fr. Geerts. On a scale of one to ten, I would rate the damages sustained by the Plaintiff as a nine.

11. John Doe III stated that the memories of the abuse began at age twelve. Father Janssen was assigned to St. Joseph Catholic Church, Plaintiff's parish, in Fort Madison, Iowa at

around that same time. The first act of sexual abuse happened in Fr. Janssen's office located underneath the stairway near the gym at St. Joseph's School. The Plaintiff was told by Fr. Janssen that the sexual contact was "our secret." After the initial sexual contact, there were numerous perpetrations in the school office as well as in the school locker room and in a garage housing a restored Model A Ford. Many times, the sexual contact involved other boys and there was group sex. In addition, Fr. Janssen took a number of boys, including the Plaintiff, to Farmington, Iowa to visit a priest named Fr. Geerts. While at Fr. Geerts' rectory, the two priests and all of the boys would have group sex. During the group sex, Fr. Janssen took Polaroid nude photographs of Plaintiff and the other boys with erections. At times, another priest named Fr. Bass would join the group and participate in the group sex. There was at least one time that Fr.s Janssen, Bass and Geerts went with approximately six (6) boys to a cabin on the Mississippi where there was an entire weekend of group sex.

12. During one of these weekends at the cabin, Plaintiff experienced a dissociative experience where he actually felt as if he was floating outside his body above the cabin. Plaintiff cannot remember what sexual acts took place during that weekend and has a recurring dream about that night where he was always crying and screaming.

13. One especially impactful sexual incident upon the Plaintiff occurred when Fr. Janssen was scheduled to celebrate mass one Sunday and Fr. Janssen had a boy sit underneath the altar hidden from the congregation's view. When Fr. Janssen approached the altar, the boy reached underneath Fr. Janssen's robe and masturbated him. Although Plaintiff was not the boy, Plaintiff knew that the acts occurred and he has been troubled by the incident throughout his life.

14. In addition to the group sexual contact, Fr. Janssen also taught the Plaintiff to shoplift and steal. Over time, Plaintiff stole coins from coin shows, as well as other items and

gave those items to Fr. Janssen.

15. In order to force Plaintiff into silence regarding the sexual abuse, Fr. Janssen instructed Plaintiff to never tell anyone, ever, about the abuse. Fr. Janssen told Plaintiff that if Plaintiff ever told anyone about the abuse, that Plaintiff would never get married because no woman would ever want to marry someone who had committed such acts. In addition, Fr. Janssen told Plaintiff that even if he did get married and his wife found out, she would never trust him around kids because his wife would always think that he was having sex with his sons. This particular threat has impacted Plaintiff greatly.

16. Plaintiff has experienced significant psychiatric problems throughout his life, but has, unfortunately, never formally received psychiatric treatment. During the 1980's, Plaintiff experienced panic attacks and agoraphobia where Plaintiff did not leave his parents home for three to four years. At some point, Plaintiff was diagnosed with Post Traumatic Stress Disorder (PTSD) and Dysthymia by a family physician and he was prescribed Zoloft. Plaintiff benefitted greatly from the Zoloft. Zoloft is typically prescribed for persons experiencing depression and anxiety.

17. Plaintiff does not report sexual problems or difficulties with gender or homosexuality.

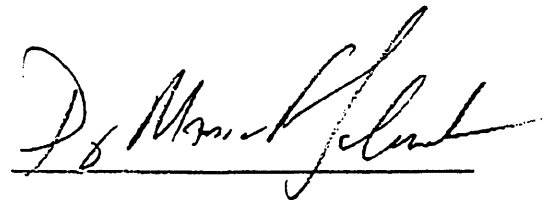
18. Plaintiff's life has been severely impacted by the abuse. As discussed below, Plaintiff suffers from depression, anxiety and dissociation and is unable to function at work or in relationships without medication. Plaintiff is rageful, sad and suffers from low self esteem. His character has been impaired by witnessing acts of sexual abuse, stealing and even sex at the altar.

19. It is my professional opinion, to a reasonable degree of psychological certainty, that the Plaintiff has manifested in the past and currently manifests symptoms consistent with

Post-Traumatic Stress Disorder, depression and anxiety, which are attributable to the sexual trauma perpetrated by Fr. Janzen, Fr. Bass and Fr. Geerts. It is also my professional opinion that the Plaintiff has suffered with Post-Traumatic Stress Disorder from the time of the abuse to the present. As a result of the Post-Traumatic Stress Disorder, Plaintiff suffers a significant psychological disability and impairment.

20. It is my professional opinion, to a reasonable degree of psychological certainty, that symptoms manifested by the Plaintiff resulted in various coping mechanisms which prevented the Plaintiff from appreciating the nature and impact of the sexual abuse. This is common with victims of sexual abuse. It is further my opinion that the passage of time to the age of majority alone would not bring about any greater ability to comprehend what happened and its impact, nor would the impact of such abuse be likely to diminish without the plaintiff receiving psychological assistance. Should the court so request, I would be pleased to amplify any of my opinions stated herein, or to conduct a psychological examination to further examine these issues.

Further Affiant sayeth not.



Dr. Mark F. Schwartz

Sworn and subscribed before me,

this the 14th day of May, 2004.


NOTARY PUBLIC

My commission expires: JANUARY 13 2007

I WITNESS THAT THE SIGNATURE ABOVE
IS THAT OF DR. MARK F. SCHWARTZ.

