MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J EISENZIMMER
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TELEPHONE (612) 228-1911
FACSIMILE (612) 223-5483

WILLIAM C MEIER
(1920 1981)
TIMOTHY P QUINN
(1921 1991)
ALOISD KENNEDY JR
(OF COUNSEL)

May 3, 1991

Mr. James P. Tweedy
Attorney at Law
Edinburgh Executive Office Plaza
8525 Edinbrook Crossing
Suite 201
Brooklyn Park, MN 55443

Re: [redacted] vs. The Archdiocese of Saint Paul and Minneapolis and Reverend Richard Jeub

Dear Mr. Tweedy:

C O P Y

This letter will confirm our telephone conversation on Friday, May 3, 1991. I indicated that I had been unable to confirm insurance coverage for the Archdiocese of Saint Paul and Minneapolis for the period from January 1968 to January 1970, which is the period of time within which your client claims that she was sexually and emotionally abused by Reverend Richard Jeub. I indicated that I would continue to attempt to confirm that insurance coverage for the period of time in question and would be in touch with you in regard thereto.

You indicated to me that you were concerned that under a certain reading of the statute of limitation the time within which your client had to bring her claim may be drawing near. I indicated that rather than having you prepare and serve a summons and complaint and rather than having my client execute a partial waiver of the statute of limitations, that I would write you this letter asking that you hold off commencing any legal action and give me sufficient additional time to locate and confirm any insurance coverage. You specifically agreed upon my request to defer any further action relative to commencement of legal action and agreed to give me such time as you would deem appropriate to undertake the actions as I have indicated.

I will continue to move forward on this matter and will be in touch with you once I have received further information.

May 3, 1991
Re: [redacted] vs. The Archdiocese of Saint Paul and Minneapolis
and Reverend Richard Jeub
Page 2

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

Andrew J. Eisenzimmer

AJE:crb
cc: Reverend Kevin M. McDonough

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

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WILLIAM C MEIER
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(1921 1991)
ALOIS D KENNEDY JR
(OF COUNSEL)

May 3, 1991

[redacted]

Re: [redacted] vs. The Archdiocese of Saint Paul and Minneapolis and Reverend Richard Jeub

Dear [redacted]:

COPY

This letter will confirm our telephone conversation on Friday, May 3, 1991. I indicated that I had been unable to confirm insurance coverage for the Archdiocese of Saint Paul and Minneapolis for the period from January 1968 to January 1970, which is the period of time within which your client claims that she was sexually and emotionally abused by Reverend Richard Jeub. I indicated that I would continue to attempt to confirm that insurance coverage for the period of time in question and would be in touch with you in regard thereto.

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I will continue to move forward on this matter and will be in touch with you once I have received further information.

May 3, 1991
Re: [redacted] vs. The Archdiocese of Saint Paul and Minneapolis
and Reverend Richard Jeub
Page 2

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

Andrew J. Eisenzimmer

AJE:crb
cc: Reverend Kevin M. McDonough

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Saint Paul, Minnesota 55102-2197

The Chancery

May 9, 1991

Sr. Carolyn Wittman, CSJ
Church of St. Mark
2001 Dayton Avenue
St. Paul, MN 55104

Dear Sr. Carolyn,

I am writing to inquire as to whether you know the whereabouts of a former Sister of St. Joseph, [redacted]. It is my understanding that she left the Sisters of St. Joseph sometime in [redacted] and was a [redacted] at St. Mark's during those days.

Knowing that you were very much a part of St. Mark's at that time and knowing that you have some very extensive connections with the Sisters of St. Joseph, I'm wondering if you could possibly find out where she is or how I might be able to track her down. We have reason to believe that she may have been the victim of some abuse, and we have some responsibility to follow up on that.

If you have any ideas about this or could offer any assistance to me, please feel free to call or write me. I thank you very much for your willingness to help.

Sincerely,

Reverend Michael J. O'Connell
Vicar General
Moderator of the Curia

MJO:jd

P.S. I still remember you with great fondness as principal of Nativity School when I was in 3rd grade there in 1949.

St. Mark's Convent
1976 DAYTON AVENUE
ST. PAUL, MINNESOTA 55104

May 21, 1991

Reverend Michael O'Connell
Vicar General
Moderator of the Curia
Archdiocese of Saint Paul and Minneapolis
226 Summit Avenue
St. Paul, MN 55102-2197

Dear Michael O'Connell,

[redacted] is now the wife of [redacted]. They and their child live at [redacted]

Your understanding of [redacted]'s story is accurate. She was a [redacted] at St. Mark's; she did leave the [redacted] and she seems to be happier now than she was in the past. I see her on rare occasions and our exchange and "catch up" is always pleasant.

I hope this is of help. I, too, have fond memories of a little third grader named Mike O'Connell who was always eager to cooperate and to learn. I wish you well,

Sincerely,

Sister Carolyn

Sister Carolyn Wittmann, CSJ

Bcc: Archbishop John [redacted] Roach
Bishop Robert Carlson
Bishop Joseph Charron
Father Michael O'Connell
Mr. Andrew Eisenzimmer

May 22, 1991

Reverend John F. Brandes
Church of St. William
6120 5th Street, Northeast
Fridley, Minnesota 55432

Dear Father Brandes,

I am writing to you about a matter of some sensitivity. Please understand that the intention of this letter is only to supplement the information that we have available in dealing with a disciplinary matter involving another priest.

I have met recently with [redacted]. While she was still single, [redacted] was involved in a relationship with Father Richard Jeub which might be characterized as sexually exploitative. We have been working both with [redacted] and with Father Jeub to respond to the pain that both of them have experienced.

[redacted] recalls that in about she came to talk with you. At that time, she was a parishioner at St. Mark in St. Paul. She recalls raising some concern with you about Father Jeub's behavior and seeking your advice. She is somewhat vague about what your response was, although it seemed to include some suggestion that the issue be dismissed. I want to emphasize, by the way, that she holds no anger or bitterness to you.

This is an important piece of information for the Archdiocese, however, because there have been other allegations regarding Father Jeub. The question of what complaints were made about him when may affect the disposition of other legal issues. It is for that reason that I am writing to you for some clarification.

Do you have any recollection of having spoken with [redacted] about Father Jeub during that period? Do you have any other recollection about complaints received about Father Jeub? If so, do you remember what you did with that information?

John, understand that I am not attempting any sort of "inquisition" here. I simply want to make certain that the Archdiocese has as much information

available to us as is possible as we are pursuing a resolution of some past harm.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Chancellor
Episcopal Vicar

KMM:ggr

[redacted]

May 28, 1991

Dear Kevin,

Enclosed are my receipts for therapy for the month of May — at least a copy of the receipts. I spent $390.00; I should be reimbursed $195.00.

I was glad to learn, through Phyllis Willwersheid, that Jeb had only been present at a funeral at St. Kevin's and had not been a presiding priest or co-celebrant. I don't know if you can appreciate how important it is to me, as someone recovering from the breach of trust that constitutes sexual exploitation, that I be able to trust your word that Jeb will not be engaging in active ministry for some time. In this scare about the funeral, I came to realize that, for me, active ministry and sacramental ministry are nearly synonymous. It is offensive to me to think of him celebrating Eucharist especially in a public setting.

Getting back to costs, I am still waiting for a response to my letter of April 29, 1991. The therapy cost for April totalled $480.00; I am awaiting reimbursement of $240.00. I am also awaiting a response to the question I posed around reimbursement for the therapy that helped me get to the place of reporting Jeb to you back in 1987. I look forward to hearing from you soon.

see above $1415.00 + ed. $307.00 on 5/27

In Christ

[redacted]

cc: Phyllis Willwersheid

May 28, 1991

Archbishop Roach -

I've been thinking a lot about the hour we spent talking together in early April. I am grateful to have had the opportunity to meet with you and to hear you talk about Father Geab. I am glad to learn that you are unhappy with him and do not approve of his behavior. It was good to be able to clarify the questions I brought about things you had been quoted as saying in the newspaper. Your response helped me to clear some of my anger and mistrust of the Church.

The part of the hour that meant the most to me was when I sensed that you genuinely wanted me to come back to the Roman Church. I needed to hear that my absence was noticed, that it is important to you that I am currently separated from the Roman Church and that I am welcome back there. It was only in hearing you say that that I knew it was what I needed and was the real purpose in meeting with you.

I've been thinking a lot about where it might be safe to test the waters, so to speak. It's difficult enough to find my place in the Church as a single gay woman. Being the survivor of sexual exploitation by a priest only adds to the feeling of being a marginal person, of not having a place.

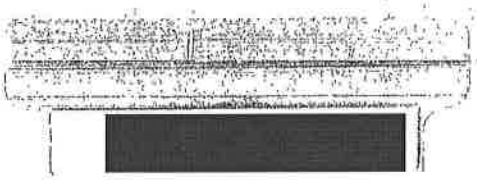
Thank you for meeting with me, for taking the time. The Church has taken strides in dealing with women such as myself. I am glad to know that it is still open to learning more about dealing with people with compassion. By taking time in dealing with me face to face, you show your own sense of integrity and you affirm mine. You have opened

the door to hope.

I ask that you keep me in your prayers, as I do you.

In Christ,

[redacted]



CONFIDENTIAL

DATE: May 29, 1991

MEMO TO: Kevin McDonough

MEMO FROM: Phyllis A. Willerscheidt

SUBJECT: Concerns of [redacted]

I received another phone call from [redacted] with regard to Jeub's appearance at the recent funeral service at St. Kevin's. I assured her that he was there with permission because the deceased was a personal friend.

She is also concerned about the merger of St. Kevin's and Resurrection. She doesn't know any of her daughters neighbors and is concerned that he might come out of one of their homes and she would not feel "safe" in that neighborhood.

qa: [redacted]

DATE: May 30, 1991

MEMO TO: Kevin McDonough

MEMO FROM: Phyllis A. Willerscheidt

SUBJECT: Baptism Letter - [redacted]

As I stated in our meeting, [redacted] was quite distressed about the letter that was given to parents of a newly baptized baby at St. Kevin's parish. The priest (Father Walker) that performed the baptismal rite either gave out a letter or spoke about the letter that had been written by Fr. Jeub. The letter is an item that is to be given to the child when they achieve their thirteenth birthday.

The concern was raised about Father Jeub having his name on the letter. There was some discussion as to why he is still being mentioned as the writer of the document. The aforementioned letter was given to a sister of [redacted] last Sunday, May 26th. Apparently [redacted] called and told [redacted] about it. As you can see, any kind of communication from Father Jeub is distressing to all of his victims.

DATE: MAY 30, 1991

MEMO TO: FR. KEVIN MCDONOUGH

FROM: FR. MICHAEL O'CONNELL

SUBJECT:

Marilyn - Jeub file, please.

All of the attached puts the further pursuance of Jueb victims in your hands.

Jerb

May 30, 1991

[redacted]

Dear [redacted],

Thank you very much for your letter of May 28th.

I thought a good deal about the time we spent together. I must tell you again, if I didn't then, that I'm really impressed with your own integrity.

It seems to me that your journey back to the Roman Catholic Church is one that has to be pretty much at your pace. If you need doors opened for you, let me know. My guess is that that won't be true, but I don't want anything to make it hard for you.

Be assured of my prayers.

Sincerely yours in Christ,

Most Reverend John R. Roach, D.D.
Archbishop of Saint Paul and Minneapolis

PERSONAL AND CONFIDENTIAL

bcc- Fr. McDonough
Phyllis Willerscheidt

June 4, 1991

Reverend Monsignor Richard E. Pates
Church of St. Kevin
5844 28th Avenue, South
Minneapolis, Minnesota 55417

Dear Monsignor Pates,

I have received the enclosed memorandum from Mrs. Phyllis Willerscheidt of the Archbishop's staff. Mrs. Willerscheidt serves as an advocate for several of the people who have been sexually victimized by Father Richard Jeub. In that role, she keeps in contact with these people and informs the Archdiocese of special concerns they have.

Several of these women are in fairly regular contact with one another. We have had some success in recent months in building some trust among them in the Archdiocese. Still, they are tremendously mistrustful of Father Jeub, and they have some suspicion that he will "work his way back" into active ministry and then hurt other women. These suspicions are tremendously disturbing to these women, and they interfere with their healing processes. I might also add that the suspicions make at least one or two of the victims more likely to pursue litigation.

I am enclosing the memorandum from Mrs. Willerscheidt both to call attention to this specific practice mentioned and also to seek your help in a wider concern. If there is still a letter being used at baptism which carries Father Jeub's name, then I would ask you to modify it to exclude Father Jeub's name. Although none of his abuse victims seem to have been members of St. Kevin's, at least two have close relatives living in the parish who are of child bearing age. What might seem to be nothing more than a nice recollection of a former pastor becomes for them a major trauma.

In the wider picture, I am writing to ask your help in seeing that his visibility is kept very low in the parish. As you and I have discussed in the past, he is not permitted to engage in public sacramental ministry anywhere currently, and especially at St. Kevin. While it may seem unreasonable to keep a former pastor out of the parish, particularly during the sort of transition that you are experiencing, I hope that you can understand how important this is to us as we try to resolve the personal pain, mistrust, and litigation threats which arise from past misconduct.

I would be happy to talk about any of this with you if you would like. I apologize if this letter seems a bit "heavy," but I am afraid that that is the legacy that misconduct like that of Father Jeub leaves behind. I wish you peace and blessings in the summer months.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Chancellor
Episcopal Vicar

KMM:ggr

Enclosure

bcc: Bishop Robert Carlson
Reverend Austin Ward
Mr. Andrew Eisenzimmer
Mrs. Phyllis Willerscheidt

June 4, 1991

[redacted]

Dear [redacted]

Thank you for your recent letters. I am embarrassed to be responding so tardily. I thought that I had seen to the April payment several weeks ago, but apparently I had not done so. It is my experience that it sometimes takes two or three months of attempts until we get a "smooth" system of reimbursement worked out. We are assisting a couple of other people, and each situation is just a little different. This is the sort of thing that moves more smoothly when it is standardized, but it is precisely because we are trying to treat you as a person and not as a "case" that makes it difficult to do that. Feel free to call, send me a nasty note, or launch a rock through my window at St. Peter Claver if I mess up again! Seriously, I ask your patience until we have a regular response with you that fits.

I have been dragging my feet a little bit on the question of the full reimbursement for past therapy costs prior to 1987. Please understand that I am not dragging my feet in the sense of trying to find a way out of it. I believe that ever since Bishop Robert Carlson made that offer in 1987 we have been committed to do so. I apparently did not understand you correctly at our April meeting, but I have no intention of going back on Bishop Carlson's original offer.

The only hesitation is in regard to the mechanics of reimbursement. I had not realized the scale of the outlay which you had to make. When we speak in terms of amounts approaching $10,000.00, then I believe we will want to seek some recovery from our own insurers. To get that arranged involves my sitting down with our attorney and our finance director as well as with the insurers. This is, of course, our internal problem and not yours. In that sense, my delay has been unfair to you. I now am taking the occasion of your May 28 letter to get that done.

I hope to have some word to you about how that reimbursement will take place before the end of this month. Let me repeat that this is not a question of "whether" but only of "how." We will honor the commitment Bishop Carlson made to you.

June 4, 1991

Once again, I apologize for my slow response to what I have already promised to do in the past. Thank you for reminding me.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Chancellor
Episcopal Vicar

KMM:ggr

June 6, 1991

Father McDonough -

Phyllis Willerscheidt (ext. 497) said [redacted] told her an agreement was made in her case that the archdiocese would pay up to $600 for her therapy costs, and that anything over that amount is to be taken out of the settlement. Phyllis wants to know if this is policy, and if so, is the same arrangement made for all the victims?

1

She also said [redacted] wants to make a women's retreat soon, but only in a retreat center staffed by women. She doesn't want any male retreat masters, or a place run by men at all. Phyllis hopes you can recommend a place suitable for her. She said this is really important to [redacted]. Phyllis believes that her wanting to make a retreat is a sign that she is beginning to trust the male-dominated Church again.

2

Finally, Phyllis asked me if I was aware of any negative letters being sent here about [redacted]. She said [redacted] told her she heard such letters had been written, and Phyllis said she needed to know for herself in her role as advocate and that she was not going to share this information with [redacted] or any of the other ladies if they asked. I told her I was aware of such letters being sent, but that they were mostly written to show support for their pastor or to express their concern about what was happening in their Church, asking for intervention by Church officials so this behavior could be stopped.

3

I shared this information with Phyllis not so much because she asked but because I feel she needs to know this if she is to be an effective advocate for these women. Withholding this information would only deter her in her role and show a lack of distrust in her judgement.

Gloria

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOL

226 Summit Aven

Saint Paul, Minnesota 55102-21,

The Chancery

Phyllis -

Here's a quick response to your June 6 call. The numbers correspond to the paragraphs in your message (copy attached)

(1) [redacted] has misunderstood this. Actually, what we did with her, as we do whenever there is a threat of a lawsuit, is that we ask the attorneys to agree that the money we're now spending to help her will be credited towa a final settlement. There was no discuss of a $600 limit.

(2) For a women-directed retreat, I sugg the Cenacle in Wayzata. By the way,

they are working there in spiritual direction with one or more women victimized by clergy, so they are already sensitized. When [redacted] calls for a retreat, she might even mention that she has some concerns this way.

(3) Actually, I disagree with what said. I do not recall receiving a letter critical of [redacted]. I did receive a couple of letters supportive of Jenb, but not attacking her.

I hope this helps!

K

June 7, 1991 CONFIDENTIAL

MEMO TO: Father Kevin McDonough

FROM: Bishop Robert J. Carlson

SUBJECT: [redacted]

Kevin, I do not have any printed data which reflect on the discussion, but it is my impression that we did offer the possibility of counseling to [redacted]. I am not sure who she originally went to, but at one point, Archbishop Roach asked me to talk to her and she certainly was very credible.

It is my impression that the meeting with you went well and I believe that we did offer to pick up counseling costs. I would have made a rather general offer and asked her to get back to me and, apparently, that is what she has now done, only this time to you as you now have the position I once held.

ALL-PROfessional℠
Career Management

Firststar Financial Center
1550 East 79th Street
Suite 680
Bloomington, MN 55425
(612) 854-7705

PERSONAL AND CONFIDENTIAL

June 20, 1991

Reverend Father Kevin McDonough
Chancellor
Archdiocese of Saint Paul
And Minneapolis
2220 Summit Avenue
Saint Paul, MN 55105-1015

Dear Father Kevin:

Working with Father Richard Jeub has been both challenging and fulfilling, professionally. From a personal perspective, it has been very rewarding, too.

There is no required need for us to meet on this subject. However, perhaps a breakfast or lunch meeting would provide an opportunity to consider this and some other good points of discussion.

Please call at your convenience to arrange.

Peace,

Cy

Cy Laurent

CONFIDENTIAL

ST. KEVIN CATHOLIC COMMUNITY

5844 28th Avenue South Minneapolis, Minnesota 55417-2799
Telephone 612-722-4336

June 24, 1991

Reverend Kevin McDonough
Archdiocese of Saint Paul and Minneapolis
The Chancery
226 Summit Avenue
Saint Paul, Minnesota 55102-2197

Dear Father McDonough,

I have received your letter of June 4th relative to the concerns about Father Richard Jeub and his continuing involvement in St. Kevin's Parish.

I shared your letter with Father Walker and we will conform strictly with your requests. Moreover, in light of our recent conversation, permission for any pastoral contact of Father Jeub in the parish must be personally communicated from you to us.

As I mentioned to you, in conjunction with the 50th Anniversary of the parish, in lieu of personally participating in the anniversary celebration, Father Jeub sent a letter which he asked to be either read or distributed to the parishioners. In fact, I read it to the parish council, Father Walker read it at Sunday Masses and after numerous requests we printed it and distributed it with the parish bulletin. For your information, I am enclosing a copy of that letter. We apologize for whatever difficulty this may have caused anyone.

I appreciate your direction in these matters. For the good of the community, we want to be entirely cooperative.

With kind personal regards, I remain

Sincerely yours in Christ,

Reverend Monsignor Richard E. Pates
Pastor

Enclosure

7/8/91

Dear Kevin,

I just finished my quarterly report for Box.

And now: a note to you to confirm what I initially suspected when we talked on the phone.

After thinking over the prison ministry for Hennepin County, I can't find a need for either general or specific help. There are three resident chaplains from the Minneapolis Council of Churches for the County. I back them up and take care of the Episcopalian needs. But I do so from the car and a briefcase, since I have their offices/phones for use only, and usually when they're not present. I do 60% of the work, evangelicals doing the other 40%, at the maximum-security adult detention center (the "jail") where the entire system does not lend itself to program-ministry.

As a result, I'd suggest you contact Ed for Ramsey County and Fred for State ministry. I'd suspect there is a real possibility at Oak Park Heights in Stillwater.

I hope this run-down will be helpful.

It was good to be with you at the assembly.

Peace, now!

And take care.

Jim

250 E. 6th St.
705
St. Paul, Mn. 55101

FROM THE PASTOR

We received the sad news in the course of the past week involving allegations of sexual abuse against Father Jeub who served very competently and generously as Pastor of St. Kevin for nine years. Our hearts share the heavy burden and pain that is experienced by the alleged victims, as well as Father Jeub himself.

Our present experience demonstrates that our community is not immune to difficulties of this nature which, our media have informed us, have touched congregations of all denominations, professionals at every level, as well as all too often, the intimacy of our families.

In the present case, two factors are worthy of note. Upon learning of the allegations, the Archdiocese ministered in a timely and appropriate manner both to Father Jeub and the alleged victims. Secondly, after a careful investigation, it appears that no one from St. Kevin was harmed in this way by Father Jeub.

Experiences such as this may raise concerns and questions for us. Please know that Father Ginsterblum, Sister Fran Donnelly, and I are available to talk about this and be of whatever help we can in discussing the issues. Please call at your convenience.

In your goodness, join me in ongoing and special prayer for Father Jeub and the alleged victims. They need our prayers and our efforts to induce healing.

REP

CONFIDENTIAL

DATE: July 10, 1991

MEMO TO: Kevin McDonough

MEMO FROM: P. A. Willerscheidt

SUBJECT: [redacted]

I thought you might be interested in learning that [redacted] and [redacted] have talked with for a couple of hours last week about their relationship with God. They have also attended Mass there last Sunday, July 7, and found it better than they had anticipated. They were able to return to Mass and feel accepted and welcomed which is a good first step for them to feel back in God's grace.

Also, [redacted] talked about quitting her job to "take the time to heal herself." I'm not sure that she will do so, but she talked about perhaps quitting this Friday. She is also talking about meeting with Jeub, but I am not setting up the meeting until her therapist feels she is ready.

It is very likely that she will continue with the Support Group which is scheduled to start again on July 31.

Persons
Ordained
Jeub, Richard H. (Restricted Cases - 1)

05/21/1987–

MEIER, KENNEDY & QUINN
CHARTERED
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ANDREW J. EISENZIMMER
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WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(OF COUNSEL)

July 12, 1991

Mr. James P. Tweedy
Attorney at Law
Edinburgh Executive Office Plaza
8525 Edinbrook Crossing
Suite 201
Brooklyn Park, MN 55443

Re: [redacted] vs. The Archdiocese of Saint Paul and Minneapolis and Reverend Richard Jeub

Dear Mr. Tweedy:

C
J
P
Y

I was unsuccessful in reaching you be telephone as it relates to your client, [redacted] I would like to invite you to my office to discuss the claims being made by your client. It would be my intention to have a claims representative present at the time we speak. In preparation for that meeting, we would like to review your client's therapy records. I would ask that you obtain a copy of those records or provide me with an authorization from your client allowing us to obtain those records.

I am suggesting such a meeting on July 29 or July 31, 1991 at 9:30 a.m. I would appreciate your contacting me to indicate whether such a date and time would be convenient for you.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb
cc: Reverend Kevin M. McDonough

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

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WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(OF COUNSEL)

July 12, 1991

[redacted]

Re: [redacted] vs. The Archdiocese of Saint Paul and Minneapolis and Reverend Richard Jeub

Dear [redacted]

C
O
P
Y

I was unsuccessful in reaching you be telephone as it relates to your client, [redacted] I would like to invite you to my office to discuss the claims being made by your client. It would be my intention to have a claims representative present at the time we speak. In preparation for that meeting, we would like to review your client's therapy records. I would ask that you obtain a copy of those records or provide me with an authorization from your client allowing us to obtain those records.

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Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb
cc: Reverend Kevin M. McDonough

Church of Saint William • 6120 FIFTH STREET NORTHEAST, FRIDLEY, MINNESOTA 55432-5098 TELEPHONE 571-5600

The Reverend Kevin McDonough
The Chancery
226 Summit Ave
St. Paul, MN 55102

July 23, 1991

Dear Kevin,

This note is in response to your letter of May 22, 1991, regarding Richard Jeub and specifically regarding a visit by [redacted] with me. I have reread your letter a few times over the past 2 months hoping that some clear memory would "perculate" but that has not happened.

Let me just say these things. Dick Jeub was never secretive about signs of affection with the young women in his life and often of our mutual acquaintanceship. I did not suspect any genital or exploitative behavior that both you and Michael O'Connell have told me about in these past 2-3 months.

I have no doubt that [redacted] came to see me if she said that she did. I do not recall the visit and do not know from your letter whether the conversation was about Dick & herself or about Dick and another close friend of theirs with a Polish name that I cannot recall.

Dick left St. Mark's Church in 1973 or 74, it seems to me. He and I are second cousins

and so his behavior in 1981 would have been of interest to me in a special way even though he was in another form of ministry at Fairview - Southdale Hospital by then.

Furthermore, waiving off a problem that did not affect me personally and which I obviously missed as done & past in [redacted]'s life sounds like something I would ~~do~~ have done.

Finally, to the best of my memory the very first time somebody told me about Dick's problem with women was on June 3, 1990, when I asked a mutual friend of Dick and me, Jeanne (Mrs Ernie) Forss, why Dick was going off to the East for treatment. Jeanne had known Dick for some years before she came to work a few months at St. Mark's, St. Paul, when we needed a secretary. In June, 1990, she told me in terse and sympathetic language what Dick's situation really was. I do not think that ~~when~~ if [redacted] visited with me and told me what Jeanne Forss told me that I would have forgotten the impression of Dick's behavior with women.

This is all that I can contribute to the process into which Dick, you, Marpie are engaged. Maybe something will come to mind soon and if so I will write an addendum to this. Sorry to be so tardy in responding.

in Christ,

John T. Brandes

DATE: July 26, 1991

TO: Ellie LaValla

FROM: Angie Blees/Fr. Austin Ward's Office

SUBJECT: **CHECKS FOR**

Per Fr. Kevin McDonough and Andy Eisenzimmer, is to receive the usual $750 for the month of August, and $1,250 for the months of September and October, 1991 ONLY. If the case is not settled by then, the monthly figure will probably go back to $750. You will be advised.

cc: Fr. Kevin McDonough

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Saint Paul, Minnesota 55102-2197

The Chancery

July 26, 1991

PERSONAL & CONFIDENTIAL

[redacted]

Dear [redacted],

When you and I talked a couple of months ago you raised a question of a conversation you had with Fr. John Brandes. I followed up on that with him, and he is only just now responded with a letter. I think it is a good, honest letter and I wanted to pass it on to you.

It obviously does not clear Fr. Brandes for having been insufficiently sensitive in following up on your conversation. At the same time, it does let you know where his mind has been in regard to all of this.

I hope that you are doing well, and that your summer is a relaxing one. Please be in touch with me if I can be of any particular help.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

Enclosure

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Saint Paul, Minnesota 55102-2197

The Chancery

July 26, 1991

PERSONAL &
CONFIDENTIAL

Reverend John F. Brandes
Church of St. William
6120 5th St. NE
Fridley, MN 55432-5099

Dear John,

Thank you for your letter of July 23. It is an excellent letter, and it helps me put some closure around any question about how you may have handled the information from [redacted]. Obviously, all of us are far more aware of these sorts of things today than we were a decade ago.

I hope that you will not be offended that I have sent a copy of that letter to [redacted]. I think that your tone in the letter was excellent, and it just the sort of thing that will be helpful to her in resolving any remaining resentment or hurt she may carry about the Church. Your tone is "classic Brandes", honest, reflective, and respectful of others.

Thank you again for the letter. I hope that your summer is a good one.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

Jeub file, please.

MEIER, KENNEDY & QUINN
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ATTORNEYS AT LAW

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WILLIAM C MEIER
(1920-1981)
TIMOTHY P QUINN
(1921-1991)
ALOIS D KENNEDY, JR
(OF COUNSEL)

July 26, 1991

Mr. Ronald Meshbesher
Attorney at Law
Meshbesher, Singer & Spence, Ltd.
1616 Park Avenue
Minneapolis, MN 55404

Re: Mary Moe [redacted] vs. The Archdiocese of Saint Paul and Minneapolis, et al

COPY

Dear Mr. Meshbesher:

As you know, my client had agreed to pay your client the sum of [redacted] per month beginning November 1, 1990 while the above-referenced litigation was pending. My client reserved the right to withdraw or terminate those payments at any time. You have now contacted me indicating that your client wants to increase those payments by [redacted] per month. I have now had the opportunity to discuss that request with my client.

My client is prepared to increase its payments to your client by an additional [redacted] per month for a two month period. The increase is being limited to a two month period which we believe will be a sufficient period of time to allow you to formulate and provide to us a settlement demand in this case. I have instructed my client, therefore, that the payments which are to be made on September 1, 1991 and October 1, 1991, will be in the amount of [redacted].

I would urge you to provide to me at your earliest opportunity a settlement demand in this case. I will then review that demand with my client and provide you with a response. As I indicated, we may find it necessary to take the deposition of your client to get a better impression of the nature and extent of the allegations being made by her in this matter. In any event, once you have made a settlement demand in this matter, I will respond accordingly. In the meantime, I assume that we continue to have an indefinite extension of time to answer the Complaint on behalf of all defendants.

[redacted]

July 26, 1991

Dear Father Mc Donough,

Enclosed are receipts for psychotherapy with [redacted] dated June 3 thru July 26, 1991. They total $740.00.

I am curious to know if you've come to any decision or made any progress with my request for compensation of past therapy costs. It's been six weeks since you last wrote about it and I'm wondering if you've been able to attend to it.

Hope the summer is relaxing and re-creative. Looking forward to hearing from you.

In peace,

[redacted]

1

2

3

The Revenge of the Repressed

Frederick Crews

Unchained Memories: True Stories of Traumatic Memories, Lost and Found
by Lenore Terr.
Basic Books, 282 pp., $22.00

The Myth of Repressed Memory: False Memories and Allegations of Sexual Abuse
by Elizabeth Loftus and Katherine Ketcham.
St. Martin's, 290 pp., $22.95

Remembering Satan
by Lawrence Wright.
Knopf, 205 pp., $22.00

The Courage to Heal: A Guide for Women Survivors of Child Sexual Abuse (3rd edition)
by Ellen Bass and Laura Davis.
Harper Perennial,
604 pp., $22.50 (paper)

Making Monsters: False Memories, Psychotherapy, and Sexual Hysteria
by Richard Ofshe and Ethan Watters.
Scribner's, 340 pp., $23.00

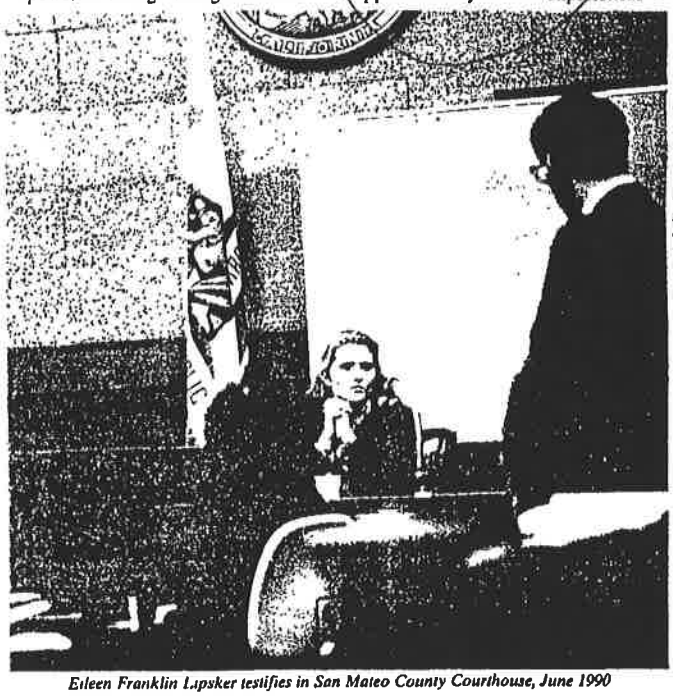
Victims of Memory: Incest Accusations and Shattered Lives
by Mark Pendergrast.
Upper Access,
603 pp., $24.95 (paper)

1.

Throughout the past decade or so, a shock wave has been sweeping across North American psychotherapy, and in the process causing major repercussions within our families, courts, and hospitals. A single diagnosis for miscellaneous complaints—that of unconsciously repressed sexual abuse in childhood—has grown in this brief span from virtual nonexistence to epidemic frequency. As Mark Pendergrast shows in *Victims of Memory*, if we put together the number of licensed American psychotherapists (roughly 255,000) with survey results about their beliefs and practices, it appears that well over 50,000 of them are now willing to help their clients realize that they must have endured early molestation. Those professionals have been joined by countless untrained operators who use the yellow pages and flea market ads to solicit "incest work." It is hard to form even a rough idea of the number of persuaded clients, because most of them take no publicly recorded action against the accused, but a conservative guess would be a million persons since 1988 alone. The number *affected* is of course vastly higher, since, as all parties acknowledge, virtually every case sows dissension and sorrow throughout a family.

When one explanation for mental distress rockets to prominence so quickly, we ought to ask whether we are looking at a medical breakthrough or a fad. However, the choice between those alternatives is not always simple. As its main proponents insist, "recovered memory" is by now not just a diagnosis but a formidable sociopolitical movement. In the words of one of that movement's founders, the Harvard psychiatrist Judith Lewis Herman,

> The study of trauma in sexual and domestic life becomes legitimate only in a context that challenges the subordination of women and children. Advances in the field occur only when they are supported by a political movement powerful enough to legitimate an alliance between investigators and patients and to counteract the ordinary social processes of silencing and denial.



Photograph © Shahn Kermani / Gamma-Liaison

Eileen Franklin Lipsker testifies in San Mateo County Courthouse, June 1990

The larger movement in question is, of course, women's liberation, including what Herman calls "a collective feminist project of reinventing the basic concepts of normal development and abnormal psychology..."[1]

However uneasy one may feel about an ideologically driven "reinvention" of scientific notions, it is possible that the feminist critique of received psychological lore is substantially right. Feminists were certainly warranted, in the 1970s and 1980s, in declaring that the sexual abuse of children was being scandalously underreported. If they now go on to claim that untold millions of victims, mostly female, have *forgotten* what was done to them, their claim cannot be discredited by the mere fact that it sprang from an activist commitment. Obviously, it needs to be assessed on independent grounds.

Yet such grounds are hard to come by. How can one count authentic cases of repressed memory when the very concept of repression stands in doubt? And what, for that matter, do the champions of recovered memory mean by repression? It is fruitless to press them very hard on this point, since most of them show an impatience with or outright ignorance of conceptual subtleties. Thus in the movement's most influential document, *The Courage to Heal*, first published in 1988, Ellen Bass and Laura Davis proclaim that "none of what is presented here is based on psychological theories." Instead, Bass and Davis appeal directly to "the experiences of survivors"—who, however, may or may not *be* survivors of abuse, depending on whether they have actually learned the previously repressed truth or succumbed to therapeutically induced delusion.

Although it is no secret that the idea of repression derives from Sigmund Freud, few of the movement's practitioners have actually studied his texts. Consequently, they are unrestrained by certain ambiguities and outright contradictions implicit in the Freudian theory of repression.[2] Freud's uncertainty, for example, whether *events* or *fantasies* make up the typical content of the repressed gets resolved in favor of events; as Herman puts it in the opening sentence of *Trauma and Recovery*, "the ordinary response to atrocities is to banish them from consciousness." Again, whereas Freud confusingly treated repression as both a conscious and an unconscious mechanism, his activist successors think of it as strictly unconscious—so much so, indeed, that they can routinely regard a young incest victim as leading two parallel but wholly independent lives, one in the warm daylight of normal family affection and the other in continually repressed horror. And while Freud only occasionally portrayed the undoing of repression as yielding undisguised, accurate information about a patient's early past, contemporary "retrievers" entertain no doubts on the point; with the right coaxing, their patients can allegedly reproduce the exact details of their long-repressed traumas.

By today, recovered memory has enlisted the enthusiasm of many psychotherapists who lack the explicit feminist agenda of Herman, Bass and Davis, and other advocates whose views we will examine later. But all parties do share the core tenet of repression—namely, that the mind can shield itself from ugly experiences, thoughts, or feelings by relegating them to a special "timeless" region where they indefinitely retain a symptom-producing virulence. Clinical experience, the therapists agree, has proven the cogency of this tenet in numberless successfully resolved cases.

But has it, really? When arbitrary assumptions leak into "clinical experience," confirming results can be pumped out as easily as bilge water. That is why research psychologists would insist that the concept of repression be required to pass tests in which variables are controlled and rival explanations for the gathered data are ruled out. Yet while psychoanalytic loyalists have repeatedly attempted to conduct just such experiments, their positive results have at best shown a compatibility with repression, not a demonstration of its existence. As David S. Holmes recently concluded after reviewing a sixty-year history of such efforts, "there is no controlled laboratory evidence supporting the concept of repression."[3]

Of course, repression cannot be experimentally disproved, either. Since the concept entails no agreed-upon behavioral markers, we are free to posit its operation whenever we please—just as we are free to invoke orgone energy or chakras or the life force. Indeed, as Elizabeth Loftus and Katherine Ketcham remark in their lively new book, *The Myth of Repressed Memory*,[4] belief in repression has the same standing as belief in God. The idea may be true, but it is consis-

[1] Judith Lewis Herman, *Trauma and Recovery* (Basic Books, 1992), pp. 9, ix.

[2] On this point, see Matthew H. Erdelyi, "Repression, Reconstruction, and Defense: History and Integration of the Psychoanalytic and Experimental Frameworks," *Repression and Dissociation: Implications for Personality Theory, Psychopathology, and Health*, edited by Jerome L. Singer (University of Chicago Press, 1990), pp. 1–32. Remarkably, Erdelyi welcomes Freud's unclarity as providing a sound basis for integrating the "dynamic" with the cognitive unconscious. The idea is that since Freud didn't really know what he meant by repression, we are free to bring the concept into alignment with current research while still thinking of ourselves as Freudians.

[3] David S. Holmes, "The Evidence for Repression: An Examination of Sixty Years of Research," in Singer, *Repression and Dissociation*, pp. 85–102; the quotation is from p. 96.

[4] Although two of the works under consideration here have double authorship, the Loftus and Ketcham book is cast in the first person singular,

tent with too many eventualities to be falsifiable—that is, amenable to scientific assessment.

It *is* possible, however, to mount experimental challenges to corollary tenets that are crucial to recovered memory therapy. That is just what Loftus, a highly regarded researcher and a professor of psychology at the University of Washington, has done in her own experimental work—and that is also why she has been pilloried by the recovery movement as an enemy to incest survivors. *The Myth of Repressed Memory* recounts some of that vilification and tries to head off more of it by taking a conciliatory tone wherever possible. But there is simply nothing to negotiate over. The burden of Loftus's argument is that memory does not function in anything like the way that the recovery movement presupposes.

Loftus offers no encouragement to the retrievers' notion that "videotaped" records of events are stored in a special part of the brain and then suddenly yielded up to near-perfect recall. Empirical science, she reports, has established that memory is inherently sketchy, reconstructive, and unlocalizable. Whether pleasant or unpleasant, it decays drastically over time, though less so if the experience in question gets periodically "rehearsed"—just the opposite of what the retrievers' theory would predict. Furthermore, memory is easily corrupted, if not with an experimenter's deliberate intervention or a therapist's unwitting one, then with a normal "retrospective bias" that accommodates one's sense of the past to one's present values. Flashbacks to an early age, then, are highly unreliable sources of information about any event. All in all, Loftus finds no basis for thinking that repression, as opposed to a gradual avoidance and atrophy of painful recollections, has figured in a single molestation case to date.

Once we have recognized that a memory can disappear because of factors other than repression, even the best anecdotal evidence for that mechanism loses its punch. Consider, for example, the closely watched case of Ross Cheit, a Brown University professor who has recently proved beyond question that his suddenly recalled 1968 molestation by a music camp administrator was real.[5] But had that abuse been repressed in the first place? In a phone conversation with me on September 7, 1994, Cheit declared that while he takes no position on the existence of repression, he is inclined to doubt that he abruptly and completely consigned his experience to oblivion. More likely account is that the a[illegible] Cheit *refocused* his faded but unrepressed experiences after he had read a book about pedophilia (as he did) and became morally exercised about it. While this, too, is guesswork, the fact that it can't be ruled out renders Cheit's case useless as a demonstration.

Useless, that is, from the standpoint of logic. For another purpose, that of inducing popular belief in the theory of repression, anecdotes can be powerfully effective. The very idea of repression and its unraveling is an embryonic romance about a hidden mystery, an arduous journey, and a gratifyingly neat denouement that can ascribe our otherwise drab shortcomings and pains to deep necessity. When that romance is fleshed out by a gifted storyteller who also bears impressive credentials as an expert on the mind, most readers in our culture will be disinclined to put up intellectual resistance.

One such narrator, of course, was Freud, whose shifting views about the content of the repressed will prove pivotal to an understanding of the recovery movement's intellectual ancestry. But Freud's stories purportedly explaining tics, obsessions, and inhibitions among the turn-of-the-century Austrian bourgeoisie are beginning to seem not just remote but eccentric. Not so the case histories recounted by the memory retrievers' most distinguished and fluent ally, Lenore Terr, who is not only a practicing therapist but also a professor of psychiatry at the University of California at San Francisco. Terr's deftly written book, *Unchained Memories: True Stories of Traumatic Memories, Lost and Found*, has already been welcomed both by the Book-of-the-Month Club and by early reviewers who perceived it as a balanced and learned brief for repression.

The publication of *Unchained Memories* has been especially cheering to recovery advocates because Terr is not afraid to challenge their *bête noire*, Elizabeth Loftus. "[P]sychological experiments on university students," Terr writes, taking dead aim at Loftus's work,

> do not duplicate in any way the clinician's observations. What comes from the memory lab does not apply well to the perceptions, storage, and retrieval of such things as childhood murders, rapes, or kidnappings. Trauma sets up new rules for memory.

From Loftus's vantage, of course, such a passage begs the question of how these new rules are to be validated without succumbing to the notorious circularity of "clinical experience." Isn't Terr simply handing herself a conceptual blank check? Nevertheless, she scores a strong rhetorical point with her animadversion against hothouse science. If Terr is right about the special character of real-world trauma, we may have to fall back on sheer stories after all.

2.

Among Terr's own stories, none carries more weight than the George Franklin/Eileen Lipsker case, which occupies the first two chapters of her

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and its protagonist is Loftus herself. Although Ketcham did conduct some of the interviews that inform *The Myth of Repressed Memory*, I will usually call the "author" Loftus alone. In contrast, the junior partner in *Making Monsters*, Ethan Watters, was the first journalist to sound an alarm about the recovered memory movement, and the book casts him as a full collaborator; that is why I will refer to "Olshe and Watters" below. I will also refer interchangeably to "the recovered memory movement" and "the recovery movement," even though the latter term is often used more broadly.

[5]See Katy Butler, "S.F. Boys Chorus Settles Abuse Suit," *San Francisco Chronicle*, Sept. 1, 1994, p. A2.

An Apology to Eric Shanes
From Yale University Press and Anna C. Chave

In her book *Constantin Brancusi: Shifting the Bases of Art*, published by Yale University Press last year, Anna C. Chave erroneously suggested that a statement which appeared in Eric C. Shanes's book *Constantin Brancusi* (first published in 1989 and republished last year) was capable of a racist construction.

Yale University Press and Anna Chave fully accept that this suggestion, which cast a slur upon Mr. Shanes, a distinguished art historian, was wholly unwarranted and deeply regret that the suggestion was made. Yale University Press and Ms. Chave are pleased to have this opportunity to withdraw unreservedly this unfounded suggestion and to apologize most sincerely to Mr. Shanes for the considerable distress and embarrassment which he has been caused.

book. The case, in which Terr herself served as an expert witness "to explain," as she says, "'repression' and 'the return of the repressed,'" came to national attention in 1989 with newspaper and television reports of Eileen Franklin Lipsker's long-buried but amazingly lucid recollection of the way her father, in her terrified presence in 1969, had raped her eight-year-old best friend in the back of his Volkswagen bus and then shattered the girl's skull with a rock and covered the body on a wooded hillside south of San Francisco. In Terr's rendering, this story has about it a ring of unanswerable truth, backed up by the soberest of corroborators, a jury in a murder trial.

But Terr's account is not the only one available. It was preceded by Harry N. MacLean's scrupulous book-length retelling of the murder story, *Once Upon a Time*, and now it has been scrutinized by MacLean himself, by Elizabeth Loftus and Katherine Ketcham in *The Myth of Repressed Memory*, and by Richard Ofshe, professor of sociology at the University of California, Berkeley, and Ethan Watters in an even more trenchant new book, *Making Monsters*.[6] In view of their findings, the Franklin matter may come to serve as a very different object lesson from the one that Terr intended. If so, a man's freedom hangs in the balance—not a good man, surely, but a man who may have been wrongly convicted.

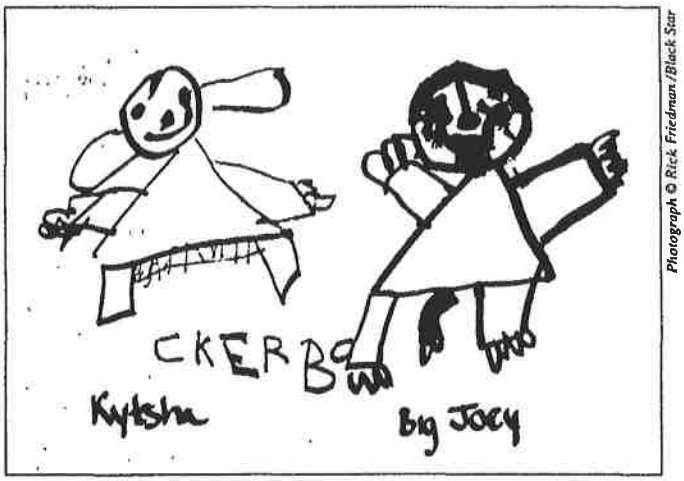
During the 1990 murder trial in Redwood City, California, it turned out that no concrete evidence implicated Franklin in Susan Nason's death. On the contrary, Franklin's junked van from 1969, located and microscopically studied by police investigators, bore no trace of the twenty-year-old crime. Until a recollection on the part of Eileen's vindictive sister Janice was conveniently revised under therapy, Franklin had a solid alibi for his whereabouts at the time of the abduction. The jury, however, determined with little difficulty that Eileen Lipsker's recovered memory too closely matched the known facts of the unsolved murder to be considered specious. As a result, Franklin is now serving a life sentence in state prison, and the theory of recovered memory has acquired an imposing trophy.

Lenore Terr appears to have assumed from the outset that Franklin was guilty as charged, and she was eager to make herself useful to the prosecution. Awkwardly, however, her research interest in actual cases of repressed memory was quite new; it seems to have postdated the writing of her 1990 book, *Too Scared to Cry*, which contains no index entry for "repression" and which reports on cases of continuously remembered rather than forgotten trauma.[7] Terr's expertise on sudden recall, moreover, dated from her first interview with Eileen Lipsker herself—and was then swelled by a flood of highly dubious anecdotes about other women's therapeutically prompted visions of incest. But Terr is a thoroughly trained Freudian, and as such she felt qualified, after all, to offer the Franklin jury what she calls "an education" in the reality of repressed memory and its retrieval. Coordinating strategy with the prosecutor and tailoring her testimony, as she now relates, to the job of rendering Eileen Lipsker a wholly credible witness, Terr exceeded the expectations of her temporary employers.

Of course, Terr testified, an expert such as herself can verify the authenticity of a recovered memory through careful interpretation of the subject's symptoms. In some cases, she continued, the expert can even reliably infer the nature of an *unknown* trauma. Indeed, she herself had recently done exactly that, deducing from Stephen King's novels and films the certain knowledge that in his childhood King had watched a playmate die under the wheels of a railroad train.

As Terr now recounts, she mentioned that feat of detection in order to create a helpful analogy in the jurors' minds.[8] She hoped they would see that, like Stephen King in his violence-ridden fiction, Eileen Franklin, for five years after the murder, had symptomatically acted out the awful scene that she had observed but almost immediately repressed. According to prosecutors, between the ages of nine and fourteen Eileen had continually pulled out all the hair from one segment of her crown, leaving what Terr calls "a big, bleeding bald spot." That spot uncannily corresponded to the part of Susan Nason's head that had allegedly been smashed by George Franklin. Eileen, then, had apparently turned herself into a living hieroglyph of a crime that Terr could have inferred all by herself, simply by translating the language of Eileen's symptomatic behavior into its mnemonic source within her repressed unconscious.

In an ordinary trial, caught up in claims and counterclaims about the purport of submitted evidence, the mesmerizing quality of Terr's self-depiction as a Freudian Sherlock Holmes could scarcely have assumed much importance. But this was no ordinary trial. Factually impoverished, it came down to little more than a twelve-person referendum on the photographic return of the repressed. According to the later word of several jurors, and to Terr's great present satisfaction, her testimony was decisive in obtaining George Franklin's conviction.



Photograph © Rick Friedman/Black Star

Drawing by an alleged victim of child abuse: the male figure was interpreted as displaying enlarged genitals, the female as wearing a protective shield.

What most impressed both Terr and the jury about Eileen Lipsker's recovered memory was its extraordinary vividness and precision. The brands of beer and cigarettes consumed by George Franklin at the murder scene; Susan Nason's raising her right hand to ward off the fatal blow; the glint of the sun in her clear blue eyes as George brought the rock down on her head; "a crushed, stoneless, silver child's ring" on the now lifeless hand—all of these details and more were as fresh to Eileen in 1989, Terr says, as they had allegedly been twenty years before. How, then, could they not be authentic and conclusively damning?

One answer to that question was provided at the trial by none other than Elizabeth Loftus herself, an expert witness on the other side. Tests on thousands of subjects have shown conclusively, Loftus told the court, not only that memory always fades with the passage of time but that it readily incorporates "post-event information" (whether true or false) that becomes indistinguishable from the actual event. Those two facts together suggest that the sharpness of Eileen Lipsker's "memory" must have been caused by *recent* images—and, as we will see, there was no shortage of such potential contaminants at hand.[9]

With coaching from Terr, however, the prosecution was ready to remove the sting from Loftus's reported findings. Did any of her experiments, she was asked in cross-examination, deal with memories that were two decades old? Wasn't it the case that her experimentally induced distortions of memory affected only some details and not loss of the brute fact that an event had occurred? And had she ever studied a repressed memory? No, she hadn't, for two excellent reasons: she wasn't sure that such memories exist, and even if they do, she couldn't imagine how one could get at them for controlled study.

Regrettably, however, this answer occurred to Loftus after she had left the stand. What she replied instead was that post-event information would probably corrupt a repressed memory in just the way that it assuredly corrupts a nonrepressed one. The concept of repression was thus left unchallenged, and the befuddled jury had no recourse but to side with the rival expert witness—the one who boasted intimacy with the dark and subtle workings of the unconscious.

But Lenore Terr first needed to tiptoe across a theoretical minefield of her own. Her studies of children who had lived through the notorious Chowchilla bus kidnapping and the *Challenger* explosion had shown unambiguously that such experiences do not get repressed. Why, then, should the jury believe that Eileen Lipsker had repressed her harrowing ordeal? Just in time for the trial, but too late for prior publication, Terr came up with a face-saving theory.[10] True, she granted, one-time trauma victims always remember the event; but victims of multiple trauma like Eileen Lipsker, whose father had been a bullying drunk and a sexual abuser of two of his other daughters, turn repression into a daily routine. By the time of the murder, according to Terr, Eileen had become an old hand at stuffing bad memories into the mental freezer.

Terr's brainstorm was remarkable in several respects. For one thing, it overlooked the fact, later acknowledged in *Unchained Memories*, that Eileen had always remembered her father's violence around the house. Second, it contradicted universal human experience of protracted duress. Has anyone past the age of, say, six who has survived racial persecution, a famine, a bombing campaign, or a brutal enemy occupation ever forgotten that it occurred? Terr had evidently confused the normal fading of *individual instances* of repeated, patterned mistreatment with willed unawareness of that mistreatment. And third, Terr

[6]See Harry N. MacLean's *Once Upon a Time: A True Story of Memory, Murder, and the Law* (HarperCollins, 1993) and his critique of Terr in the September 1994 *False Memory Syndrome Foundation Newsletter*. The foundation can be reached at (215) 387-1865 or (800) 568-8882, or by mail at 3401 Market St., Suite 130, Philadelphia, PA 19104.

[7]Lenore Terr, *Too Scared to Cry: Psychic Trauma in Childhood* (Harper and Row, 1990; Basic Books, 1992).

[8]Whether Terr had actually detected anything is open to doubt. The upsetting death of King's boyhood friend was already familiar to her from King's autobiography—where, however, King reports that, so far as he knows, he did *not* witness the accident in question. Thus Terr's courtroom example of trustworthy clinical reasoning—proceeding from obsessive themes in King's eventual artistic productions to a "repressed" fact about one early day in his life—actually dealt with a *still uncorroborated* detail superadded to a story in the public domain. Insofar, then, as the Franklin trial hinged on Terr's testimony about Stephen King, it appears that one no-evidence case was decided on the basis of another.

[9]Eileen Lipsker's problems with memory are echoed by Terr's own in her capacity as storyteller. Eileen never testified about seeing what Terr calls "white socks and white child-size underwear" in the rape scene, but only something white. And Terr, bent upon condemning George Franklin as a rapist, has lately supplied the useful "fact," which is false, that semen was found in the dead Susan Nason's vagina.

[10]See Lenore Terr, "Childhood Traumas: An Outline and Overview," *American Journal of Psychiatry*, Vol. 148 (1991), pp. 10–20.

was refusing to grant any distinction in memorability between George Franklin's usual brutality and the witnessed rape and murder of Eileen's best girlhood friend.

Beyond the already mentioned dubieties in Terr's version of the Franklin case lie a good number of others emphasized by MacLean, Loftus and Ketcham, and Ofshe and Watters, and more briefly by Mark Pendergrast as well. The cardinal point is that Eileen Lipsker's certainty that she had attended the murder of Susan Nason did *not* overwhelm her in a single unprompted flash on what Terr calls "a quiet winter afternoon in 1989." That was the least plausible of five distinct stories that Lipsker kept changing to forestall objections. As the trial record shows, Lipsker, whom Terr characterizes as having known "nothing at all" about repression, had already been consulting two therapists who were helping her probe her childhood "memories" and her conscious, long-standing suspicions about the murder. Both practitioners employed the theory of repression and had discussed it with her. Moreover, Eileen was aided in producing increasingly bizarre visions of George Franklin committing another murder—this one not just unsolved but completely unknown to police or anyone else—with herself as a witness and of his raping or otherwise sexually abusing her, sometimes in the presence of oblivious family members, from the ages of three through fourteen. She even came to believe that George had physically assisted her godfather in raping her. Incredibly, though, none of these barbarities had left a glint of long-term memory [redacted] conscious mind.[11]

Terr omits any mention of George's second "murder" committed in Eileen's presence, but she does cite the equally implausible memories of incest scenes. In doing so, however, she offers no clue that all this knowledge emanated from a regimen of therapeutic dowsing and that some of it *preceded* the original murder flashback. This latter fact is important because Eileen's newly formed belief that she had spent her childhood being molested provided her with an extra motive for wanting to see George imprisoned. Terr as author is no more interested in dwelling on such motives than the prosecution was. She uses Eileen's sexual "memories" only in the partisan and highly effective way that they were used in the trial, to establish that a beast like George was just the sort of person who could have raped Susan Nason and then bludgeoned her to death.

[11]Indeed, as Terr reports, so unaware was Eileen that her subsequently divorced father had been raping her that she went off to live with him for a while at age fourteen, right after the alleged eleven years of violation had ended. Later, the two of them drove across the country together to Florida, employing the back of the VW van, the supposed site of Susan Nason's rape, as their joint sleeping quarters. For Eileen's nineteenth birthday celebration, she took a similar trip with George to Ensenada in the same vehicle. How strange that "the repressed" produced no symptoms or qualms to warn her against taking those risks with the rapist-murderer!

The fact that memory thera[redacted]y at the very heart of the Franklin [redacted] was manifested in little-noted testimony from one of Eileen's therapists, Kirk Barrett. According to Barrett, as Ofshe and Watters report,

> Eileen's memories "developed" over the course of the therapy sessions and often during the encounter itself. With the relaxation exercises and the free-association techniques, these memories often became more detailed during their hour-and-a-half meetings....
>
> Barrett remembers that from June [1989], when she initially visualized the first element of what was to become the crime scene, through July, Eileen worked both in and out of the sessions trying to sort out the meaning of her feelings, visualizations, and memories. He assured Eileen at the time that it "wasn't important... whether her visualizations were real or not," and that they could "sort that out later." In and out of therapy the details slowly cohered into a narrative. One day she came in and reported to Barrett that she had seen a flash image of someone hitting Susan with a rock—*but that she couldn't make out who the person was*. According to Barrett it was several sessions later, in a highly emotional moment, that Eileen revealed that she was finally able to see the face of the man who killed [Susan]. It was her father's.

Eileen Lipsker originally told her brother that the murder scene had revealed itself to her *in hypnosis* during her therapy. Later, she told a sister that she had *dreamed* the crucial knowledge—an equally suggestive fact, since recovered memory therapy often employs either hypnosis or dream analysis or both. Lenore Terr wants us to regard these statements as forgivable "lies" and to put our trust in the more enchanting image of Eileen's single flashback to the murder scene. It makes a good deal more sense to suppose that Eileen only belatedly learned that evidence from hypnosis had recently been deemed inadmissible in California courts.

Kirk Barrett's neglected testimony does exculpate Eileen Lipsker in one respect: she had sincerely come to believe that her father was the murderer. Once committed to having him put away, however, she allowed her "memories" to evolve as expediency required, picking up new details and dropping others as newspaper reports disclosed the content of old police records. As Ofshe and Watters remark, virtually the only correct details in her original report were "that Susan had been killed with a rock and that her ring had been crushed—facts that she had told Barrett she had known all her life."[12]

There remains, however, the one striking detail that captivated both the

[12]Intriguingly, one of the tiny errors that survived in Eileen's testimony, having to do with a confusion between two rings on Susan Nason's hands, corresponded exactly to a mistake made in a newspaper story in 1969. That could only mean that Eileen's "memories" were tainted by misinformation

jurors and, I am sure, the early readers of Terr's book: the bleeding bald spot that was said to have marred Eileen Franklin's pate for five straight years after the murder. Quite simply, it turns out to be a figment of Eileen's adult imagination. As Ofshe and Watters discovered, more than forty photographs of her in the relevant period—potential exhibits that the prosecution wrongly withheld from the defense—show no trace of missing hair. Eileen's mother, Leah, who has changed her mind about George's guilt after finding the narrative in *Unchained Memories* so erroneous, has told Ofshe and Watters that she couldn't have failed to notice any such disfiguration if it had occurred even once. An older and a younger sister have also refuted this claim. If, as Terr believes, every symptom tells a story, in this instance the story is a fairy tale.

Once understood in its true lineaments, the Franklin/Lipsker matter turns out to be highly typical of other recovered memory cases. There is, in the first place, the eerily dreamlike quality of the "memories" themselves, whose floating perspective, blow-up details, and motivational anomalies point to the contribution of fantasy.[13] There is the therapist's reckless encouragement of the client to indulge her visions and worry "later"—usually never—whether or not they are true, along with his "supportive" absence of concern to check the emerging allegations against available knowledge. There is the interpretation of the "survivor's" moral frailties as further evidence that she is a "trauma victim."[14] There is also, we can infer, the therapist's false promise that excavation of the repressed past will lead to psychic mending instead of the nearly inevitable, result—disintegration, panic, vengefulness, and the severing of family ties. And there is the flouting or overlooking of what is scientifically known about memory, leaving the field free for dubious theories exfoliating from the original dogma of repression.

One remaining feature of the Lipsker case turns out to be reproduced in nearly every controversy over therapeutically assisted recall. The Franklin jury members, like many people who must weigh the credibility of "survivors," felt that they had to accept Eileen's story because she stood to gain nothing and lose everything by accusing her own father of murder. Of course, that was an oversimplification; Eileen felt that the pedophile George was a threat to her own child, and besides, as many observers perceived, she had a distinct taste for fame.[15] In a deeper sense, however, the jury was right: Eileen had opened a Pandora's box of bitterness and recrimination that will probably trouble her for the rest of her life. Nevertheless, the cardinal point about all this self-destructiveness went completely unnoticed. Eileen Lipsker did not *decide* to send her mind into a tailspin after making rational calculations about the opposing claims of justice and filial loyalty; she was progressively *encouraged* to do so by therapists who believed that full psychic health must wait upon a vomiting up of the repressed past.

Disastrously missed at the trial, this cardinal fact slipped away once again on a subsequent Faith Daniels talk show where, for the first time, Eileen Lipsker and Elizabeth Loftus sat down together. "Why would you want to suffer if you didn't have to?" asked one member of the audience who, like nearly all the others, believed Eileen's story and considered Loftus a heartless crank. "Why would you want to put yourself through it? There's no logic behind it." As Loftus now tells us in her book, she smiled stoically as the audience continued to berate her and rally to Lipsker's cause. And then the program was over.

Reading about this episode, one experiences an extreme frustration. Couldn't Loftus have pointed out that other parties besides Eileen had "put her through it"? That, however, was four years ago, when no one yet had an explanatory handle on the burgeoning plague that still besieges us. Now at last, thanks to the inquiries of Loftus and others, it is starting to make an eerie kind of sense.

3.

The Franklin/Lipsker case, so attractive to Lenore Terr as Exhibit A of validated repression, actually shows how a "memory" originating in conscious hunches and resentments can be crystallized by protracted therapeutic *suggestion*, or the subliminal contagion of ideas between a dominant and a subordinate party. That is what we regularly find when missing elements of recovered memory stories are filled in; where repression was, there shall suggestion be. Indeed, someone who reviews many such cases will eventually realize that the salient question isn't whether or not a bona fide instance of repression can be found, but rather whether there are any limits at all to the malleability of the human mind. Therapists, it seems, are helpful but not strictly necessary to the production of wildly fantastic memories. Given a facilitating belief structure, the compliant subject can use the merest hints as triggers to delusion.

To illustrate this fact, there is nothing quite like the sequence of events recounted in Lawrence Wright's *Remembering Satan*, a short but gripping and brilliantly constructed book that will already be familiar to some readers from its serialization in *The New Yorker* in May 1993. Wright tells of Paul Ingram, an Olympia, Washington, sheriff's deputy, a born-again Christian, and the chair of his county Republican committee, who was eventually thought to have raped both of his daughters as well as one of his sons innumerable times, to have passed the daughters around sexually as poker nights at home turned into gang rapes, to have hideously tortured the girls and forced them and his wife to have sex with goats and dogs, and to have murdered and cannibalized many babies at huge gatherings of his Satanic cult—where, be it noted, long gowns, pitchforks, and "Viking hats" were *de rigueur*. The still greater novelty, however, is that Ingram, though he initially remembered none of those atrocities, succeeded in visualizing most of them through the exercise of prayerful introspection. Indeed, he labored so hard to admit to new crimes that his tale-spinning daughters sometimes fell behind his pace.

All this would be hilarious Thurberesque Americana if it were not also inexpressibly sad. Whereas the Franklin household, when Eileen Lipsker went public with her vision, no longer contained a married couple or any children, in the Ingram case a devout family of seven was shattered for good. Moreover, Ingram, who is now serving a twenty-year term in prison after having confessed to six counts of child molestation, came close to being joined there by others who were caught in a widening net of lunacy—and at least two of them, who were in fact jailed briefly and then kept under house arrest for five months each, will never recover their reputations. Even those men had to think long and hard about whether they might have unknowingly lived double lives; and Ingram's wife, Sandy, did conclude that she must have been a secret Satanist. She has moved away now and lives under a different name, as does the only one of her five children who hasn't fled Olympia.

What is most arresting about the Ingram calamity is how little suggestion—indeed, how little *auto*-suggestion—was required to set it in motion and then to keep it hurtling toward its climax. Ericka Ingram had a history of making unsubstantiated sexual charges prior to her "realiza-

that she had either heard or, more probably, read in old clippings or on microfilm. Quixotically, however, the judge ruled all journalism from the murder period inadmissible—as if the only possible question to settle were whether Eileen was revealing the sheer truth or telling lies, instead perhaps of unknowingly recycling second-hand lore. Such bits of truth and error were available to her at all times, thanks to the fact that within her family George Franklin had always been considered a suspect in the Nason murder.

[13] As for anomalies, why did George Franklin take his daughter along to watch the rape and murder of her dearest friend? How could he not have expected to be found out? Why would he then make Eileen witness another killing? Why did no one in a crowded living room notice George inserting his finger in Eileen's vagina? Etc.

[14] As Loftus and Ketcham say, "With that diagnosis all the quirks and idiosyncrasies of Eileen Franklin's personality could be explained away. Yes, she lied about being hypnotized... but that's understandable because she is a *trauma victim*. Yes, she used drugs and was arrested for prostitution... but her behavior makes sense given that she is a *trauma victim*. Yes, she repressed the memory for twenty years... but that's a defensive reaction common to *trauma victims*. Anything the defense might say in an attempt to undermine Eileen's credibility as a witness could be turned around and presented as an ongoing symptom...."

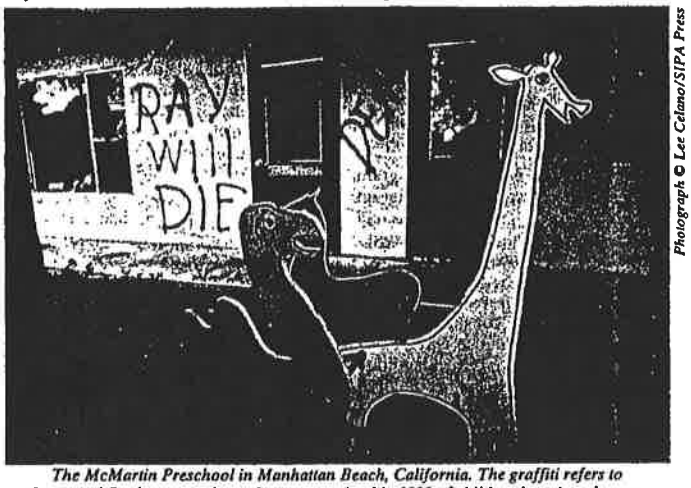
[15] Lipsker quickly become a heroine in psychotherapeutic circles, appeared on *Sixty Minutes*, collaborated on an as-told-to book, and found herself flatteringly portrayed by Shelley Long in a made-for-TV movie about the case. Her book and movie contracts, negotiated by a Hollywood entertainment lawyer, were signed before the case had gone to trial.

tion" at age twenty-two that her father had been raping her. That insight did not occur during therapy but at a Christian retreat in August 1988 at which a visiting charismatic healer told Ericka the news, relayed to her by the Holy Spirit, that she had been molested as a child. Ericka immediately accepted the diagnosis—and, six years later, she apparently still does.[16]

Similarly, during the second day of his questioning Paul Ingram easily allowed himself to be led into a trance, resulting in his confession to all of the crimes with which he was eventually charged after prosecutors had deleted the witches' sabbath material, which could have raised awkward questions in jurors' minds if the case had come to trial. Ingram's prolific later admissions were facilitated not only by prayer but by "relaxation techniques," one of which he had picked up from a magazine. And two of his sons also developed a knack of instantly becoming "dissociated" in order to provide inquisitors with the required lurid reminiscences.

This is not to say that the Ingram family generated hallucinations entirely under its own steam. To begin with, Paul Ingram's police colleagues exerted unscrupulous (though hardly unusual) pressure on him, extending the second interrogation over a mind-buckling eight-hour period and using his piety as a wedge to confession. They lied to him about what others had revealed and assured him that if he would only begin by admitting his guilt, the relevant memories would come flooding back.[17] By that second day, furthermore, Paul was being advised by a Tacoma psychologist whose recent practice had included Satanic abuse ca[illegible] and who later helped Paul's so[illegible]d to conclude that his remembered childhood dreams were proof of molestation. An assistant pastor in the Church of Living Water also helped both Paul and his wife to sustain the cleansing flow of visions. During five months of interrogation, no fewer than five psychologists and counselors kept the heat on Paul, preventing him from ever stepping back to test whether the grimmer yet more tentative of his two memory systems—his "horror movie," as he called it—was anchored to actual events.

When all this pressure has been duly weighed, however, the fact remains that the Ingram case displays a breathtaking readiness on the part of its major players to form lasting "memories" on very slight provocation. And this is important for grasping the explosive potentiality of recovered memory allegations. There was nothing exceptional about the Ingram family's prelapsarian makeup or the Olympia scene in general. Apparently, a community steeped in Biblical literalism on the one hand and *Geraldo* on the other needs only a triggering mechanism to set off a long chain reaction of paranoia.[18] Yet such a community epitomizes a good portion of North America. The potential for mass havoc from "memory"-based accusations is thus no smaller today than it was in the seventeenth century. In fact, it is incomparably greater, thanks to the power of our sensation-seeking media to spread the illness instantaneously from one town or region to another.



Photograph © Lee Celano/SIPA Press

The McMartin Preschool in Manhattan Beach, California. The graffiti refers to Raymond Buckey, a teacher, who was acquitted in 1990 of child molestation charges, along with the other defendants in the case.

As Lawrence Wright [illegible]perly stresses, one further ingredi[illegible]s as a multiplier of trouble. Not [illegible]prisingly, it is a shared belief in the theory of repression. Only a few hours into his first grilling, Paul Ingram was ready to state, "I did violate them and abuse them and probably for a long period of time. I've repressed it." His questioners of course held the same view, which took on firmer contours as more psychologists were called in; before long, the official version was that Paul had repressed each of his myriad offenses just as soon as he had finished committing it. A county under-sheriff (himself falsely accused of Satanism, but still an enthusiastic believer in its reality) became so enamored of this notion that he started moonlighting as a counselor to survivor groups and writing theoretical papers about the effects of repression.[19] One can only second Lawrence Wright's conclusion: "[w]hatever the value of repression as a scientific concept or a therapeutic tool, unquestioning belief in it has become as dangerous as the belief in witches."

Some secular-minded readers may feel that the Ingram case, in view of its fundamentalist soil and its resultant exotic blossom of Satanism, is too outlandish to tell us much about the prudent and responsible search for incest memories. Yet the more one learns about the scare over "Satanic ritual abuse," the more porous its boundary with the larger recovered memory movement appears to be. According to surveys taken by the False Memory Syndrome Foundation, at least 15 percent of all memory retrievers come to recall Satanic torture in childhood—this despite a lack of evidence to support the existence of *any* sadistic devil-worshiping cults in North America or anywhere else.[20] The fact is that "memories" of baby barbecues and the like are usually evoked through the same techniques of psychic exploration commended by prestigious academics such as Judith Herman and Lenore Terr. Indeed, as she testified at the Franklin trial, Terr herself has treated "victims" who thought they recalled having been forced to watch ritual human sacrifices.

Until the recovered memory movement got properly launched in the later 1980s, most Satanism charges were brought against child-care workers who were thought to have molested their little clients for the devil's sake. In such prosecutions, which continue today, a vengeful or mentally unhinged

[16]At the sentencing, Ericka was instrumental in seeing that her father receive the stiffest allowable punishment, and afterward, like Eileen Lipsker, she advanced her cause on the tabloid talk shows. Today, I gather, she is still concerned with denouncing a coven of Satanists within the Olympia police department.

[17]The Olympia police authorities never conducted an investigation in the usual meaning of that term. "Believe the children" was their tacit motto from the word go. To this day they haven't realized the unfairness of collecting a mountain of absurd and contradictory stories from patently unstable witnesses, lopping off the charges that would be most likely to arouse a jury's suspicions about the reliability of those sources, and using the remaining, equally unsubstantiated, charges to hustle a respected colleague off to prison. Nor, in Wright's words, did the detectives "ever consider the possibility that the source of the memories was the investigation itself."

[18]One month before Paul Ingram was summoned to police headquarters for his first grilling, the Ingram family sat down to watch Geraldo Rivera's prime-time special, *Devil Worship: Exposing Satan's Underground*. The previous day's program, which they may or may not have seen, was called *Satanic Breeders: Babies for Sacrifice*.

[19]Ingram himself learned, pathetically, how to talk the self-pitying lingo of the recovered memory movement. "I have also been a victim since I was five years old," he told an interrogator, "and I learned very early that the easiest way to handle this was to hide it in unconscious memory...."

[20]For a reliable account of the way that the mania over "Satanic ritual abuse" has blended with the recovered memory movement, see Jeffrey S. Victor, *Satanic Panic: The Creation of a Contemporary Legend* (Open Court, 1993). For the FBI's inability to locate any such abuse, see Kenneth V. Lanning, "Satanic, Occult, Ritualistic Crime: A Law Enforcement Perspective," *The Police Chief*, October 1989, pp. 62–83. Among the books under review, the question of Satanism is most fully covered in Mark Pendergrast's *Victims of Memory*.

adult typically launches the accusations, which are immediately believed by police and social workers. These authorities then disconcert the toddlers with rectal and vaginal prodding, with invitations to act out naughtiness on "anatomically correct" dolls with bloated genitals, and, of course, with leading questions that persist until the child reverses an initial denial that anything happened and begins weaving the kind of tale that appears to be demanded. As many studies have shown, small children can be readily induced to believe that they have experienced just about any fictitious occurrence. In this respect, however, they do not stand fundamentally apart from their elders. The only real difference is that the grown-ups, in order to become as gullible as three-year-olds, must first subscribe to a theory such as that of demonic possession or its scientific counterpart, Freudian repression. They then become putty in the hands of their would-be helpers.

As it happens, the most impressive controlled illustration of this fact to date came directly from the Paul Ingram case, after the prosecutors—not the defense!—had invited the social psychologist Richard Ofshe to Olympia as an expert on cults and mind control. Perhaps, they thought, Ofshe could cast some light into the murky Satanic corner of the affair. But Ofshe, immediately struck by the conditional quality of Ingram's confessions and their suggestion that a scene was taking place in the mind's eye ("I would've," "I must have," "I see it," etc.), decided to test Ingram's suggestibility by proposing a false memory for him to accept or reject.

"I was talking to one of your sons and one of your daughters...," Ofshe told Ingram. "It was about a time when you made them have sex with each other while you watched." This was one charge that had *not* been levied and would never be, but one day later, Paul proudly submitted a new written confession:

> ...I ask or tell Paul Jr. & Ericka to come upstairs.... I tell Ericka to knell [sic] and to caress Paul's genitals. When erect I tell her to put the penis into her mouth and to orally stimulate him.... I may have told the children that they needed to learn the sex acts and how to do them right.... I may have anal sex with Paul, not real clear.... Someone may have told me to do this with the kids. This is a feeling I have.

When Ofshe then informed Ingram that this memory was specious, Ingram refused to believe him. "It's just as real to me as anything else," he protested.

When, months later, Ofshe phoned Ingram in jail and begged him not to plead guilty, Ingram wavered but declined. Apart from consideration for the daughters who had so egregiously betrayed him, he cited the likelihood that he was still repressing material that would make the whole case clear. Protected at last from the ministrations of his "counselors," he did change his mind shortly thereafter, but his guilty plea had already been accepted by the court, and two subsequent appeals have failed.

The criminal cases we have examined suffice to show that the "return of the repressed," however bland its uses within the amorphous aims of Freudian therapy, can turn noxious when it is considered by police, prosecutors, jurors, and even accused malefactors to be a source of unimpeachable truth. In the light of the actual recovery *movement*, however, the Franklin and Ingram examples can be seen to lack a baleful but typical ingredient. So far as we know, neither Eileen Lipsker nor Ericka Ingram (not to mention Paul Ingram himself) was systematically recruited by self-help "recovery" books to believe that certain despicable deeds must have been committed and then wholly repressed.

Just such solicitation—we can think of it as suggestion-at-a-distance—has by now been brought to bear on myriad vulnerable people, mostly women, by advocates in search of ideological and/or financial gain. The result has been a widespread tragedy that is still unfolding before our incredulous eyes. To lay bare not just its nature but also its causes, both proximate and remote, is a socially urgent task. With the help of several excellent new critical works, we will explore that ground in the concluding portion of this essay. □

(This is the first of two articles.)

LETTERS

THE 'GOTHIC FOX'

To the Editors:

Of the lettered sins, authorial whining about reviewers is probably the most tiresome, surpassed rarely, and then only by the procrastinations of publishers. So it is with much diffidence I offer some marginal comments on Professor J.H. Elliott's otherwise illuminating and generous review of my *Gothic Fox* [*NYR, October 20*], a review made additionally helpful by brilliant summaries of my last two books.

Professor Elliott doubts the validity of my assertion that "The Counter-Reformation is to the cultural tradition of Spain and her Indies what the Industrial Revolution is to that of the English-speaking peoples everywhere...." He believes that comparisons such as these should be chronologically and geographically matched, otherwise the difference in their character and timing makes them "more than usually elusive."

Is this really so? Is it not possible to compare the age of Alexander with that of Napoleon? Or the Dutch commercial patriciate with that of Phoenicia, Venice, or Catalonia? Ought we to refrain from rereading Gibbon when considering the downfall of empires other than that of Rome? Can we not compare the economic feats of Parsees, Jews, and Quakers, even though they are distant in character and in time and space.

This is nonetheless an interesting conceptual problem, one I thought to have resolved at least in part with the sentence immediately preceding the quotation chosen by Professor Elliott, in which I attempted to establish the legitimacy of my interpretation by putting the two cultural achievements in perspective, observing that "nothing in the Spanish cultural tradition can compare with the prowess of the Catholic Reformation, and nothing that the English people have done can compare with their Industrial Revolution."

Professor Elliott also doubts that statements about the "love of change" of the English-speaking peoples are necessarily applicable, for example, to the obsessive conservatism of Puritan New England. This may well be so, but I would comment that the readiness to innovate and the ability to thrive on diversity are bound up inextricably with the cultural traditions of the English-speaking peoples, and that they possibly find their most convincing illustration in the North American experience, whose origins range from the very different non-conformist communities of Puritan Boston and Quaker Philadelphia to the *sui generis* orthodoxies of Jamestown and New York, all of which eventually contributed to the tidal wave of relentless innovation associated with modernity.

May I close by reiterating my gratitude to Professor Elliott for his most encouraging comments.

Claudio Véliz

Boston, Massachusetts

J.H. Elliott *replies:*

In his last published book, *L'identité de la France*, Fernand Braudel urged the claims of comparative history, "a history that seeks to compare like with like—the condition of all social science if the truth be told." But what constitutes "like"? Every historian who sets out to compare two or more societies is liable to discover very quickly that the like, on closer inspection, turns out to be unlike. While differences may in fact prove to be more illuminating than similarities, all such comparisons, as I suggested in my review, tend to be elusive.

This should not of itself discourage would-be comparativists, and I see no need to succumb to the pessimism embodied in the French adage "*comparaison n'est pas raison*." But it is obvious that the criteria for the initial selection of units of comparison need to be carefully determined. Hence my plea in my review of Claudio Véliz's *The New World of the Gothic Fox* for "a careful definition and matching of the units of comparison."

I do not, however, believe that close proximity in time and space are essential for successful comparison, and I am sorry if my words should have given Professor Véliz this impression. The choice of the societies to be compared should surely depend on the historical problem that is to be addressed. Because they were contemporaneous and shared a common European culture, a comparison between the France of Louis XIV and the England of William III is likely to help us resolve a wider range of historical questions than a comparison, say, between France and Bali. But the historian interested in exploring the relationship between power and pageantry might well find a Franco-British comparison less illuminating than one between the France of Louis XIV and the Balinese "theater-state," as described by Clifford Geertz.

The historical problem addressed by Claudio Véliz in his book is that of the failure of Iberian American societies to emulate or surpass the economic achievements of British North America. He believes that the answer is primarily to be found in their *differing cultural traditions*: the English cultural tradition encouraged change and innovation, while the cultural tradition fostered by the Spanish Counter-Reformation did not. While he may well have a strong case here, I do not believe that he proves it in this book, or that he adopts the best

STRICTLY CONFIDENTIAL

MEMO TO: ARCHBISHOP ROACH

DATE: JULY 30, 1991

FROM: KO FR. KEVIN MCDONOUGH

SUBJECT: FR. RICHARD JEUB

I met with Fr. Jeub on July 26th for our monthly review meeting. He told me that he has just returned from Saint Luke Institute for his six-month aftercare visit. He said it was a very positive experience. He talked through some family issues and some issues of adjustment back into the Archdiocese. He will return to Saint Luke's on January 6th for his next aftercare experience. I expect that we will have some written summary from Saint Luke soon.

He then raised two questions about ministerial possibilities. Obviously, he is frustrated that he is not working in some sort of ministerial setting. He asked whether we might consider assigning him a substitute for Fr. Tom Fitzgerald when Tom has his hip replacement surgery in the winter. I told him that we would not. He also asked whether he might celebrate a wedding for a personal friend at St. Catherine's in the spring. I told him that we would probably permit him to do that. Unless you object, I will have him go ahead and make those arrangements.

Finally, we talked about what he is doing with his time. He is spending two days a week doing independent contracting work as a remodeler and carpenter. He is spending another two days a week as a part-time janitor at the First Baptist Church in Hastings. He is making $5.50 an hour doing that work. I suggested that, beginning next month, we would reduce his salary by $500. This would reflect the amount that he is earning from his part-time work as well as the expense that he is incurring in therapy. He and I have agreed that the goal is to have him entirely off of Archdiocesan salary as soon as possible. We would continue providing his pension and health insurance.

If you have no objection to reducing his pay by $500 a month, please send the attached memorandum on to Fr. Ward.

STRICTLY CONFIDENTIAL

MEMO TO: FR. AUSTIN WARD

DATE: JULY 30, 1991

FROM: FR. KEVIN MCDONOUGH

SUBJECT: FR. RICHARD JEUB

Dick Jeub is working part-time in a couple of secular capacities. We would like to reduce his salary from the Archdiocese in recognition of the fact that he is also earning money elsewhere. Eventually, our goal is to remove him entirely from that Archdiocesan salary support, while continuing his pension and health insurance contributions from here.

He is now in a position to have his monthly pay reduced by $500. I do not know what exact total that leaves him with, but I ask that you would reduce his paycheck by $500 each month beginning with the check that he will receive toward the end of August.

Approved

Midwest Center for Personal & Family Development

2550 University Ave. W., Suite 335N • St. Paul, MN 55114-1096

A Private Mental Health Clinic, Approved by the State of Minnesota, Rule 29

7-30-91

Rev. Kevin McDonough
Moderator of the Curia, Vicar General
Chancery of the Archdiocese of St. Paul and Minneapolis
226 Summit Ave.
St. Paul, Minn. 55102

Dear Fr. McDonough;

We believe you are aware that [redacted] has been in contact with us relative to some emotional problems she has experienced. She explained that she was instructed to inform us that the bills should be forwarded to you. Please do so inform me if that instruction is in error.

Of course we greatly appreciate the opportunity to work with [redacted] and are pleased that you approved of her selection of us. Since the Archdiocese is assuming responsibility for her fees, we will, of course, extend a 20% discount. Please let us know if that is ever overlooked.

Sincerely in Christ,

Jack

Jack Quesnell, LICSW, LMFT
Director
Midwest Center for Personal and Family Development

-- (612) 647-1900 • FAX: (612) 647-1861 --

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Saint Paul, Minnesota 55102-2197

The Chancery

July 31, 1991

STRICTLY CONFIDENTIAL

[redacted]

Dear [redacted],

Thank you for your letter of July 26th. I have forwarded your receipts so that they will be paid in the next few days.

I do want to follow up on the question of the compensation for past therapy costs. I have asked our Finance Director to work with our insurance people to see how best we can do that. As I think I've indicated to you before, I do not see us not doing it. Rather, it is only a question of how. I apologize for the delay. Although I had expected to hear by now, I do not have the information. I will do some further checking and I hope to be back to you soon.

Thank you for the good wishes for my summer. I hope that yours is good as well.

Sincerely yours in Christ,

Hold - Waiting for response from Archdio & Austin

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

August 1991

to

July 14, 1995

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Saint Paul, Minnesota 55102-2197

The Chancery

August 2, 1991

Mr. Jack Quesnell
Director
Midwest Center for Personal and Family Development
2550 University Avenue W.
Suite 335N
St. Paul, MN 55114-1096

Dear Mr. Quesnell,

Thank you for your letter of July 30.

I referred [redacted] to you and I instructed her to tell you that bills for her therapy should be addressed to the Archdiocese of St. Paul and Minneapolis. We have worked out an arrangement with the Community of Christ the Redeemer for a co-payment of these bills.

I also asked [redacted] to rely on us to pay for that therapy for as long as the focus of the therapy is on harm caused by the alleged misconduct of Fr. Michael Kolar with her. I believe that she understands that issues arising from other times or situations in her life would be her own responsibility.

Thank you for your help in this matter.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

CHANCERY INTEROFFICE MEMO

ARCHDIOCESE OF ST. PAUL AND MINNEAPOLIS

1. TO: Austin/Angie	☐ approval ☐ action ☐ signature
2. TO:	☐ see me ☐ coordination ☐ prepare reply
3. TO:	☐ research ☐ recommendation ☐ circulate
4. TO:	☐ comment ☐ note & return ☐ information
5. TO:	☐ as requested ☐ per conversation ☐ file

REMARKS:

Please make the extra $500 for [redacted] (Jeub victim) to her for August + Sept rather than Sept + Oct.

Thanks.

FROM:

DATE 8/5/91

PHONE

ARCH-012498

Date 8/5 Time 2:40

WHILE YOU WERE OUT

M

of Ron Meshbesher's office

Phone 339-9121

Area Code Number Extension

TELEPHONED	X	PLEASE CALL	X
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	
RETURNED YOUR CALL			

Message Ron did not see the actual timeframe for these payments - September & October. Told Peggy it.

ARCH-012499

MidWest Center FOR PERSONAL & FAMILY DEVELOPMENT

2550 University Ave. W., Suite 335N • St. Paul, MN 55114-1096

A Private Mental Health Clinic, Licensed by the State of Minnesota, Rule 29

Jeub file, please.

August 6, 1991

The Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia
Archdiocese of St. Paul and Minneapolis
226 Summit Avenue
St. Paul, MN 55102-2197

Dear Father McDonough:

Thank you so very much for your letter of August 2 relative to the [redacted] situation. Just for your records, please do note that this is not a matter involving Father Michael Kolar. Instead, this matter involves Father Richard Jeub.

Sincerely,

Jack Quesnell

Jack Quesnell, L.I.C.S.W., L.M.F.T.
Director
Midwest Center for Personal & Family Development

JQ:lz

DAVID BRINGS, Ph.D.
EUGENE E. BURKE, L.P.
PATRICIA CAMILLO, R.N.C., M.S.
MARY LOU CASKEY, L.P.
DENNIS M. CHLEBECK, L.I.C.S.W.
CATHY CHAVEZ, L.I.C.S.W.

THOMAS McKENNA, Ph.D.
KEVIN MUNSTERTEIGER, L.P.
JACK QUESNELL, L.I.C.S.W.
JOHN SHIRRIFF, M.D.
LISA S. SQUIRE, Ph.D.

ANNE BISANZ HANNAHAN, R.N.
SAM W. JOHNSON, L.I.C.S.W.
JONATHAN R. LEONARD, L.I.C.S.W.
RITA YOUNGER LOBBY, L.I.C.S.W.
BARBARA L. LOPATA, L.I.C.S.W.
EILEEN McGINLEY, L.I.C.S.W.

– (612) 647-1900 • FAX: (612) 647-1861 –
Quesnell & Associates d/b/a MidWest Center for Personal & Family Development
Edina Location: 6550 York, Suite 312, Edina, MN 55435

Fr. Jeub's file, please

Saint Luke Institute

August 19, 1991

CONFIDENTIAL

Most Reverend John R. Roach, D.D.
Archdiocese of St. Paul/Minneapolis
226 Summit Avenue
St. Paul, MN 55102

Re: Reverend Richard Jeub
SLI #12198

Dear Archbishop Roach:

Father Jeub recently attended a workshop with us as part of his Continuing Care Program. We want to inform you at this time regarding his progress in recovery over the past six months. Also, we wish to take this opportunity to inform you of a recent change in the Continuing Care service. We're happy to have Michael Brenneis MA, M.Div. as a new Continuing Care Therapist. Michael comes to us with a background in treatment of addictions, pastoral ministry, and spiritual direction.

The following is our perception of Father Jeub's progress in his ongoing recovery:

1) Recovery Program: This is Father Jeub's first Continuing Care Workshop. Since his departure, he has become involved in fellowship meetings in his area. He attends an SA meeting for clergy on Sunday evenings. Also on Tuesday afternoon, he attends a meeting of SAA. He has a fellowship sponsor. He also meets on a monthly basis with a support group for priests who have been through treatment. Additionally, he has found an ACA group to which he will be going on a regular basis. Also, he has just begun therapy with Delore Rocker, after doing some individual work with Ken Pierre.

Father Jeub feels that the past months have been a time of transition for him, and of establishing himself in the ongoing process of recovery. He has recognized that the recovery work can be difficult at times, but Father Jeub is also realizing that he is a gifted person who is worth the effort that it takes. In collateral letters, we have received examples of how Father Jeub

2420 Brooks Drive • Suitland, Maryland 20746-5294 • (301) 967-3700 • FAX: (301) 967-3953
Affiliated with the Daughters of Charity, National Health System

is capably handling both routine and difficult situations over the past several months.

2) Current Living Experiences/Vocational Functioning:

Father Jeub has appreciated the stay in Cottage Grove, with Father Tom. They have known each other for some time, and are able to speak of things that are of concern to them. It certainly seems to be an atmosphere in which Father Jeub can begin to establish an ongoing recovery. Father Jeub has had to work with several difficult situations over the past several months, including a hospitalization of his mother. With regard to a work situation, we encourage Father Jeub to continue with his active career counseling, and seek to find avenues in which his giftedness can become a part of any vocational activities that he undertakes.

3) Medical: During the course of the workshop we monitor physical health via various laboratory indices. Father Jeub's laboratory values show elevations of cholesterol at 257, as well as an LDL of 186, and a blood lipid of 69. These indicate the need to continue to monitor a low-fat low cholesterol diet, and to have follow-up measurements of these values in the future.

4) Recommendations and Treatment Plan: Father Jeub has made some solid efforts as he begins the process of ongoing recovery. Under situations where a priest does not return to active ministry after treatment, there has sometimes been a tendency for the person to discontinue their recovery efforts, or to go about them in only an indifferent manner. To his credit, Father Jeub has made efforts to establish a recovery network. The persons who attended his Re-Entry Workshop were certainly caring, concerned, and a source of support and positive challenge to him. We encourage him to continue his regular involvement with these individuals. In addition, it will be very important that Father Jeub continue to develop his active participation in Twelve Step Fellowship recovery. By doing so, he will be certain to avoid shortchanging himself of the many benefits that can be derived only through active participation in Twelve Step spirituality and recovery. We encourage him to work actively with Delore Rocker over the next few months, so as to get a basis from which to work in the future. We ask Father Jeub to contact us over the next few months, as to how things are going for him, and any new developments that may occur. We thank him for his active participation in our workshop, and look forward to seeing him again here during the second week of January, 1992.

A copy of this letter is being sent to Father Jeub for his reflections. If you have any questions regarding this report, please contact us.

We thank you for the support you offer to Father Jeub. We believe that a life of sobriety helps him to continue in his life giving ministry with God's people. We ask for your prayers on behalf of the many clergy and religious persons who we serve and for continued blessings on the work of the Institute.

Sincerely yours,

John Sullivan MA, CAC
Coordinator,
Continuing Care Services
Outpatient Department

Stephen Montana, Ph.D.
Director,
Outpatient Department

Frank Valcour, M.D.
Medical Director

JS:rp

CC: Reverend Richard Jeub

8-22-91

KEVIN,

Though that you would like to read this article. Hopefully we will be able to reach more women, who are afraid to come forward.

The support Group is going well, & I'm learning alot. Especially not to blame myself, it is and was not my fault. I think it is part of the shame that I feel.

Keep me in your prayers, I have along road ahead of me.

Sincerely,

[redacted]

P.S.
Pass this onto the Archbishop, so he gets a chance to read it.

ARCH-012758

CHANCERY INTEROFFICE MEMO

ARCHDIOCESE OF ST. PAUL AND MINNEAPOLIS

1. TO: Archbishop	☐ approval
2. TO: Fr. McDonough	☐ action
3. TO:	☐ signature
4. TO:	☐ see me
5. TO:	☐ coordination
	☐ prepare reply
	☐ research
	☐ recommendation
	☐ circulate
	☐ comment
	☑ note & return
	☐ information
	☐ as requested
	☐ per conversation
	☐ file

REMARKS:

[redacted] (Jeub victim) asked me to show this to you.

thanks.

FROM: [signature]

DATE 8/28/91

PHONE

LAW OFFICES

MESHBESHER & SPENCE, LTD.

1616 PARK AVENUE

MINNEAPOLIS, MINNESOTA 55404

(612) 339-9121

FAX (612) 339-6100

KENNETH MESHBESHER*
RONALD I. MESHBESHER
RUSSELL M. SPENCE*
JAMES H. GILBERT*
JOHN P. CLIFFORD
DENNIS K. JOHNSON***
JACK NORDBY
PAUL W. BERGSTROM
PATRICK E. HORAN

*ALSO ADMITTED TO PRACTICE IN WISCONSIN

***ALSO ADMITTED TO PRACTICE IN WISCONSIN & NORTH DAKOTA

DANIEL J. BOIVIN**
MICHAEL C. SNYDER*
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MARK D. STREED
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HOWARD I. BASS
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J. K. IVEY***
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JOHN L. GREER

**ALSO ADMITTED TO PRACTICE IN ILLINOIS

***ALSO ADMITTED TO PRACTICE IN TEXAS

REPLY TO MINNEAPOLIS OFFICE

September 6, 1991

Andrew Eisenzimmer, Esq.
220 Northern Central Life Tower
445 Minnesota Street
St. Paul, MN 55101-2100

Re: Mary Moe v. The Archdiocese of St. Paul, et al.

Dear Mr. Eisenzimmer:

You earlier indicated that you would arrange for acknowledgment of service on Father Jeub. We have already received an acknowledgment of service on behalf of the Archdiocese and the defendant churches. Therefore I enclose a notice and acknowledgment of service by mail and ask that you arrange to have an admission of service executed by Father Jeub and then transmitted to me.

Recently you suggested that I put a demand in writing so that you could meet with the various insurers and submit a proposal. I have reviewed the file and find that Father Jeub's actions were egregious and that the Archdiocese churches involved were aware of his propensities and did little or nothing to protect the female parishoners. Father Jeub took advantage of a very vulnerable person who had put her faith and trust in him. As a result of that, [redacted] has severe emotional problems which have wreaked havoc on her relationship with her family and, of course, on her personally. She continues to undergo psychological counselling.

In view of all these circumstances and because of the long period of time involved, we hereby demand, pursuant to the pre-judgment interest statute, $1.4 million.

As you know, we have delayed filing a complaint pending settlement discussions. I would like to get this matter resolved quickly.

MESHBESHER & SPENCE, LTD.

Please get back to me as soon as you have had an opportunity to discuss this case with your clients and the insurers. Thank you for your cooperation.

Yours truly,

Ronald I. Meshbesher

RIM:lr
Enc.

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J EISENZIMMER
LEO H DEHLER
THOMAS B WIESER
NANCY GOERING REILLY
JOHN C GUNDERSON
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445 MINNESOTA STREET
SAINT PAUL, MINNESOTA 55101-2100
TELEPHONE (612) 228-1911
FACSIMILE (612) 223-5483

WILLIAM C MEIER
(1920-1981)
TIMOTHY P QUINN
(1921-1991)
ALOIS D KENNEDY JR
(OF COUNSEL)

September 10, 1991

Mr. Ronald Meshbesher
Attorney at Law
Meshbesher, Singer & Spence, Ltd.
1616 Park Avenue
Minneapolis, MN 55404

Re: Mary Moe [redacted] vs. The Archdiocese of Saint Paul and Minneapolis, et al

COPY

Dear Mr. Meshbesher:

I received your letter of September 6, 1991 in connection with the above-referenced matter. By my letter of March 20, 1991, I had asked you to forward me an additional notice and acknowledgement of service by mail so that I could arrange to have admission of service executed by Father Richard Jeub. Since you have now sent that notice and acknowledgement of service to me, I will arrange to have an admission of service executed by him and forwarded to you.

Regarding your settlement offer, I would indicate that as you urged, I will be discussing this case with my clients and its insurers. Given my previous experience with these matters, I assume that this will take some time. I understand that you would like to get the matter resolved quickly and I will do my best to speed the process along but you and your client should know that it will take some time.

I assume that you will not file the pleadings in this matter without first informing me that settlement discussions have been exhausted.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb

[redacted]

TAB 29

Bishops to Extend Ban on Abusive Priests

AP - **1 hour, 1 minute ago**

CHICAGO - The nation's Roman Catholic bishops agreed Friday to a five-year extension on their unprecedented policy of permanently barring sexually abusive clergy from church work. The overwhelming vote by the U.S. Conference of Catholic Bishops means the American church will stick with the main points of the policy it adopted in 2002 at the height of crisis brought on by molesters in the priesthood. The Vatican is expected to approve the extension.

218-372-3349

CHANCERY INTEROFFICE MEMO

ARCHDIOCESE OF ST. PAUL AND MINNEAPOLIS

1. TO: Marilyn	☐ approval ☐ action ☐ signature
2. TO:	☐ see me ☐ coordination ☐ prepare reply
3. TO:	☐ research ☐ recommendation ☐ circulate
4. TO:	☐ comment ☐ note & return ☐ information
5. TO:	☐ as requested ☐ per conversation ☐ file

REMARKS:

Could you please set up a meeting involving the following priests + me:

10/28/91 9:30-10:30

~~Following were present~~

✓ Robt Cassidy 929-3317

✓ Jerry Keiser 645-5717 left message to call

✓ Richard Pates 823-8253 gave dates - on parent book site Friday 10/25

✓ Greg Esty 869-2426 left message

✓ Tom Fitzgerald 459-4596 459-3902 Greg Winters 10/29? Is he really needed

This relates to the attached.

Thanks.

FROM:

DATE 9/12/91

PHONE

ARCH-012950

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J EISENZIMMER
LEO H DEHLER
THOMAS B WIESER
NANCY GOERING REILLY
JOHN C GUNDERSON
CHARLES M BICHLER

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WILLIAM C MEIER
(1920-1981)
TIMOTHY P QUINN
(1921-1991)
ALOIS D KENNEDY JR
(OF COUNSEL)

September 19, 1991

Mr. Ronald Meshbesher
Attorney at Law
Meshbesher, Singer & Spence, Ltd.
1616 Park Avenue
Minneapolis, MN 55404

Re: Mary Moe [redacted] vs. The Archdiocese of Saint Paul and Minneapolis, et al

Dear Mr. Meshbesher:

I have spoken with my client concerning your request that it continue the increased payments to [redacted] until such time as my client and its insurers are prepared to respond to your settlement demand in this matter. The Archdiocese has agreed to continue those extra payments for two additional months to allow us to so respond.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb

[redacted]

Thursday, October 10, 1991

KEVIN MC DONOUGH
REV
Archdiocese of St Paul and Minneapolis
226 Summit Ave
St Paul , MN 55102-2197

Dear Rev. McDonough,

Enclosed are the receipts for psychotherapy with [redacted] dated 29 July to 30 September 1991. They total $1000.

In my letter of 26 July I neglected to mention the agreement we have that the Archdiocese will reimburse half the cost of therapy. I received the entire amount rather than half. Therefore, out of this collection of receipts I should be reimbursed for $130. Future correspondence on my part will be clearer.

I recently spoke with Phyllis Willwersheid about our conversation and correspondence around the issue of compensation for past therapy. She assures me that she will speak with you about it and press for progress on your conversations with the insurance companies involved.

I understand that you have a new title and new responsibilities in the Chancery. Congratulations.

Thank you for your continued attention to this.

Sincerely,

[redacted]

Jenb • file, please

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J EISENZIMMER
LEO H DEHLER
THOMAS B WIESER
NANCY GOERING REILLY
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WILLIAM C MEIER
(1920-1981)
TIMOTHY P QUINN
(1921-1991)
ALOIS D KENNEDY, JR
(OF COUNSEL)

October 14, 1991

[redacted]

Re: Your Client: [redacted]
Our Client: The Archdiocese of Saint Paul and Minneapolis

Dear [redacted]:

COPY

On August 28, 1991, Mr. Michael VanGrunsven from Crum & Forster Insurance and I met with you in my office to discuss matters pertaining to your client, [redacted]. Since that time, I have had a number of discussions with Mr. VanGrunsven and I have forwarded him the narrative statement prepared by your client.

As you will recall, you had indicated to Reverend Kevin McDonough that in addition to the Archdiocese's offer to reimburse [redacted] for her therapy costs which were not covered by insurance, your client was seeking an additional amount as compensation for pain and suffering. We indicated that this matter would need to be reviewed with our insurance representative.

Mr. VanGrunsven has now informed me that Crum & Forster Insurance will not provide coverage for this claim because it does not come within the definition section of the policy in question. This is an unfortunate determination as it affects my client's ability to respond to you and your client in this matter.

Despite the position taken by Crum & Forster, my client, at this time, is prepared to offer [redacted] $[redacted] in full and final settlement of all claims which she might have in this matter. Any settlement offer would include a condition that the final release would incorporate a confidentiality agreement.

Please contact me after you have had a chance to review this matter with your client.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb
bcc: Reverend Kevin M. McDonough

CONFIDENTIAL

DATE: October 22, 1991

MEMO TO: FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN McDONOUGH

SUBJECT: MONTHLY MEETING WITH FR. JEUB

I met with Father Jeub on October 18 for our monthly monitoring meeting. In this initial phase of his aftercare I have been meeting with him on a regular basis.

We reviewed his continuing participation in therapy and support groups. I am satisfied that he is attending those programs regularly as required.

We discussed the question of work. I have asked him to become as self-supporting as possible within the strictures placed by his aftercare program. He continues to find work and is providing about half of his support at this time.

We clarified his standing in regard to the Archdiocese and priestly assignment. I do this with him regularly so that he will understand what his situation is. I told him that we are still not clear about when, if ever, he could be restored to a full-time pastoral ministry, even a parochial one. I indicated that there are many factors involved in that determination: his continuing aftercare work, his legal situation, the evolving understanding of our parishes around this question, the healing that is or is not happening with the people who were hurt by him. He told me that he understood this and that the Archdiocese "has not promised me anything" as far as an assignment goes.

I informed him of the fact that the legal situation was becoming more complicated, and I advised him to clarify the ground rules which he has in working with his attorney. The Archdiocese will not be performing his defense for him, and it is in his own interest that his legal case be well cared for. I also reminded him that the legal fees that he would incur would be his own responsibility.

cc: Archbishop Roach
Fr. Tom Vowell

Job file, please

DATE: October 25, 1991

MEMO TO: Kevin McDonough

MEMO FROM: Phyllis Willerscheidt

SUBJECT: Meeting with [redacted]

[redacted] and I met yesterday with regard to her therapy. She asked me what boundaries (or limits) there were on her seeking therapy. She mentioned that Jack Quesnell had received a letter from you in August stipulating some things. I was in the dark about this so did not know how to respond to her. She also told me that the letter stipulated the wrong perpetrator. Could I please have a copy of items like this so that I am responding appropriately? She felt angry at something that was in the letter and I did not know what to say other than to recognize her anger.

Another concern she had was about [redacted]'s lawsuit. She is afraid that it will become public and if his name is used, people will connect her with him.

She is also concerned about his treatment. Did it work? Does he still deny he did anything? Is he sorry?

While I think she is progressing, I feel she needs to continue with therapy and needs some assurance about the length of time. She is going weekly for therapy, but it is difficult to prescribe how long it will take. Perhaps we need to talk about this further.

CONFIDENTIAL

DATE: November 12, 1991

MEMO TO: PHYLLIS WILLERSCHEIDT

FROM: FR. KEVIN McDONOUGH

SUBJECT: [redacted] AND ST. RICHARDS

Phyllis, in the lawsuit which [redacted] has filed the Church of St. Richard is named as a codefendant. I met recently with Fr. Greg Esty in order to bring him up to date on the legal situation regarding his parish. Greg called me back and indicated that he wants to be a pastoral support to [redacted] but the fact that his parish is named as a codefendant makes that somewhat uncomfortable for him.

I proposed that we might set up a meeting that would involve [redacted], Greg, and yourself. I might also participate. The purpose of that meeting would be help figure out how the parish can provide pastoral care and support to her while it is also being sued by her. I do not think that this needs to make her participation in the parish impossible. I simply think there are some ground rules that have to be worked out. Please let me know what you think.

cc: Archbishop Roach
Bishop Charron

DATE: November 18, 1991 **STRICTLY CONFIDENTIAL**

MEMO TO: PHYLLIS WILLERSCHEIDT

FROM: FR. KEVIN McDONOUGH

SUBJECT: [redacted]

Phyllis, you and I have talked about your meeting with [redacted] on a couple of occasions. I want to give you a fuller response in writing, however, because we have really only talked about various elements of that conversation at separate times.

First of all, let me indicate again my embarrassment at my miscommunication with [redacted] in regard to [redacted]. As I have indicated to you, I had gotten the mistaken notion in my mind that she was a victim of Fr. Michael Kolar. When I wrote to [redacted], I sent a standard sort of letter that we have been using in regard to members of the Community of Christ the Redeemer. This was the cause of the mix-up that you and I have discussed several times.

[redacted] has been wondering about the limits of treatment that we will support. At this point, it has been my general practice to say that we will support up to two years of therapy to deal with the pain resulting from the misconduct of a member of the clergy. If there are compelling reasons for further therapy, then we will certainly consider extending our support beyond the two years. If [redacted] would like some clarity, however, please let her know that we anticipate providing those two years of therapy.

The other major question she had was in regard to Fr. Jeub's treatment. This is not something that I am in a position to discuss in detail. It is my understanding, however, that he completed treatment successfully and that he continues to follow up on the sorts of therapy and other personal supports that are needed for his health. In your memorandum, you asked "does he still deny that he did anything? Is he sorry?" As you know, I have not received permission to use [redacted]'s name with Fr. Jeub. I have never confronted him about the complaint that she has made about him. Therefore, it is not accurate to say that he has denied that he did anything. I have not asked him about any inappropriateness in relationship with her because I do not have permission to use her name.

I appreciate what you passed on about her concern that the lawsuit filed by [redacted] might "bounce back" and hurt her. I certainly hope that this does not happen. This is one of the potential negative effects of the legal process.

I hope that this provides some better clarity. Once again, I apologize for not having given you a written response sooner.

DATE: NOVEMBER 19, 1991 **STRICTLY CONFIDENTIAL**

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN McDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Richard Jeub on November 15. This was another in a series of regular communications and monitoring meetings. At the beginning of the meeting, he indicated that he had heard nothing from his attorney about the acceptance of service in the lawsuit file by [redacted]. He has also heard nothing from his attorney about the meeting that [redacted] has requested. He indicated to me earlier that his attorney has advised him not to participate in such a meeting unless [redacted]'s attorney and Fr. Jeub's attorney can talk to one another about ground rules first. I am sending a copy of this file statement to Mr. Andrew Eisenzimmer. If he is aware of any blockage in either of these matters of legal communication concerning Fr. Jeub, I would ask that he be in contact with me.

I must say in summary that this was the most positive meeting that I have had with Fr. Jeub. Our meetings are consistently fairly pleasant and direct, but it was in this meeting that I noticed concrete signs of further emotional and spiritual growth on his part. Here are some of the key elements which prompt that perspective:

1) He indicated that he was at home alone for nine days while Fr. Tom Fitzgerald, with whom he lives, was away on a hunting trip. During this time he found himself tempted to purchase pornography, but he successfully resisted that temptation. He was frustrated that the temptation ever occurred to him, but he is grateful both that he was successful in avoiding it and also that he is holding himself accountable for it by talking with his therapist, his support group, and with me.

2) He had what I would label an important breakthrough into an empathic understanding of the position of his victims. He said that one day he was working on some of his therapeutic "homework" for Dr. Rockers when he paused to reflect, "What would I feel like if Dr. Rockers made a sexual advance on me?" This prompted him to recognize the terrible position that he had placed people in when, as their priest, he had made sexual advances to them. In my recollection this is the first spontaneous indication of empathy that Fr. Jeub has given.

3) He indicated that he has been giving some fairly honest indications of his situation to a number of people. During the several months between our intervention with him in 1989 and the beginning of his therapy in 1990, Fr. Jeub was unable to give

even the beginning of an accurate description of his situation to family members or other close friends. In our most recent conversation, he described some limited, and appropriate, disclosure about his situation that he had made to a member of his extended family and to a funeral director. He is now more able to describe his situation in realistic but not excessively detailed terms in response to questions.

4) One of the issues that he is facing in therapy is the question of expanding his male friendships. He, and apparently Dr. Rockers, labels this as "male bonding". Particularly through the years of his involvement with [redacted], he had almost totally cut himself off from male friendships of any depth. During our review session, he gave several indications of his having spent solidly supportive time with male peers. This will be important if he is going to be able to live as an effective celibate.

Finally, he identified some appropriate emotionally expressive behavior on his part. He has maintained a controlled and mostly stoic exterior which reflected his lack of insight into his own emotional life. He is now finding that he is feeling things more and is able to express them more directly.

All of this adds up to a picture of a man who is making some solid recovery. He is fairly enthusiastic about his participation both in therapy and in support groups.

I passed on to him one item for further reflection. In a recent meeting, Fr. Dick Pates had indicated that he is having some pastoral difficulty dealing with the number of people with whom Fr. Jeub had expressed a desire to perform some major sacramental or ritual event in their lives. He told several families that he wanted to baptize their children, perform their weddings, and so on. I challenged Fr. Jeub to examine whether this might be another example of improper ministerial boundaries, not sexual in nature but still inappropriate. He was defensive about this, but I suspect he will do some thinking about it.

We have scheduled our next review for early January, just before he returns to Saint Luke Institute for another aftercare session.

cc: Archbishop Roach
Bishop Carlson
Fr. Tom Vowell
Mr. Andrew Eisenzimmer

TAB 25

DATE: NOVEMBER 19, 1991 **STRICTLY CONFIDENTIAL**

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN McDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Richard Jeub on November 15. This was another in a series of regular communications and monitoring meetings. At the beginning of the meeting, he indicated that he had heard nothing from his attorney about the acceptance of service in the lawsuit file by [redacted]. He has also heard nothing from his attorney about the meeting that [redacted] has requested. He indicated to me earlier that his attorney has advised him not to participate in such a meeting unless [redacted]'s attorney and Fr. Jeub's attorney can talk to one another about ground rules first. I am sending a copy of this file statement to Mr. Andrew Eisenzimmer. If he is aware of any blockage in either of these matters of legal communication concerning Fr. Jeub, I would ask that he be in contact with me.

I must say in summary that this was the most positive meeting that I have had with Fr. Jeub. Our meetings are consistently fairly pleasant and direct, but it was in this meeting that I noticed concrete signs of further emotional and spiritual growth on his part. Here are some of the key elements which prompt that perspective:

1) He indicated that he was at home alone for nine days while Fr. Tom Fitzgerald, with whom he lives, was away on a hunting trip. During this time he found himself tempted to purchase pornography, but he successfully resisted that temptation. He was frustrated that the temptation ever occurred to him, but he is grateful both that he was successful in avoiding it and also that he is holding himself accountable for it by talking with his therapist, his support group, and with me.

2) He had what I would label an important breakthrough into an empathic understanding of the position of his victims. He said that one day he was working on some of his therapeutic "homework" for Dr. Rockers when he paused to reflect, "What would I feel like if Dr. Rockers made a sexual advance on me?" This prompted him to recognize the terrible position that he had placed people in when, as their priest, he had made sexual advances to them. In my recollection this is the first spontaneous indication of empathy that Fr. Jeub has given.

3) He indicated that he has been giving some fairly honest indications of his situation to a number of people. During the several months between our intervention with him in 1989 and the beginning of his therapy in 1990, Fr. Jeub was unable to give

even the beginning of an accurate description of his situation to family members or other close friends. In our most recent conversation, he described some limited, and appropriate, disclosure about his situation that he had made to a member of his extended family and to a funeral director. He is now more able to describe his situation in realistic but not excessively detailed terms in response to questions.

4) One of the issues that he is facing in therapy is the question of expanding his male friendships. He, and apparently Dr. Rockers, labels this as "male bonding". Particularly through the years of his involvement with [redacted], he had almost totally cut himself off from male friendships of any depth. During our review session, he gave several indications of his having spent solidly supportive time with male peers. This will be important if he is going to be able to live as an effective celibate.

Finally, he identified some appropriate emotionally expressive behavior on his part. He has maintained a controlled and mostly stoic exterior which reflected his lack of insight into his own emotional life. He is now finding that he is feeling things more and is able to express them more directly.

All of this adds up to a picture of a man who is making some solid recovery. He is fairly enthusiastic about his participation both in therapy and in support groups.

I passed on to him one item for further reflection. In a recent meeting, Fr. Dick Pates had indicated that he is having some pastoral difficulty dealing with the number of people with whom Fr. Jeub had expressed a desire to perform some major sacramental or ritual event in their lives. He told several families that he wanted to baptize their children, perform their weddings, and so on. I challenged Fr. Jeub to examine whether this might be another example of improper ministerial boundaries, not sexual in nature but still inappropriate. He was defensive about this, but I suspect he will do some thinking about it.

We have scheduled our next review for early January, just before he returns to Saint Luke Institute for another aftercare session.

cc: Archbishop Roach
Bishop Carlson
Fr. Tom Vowell
Mr. Andrew Eisenzimmer

file, please

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
NANCY GOERING REILLY
JOHN C. GUNDERSON
CHARLES M. BICHLER

SUITE 2200, NORTH CENTRAL LIFE TOWER
445 MINNESOTA STREET
SAINT PAUL, MINNESOTA 55101-2100
TELEPHONE (612) 228-1911
FACSIMILE (612) 223-5483

WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(OF COUNSEL)

December 9, 1991

Mr. James P. Tweedy
Attorney at Law
Edinburgh Executive Office Plaza
8525 Edinbrook Crossing
Suite 201
Brooklyn Park, MN 55443

Re: Your Client: [redacted]
Our Client: The Archdiocese of Saint Paul and Minneapolis

Dear Mr. Tweedy:

Enclosed please find my client's check number [redacted] in the amount of [redacted] in full settlement of the claims of your client, [redacted]. Also enclosed is an original and four copies of the Settlement Agreement and Release.

Please have your client execute the original and all four copies of the Settlement Agreement and Release and return them to me prior to release of the settlement proceeds to [redacted]. As you will note, the Settlement Agreement and Release provides that your client is responsible for all past, present, and future therapy expenses.

If, for any reason, your client is unable to execute the Settlement Agreement and Release exactly as it is prepared, the settlement proceeds are not to be released to her but are to be returned to me.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb
Enclosures
[redacted]

COPY

TAB 16

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
NANCY GOERING REILLY
JOHN C. GUNDERSON
CHARLES M. BICHLER

SUITE 2200, NORTH CENTRAL LIFE TOWER
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WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(OF COUNSEL)

December 9, 1991

[redacted]

Re: Your Client: [redacted]
Our Client: The Archdiocese of Saint Paul and Minneapolis

Dear Mr. [redacted]:

Enclosed please find my client's check number [redacted] in the amount of [redacted] in full settlement of the claims of your client, [redacted]. Also enclosed is an original and four copies of the Settlement Agreement and Release.

Please have your client execute the original and all four copies of the Settlement Agreement and Release and return them to me prior to release of the settlement proceeds to [redacted]. As you will note, the Settlement Agreement and Release provides that your client is responsible for all past, present, and future therapy expenses.

If, for any reason, your client is unable to execute the Settlement Agreement and Release exactly as it is prepared, the settlement proceeds are not to be released to her but are to be returned to me.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb
Enclosures

[redacted]

COPY

file, please

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
NANCY GOERING REILLY
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CHARLES M. BICHLER

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WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(OF COUNSEL)

December 9, 1991

[redacted]aza

Re: Your Client: [redacted]
Our Client: The Archdiocese of Saint Paul and Minneapolis

Dear [redacted]:

Enclosed please find my client's check number [redacted] in the amount of [redacted] in full settlement of the claims of your client, [redacted]. Also enclosed is an original and four copies of the Settlement Agreement and Release.

Please have your client execute the original and all four copies of the Settlement Agreement and Release and return them to me prior to release of the settlement proceeds to [redacted]. As you will note, the Settlement Agreement and Release provides that your client is responsible for all past, present, and future therapy expenses.

If, for any reason, your client is unable to execute the Settlement Agreement and Release exactly as it is prepared, the settlement proceeds are not to be released to her but are to be returned to me.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb
Enclosures
bcc: Reverend Kevin M. McDonough

COPY

Jeub file, plea

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J EISENZIMMER
LEO H DEHLER
THOMAS B WIESER
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WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D KENNEDY, JR.
(OF COUNSEL)

December 27, 1991

Mr. Ronald Meshbesher
Attorney at Law
Meshbesher, Singer & Spence, Ltd.
1616 Park Avenue
Minneapolis, MN 55404

COPY

Re: Mary Moe vs. The Archdiocese of Saint Paul and Minneapolis, et al

Dear Mr. Meshbesher:

I have your letter of December 19, 1991 in connection with the above-referenced matter. Your indication that Father Jeub's inappropriate behavior began in the spring of 1980 complicates this case and necessitates my continued discussions with the various representatives involved in terms of how they wish to respond to your settlement demand. I expect this to take some amount of time but I will be in touch with you as soon as possible.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

Andrew J. Eisenzimmer

AJE:crb
cc: Reverend Kevin M. McDonough

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
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WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(OF COUNSEL)

December 27, 1991

Mr. William L. Lucas
Attorney at Law
The Marquette Bank Building
6640 Shady Oak Road
Suite 400
Eden Prairie, MN 55344

Re: Mary Moe v. The Archdiocese of Saint Paul and Minneapolis, et al

Dear Mr. Lucas:

I have your letter of December 20, 1991 in connection with the above-referenced matter. I apparently mistakenly assumed that you had received the Summons and Complaint in this case along with the Notice and Acknowledgement of Service by Mail. I had forwarded those documents to Reverend Kevin McDonough, the Vicar General of the Archdiocese by a letter dated September 10, 1991. I was under the mistaken impression that he had in turn forwarded them to your client, Father Richard Jeub, so that you and your client could acknowledge service of the Summons and Complaint in this matter and forward the Notice and Acknowledgement of Service by Mail back to Mr. Ronald I. Meshbesher, the attorney for the plaintiff.

Please accept my apology for this mistaken assumption and oversight. Enclosed is a copy of the Summons and Complaint along with a copy of the Notice and Acknowledgement of Service by Mail. I assume and understand that you will undertake to have Father Jeub admit service and forward the appropriate acknowledgement to Mr. Meshbesher.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

Andrew J. Eisenzimmer

AJE:crb
Enclosure
cc: Reverend Kevin M. McDonough✓
Mr. Ronald I. Meshbesher

COPY

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue
Saint Paul, Minnesota 55102-2197
FAX #: 290-1629

The Chancery

FAX TO: John Sullivan
Saint Luke Institute

DATE: 1-7-92

FAX #: 301-967-3953

FROM: Father Kevin M. McDonough

MESSAGE: I am sending summaries of my monitoring meetings with Richard Jeub

# of pages: 8
(including cover page)

TRANSMITTED BY: Marilyn Wagner PHONE # 612 291-4434

PLEASE CALL IF THERE ARE ANY PROBLEMS WITH THIS TRANSMISSION.

Saint Luke Institute

To: Persons concerned about Fr. Dick Jeub

From: Coordinator of Continuing Care Services

Dick will be returning to the Saint Luke Institute in the near future to participate in a Continuing Care Workshop. It would be much appreciated if you would share your observations about his/her progress in recovery. You may wish to share your thoughts on issues such as ministerial functioning, relations with those with whom he/she lives, relationships with those in authority, participation in activities such as priest support groups/therapy/Twelve Step meetings, and so on. Please share any observations or concerns that you may have below and/or on reverse, and return to us in the provided envelope. Your comments will be used by us for therapeutic purposes only; they do not become part of the medical record.

You may certainly also wish to share your observations with our Continuing Care client at this time, and we encourage our clients to seek and benefit from your observations.

Thank you again for your help, and please do not hesitate to contact us if you have any concerns.

John Sullivan, MA, CAC
Coordinator,
Continuing Care Services
Outpatient Department

Relationship to Client_____Date_____

2420 Brooks Drive • Suitland, Maryland 20746-5294 • (301) 967-3700 • FAX: (301) 967-3953
Affiliated with the Daughters of Charity, National Health System

DATE: January 7, 1992 **STRICTLY CONFIDENTIAL**

MEMO TO: The File of Richard Jeub

FROM: Fr. Kevin McDonough

SUBJECT: Monitoring Meeting

I met with Fr. Richard Jeub on January 3, 1992. He indicated that he was somewhat depressed after the holidays, and perhaps also because he has been working hard in therapy. In spite of his initial report of depression, I must indicate that this was perhaps the most positive meeting that I have had with Fr. Jeub.

He indicated at the beginning of our conversation that he has recently read the book Sex in the Forbidden Zone, which discusses the problems of sexual exploitation by professionals. He indicated that this has helped him understand much more profoundly the violation of trust that he perpetrated against others. It has had a particular effect at helping him understand that the sort of "helping" that he was doing with people like [redacted] (providing money, spending time with family, and so on) actually deepened the hurt that he caused. During our last meeting in late November, he had provided evidence of another real breakthrough in empathy. This understanding of the harm he has caused by exploitation seems to me to be a sign of very real progress. I complimented him on it, and he gave credit to Dr. Dolore Rockers, who has been very challenging to him in therapy.

He next indicated that the case of Fr. Thurner has been very troubling to him. It has prompted him to ask the question "What am I going to be trusted with again?" He said that, as he meditates on this, he is coming to believe that he will probably never be permitted to be a pastor again. He says that it even seems likely to him that he may never be assigned in the parochial setting. He has observed how the Archdiocese is charged with "moving problems from one place to another", and he does not want to be one of those.

As a result of this, he has been talking with Dr. Rockers about where all of this may be going. They are having some initial discussions about where he feels he might be able to make contributions to the Church.

Fr. Jeub indicated that he has taken some steps to broaden his contacts with other priests. He has recently rejoined an old group of friends who recreate together in the winter. This group consists of people who know about his participation in treatment, and they are supportive of his continued steps toward health.

Fr. Jeub is spending the week of January 6 at an aftercare seminar at Saint Luke Institute. After the aftercare seminar, he will continue on to Ireland, where he will vacation with a priest with whom he was in treatment at Saint Luke Institute. He will be back in the Archdiocese on February 1.

He will be staying with the priest in his family home in Ireland. According to the Irish custom, the pastor will expect him to concelebrate at Mass while he is there. I gave him permission to do so.

Finally we discussed the question of a confrontation with [redacted]. She has indicated through Phyllis Willerscheidt that her therapist believes she is ready to do so. There were problems in getting the attorneys to confer about how such a discussion could take place. Jeub will confirm with his own attorney that the ground rules have been worked out. This is to make certain that no legal complications result. I, in turn, will write to the therapists involved and ask them to set up a meeting involving themselves, [redacted], and Fr. Jeub.

It is evident that Fr. Jeub has been doing hard work in therapy.

cc: Bishop Carlson
Fr. Tom Vowell
Mr. Andy Eisenzimmer

DATE: January 7, 1992 **STRICTLY CONFIDENTIAL**

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cc: Bishop Carlson
Fr. Tom Vowell
Mr. Andy Eisenzimmer

January 7, 1992

Dr. Dolore Rockers
Consultation Services Center
633 N. Snelling Avenue
St. Paul, MN 55104

Dear Dr. Rockers,

I meet every four to six weeks with Fr. Richard Jeub in a monitoring session. I am aware that he is also seeing you for therapy.

At our two most recent monitoring meetings Fr. Jeub has spontaneously exhibited what to me are surprising depths of empathy. When I first spoke with him after his treatment at Saint Luke Institute, I was concerned that he was unable to do so. These two recent manifestations of empathy are, therefore, all the more exciting. In both cases I have complimented him on them, and in both cases he has attributed them directly to your challenging work with him in therapy.

I wanted you to have this positive feedback about the work that you are doing. Thank you for your professional care for him.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

cc: Fr. Richard Jeub

January 7, 1992

Dr. Dolore Rockers
Consultation Services Center
633 N. Snelling Avenue
St. Paul, MN 55104

Ms. Gerry Peterson, LICSW
Family and Children Services
9801 Dupont Avenue S., Suite 100
Bloomington, MN 55431

Dear Ms. Peterson and Dr. Rockers,

Phyllis Willerscheidt, who serves as advocate for [redacted], has recently called me to indicate that [redacted] is now ready for a meeting in which she can confront Fr. Richard Jeub with the effects of his abuse of his relationship with her. Mrs. Willerscheidt tells me that [redacted]'s therapist also believes that she is ready for this confrontation. Until recently, there has been a roadblock because the attorneys for [redacted] and Fr. Jeub had not been in contact with each other about setting some ground rules for such a conversation. I understand that now each of the attorneys has removed any objection to such a meeting.

I am writing to suggest an approach to such a meeting and to ask your help either in implementing that approach or suggesting an alternative one. There are a lot of parties involved in this matter besides the principals, including yourselves, two attorneys, Mrs. Willerschdeidt, and myself. I would like to propose that a structured conversation be set up involving only [redacted], Fr. Jeub, and the two of you. This seems the least unwieldy solution, and it may help keep the meeting most focussed.

If this approach is acceptable to you, may I ask that you would discuss it with your clients, and then do the difficult work of finding a mutually agreeable time? If I or my staff can be of some assistance in doing the "legwork" to get such a meeting set up, please let me know. If possible, however, I would prefer to have you structure the meeting in a therapeutic way most convenient to you. Please let me know what you think of all of this. I am grateful for the work each of you is doing with your clients, fellow members with me of our Church.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

cc: Phyllis Willerscheidt
Fr. Richard Jeub

bcc: Archbishop Roach
Bishop Carlson
Fr. Tom Vowell
Mr. Andy Eisenzimmer

SETTLEMENT AGREEMENT AND RELEASE

THIS SETTLEMENT AGREEMENT AND RELEASE ("Settlement Agreement") is entered into this 7th day of January, ~~1991~~ 1992 by [redacted], and The Archdiocese of Saint Paul and Minneapolis, The Church of [redacted] Minnesota, The Church of [redacted] Minnesota, and Reverend Richard Jeub, (the "Released Parties").

RECITALS

A. [redacted] has asserted certain claims for damages for sexual abuse and exploitation, which claims arose out of certain alleged acts or omissions by the Released Parties. [redacted] seeks to recover certain compensatory and monetary damages on account of injuries allegedly sustained by her.

B. The Parties desire to enter into this Settlement Agreement in order to provide for certain payments in full settlement and discharge of all claims which are or might have been asserted by , upon the terms and conditions set forth herein.

AGREEMENT

The parties agree as follows:

1. Release and Discharge

In consideration of the payments called for herein, [redacted] completely releases and forever discharges the Released Parties, their insurers and their past, present and future officers, directors, stockholders, attorneys, agents, servants, representatives, employees, subsidiaries, affiliates, partners, predecessors and successors in interest, and assigns and all other persons, firms, or corporations with whom any of the former have been, are now or may hereafter be affiliated, of and from any and all past, present or future claims, demands, obligations, actions, causes of action, wrongful death claims, damages, costs, losses of services, expenses and compensation of every kind and nature whatsoever, including claims and actions for contribution on any claims that may be brought against [redacted] herein whether based on a tort, contract or other theory of recovery, which [redacted] now has, or which may hereafter accrue or otherwise be acquired, on account of, or in any way growing out of, or which are the subject of, [redacted]'s claims, including, without limitation, any and all known or unknown claims for personal injury or sickness or emotional injury or sickness and any future wrongful death claims of [redacted]'s representatives, which have resulted or may result from the alleged acts or omissions of the Released Parties. This Release, on the part of [redacted], shall be a fully binding and complete settlement between [redacted] and the Released Parties, their agents, servants, employees, personal representatives, insurers, affiliates, predecessors, successors and assigns, save only the

executory provisions of this Settlement Agreement. [redacted] agrees to defend, indemnify and hold the Released Parties, their agents, employees, subsidiaries, predecessors and successors in interest and assigns harmless from and against all such claims, demands, obligations, causes of action, damages, costs and expenses arising out of the alleged injuries and damages above referred to and described.

2. Payments

In consideration of the Release set forth above, the Released Parties hereby agree to pay the following sums in the following manner:

2.1 [redacted] will be paid to [redacted] upon the proper execution of this Settlement Agreement.

3. Attorney's Fees.

Each party hereto shall bear all attorney's fees and costs arising from the actions of its own counsel in connection with the claims, this Settlement Agreement and the matters and documents referred to herein, and all related matters.

4. General Release.

[redacted] hereby acknowledges and agrees that the Release set forth in Paragraph 1 is a general release and she further expressly waives and assumes the risk of any and all claims for damages which exist as of this date but of which she does not know or suspect to exist, whether through ignorance, oversight, error, negligence, or otherwise, and which, if known, would materially affect her decision to enter into this Settlement Agreement. [redacted] further agrees that she has accepted payment in the sum specified herein as a complete compromise of matters involving disputed issues of fact and law and she assumes the risk that the facts or law may be otherwise than she believes. It is understood and agreed by the Parties that this settlement is a compromise of a doubtful and disputed claim, and the payments are not to be construed as an admission of liability on the part of the Defendants, by whom liability is expressly denied.

5. Expenses.

In consideration for the payment of the sums set forth in paragraph 2.1 herein to her, [redacted] agrees that the Released Parties are released from any obligation for payment of any therapy, hospital, medical or any health or mental health related expenses, whether incurred in the past or present, or to be incurred in the future.

6. Warranty of Capacity to Execute Agreement.

[redacted] represents and warrants that no other person or entity has or has had any interest in the claims, demands, obligations, or causes of action referred to in this Settlement Agreement except as otherwise set forth herein and that she has the sole right and exclusive authority to execute this Settlement Agreement and receive the sum specified in it; and that she has not sold, assigned, transferred, conveyed or otherwise disposed of any of the claims, demands, obligations, or causes of action referred to in this Settlement Agreement.

7. Confidentiality.

[redacted] and the Released Parties mutually agree that neither they nor their attorneys nor representatives shall reveal to anyone, other than as may be mutually agreed to in writing, any of the terms of this Settlement Agreement and Release or any of the amounts, numbers or terms and conditions of any sums payable to hereunder. [redacted] hereby understands and agrees that the implementation of this Confidentiality Section of the Settlement Agreement and Release is of paramount importance to the Released Parties and that observance of this Confidentiality Section is of the essence to the Settlement Agreement achieved between the Parties. Further, [redacted] agrees to abide by the terms of this Confidentiality Section as consideration for and as an integral part of this Settlement Agreement, it being understood and agreed by the Parties hereto that any and all details of the Settlement Agreement are to be treated as if sealed and held as strictly confidential; and all Parties agree that said terms are to remain forever sealed and confidential unless and until modified by court order for good cause shown. The Parties further agree that under no circumstances will the existence or the amount of the settlement be revealed to anyone for any reason whatsoever, nor shall any details of the settlement be revealed, including the terms and conditions of this Confidentiality Section. The only exceptions that the Parties recognize to this Confidentiality Section would be if the Parties were required to make disclosure to the Internal Revenue Service, compelled to testify by a court order, or if the Parties need to supply certain information to a financial institution in order to obtain a loan or credit. It is also agreed that [redacted] may make such disclosures to her therapist, her family, or legal or accounting representatives as may be reasonably necessary. Under these circumstances, [redacted] shall advise such persons or institutions of the Confidentiality Section of this Settlement Agreement and obtain their consent to abide by such terms and conditions. If the person or institution refuses to be bound by the terms of this Confidentiality Section, [redacted] shall give the Released Parties or their counsel prior notice before making any such disclosure. [redacted] also agrees that should she or her attorneys breach any of the terms of this Confidentiality Section, that she shall pay as liquidated damages to the Released

Parties the sum of [redacted] The Parties agree that this amount is necessary and reasonable to protect the Released Parties' rights under this Settlement Agreement. In addition to payment of liquidated damages in the sum of [redacted] the court may also award as additional liquidated damages, the Released Parties' costs and disbursements, including attorney's fees, incurred in enforcing this Confidentiality Section.

8. Entire Agreement and Successors in Interest.

This Settlement Agreement contains the entire agreement between [redacted] and the Released Parties with regard to the matters set forth herein and shall be binding upon and enure to the benefit of the executors, administrators, personal representatives, heirs, successors and assigns of each.

9. Representation of Comprehension of Document.

In entering into this Settlement Agreement, [redacted] represents that she has relied upon the legal advice of her attorneys, who are the attorneys of her own choice and that the terms of this Settlement Agreement have been completely read and explained to her by her attorneys, and that these terms are fully understood and voluntarily accepted by her.

10. Governing Law.

This Settlement Agreement shall be construed and interpreted in accordance with the laws of the State of Minnesota.

11. Additional Documents.

All Parties agree to cooperate fully and execute any and all supplementary documents and to take all additional actions which may be necessary or appropriate to give full force and effect to the basic terms and intent of this Settlement Agreement.

12. Effectiveness.

This Settlement Agreement shall become effective following execution by all of the Parties.

[redacted] hereby acknowledges that she has read and executes this document at Minneapolis, Minnesota, this 7th day of January, ~~1991.~~ 1992

[redacted]
Witness

By: [redacted]

The Archdiocese of Saint Paul and Minneapolis hereby acknowledges that its undersigned representative has read and executes this document at St Paul, Minnesota, this 26 day of July, 1992.

The Archdiocese of Saint Paul and Minneapolis

Marilyn R. Wagner
Witness

By: [signature]
Its: Vice-President

The Church of [redacted] Minnesota hereby acknowledges that its [redacted] has read and executes this document at [redacted], Minnesota, this 30 day of November, 1993.

[redacted]

The Church of [redacted]

By: [redacted]
Its: [redacted]

The Church of [redacted] acknowledges that its [redacted] has read and executes this document at [redacted], Minnesota, this 22 day of July, 1993.

[redacted]

The Church of [redacted]

By: [redacted]
Its [redacted]

Richard Jeub hereby acknowledges that he has read and executes this document at Cottage Grove, Mn, Minnesota, this 17 day of January, 1994

Witness

By: Richard H Jeub
Richard Jeub

SETTLEMENT AGREEMENT AND RELEASE

THIS SETTLEMENT AGREEMENT AND RELEASE ("Settlement Agreement") is entered into this 7th day of January, ~~1991~~ 1992 by [redacted], and The Archdiocese of Saint Paul and Minneapolis, The Church [redacted] Minnesota, The Church [redacted] Minnesota, and Reverend Richard Jeub, (the "Released Parties").

RECITALS

A. [redacted] has asserted certain claims for damages for sexual abuse and exploitation, which claims arose out of certain alleged acts or omissions by the Released Parties. [redacted] seeks to recover certain compensatory and monetary damages on account of injuries allegedly sustained by her.

B. The Parties desire to enter into this Settlement Agreement in order to provide for certain payments in full settlement and discharge of all claims which are or might have been asserted by [redacted], upon the terms and conditions set forth herein.

AGREEMENT

The parties agree as follows:

1. Release and Discharge

In consideration of the payments called for herein, [redacted] completely releases and forever discharges the Released Parties, their insurers and their past, present and future officers, directors, stockholders, attorneys, agents, servants, representatives, employees, subsidiaries, affiliates, partners, predecessors and successors in interest, and assigns and all other persons, firms, or corporations with whom any of the former have been, are now or may hereafter be affiliated, of and from any and all past, present or future claims, demands, obligations, actions, causes of action, wrongful death claims, damages, costs, losses of services, expenses and compensation of every kind and nature whatsoever, including claims and actions for contribution on any claims that may be brought against [redacted] herein whether based on a tort, contract or other theory of recovery, which [redacted] now has, or which may hereafter accrue or otherwise be acquired, on account of, or in any way growing out of, or which are the subject of, [redacted]'s claims, including, without limitation, any and all known or unknown claims for personal injury or sickness or emotional injury or sickness and any future wrongful death claims of [redacted]'s representatives, which have resulted or may result from the alleged acts or omissions of the Released Parties. This Release, on the part of [redacted], shall be a fully binding and complete settlement between [redacted] and the Released Parties, their agents, servants, employees, personal representatives, insurers, affiliates, predecessors, successors and assigns, save only the

executory provisions of this Settlement Agreement. [redacted] agrees to defend, indemnify and hold the Released Parties, their agents, employees, subsidiaries, predecessors and successors in interest and assigns harmless from and against all such claims, demands, obligations, causes of action, damages, costs and expenses arising out of the alleged injuries and damages above referred to and described.

2. Payments

In consideration of the Release set forth above, the Released Parties hereby agree to pay the following sums in the following manner:

2.1 [redacted] will be paid to [redacted] upon the proper execution of this Settlement Agreement.

3. Attorney's Fees.

Each party hereto shall bear all attorney's fees and costs arising from the actions of its own counsel in connection with the claims, this Settlement Agreement and the matters and documents referred to herein, and all related matters.

4. General Release.

[redacted] hereby acknowledges and agrees that the Release set forth in Paragraph 1 is a general release and she further expressly waives and assumes the risk of any and all claims for damages which exist as of this date but of which she does not know or suspect to exist, whether through ignorance, oversight, error, negligence, or otherwise, and which, if known, would materially affect her decision to enter into this Settlement Agreement. [redacted] further agrees that she has accepted payment in the sum specified herein as a complete compromise of matters involving disputed issues of fact and law and she assumes the risk that the facts or law may be otherwise than she believes. It is understood and agreed by the Parties that this settlement is a compromise of a doubtful and disputed claim, and the payments are not to be construed as an admission of liability on the part of the Defendants, by whom liability is expressly denied.

5. Expenses.

In consideration for the payment of the sums set forth in paragraph 2.1 herein to her, [redacted] agrees that the Released Parties are released from any obligation for payment of any therapy, hospital, medical or any health or mental health related expenses, whether incurred in the past or present, or to be incurred in the future.

6. Warranty of Capacity to Execute Agreement.

[redacted] represents and warrants that no other person or entity has or has had any interest in the claims, demands, obligations, or causes of action referred to in this Settlement Agreement except as otherwise set forth herein and that she has the sole right and exclusive authority to execute this Settlement Agreement and receive the sum specified in it; and that she has not sold, assigned, transferred, conveyed or otherwise disposed of any of the claims, demands, obligations, or causes of action referred to in this Settlement Agreement.

7. Confidentiality.

[redacted] and the Released Parties mutually agree that neither they nor their attorneys nor representatives shall reveal to anyone, other than as may be mutually agreed to in writing, any of the terms of this Settlement Agreement and Release or any of the amounts, numbers or terms and conditions of any sums payable to [redacted] hereunder. [redacted] hereby understands and agrees that the implementation of this Confidentiality Section of the Settlement Agreement and Release is of paramount importance to the Released Parties and that observance of this Confidentiality Section is of the essence to the Settlement Agreement achieved between the Parties. Further, [redacted] agrees to abide by the terms of this Confidentiality Section as consideration for and as an integral part of this Settlement Agreement, it being understood and agreed by the Parties hereto that any and all details of the Settlement Agreement are to be treated as if sealed and held as strictly confidential; and all Parties agree that said terms are to remain forever sealed and confidential unless and until modified by court order for good cause shown. The Parties further agree that under no circumstances will the existence or the amount of the settlement be revealed to anyone for any reason whatsoever, nor shall any details of the settlement be revealed, including the terms and conditions of this Confidentiality Section. The only exceptions that the Parties recognize to this Confidentiality Section would be if the Parties were required to make disclosure to the Internal Revenue Service, compelled to testify by a court order, or if the Parties need to supply certain information to a financial institution in order to obtain a loan or credit. It is also agreed that [redacted] may make such disclosures to her therapist, her family, or legal or accounting representatives as may be reasonably necessary. Under these circumstances, [redacted] shall advise such persons or institutions of the Confidentiality Section of this Settlement Agreement and obtain their consent to abide by such terms and conditions. If the person or institution refuses to be bound by the terms of this Confidentiality Section, [redacted] shall give the Released Parties or their counsel prior notice before making any such disclosure. [redacted] also agrees that should she or her attorneys breach any of the terms of this Confidentiality Section, that she shall pay as liquidated damages to the Released

Parties the sum of [redacted]. The Parties agree that this amount is necessary and reasonable to protect the Released Parties' rights under this Settlement Agreement. In addition to payment of liquidated damages in the sum of [redacted] the court may also award as additional liquidated damages, the Released Parties' costs and disbursements, including attorney's fees, incurred in enforcing this Confidentiality Section.

8. Entire Agreement and Successors in Interest.

This Settlement Agreement contains the entire agreement between [redacted] and the Released Parties with regard to the matters set forth herein and shall be binding upon and enure to the benefit of the executors, administrators, personal representatives, heirs, successors and assigns of each.

9. Representation of Comprehension of Document.

In entering into this Settlement Agreement, [redacted] represents that she has relied upon the legal advice of her attorneys, who are the attorneys of her own choice and that the terms of this Settlement Agreement have been completely read and explained to her by her attorneys, and that these terms are fully understood and voluntarily accepted by her.

10. Governing Law.

This Settlement Agreement shall be construed and interpreted in accordance with the laws of the State of Minnesota.

11. Additional Documents.

All Parties agree to cooperate fully and execute any and all supplementary documents and to take all additional actions which may be necessary or appropriate to give full force and effect to the basic terms and intent of this Settlement Agreement.

12. Effectiveness.

This Settlement Agreement shall become effective following execution by all of the Parties.

[redacted] hereby acknowledges that she has read and executes this document at Minneapolis, Minnesota, this 7th day of January, ~~1991~~ 1992

[redacted]
Witness

By: [redacted]

The Archdiocese of Saint Paul and Minneapolis hereby acknowledges that its undersigned representative has read and executes this document at St Paul, Minnesota, this 26 day of July, 1991.

The Archdiocese of Saint Paul and Minneapolis

[redacted]
Witness

By: [signature]
Its: Vice-President

The [redacted] Minnesota hereby acknowledges that its undersigned representative has read and executes this document at Edina, Minnesota, this 30 day of November, 1991.

[redacted]
Witness

The [redacted], Minnesota

By: [redacted]
Its

The [redacted], Minnesota hereby acknowledges that its undersigned representative has read and executes this document at St Paul, Minnesota, this 22 day of July, 1991.

[redacted]
Witness

The Church [redacted], Minnesota

By: [redacted]
Its

Richard Jeub hereby acknowledges that he has read and executes this document at Cottage Grove, Minn, Minnesota, this 17 day of January, 1994.

Witness

By: Richard H Jeub
Richard Jeub

SETTLEMENT AGREEMENT AND RELEASE

THIS SETTLEMENT AGREEMENT AND RELEASE ("Settlement Agreement") is entered into this 7th day of January, ~~1991~~ 1992 by [redacted], and The Archdiocese of Saint Paul and Minneapolis, The Church [redacted] in [redacted], Minnesota, The Church [redacted], Minnesota, and Reverend Richard Jeub, (the "Released Parties").

RECITALS

A. [redacted] has asserted certain claims for damages for sexual abuse and exploitation, which claims arose out of certain alleged acts or omissions by the Released Parties. [redacted] seeks to recover certain compensatory and monetary damages on account of injuries allegedly sustained by her.

B. The Parties desire to enter into this Settlement Agreement in order to provide for certain payments in full settlement and discharge of all claims which are or might have been asserted by [redacted], upon the terms and conditions set forth herein.

AGREEMENT

The parties agree as follows:

1. Release and Discharge

In consideration of the payments called for herein [redacted] completely releases and forever discharges the Released Parties, their insurers and their past, present and future officers, directors, stockholders, attorneys, agents, servants, representatives, employees, subsidiaries, affiliates, partners, predecessors and successors in interest, and assigns and all other persons, firms, or corporations with whom any of the former have been, are now or may hereafter be affiliated, of and from any and all past, present or future claims, demands, obligations, actions, causes of action, wrongful death claims, damages, costs, losses of services, expenses and compensation of every kind and nature whatsoever, including claims and actions for contribution on any claims that may be brought against [redacted] herein whether based on a tort, contract or other theory of recovery, which [redacted] now has, or which may hereafter accrue or otherwise be acquired, on account of, or in any way growing out of, or which are the subject of, [redacted]'s claims, including, without limitation, any and all known or unknown claims for personal injury or sickness or emotional injury or sickness and any future wrongful death claims of [redacted]'s representatives, which have resulted or may result from the alleged acts or omissions of the Released Parties. This Release, on the part of [redacted], shall be a fully binding and complete settlement between [redacted] and the Released Parties, their agents, servants, employees, personal representatives, insurers, affiliates, predecessors, successors and assigns, save only the

executory provisions of this Settlement Agreement. [redacted] agrees to defend, indemnify and hold the Released Parties, their agents, employees, subsidiaries, predecessors and successors in interest and assigns harmless from and against all such claims, demands, obligations, causes of action, damages, costs and expenses arising out of the alleged injuries and damages above referred to and described.

2. Payments

In consideration of the Release set forth above, the Released Parties hereby agree to pay the following sums in the following manner:

2.1 [redacted] will be paid to [redacted] upon the proper execution of this Settlement Agreement.

3. Attorney's Fees.

Each party hereto shall bear all attorney's fees and costs arising from the actions of its own counsel in connection with the claims, this Settlement Agreement and the matters and documents referred to herein, and all related matters.

4. General Release.

[redacted] hereby acknowledges and agrees that the Release set forth in Paragraph 1 is a general release and she further expressly waives and assumes the risk of any and all claims for damages which exist as of this date but of which she does not know or suspect to exist, whether through ignorance, oversight, error, negligence, or otherwise, and which, if known, would materially affect her decision to enter into this Settlement Agreement. [redacted] further agrees that she has accepted payment in the sum specified herein as a complete compromise of matters involving disputed issues of fact and law and she assumes the risk that the facts or law may be otherwise than she believes. It is understood and agreed by the Parties that this settlement is a compromise of a doubtful and disputed claim, and the payments are not to be construed as an admission of liability on the part of the Defendants, by whom liability is expressly denied.

5. Expenses.

In consideration for the payment of the sums set forth in paragraph 2.1 herein to her, [redacted] agrees that the Released Parties are released from any obligation for payment of any therapy, hospital, medical or any health or mental health related expenses, whether incurred in the past or present, or to be incurred in the future.

6. Warranty of Capacity to Execute Agreement.

[redacted] represents and warrants that no other person or entity has or has had any interest in the claims, demands, obligations, or causes of action referred to in this Settlement Agreement except as otherwise set forth herein and that she has the sole right and exclusive authority to execute this Settlement Agreement and receive the sum specified in it; and that she has not sold, assigned, transferred, conveyed or otherwise disposed of any of the claims, demands, obligations, or causes of action referred to in this Settlement Agreement.

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Parties the sum of [redacted]. The Parties agree that this amount is necessary and reasonable to protect the Released Parties' rights under this Settlement Agreement. In addition to payment of liquidated damages in the sum of [redacted] the court may also award as additional liquidated damages, the Released Parties' costs and disbursements, including attorney's fees, incurred in enforcing this Confidentiality Section.

8. Entire Agreement and Successors in Interest.

This Settlement Agreement contains the entire agreement between [redacted] and the Released Parties with regard to the matters set forth herein and shall be binding upon and enure to the benefit of the executors, administrators, personal representatives, heirs, successors and assigns of each.

9. Representation of Comprehension of Document.

In entering into this Settlement Agreement, [redacted] represents that she has relied upon the legal advice of her attorneys, who are the attorneys of her own choice and that the terms of this Settlement Agreement have been completely read and explained to her by her attorneys, and that these terms are fully understood and voluntarily accepted by her.

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This Settlement Agreement shall be construed and interpreted in accordance with the laws of the State of Minnesota.

11. Additional Documents.

All Parties agree to cooperate fully and execute any and all supplementary documents and to take all additional actions which may be necessary or appropriate to give full force and effect to the basic terms and intent of this Settlement Agreement.

12. Effectiveness.

This Settlement Agreement shall become effective following execution by all of the Parties.

[redacted] hereby acknowledges that she has read and executes this document at Minneapolis, Minnesota, this 7th day of January, ~~1991~~ 1992.

[redacted]
Witness

By: [redacted]

The Archdiocese of Saint Paul and Minneapolis hereby acknowledges that its undersigned representative has read and executes this document at St Paul, Minnesota, this 22 day of July, 1991.

The Archdiocese of Saint Paul and Minneapolis

Marilyn R. Wagner
Witness

By: [signature]
Its: Vice-President

The Church [redacted], Minnesota hereby acknowledges that its undersigned representative has read and executes this document at Edina, Minnesota, this 30 day of November, 1991.

[redacted]
Witness

[redacted]
By: [redacted]
Its: [redacted]

The Church [redacted], Minnesota hereby acknowledges that its undersigned representative has read and executes this document at St Paul, Minnesota, this 22 day of July, 1991.

[redacted]
Witness

[redacted]
By: [redacted]
Its [redacted]

Richard Jeub hereby acknowledges that he has read and executes this document at Cottage Grove, Mn, Minnesota, this 17 day of January, 1994

Witness

By: Richard J. Jeub
Richard Jeub

M E M O

DATE: January 24, 1992

MEMO TO: Phyllis Willersheidt

FROM: Fr. Kevin McDonough

SUBJECT: Confrontation Meeting: [redacted] and Jeub

Phyllis, I deliberately sent a letter to the two therapists to ask them to set up this meeting so that all the proper groundwork for releases and so on would be obtained ahead of time. I would very strongly suggest that you not be involved in setting up that meeting. That is the job of the therapists. If you continue to try to set up the date, you will be spending a lot of frustrating hours on the phone. If only the two therapists are involved up front, they will talk initially with their clients, obtain the proper permissions, and then work things out with their own calendars.

If you have a problem with this, please let me know. I simply think you are setting yourself up for a great deal of frustration by trying to force a process to move faster than it can.

January 30, 1992

Dear Father McDonough,

Enclosed are copies of receipts for psychotherapy with Mr [redacted] appointments from October through December 1991. They total $663. According to our agreement, I should be reimbursed $331.50.

It's hard to believe that it has been a full year that we have been in communication about this matter of Dick Jeub. It has been quite a year of growth and healing and change.

Just a gentle reminder that I continue to wait for news of reimbursement for past therapy as we have discussed in the past.

May the new year be a God-filled one for you.

In Peace,

CONFIDENTIAL

AUTHORIZATION REQUIRED TO VIEW OR COPY

PSYCHOLOGICAL

Jeub file, please

CONSULTATION SERVICES CENTER

633 No. Snelling Avenue
St. Paul, Minnesota 55104
(612) 644-0112

February 11, 1992

Gerry Peterson, LICSW
Suite 100
9801 Dupont Avenue South
Bloomington, MN 55431

Dear Ms. Peterson,

When we spoke on the phone several days ago I was not able to be very helpful since I had no signed release from my client, Dick Jeub. Yesterday I met with him and discussed your client's need for a confrontational session. He is very willing to be cooperative if we can work out the details. Dick has had several therapists across the time of his therapy. I have worked with him since June, 1991.

Because litigation is still in process I am concerned about the nature and context of a mutual meeting. Your client's ease and her chance to give back her painful story is the paramount consideration. Does she need to confront the man-priest who represents church? Does she need to confront the man-Dick? I don't mean to be presumptuous in these suggestions, Gerry, but I have found that the persons in attendance at such confrontations do influence the outcomes. Here are some of the possibilities as I see them.

1. If "church" is an important piece that your client needs to address then you, your client, her advocate, the accused, his advocate and a church official need to be present. I, as the accused's therapist, do not belong in this meeting.

2. If the man-Dick is the person your client needs to confront in a therapeutic context then you, your client, the accused and me, his therapist need to be present. Noone else belongs at this meeting.

Thank you, Gerry. If the second option is possible please have your office staff give me a call with three or four possible times and I will arrange to be there at your office with my client.

Peace and all good,

Dolore Rockers, PhD
Licensed Consulting Psychologist

cc: [redacted]
Fr. K. McDonough

ARCHDIOCESE OF ST. PAUL AND MINNEAPOLIS

DATE: February 19, 1992 **STRICTLY CONFIDENTIAL**

MEMO TO: File of Fr. Richard Jeub

FROM: Fr. Kevin McDonough

SUBJECT: Regular Monitoring Meeting

I met with Fr. Richard Jeub on February 7 for a regular scheduled monitoring meeting. Fr. Jeub had just returned from a vacation trip. He spent his vacation with a priest whom he befriended while at Saint Luke Institute. He reported that the trip gave him a chance to re-examine some of the things he had learned while at Saint Luke's by talking them through with this friend.

Before leaving for his trip, he attended an after-care workshop at Saint Luke Institute. We have not yet received the written report of that. He told me, however, that they challenged him on two things while he was there. He said that staff expressed some concern that he is attending only one weekly fellowship meeting. Jeub indicated that he is attending other bi-weekly or monthly gatherings, but only one of them does in fact meet weekly. He was also challenged because he has not yet contacted a spiritual director. I told him that I thought that this was an important issue, and told him that I would call him to accountability on this again in a future meeting.

We then talked about the "confrontation session" that [redacted] has requested. He told me that the information I had previously received was wrong. His attorney had not given clearance for any meeting. In fact, his attorney had talked with [redacted], Mr. Meshbessher, who was supposed to get back to Jeub's attorney with some written clarification of the ground rules for the confrontation meeting. Apparently, this had still not happened. Jeub and I agreed on steps to be taken to facilitate having that meeting as soon as possible.

Jeub indicated that he started back to work this week. He no longer is the janitor at the Baptist Church in Hastings, but is working as a maintenance man. He has asked for an increase in his wage to reflect his newly expanded responsibilities, but he had not had a response yet.

Finally, he indicated that his living situation is going well. He regularly checks with Fr. Tom Fitzgerald to make sure that the boundaries needed are being respected. He believes the situation is a healthy one for him.

We set another monitoring meeting for between one and two months from the date of this one.

cc: Archbishop Roach
Bishop Carlson
Fr. Tom Vowell

Jeub file, please.

Meeting with Pastors: 10/28

1. Occasion: Jeub misconduct
   (brief outline of allegations)

2. Purposes:
   a. review the process
   b. set pastors up to structure their responses well (legally, pastorally, publicity, victims)
   c. lay groundwork for coordination

3. Legal situation + response
   - parishes as defendants
   - the question of counsel
   - look for your insurance records.

4. Publicity
   - will follow the legal situation
   - we should have some warning
   - coordinate with Archdiocese
   -

5. general pastoral response
   - broad information is helpful in context
   - do not encourage pro-Jeub feeling
   - evaluate situation + propose our involvement in a broader process if necessary

- some options:
  - meet with staff
  - meet with par council
  - letter to parish
  - general meeting
  - pulpit announcement

6. the special response: victims
   - families and in some cases individuals, still live in parishes
   - others will have had "guilty knowledge".
   - listen carefully + express continued belonging + support
   - refer actual victims to us (review the process)

copy also
sent to
Dick Jeub.

CONFIDENTIALITY AGREEMENT

THIS AGREEMENT is made and entered into this 25th day of February, 1992, by and among [redacted], Gerry Peterson, Phyllis Willerscheidt, Kevin McDonough, Richard Jeub and Delore Rockers (hereinafter referred to individually as "party" and collectively as "parties").

In consideration of the mutual agreement among the parties that on the date of this agreement they will attend a therapy session intended to benefit [redacted] by providing her an opportunity to express herself in the presence of Richard Jeub for therapeutic purposes, and of the mutual promises and agreements of the parties stated in this agreement, the parties hereby mutually agree that no communication, suggestion, action, or anything else of any kind which occurs solely during the therapy session shall ever be disclosed to anyone not a party to this agreement or disclosed, except as is necessary for therapeutic purposes, or offered or used in any way for any purpose in any way related to investigation, litigation or threat of prosecution of, or defense against, any claim or possible claim of any party against any other party, and that every such communication will be not discoverable under Rules 26 through 37 of the Rules of Civil Procedure and not admissable under Rule 408 of the Rules of Evidence. This agreement is not intended to restrict the use of pre-existing relevant evidence which is merely referred to or repeated during the therapy session.

Gerry Peterson

Gerry Peterson

Phyllis A. Willerscheidt

Phyllis Willerscheidt

[redacted]

Kevin McDonough

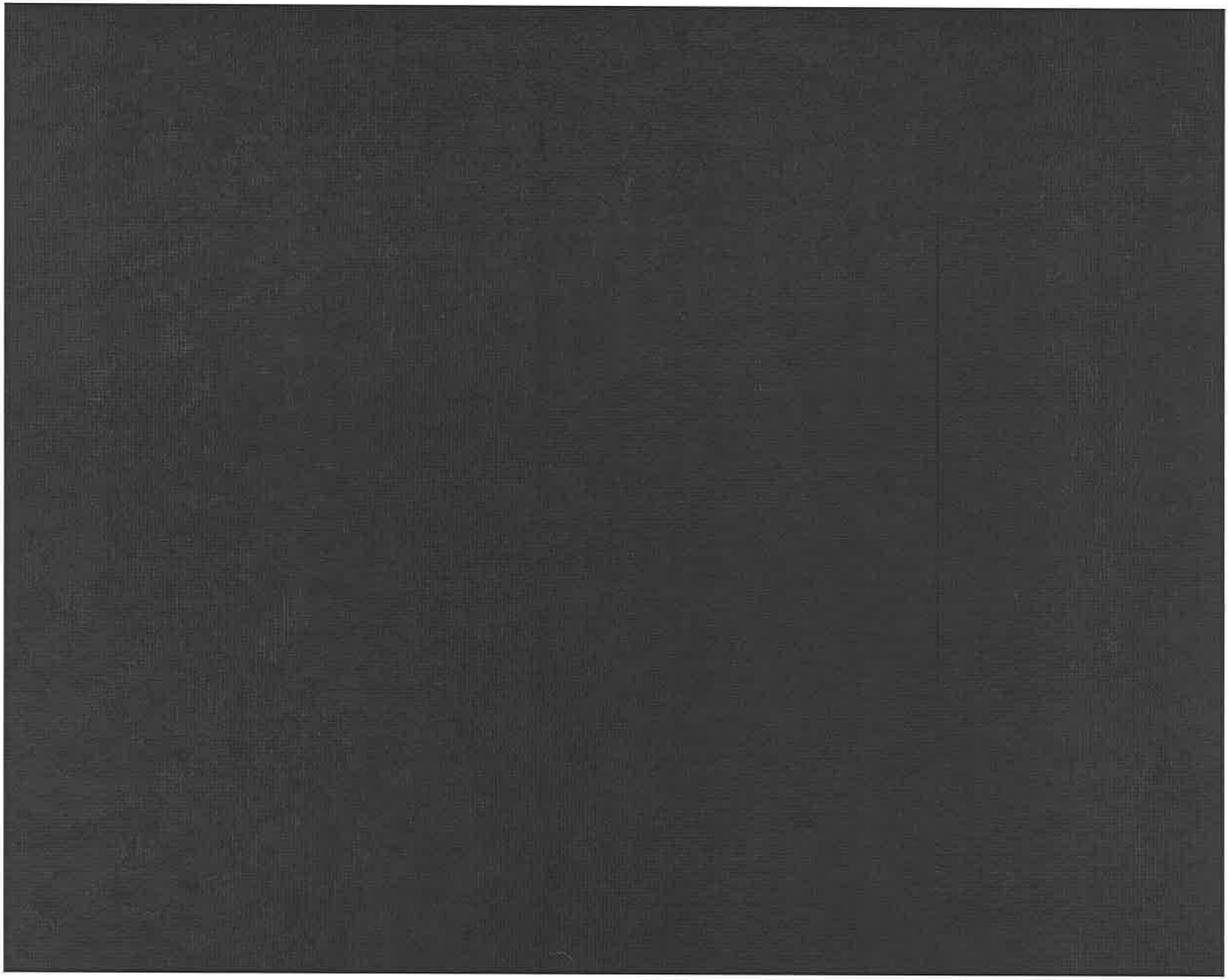
Richard H. Jeub

Richard Jeub

not present

Delore Rockers

\EMP\J1399101.03



M E M O

DATE: February 26, 1992

MEMO TO: Phyllis Willerscheidt

FROM: Fr. Kevin McDonough

SUBJECT: Confidentiality Agreement

Phyllis, I am attaching three copies of the document that we signed in Gerry Peterson's office. I ask you to keep one for yourself and pass on the other two to Jerry and to [redacted]. I am keeping the original copy on file here at the Chancery office.

Enclosure

bcc: Andrew Eisenzimmer

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS
226 SUMMIT AVENUE
ST. PAUL, MINNESOTA 55102

22-7
960

RCF [redacted]

PAY

REG. 8P142286
11-91 TO 11-93

331 DOLS 50 CTS

DATE	AMOUNT
2-26-92	$ 331.50

TO THE ORDER OF

[redacted]

CURRENT FUNDS
ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

[redacted]

DATE	INVOICE NO.		ACCOUNT NUMBER	TOTAL
		Reimbursement for Psychotherapy with [redacted] covering Appointments from October thru December 1991	14 15 280	331.50

REMITTANCE VOUCHER

Please Detach Before Cashing Check

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS
Saint Paul, Minnesota 55102

VOUCHER RCF

RUSH!! PAYMENT DUE BY Immediately

CHECK REQUISITION
ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

DATE February 26, 1992

PAY TO [redacted]

MAIL CHECK DIRECTLY

DELIVER CHECK TO Marilyn

CHECK NUMBER

(IF CHECK IS TO BE MAILED DIRECTLY FROM ACCTG. DEPT., PLEASE SHOW MAILING ADDRESS)

AMOUNT [redacted] DOLLARS $ [redacted]
Numerical Amt

PURPOSE Reimbursement for psychotherapy with Mr. [redacted],
covering appointments from October through December, 1991.

(FOR STIPENDS & PROFESSIONAL SERVICES PAYMENTS ONLY: PLEASE ENTER SOCIAL SECURITY NUMBER AND ADDRESS FOR ACCTG DEPT. RECORDS - THANK YOU)

1415
Account Number

REQUESTED BY Marilyn Wagner

FUNDS AVAILABLE
Controller

DEPOSIT CREDIT

ARCH-011418

Rec'd April 6, '92

March 1, 1992

Dear Phyllis.

In going through my files for 1991, I realized that I had never followed through with sending copies of my correspondence with Rev. Kevin McDonough to you. I apologize for the oversight, and am correcting it. Enclosed are copies of the letters I have sent to him over the last eight months or so. As you can tell from them, we are still waiting to hear from the insurance companies about payment for past therapy expenses.

I am doing well, still dealing with issues arising from my involvement with Fr. Jeub. The issues are prominent now. I wonder if they will ever recede in importance. I hope they will when I have completed this piece of the work.

In talking with [redacted], and hearing her recount of the confrontation she had with Fr. Jeub, I wonder whether or not there would be some value in letting Fr. Jeub know that I would be open to receiving some direct amends on his part when he is ready to make them. The letter I received from him in 1987 does not meet the criteria of direct amends, at least as I understand amends. He could say much more. When I spoke with Bishop Carlson, I was clear that I wanted no contact with Fr. Jeub, and that remains true. I don't want him to call me and I don't want to see him. I would like to know if he ever has a change of heart, however, and understands something of how he exploited me/us. I won't hold my breath while waiting.

Thank you for all that you have done for the women of the church. I look forward to hearing from you.

In the unity of the Spirit,

[redacted]

STRICTLY CONFIDENTIAL

M E M O

DATE: April 1, 1992

MEMO TO: Archbishop Roach

FROM: Fr. Kevin McDonough

SUBJECT: [redacted]

Archbishop, I met with [redacted] on March 30, in the presence of her advocate, [redacted]. This is part of our ongoing process of assisting in her healing after her victimization by Fr. Richard Jeub.

I am happy to report that it is evident that she is healing. It would be premature to say that she has already healed, but she has clearly moved ahead in life well.

She told me that she is getting married in two weeks. Her wedding will be performed by the Reverend Margo Maris, the Episcopalian priest who works with misconduct cases for her denomination. I think that that is a good sign that this will be a healthier relationship for her than she has ever known. By the way, she asked that we would not inform Fr. Jeub of her marriage.

You met with [redacted] at St. Richard's about one year ago. I simply wanted to keep you informed on her progress.

STRICTLY CONFIDENTIAL

DATE: April 2, 1992

MEMO TO: FILE OF FR. RICHARD JEUB

FROM: Fr. Kevin McDonough

SUBJECT: Monitoring Meeting

I met with Fr. Richard Jeub on March 20. This was part of our usual process of monitoring. He indicated to me that he continues to participate in therapy and in support groups as required by his aftercare plan. He has not yet followed through on obtaining a spiritual director. I pressed him on doing so. He indicated that he would like to make a retreat this summer, and asked whether the Archdiocese, as his sponsoring institution would help him with those costs. I indicated that we would do so. He also indicated that he would like to participate in a continuing education program, and once again asked whether we would assist him in meeting those costs. I told him that we would. It appears to me that Fr. Jeub continues to work on his program of recovery. We will continue our regular pattern of monitoring.

cc: Archbishop Roach
Bishop Carlson
Fr. Tom Vowell

file, please

DATE: April 6, 1992

MEMO TO: Kevin McDonough

MEMO FROM: Phyllis A. Willerscheidt

SUBJECT: [redacted]

Attached are two recent memos I have received:

1. [redacted] would like to know how her backpayment for therapy will be handled. She has been waiting for some response on this issue since July. As stated in her October memo, she is willing to absorb one-half of the costs.

   Also, there seems to be a desire for a confrontation meeting with Dick Jeub with regard to [redacted]. I will follow up on this and let you know when, and if, she wishes to do it.

2. [redacted] has notified me via registered mail that she will not need our advocacy services as she will use the advocacy system in the Minnesota Council of Churches.

Attach: 2

CONFIDENTIAL

DATE: April 14, 1992

TO: Fr. Kevin McDonough

FROM: Angie Blees/Fr. Austin Ward's Office

SUBJECT: [redacted]

I had an opportunity of talking with Bishop Carlson this morning to see if he had anything on [redacted] in his files. He said he would not have kept those but they would either be in Fr. Jeub's files or the parish that was involved. I am assuming you have Fr. Jeub's file in yours or Marilyn's office.

I was not "keeping track" of the expenses on these cases back in 1987, and have been unable to locate anything pertaining to this case going back that far.

Regarding your letter of June 4, 1991, regarding her request for reimbursement of "nearly $10,000" in bills, you indicate that "Gloria Rodriguez has already forwarded that statement to Angie Blees". This is the statement I never received and asked Gloria several times for it - to no avail. When I had asked you, you said it was being held for "clarification". Maybe if this statement could be found, it would clear some of this up.

Sorry I'm not able to help further.

DATE: April 20, 1992

MEMO TO: FR. AUSTIN WARD, ANDREW EISENZIMMER

FROM: Fr. Kevin McDonough

SUBJECT: [redacted]

Thank you both for your recent communications in response to my memorandum of April 8. Permit me to respond to a couple of points raised therein. First, the unreimbursed counseling expenses from 1984-1990 totalled $9,490. This is indicated in the letter from [redacted] of April 29, 1991, a copy of which is attached. If we have further specific documentation of this, I will attach that as well.

Second, in regard to the time of the abuse, I was incorrect in indicating to you that that began when Fr. Jeub was at Fairview-Southdale. Rather, it began while Jeub was an associate pastor at St. Mark and was providing hospital chaplaincy at Midway. This would have been in [redacted]. Fr. Jeub's contact with her continued after he was transferred to Fairview Southdale and Methodist Hospitals. This is what she has indicated to us, as the attached documentation demonstrates.

It may be that we require further documentation around this, particularly for the unreimbursed costs. I could approach [redacted] about this if you would like.

I appreciate your assistance in moving ahead with this as quickly as possible.

Enclosure

STRICTLY CONFIDENTIAL

DATE: May 4, 1992

MEMO TO: THE FILE OF RICHARD JEUB

FROM: Fr. Kevin McDonough

SUBJECT: REGULAR MONITORING MEETING

I met with Fr. Jeub on May 1. This was for a regular check-in session.

Jeub indicated that he is continuing to participate in therapy and in the SA group of which he has been a member. I raised the question of his finding a spiritual director, and he told me that he has met with Fr. Robert Schwartz about this. Schwartz wanted him to find out from me whether the spiritual director in a situation such as this is expected to have some independent reporting responsibility to the Chancery. I told Jeub, and asked him to pass on to Schwartz, that we would not ask for that sort of reporting, and that we would respect the confidentiality of that internal forum relationship.

In the last few weeks, with my permission, Fr. Jeub performed a wedding at the St. Catherine's Chapel for a former staff member of his. He reported that this opportunity to exercise priestly ministry was a positive one. He then reflected on the difficulty of not assisting in a parish during Holy Week.

I told Jeub that Archbishop Roach had reminded me recently not to mislead Jeub with vague promises of a future assignment, particularly when it is not clear to us that that will ever be possible. I clarified this with Jeub, who told me that he thinks that I have been clear about this with him since his return from treatment.

cc: Archbishop Roach
Bishop Carlson

File, please

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B WIESER
NANCY GOERING REILLY
JOHN C GUNDERSON
CHARLES M BICHLER

SUITE 2200, NORTH CENTRAL LIFE TOWER
445 MINNESOTA STREET
SAINT PAUL, MINNESOTA 55101-2100
TELEPHONE (612) 228-1911
FACSIMILE (612) 223-5483

WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D KENNEDY, JR.
(OF COUNSEL)

May 11, 1992

Mr. John L. Weyland
Attorney at Law
641 E. Lake Street
Suite 204
P.O. Box 740
Wayzata, MN 55391

Re: Mary Jane Doe [redacted] vs. Archdiocese, et al

Dear Mr. Weyland:

Enclosed please find the Acknowledgement of Service of Summons and Complaint on behalf of The Archdiocese of Saint Paul and Minneapolis and The Church of Our Lady of Grace in connection with the above-referenced matter. I have forwarded the Acknowledgement of Service relating to Reverend Richard Jeub to his attorney to arrange for service.

I want to also confirm my telephone conversation with you today wherein you agreed that the Archdiocese and Our Lady of Grace have an indefinite extension of time to answer while we engage in settlement discussions. We agreed that the extension can be withdrawn at any time upon 20 days notice.

Finally, I also expect that you will have a settlement demand to me perhaps by the end of this week. In that regard, I refer you to my letter of November 14, 1991 which detailed the kind of information I would need to facilitate our discussions.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

Andrew J. Eisenzimmer

AJE:crb
bcc: Reverend Kevin M. McDonough

COPY

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue
Saint Paul, Minnesota 55102

The Chancery

Feb 23

Dear [redacted] —

I apologize for the overlong delay. I was on vacation, and then your note was caught in the usual stack of papers and letters.

I am enclosing the check you requested. Your "gentle reminder" has prodded me to give a far-less-gentle reminder to our finance people and attorney in regard to the back bills.

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue
Saint Paul, Minnesota 55102

The Chancery

I will be back to you as soon as possible.

Thank you for your patience.

[redacted]

Phyllis Willwersheid
Commission on Women
328 West Kellogg
St Paul, Minnesota 55102
June 26, 1992

Dear Phyllis,

At long last, I am sending you the information that you requested. It has taken some time to compile, since I started therapy in 1984 and continued into 1988. Just going back through the checks has stirred up the pain and the shame of the abuse again. I hope someday that this will be put to rest in me.

I have to keep reminding myself that this is a justice issue. That helps, but it is still hard to stay out of the shame.

Thank you for your support and your effort on my behalf. I wouldn't follow through without it. God bless.

Sincerely,
[redacted]

OK KMD
5/22/92

May 20, 1992

Dear Kevin,

Thank you for the copy of the memo to Fr Austin Ward about the outstanding question we have between us around payment for previous therapy. It is good to see some written action. I understand from Phyllis Willwersheid that the next step is up to me in terms of gathering and submitting documentation to you. This is no small task and I am moving on it, albeit slowly. I am becoming very familiar with the operation of copy machines, and a familiar face at Kinko's.

younger sister ran into Fr. Jeub in Cottage Grove a few weeks ago. She reported that he told her that he is no longer in active ministry and is living at St Rita's parish. It is good to have some independent verification of what we've been talking about.

Enclosed are copies of the receipts for therapy January to May 20, 1992. They total $~~1510~~ 2045.00. My reimbursement is to be $~~755.00~~ 1022.50.

Blessings in this Easter season!

[redacted]

cc: Phyllis Willwersheid

STRICTLY CONFIDENTIAL

DATE: June 15, 1992

MEMO TO: FILE OF FR. RICHARD JEUB

FROM: Fr. Kevin McDonough

SUBJECT: MONITORING MEETING

I met with Fr. Jeub on June 12 for one of our regularly scheduled meetings. He continues to participate in therapy and in two support groups. He will be vacationing in the latter part of June with one of the priests he met at Saint Luke's Institute. He returns to Saint Luke's for an aftercare conference in early July. He will be participating in a continuing education program at the seminary at Hale's Corners in early August. He continues working at the maintenance and carpentry work he has been doing, although he finds it less stimulating than he would like.

While going through some of his personal files, he came across an envelope containing some personal documents belonging to [redacted]. He asked that I would see that those are returned through our channels of communication. I agreed to do so.

A good part of the meeting focused on a letter he had just received through his attorney in regard to [redacted] That letter includes a demand for settlement. Mr. Eisenzimmer had just received it, but I had not yet seen a copy.

Fr. Jeub emphasized that he has a very different recollection of his relationship with [redacted]. She is accusing him of sexual contact, and he firmly maintains that there was no such contact. He will be clarifying all of this with his attorney, and we will be hearing more of it through him.

It should be noted that Fr. Jeub is very strong in his belief that the documents in the [redacted] case significantly misrepresent him. I recommend that we hear what he has to say about it before settlement negotiations proceed with any seriousness.

cc: Archbishop Roach
Fr. Jeub
Mr. Eisenzimmer

STRICTLY CONFIDENTIAL

DATE: June 15, 1992

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FROM: Fr. Kevin McDonough

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cc: Archbishop Roach
Fr. Jeub
Mr. Eisenzimmer

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Saint Paul, Minnesota 55102-2197

The Chancery

MEMO

TO: Margo Maris

FROM: Fr. Kevin McDonough

DATE: June 16, 1992

RE: [redacted] DOCUMENTS

The enclosed documents belonging to [redacted] were brought to a recent meeting that I had with Fr. Jeub and he asked that they be forwarded to her.

I am wondering if I might request that favor from you since you would probably have more of an opportunity to be in contact with [redacted] than I would.

Thanks in advance for taking care of this matter.

June 22, 1992

Archdiocese of St. Paul and Minneapolis
ATTN: Father McDonough
226 Summit Avenue
St. Paul, MN 55102

Dear Father McDonough:

I am writing to you regarding a recent request that my fiance, made to your office. We are currently trying to locate Father Jube, he had previously been serving at St. Kevin's parish in Minneapolis.

We are interested in possibly having Father Jube participate in our wedding ceremony in June of 1993. If you should have any information which would help us in our search for Father Jube, please forward such information on to me.

Your cooperation in this matter is much appreciated.

Very truly yours,

June 22, 1992

Archdiocese of St. Paul and Minneapolis
ATTN: Father McDonough
226 Summit Avenue
St. Paul, MN 55102

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Your cooperation in this matter is much appreciated.

Very truly yours,

June 29, 1992 **STRICTLY CONFIDENTIAL**

Reverend Richard Jeub
8482 79th St. S.
Cottage Grove, MN 55016

Dear Fr. Jeub,

We received the enclosed letter here at the Chancery. Before we respond to them, I would like to get your reaction. Are these people with whom you had a unique relationship?

As you know, as a general rule we are asking that you would not be engaging in ministry in that parish. Unless there is some special familial or quasi-familial relationship, I do not think it would be appropriate for you to perform another wedding there.

Please let me know what you think?

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

Enclosure

File, please

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Saint Paul, Minnesota 55102-2197

The Chancery

June 29, 1992

STRICTLY CONFIDENTIAL

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8482 79th St. S.
Cottage Grove, MN 55016

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Please let me know what you think?

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

Enclosure

Kevin,
I haven't a clue as to who these people are. If they were to contact me I would refer them to their parish. You may tell them that or may give them my # and I will tell them. Let me know if I should expect a call from them.

Dick

Jeub

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

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ALOIS D. KENNEDY, JR.
(OF COUNSEL)

July 7, 1992

BY FACSIMILE AND BY MAIL

[redacted]

Re: [redacted] vs. Archdiocese, et al

Dear [redacted]:

I want to bring you up to date regarding my communications with the various insurance carriers as it relates to the settlement demand you forwarded to me in connection with the above-referenced matter.

As I indicated by my letter of June 11, 1992, I was not able to respond by the deadline you originally established. As I promised, I did tender the matter to the insurers and I continue to follow-up with them.

The claims being made by your client cover the period from 1966 to 1972. For a portion of that time period, I am unable to get acknowledgement from an insurance carrier which may have provided coverage to the Archdiocese. Another insurer has acknowledged receipt of the pleadings, settlement demand, and other materials but has not formally responded to me. The third insurer has referred the matter to its home office for a determination as to how its coverage may apply to these claims.

I can only suggest that patience is needed until we get more specific responses from the insurers. I cannot do anything more than continue to follow-up with them in order to get a response to you as promptly as possible.

I also spoke with the attorney for Father Richard Jeub. I suggested to him that it would be beneficial to determine Father Jeub's response to the case summary narrative you provided to me.

I understand that Father Jeub's attorney will be responding to me in that regard. If it appears that there are serious questions about the factual allegations, it would be helpful to look at a deposition or other means to follow-up on such questions.

I hope to be back in touch with you shortly. In the meantime, if you have any questions, please do not hesitate to contact me.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

Andrew J. Eisenzimmer

AJE:crb
bcc: The Most Reverend John R. Roach, D.D.
Reverend Kevin M. McDonough
Mr. William Fallon

July 9, 1992

Dear Ms. ,

I received your letter of June 22. Congratulations on your engagement to I wish both of you well in your June wedding and in your lives together.

Fr. Richard Jeub is currently unavailable to perform weddings. I will communicate your good wishes to him, however.

Once again, I wish you well in your marriage.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

bcc: Fr. Richard Jeub

DATE: July 10, 1992

MEMO TO: Fr. Kevin McDonough

MEMO FROM: Phyllis A. Willerscheidt

SUBJECT: Therapy Expenses for [redacted]

I am enclosing the bills for [redacted]'s therapy that you requested several months back. If there is anything else you need with regard to this case, please let me know.

Saint Luke Institute

July 14, 1992

Confidential

Most Reverend John R. Roach, DD
Diocese of St. Paul
226 SUmmit Avenue
St. Paul, Minnesota 55102

Re: Reverend Richard Jeub
SLI #12198

Dear Bishop Roach:

Father Jeub recently attended a Workshop with us as part of his Continuing Care Program. We want to inform you at this time regarding his progress in recovery over the past six months.

This was Father Jeub's third Continuing Care Workshop. Over the past months, Father Jeub has continued to participate in various activities to support his recovery. He attends a Sunday evening meeting of clergy in recovery, and also has phone contact with members of this group throughout the week. Also, on alternate Friday evenings, he attends another meeting of recovering clergy. He continues to be involved in his monthly priest support group. He also continues to meet with Delore Rocker, on a monthly basis. He is journaling as part of the therapy, and according to Delore in her collateral letter, they are working on the area of his feeling life, and Father Jeub is making good progress. Father Jeub also went on a retreat in May of this year. He also recently made contact with a spiritual director and will be adding this to his recovery program.

Copied to Kami 7/21/92

2420 Brooks Drive • Suitland, Maryland 20746-5294 • (301) 967-3700 • FAX: (301) 967-3953
Affiliated with the Daughters of Charity, National Health System

Among the areas of progress that Father Jeub is able to identify is an increased ability to articulate his needs, and request that they be met to the extent possible. Additionally, he has worked to develop an increased sense of empathy, and is increasingly able to anticipate and understand the perspectives of other persons. In February, he met with one of his former victims in a scheduled meeting, and he felt that he had been better prepared for this meeting than an earlier meeting with one of his victims.

Father Jeub is quite appreciative of his living situation in the rectory, and appreciates the active support of his pastor. Father Jeub is hopeful that he might be able to return to ministry at some time in the future, after legal matters are resolved. Recently he has been doing physical work and manual labor four days per week.

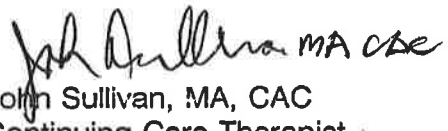
Father Jeub reports the relationship with his mother is "getting better." His mother is living in a nursing home.

Father Jeub appears to be benefitting from the various activities that support ongoing recovery. He is making noticable progress in his ability to recognize his own needs and feelings, and to also recognize and respect the needs and feelings of others. Continuing progress along these lines will lead to a higher degree of freedom in interpersonal relations, and a better ability to serve others. The only specific concern that we discussed with Father Jeub is that he is attending somewhat fewer Twelve Step fellowship meetings than is usually the case with persons at his point in recovery. One of the issues with which Father Jeub is appripriately concerned is that of shame; fellowship recovery work, particularly Fifth Step efforts, are one of the best known means of dealing with and resolving shame issues. Father Jeub may wish to consider increasing his meetings, in order that he not shortchange himself of this benefit. It is also evident that he has benefitted from his work with Delore. We also find that spiritual direction is an important component of recovery for many of our clients. Father Jeub is a gifted person with much to share, and we are happy to see that he is experiencing results from his ongoing efforts. We encourage him to continue his steady progress, we hope to hear from him from time to time as to how things are going, and we look forward to seeing him for the next Workshop of his continuing care group at the beginning of January, 1993.

A copy of this letter is being sent to Father Jeub for his reflections. If you have any questions regarding this report, please contact us.

We thank you for the support you offer to Father Jeub. We believe that a life of sobriety helps him to continue in his life giving ministry with God's people. We ask for your prayers on behalf of the many clergy and religious persons who we serve and for continued blessings on the work of the Institute.

Sincerely yours,



John Sullivan, MA, CAC
Continuing Care Therapist

Michael J. Brennels, MA, MDiv, CPC
Coordinator, Continuing Care Services
and Three-Quarterway House

Stephen Montana, PhD
Director, Outpatient Department

Frank Valcour, MD
Medical Director and
Vice-President for Medical Affairs

JS/bm
cc: Rev. Richard Jeub

Saint Luke Institute

July 14, 1992

Confidential

Most Reverend John R. Roach, DD
Archdiocese of St. Paul/Minneapolis
226 Summit Avenue
Minneapolis, MN 55102

Re: Reverend Richard Jeub
SLI #12198

Dear Archbishop Roach:

A review of our files indicates that you did not receive this summary of Father Jeub's Continuing Care Workshop in January. We apologize for the error. We have made staffing changes and hired an additional therapist. Future summaries will arrive promptly, and you have probably already received the summary for Father Jeub's July 6-10 Workshop.

1) Recovery Program: This is Father Jeub's second continuing care workshop. Over the past months, Father Jeub has continued to be involved in a variety of recovery activities. He has maintained his involvement in 12-step fellowship meetings. He also meets on a monthly basis with a support group for recovering priests. In addition, he has established an ongoing therapeutic relationship with Delore Rocker, and has found this to be quite helpful. He also has continued to meet on a regular basis with Father McDonough.

2420 Brooks Drive • Suitland, Maryland 20746-5294 • (301) 967-3700 • FAX: (301) 967-3953
Affiliated with the Daughters of Charity, National Health System

Father Jeub feels that the second half of his first year following residential treatment, has been characterized by increasing appreciation of the ongoing nature of recovery activities. He is appreciating the need to be open to growth along various dimensions; paying attention not only to abstinence from problematic behaviors, but also being aware of growth in areas such as interpersonal relations, family issues, and empathy for the feelings and perspectives of others. We encourage Father Jeub to continue his efforts along these important dimensions of recovery. Various collateral letters make note of his ongoing efforts in these and other areas.

2) Current living experiences/Vocational Functioning: Father Jeub continues to appreciate the support he receives in residence at the parish and the support that he receives from Father Tom Fitzgerald. He has done part time work as a janitor and also as a carpenter.

3) Medical: During the course of the Workshop we monitor physical health via various laboratory indices. Father Jeub's laboratory values indicate a need to pay continuing attention to diet and exercise, so as to reduce his cholesterol level.

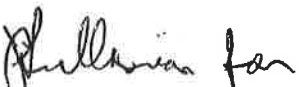
4) Recommendations and Treatment Plan: Father Jeub has continued his recovery activities, and has been able to recognize and appreciate the need for continuing attention to some issues and areas which are characteristic of high quality recovery, and notable among these, is the ability to adopt the perspective of others, and thus become more aware of the feelings and reactions of others. In addition to fellowship meetings, a particular help along this regard has been his individual work with Delore Rocker. We continue to encourage him to explore issues in his ongoing therapeutic work. In addition, he will need to maintain his involvement in 12-step fellowship meetings, as well as his work with his sponsor. By faithfully participating in these various recovery activities, Father Jeub will create conditions that are likely to result in the higher levels of serenity and sobriety that he desires and deserves. We also encourage him to continue to explore vocational issues and options. Father Jeub is beginning to appreciate the fact that his giftedness can be recognized and appreciated in various situations. We hope to hear from Father Jeub from time to time as to how things are going, and look forward to seeing him for the next workshop of his continuing care group in the summer of 1992.

A copy of this letter is being sent to Father Jeub for his reflections. If you have any questions regarding this report, please contact us.

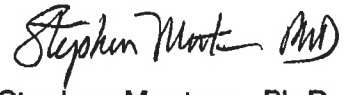
We thank you for the support you offer to Father Jeub. We believe that a life of sobriety helps him to continue in his life giving ministry with God's people. We ask for your prayers on behalf of the many clergy and religious persons who we serve and for continued blessings on the work of the Institute.

Sincerely yours,

John Sullivan, MA, CAC
Continuing Care Therapist



Michael J. Brenneis, MA, MDiv
Coordinator, Continuing Care Services
and Three-Quarterway House



Stephen Montana, Ph.D.
Director, Outpatient Department

Frank Valcour, MD
Medical Director and
Vice-President for Medical Affairs

JS/ng

cc: Reverend Richard Jeub

DRAFT FOR FULL STAFF
MEMO

July 20, 1992

TO: Full Staff
FR: Fr. Kevin McDonough

In the coming days you will likely see some news stories regarding allegations of inappropriate behavior involving Father Richard Jeub. We want you to know that we have worked very hard to meet the needs of victims (as we do whenever a problem like this arises). Below is the short statement we used with the media. Please share this information with your staff, and contact me if you have questions or concerns.

DRAFT STATEMENT July 20, 1992

RESPONSE TO ALLEGATIONS INVOLVING FATHER RICHARD JEUB

This lawsuit marks the first public allegation of inappropriate behavior with an adult woman by Father Richard Jeub, but the Archdiocese has been addressing the situation with the plaintiff and Father Jeub for over two years.

Upon learning of the problem the Archdiocese took several steps. Counseling, access to support groups and spiritual direction were offered and accepted by the victim. After intervening with Father Jeub, ~~he was evaluated and treated as recommended.~~ received professional evaluation, counseling as recommended. He has not been in active ministry for five years. ~~been reassigned~~. Subsequently, a second allegation surfaced dating from an earlier time, which could lead to further legal proceedings. The Archdiocese is also providing support to this victim.

1980-89
9 year consensual relationship

1980 - 1989
divorced 1981

St. Richard's
St. Kevin's } lived there

Providing ~~therapy~~ counseling since 1991

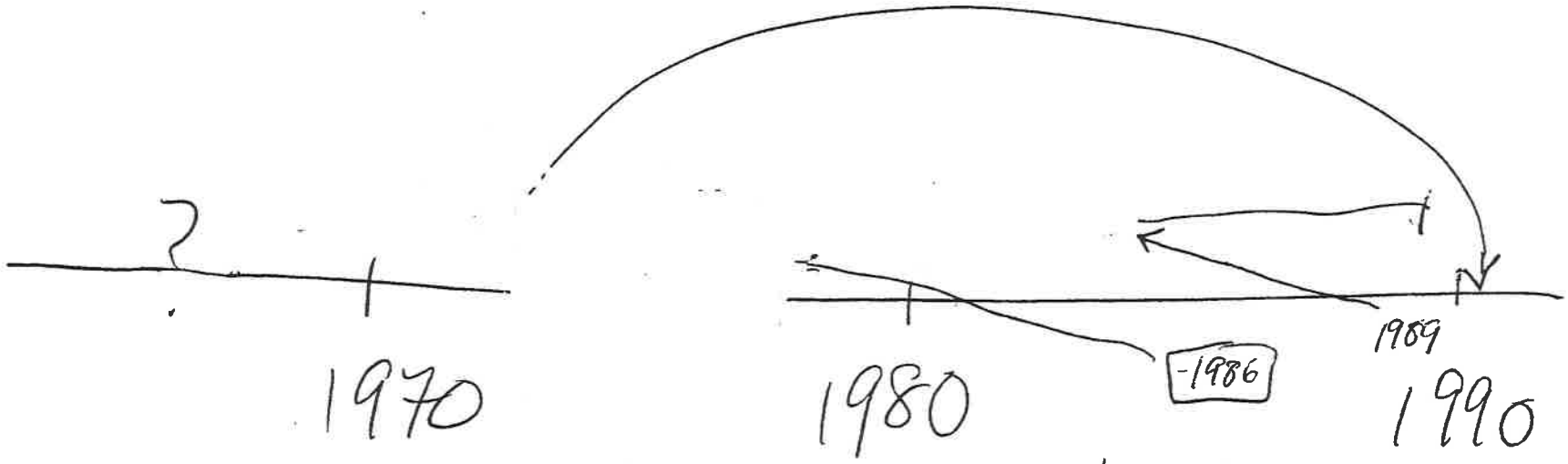
Started in 1991

10 year
consensual

Jew's chaplain > married husband

▶ Employer negligence

(LG - no sexual relationships)


?
1970
1980
-1986
1989
1990
St Jos Hopkins
66-68
OLG
68-70
St Mark
70-76
Hospitals
76-81
St Kevin
81-90

DRAFT STATEMENT July 20, 1992

RESPONSE TO ALLEGATION INVOLVING FATHER RICHARD JEUB

The Archdiocese has been addressing this the situation with the claimant and Father Jeub for over two years. Father Jeub has denied abusing the claimant. Still, as with all alleged victims, the claimant was offered counseling, access to support groups and spiritual direction. Archdiocesan officials had already intervened with Father Jeub regarding a situation involving adult women. He was evaluated and treated as recommended. He has not been reassigned and is not now actively ministering. engaged in active min.

July 22, 1992

RESPONSE TO ALLEGATION INVOLVING FATHER RICHARD JEUB

The Archdiocese has been addressing the situation with the claimant and Father Jeub for over two years. Father Jeub has denied abusing the claimant. Still, as with all alleged victims, the claimant was offered counseling, access to support groups and spiritual direction. Archdiocesan officials had already intervened with Father Jeub regarding a situation involving adult women. He was evaluated and treated as recommended. He has not been reassigned and is not actively ministering.

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JUL 22 '92 01:59PM ST

former priest, church for sexual assault

By Mary Durben

A former parishioner has filed a civil suit against the Rev. Richard Jeub, a former parish priest at Our Lady of Grace Church in Edina, for damages resulting from sexual assault, negligent counseling and breach of fiduciary duty while Jeub was counseling the woman.

Our Lady of Grace Church and the Archdiocese of St. Paul and Minneapolis are also named in the suit, which was filed July 14 in Hennepin County District Court.

The complaint alleges that during a period between 1966 and 1972, Jeub engaged in sexual contact with the woman in incidents that occurred in the rectory, Jeub's automobile and the woman's home.

Attorney John Weyland who filed the suit on behalf of the plaintiff said the woman was 15 or 16 years old at the time the alleged abuse began.

As a result of the incidents, the suit claims that the woman suffered "severe and permanent injuries to her body and mind," including extreme depression, self-hatred and self-mutilation, inability to trust family, friends and counselors, post traumatic stress disorder, dissociative disorder and psychosomatic disorders, loss of self-esteem and impaired social adjustment and "profound damage to her spiritual relationships which have resulted in feelings of betrayal and abandonment by her church."

The complaint further states that the woman has incurred "a diminution in her earning capacity if not total disability from obtaining any gainful employment," and is continuing to receive medical and psychological treatment.

The complaint alleges that Jeub "had a pattern and history of negligence in pastoral counseling" that included sexually exploiting females, and that the pattern and history "eventually became known" to officials of Our Lady of Grace and of the archdiocese.

Our Lady of Grace and the ar-

Suit

From page 1A

chdiocese are charged with negligence for continuing to employ Jeub despite knowledge of his history, failing to provide reasonable supervision of him and failing to provide the woman with adequate warning.

Weyland said he had heard of Jeub's involvement with one other woman but he didn't know whether that resulted in any court action. He said Jeub apparently left the parish in the mid-1970s.

Weyland said he had been negotiating with the archdiocese for about six months in hopes of reaching a settlement, but he finally filed the suit because the statute of limitations would expire Aug. 1.

Neither the attorney for Jeub nor the attorney for the church and archdiocese would comment on the case.

dropped

DRAFT LETTER TO PRIESTS

I know that this has been an particularly difficult time for you with the recent media attention focused on James Porter, who served in the East, and following treatment, in the Crookston diocese. Although Porter never served here as a priest, he and his family are members of Transfiguration, Oakdale. National and local media have repeatedly given the impression that something may have happened while Porter served as a volunteer tutor at Transfiguration School. Thus far there is absolutely no evidence to suggest such problems during that period.

As you know, we have been moving towards a fall announcement of a rather comprehensive plan addressing sexual issues. I want to correct two inaccurate impressions left by the news reports. First, our proposed screening process, modelled on one implemented already in St. Cloud, is aimed toward future potential employees, not toward the past. Father McDonough communicated this to the interviewers, but the coverage did not reflect it. Second, I want to assure you that we have not been conducting secret checks on our priests. In the past five years we have checked on priests new to the diocese and on any who have had allegations made against them. Our consultation and editing continues, a fact given to the press, but not clearly reported by them.

Sadly, with this letter I must also inform you about another situation that does involve the Archdiocese. Allegations will likely become public this week concerning inappropriate behavior by Father Richard Jeub. My goal is to ensure that you have the most accurate information possible about your brother priest, and that you be able to respond to questions that may be addressed to you once this story becomes public.

We have been working with this particular allegation for a couple of years. Father Jeub has denied abusing the claimant. Still, as with all alleged victims, the claimant was offered counseling, participation in archdiocesan sponsored support groups, and spiritual direction.

We had already been working with Father Jeub regarding his behavior with adult women. He was evaluated and has pursued treatment as recommended. He has not been reassigned, but is now residing in the Archdiocese while continuing counseling.

Fathers, I appreciate your faithfulness and endurance through these difficult days. I think we can take heart that we are doing much better at addressing these problems today. I ask for your continued prayers that healing will occur for all abused and their abusers.

Our Lady of Peace

July 22, 1992

MEMO TO: Archbishop Roach
Bishop Charron
Father Kevin McDonough
Jerry Kline

FROM: Fr. Richard Pates - RLP

For your information, I am enclosing two documents which I prepared in conjunction with the complaint against Father Jeub. Kevin and I had the opportunity to review them before they were finalized.

1) A letter which was sent to all of the former members of St. Kevin Parish.

2) An article which I prepared for a little column in our parish bulletin which is circulated throughout the Our Lady of Peace Parish.

I will keep you informed of the reaction from the parishioners as the story develops.

Our Lady of Peace
Catholic Community
5425 11th Avenue South
Minneapolis, MN 55417
823-8253

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Saint Paul, Minnesota 55102-2197

The Chancery

DATE: July 22, 1992

MEMO TO: Full Staff

FROM: Fr. Kevin McDonough

In the coming days you may see some stories regarding allegations of inappropriate behavior involving Father Richard Jeub. We want you to know that we have worked very hard to meet the needs of victims (as we do whenever a problem like this arises). Below is the short statement we used with the media. Please share this information with your staff, and contact me if you have questions or concerns.

RESPONSE TO ALLEGATION INVOLVING FATHER RICHARD JEUB

The Archdiocese has been addressing the situation with the claimant and Father Jeub for over two years. Father Jeub has denied abusing the claimant. Still, as with all alleged victims, the claimant was offered counseling, access to support groups and spiritual direction. Archdiocesan officials had already intervened with Father Jeub regarding a situation involving adult women. He was evaluated and treated as recommended. He has not been reassigned and is not actively ministering.

Our Lady of Peace

July 22, 1992

Dear Parishioners:

We have just received notice from the Chancery Office of the Archdiocese of St. Paul and Minneapolis that a complaint has been filed against Father Richard Jeub alleging sexual abuse of a young woman. The alleged incident occurred over 20 years ago.

I have been informed that while Father Jeub has denied abusing the plaintiff, the Archdiocese, in accord with its standing policy, has offered the plaintiff counseling, access to support groups and spiritual direction.

The Archdiocese has been addressing the situation with the plaintiff and Father Jeub for over two years. Prior to learning of this concern, Archdiocesan officials had already intervened with Father Jeub regarding a situation involving adult women. He was evaluated and treated as recommended. Since leaving St. Kevin, he has not been reassigned and is not actively ministering.

A careful investigation by the Archdiocese has shown that no one from St. Kevin has been identified as being harmed in this way by Father Jeub. At the same time, however, please know that Father Ginsterblum, Sister Fran Donnelly, our Pastoral Minister, and I are available to speak with you regarding any concerns you may have. Feel free to call us at your convenience.

Our reaction to this news is one of sadness. We certainly have compassion for Father Jeub, who generously served this community competently for nine years, as well as the alleged victims who we know have suffered. All involved need our prayers, our efforts to induce healing, and our forgiveness. I know that in your goodness you will join me in this very special ongoing prayer.

Sincerely yours in Christ,

Father Richard Pates
Pastor

Our Lady of Peace
Catholic Community
5425 11th Avenue South
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823-8253

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Catholic Community
5425 11th Avenue South
Minneapolis, MN 55417
823-8253

FROM THE PASTOR

We received the sad news in the course of the past week involving allegations of sexual abuse against Father Jeub who served very competently and generously as Pastor of St. Kevin for nine years. Our hearts share the heavy burden and pain that is experienced by the alleged victims, as well as Father Jeub himself.

Our present experience demonstrates that our community is not immune to difficulties of this nature which, our media have informed us, have touched congregations of all denominations, professionals at every level, as well as all too often, the intimacy of our families.

In the present case, two factors are worthy of note. Upon learning of the allegations, the Archdiocese ministered in a timely and appropriate manner both to Father Jeub and the alleged victims. Secondly, after a careful investigation, it appears that no one from St. Kevin was harmed in this way by Father Jeub.

Experiences such as this may raise concerns and questions for us. Please know that Father Ginsterblum, Sister Fran Donnelly, and I are available to talk about this and be of whatever help we can in discussing the issues. Please call at your convenience.

In your goodness, join me in ongoing and special prayer for Father Jeub and the alleged victims. They need our prayers and our efforts to induce healing.

REP

Our Lady of Peace

July 22, 1992

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Father Richard Pates
Pastor

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823-8253

3/21

Fr. M. J. O'Connell suggested that Dick Jenkins or Fr. McLaughlin might want to be in contact w/ Mike Kolan to discuss his recent testing & work done thru Loving McAlister, an employment psychologist but McA opted to go w/ Abner

Until he knows him & what would be about the same.

Marilyn Wagner

SEXUAL MISCONDUCT POLICY
THE ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

QUESTIONNAIRE

Name: Jenk (Last) Richard (First) Herman (Middle)

Address: 8482-79th St S (Street)

Cottage Grove (City) Mn (State) 55016 (Zip)

Business Phone: _____ **Home Phone:** 458-3919

1. Employment Record (list current and previous employers for the last seven (7) years).

Employed by: First Baptist Church of Hastings

Address: 800 Vermillion St

City & State: Hastings Mn

Position or Job Title: Maintenance

Your Supervisor: Steve Chamberlain Phone No. 437-3965

Employed from (Mo./Yr.) 7-91 To (Mo./Yr.) current

Why did you leave?

Employed by: David Jasper

Address: 8900 Birchwood Lane

City & State: Bloomington Mn

Position or Job Title: Handyman

Your Supervisor: Mr Jasper Phone No. 944-1111

Employed from (Mo./Yr.) 7-91 To (Mo./Yr.) current

Why did you leave?

Employed by: Church of St Kevin

Address: 5944-28th Ave S

City & State: Mpls Mn

Position or Job Title: Pastor

Your Supervisor: _____ Phone No. _____

Employed from (Mo./Yr.) 10-81 to (Mo./Yr.) 5-90

Why did you leave? Sought help for explortive behavior.

2. MISCONDUCT QUESTIONS (mark your answers to the following questions).

a. Have you ever been convicted of a crime of sexual abuse, physical abuse, sexual harassment or exploitation?

_____ Yes X No

b. Has any civil or criminal complaint or investigation been made about you or to your present or former employer which alleges that you committed sexual abuse, sexual harassment or exploitation, or physical abuse?

X Yes _____ No

If yes, how was the complaint resolved?
as yet unresolved (7-17-93)

c. Have you ever terminated your employment or had your employment terminated for reasons relating to allegations of sexual abuse or physical abuse or sexual harassment or exploitation by you, or relating to civil or criminal complaints against you for sexual or physical abuse or sexual harassment or exploitation against you?

X Yes _____ No

d. Have you ever received any medical treatment, physical or psychological, because you committed physical or sexual abuse or sexual harassment or exploitation of other people?

X Yes _____ No

Richard H Jenk
Signature

ACKNOWLEDGMENT, CERTIFICATION AND AUTHORIZATION

I, Richard Jeub, understand and acknowledge that applications for employment in certain positions require that applicants authorize the Employer to conduct a criminal conviction records investigation, and I agree to execute any forms required by the Minnesota Department of Public Safety for such purposes.

I state and certify that I have not been convicted of a crime involving criminal sexual conduct, obscenity, or criminal assault nor have I been convicted of any such offenses in any other state or against the laws of the United States.

I further state and certify that I have not been terminated from a former position nor have I been the subject of any disciplinary action or investigation because of sexual exploitation, sexual abuse, sexual harassment, or physical abuse by me with anyone, and I hereby authorize the Employer to make specific written requests of my employer or former employers or associates concerning the occurrence of such matters or the existence or nature thereof.

Dated: _____, 19___.

_____
Applicant

accusations and allegations are known to the archdiocese.

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Office of the Archbishop

Saint Paul, Minnesota 55102-2197

July 22, 1992

Reverend and dear Fathers,

I know that this has been a particularly difficult time for you with the recent media attention focused on James Porter, who served in the East, and following treatment, in the Crookston Diocese. Although Porter never served here as a priest, he and his family are members of Transfiguration Parish, Oakdale. National and local media have repeatedly given the impression that something may have happened while Porter served as a volunteer tutor at Transfiguration School. Thus far there is absolutely no evidence to suggest such problems during that period.

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Sadly, with this letter I must also inform you about another situation that does involve the Archdiocese. Allegations will likely become public this week concerning inappropriate behavior by Father Richard Jeub. My goal is to ensure that you have the most accurate information possible about your brother priest, and that you be able to respond to questions that may be addressed to you once this story becomes public.

We have been working with this particular allegation for a couple of years. Father Jeub has denied abusing the claimant. Still, as with all alleged victims, the claimant was offered counseling, participation in archdiocesan-sponsored support groups, and spiritual direction.

We had already been working with Father Jeub regarding his behavior with adult women. He was evaluated and has pursued treatment as recommended. He has not been reassigned, but is now residing in the Archdiocese while continuing counseling.

Fathers, I appreciate your faithfulness and endurance through these difficult days. I think we can take heart that we are doing much better at addressing these problems today. I ask for your continued prayers that healing will occur for all abused and their abusers.

Sincerely yours in Christ,

+John R. Roach

Most Reverend John R. Roach, D.D.
Archbishop of Saint Paul and Minneapolis

St Mark
St Paul

Jeub file, please

DRAFT BULLETIN INSERT

July 24, 1992

Dear Parishioners,

You may have heard on the news or read in the paper over the last few days about allegations concerning the inappropriate behavior by Father Richard Jeub. Father Jeub was an Associate Pastor at St Mark's from February, 1970 to June, 1976.

The Archdiocese has been addressing the situation with the claimant and Father Jeub for over two years. The alleged incident did not take place during his time at St. Mark's. Father Jeub has denied abusing the claimant. Still, as with all alleged victims, the Archdiocese offered the claimant counseling, access to support groups and spiritual direction. Archdiocesan officials had already intervened with Father regarding a situation involving adult women. He was evaluated and treated as recommended. He has not been reassigned and is not actively ministering.

At this time we would ask for your prayers that healing will occur for all who are involved in this allegation.

St Mark St Paul

Jeub File, please

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DRAFT LETTER TO PRIESTS

I wanted you to be aware of allegations which will likely become public this week concerning inappropriate behavior by Father Richard Jeub. My goal is to ensure that you have the most accurate information possible about your brother priest, and that you be able to respond to questions that will surely be addressed to you once this story becomes public.

Actually, we've been working with this particular allegation for a couple of years. The victim was offered and accepted counseling, participated in archdiocesan sponsored support groups, and has received spiritual direction. Subsequently, another allegation from an earlier time was made which might lead to another lawsuit.

Father Jeub was evaluated following the intervention, and has pursued treatment as recommended. He has not been reassigned, but is residing in the Archdiocese while continuing counseling.

Fathers, I appreciate your faithfulness and endurance through these difficult days. I think we can take heart that we are doing much better at addressing these problems today. I ask for your continued prayers that healing will occur for all abused and their abusers.

July 24, 1992

Frank Valcour, MD
Medical Director and
Vice-President for Medical Affairs
Saint Luke Institute
2420 Brooks Drive
Suitland, Maryland 20746-5294

Dear Dr. Valcour,

Thank you and others for your report of July 24, 1992 on Reverend Richard Jeub.

It is clear that Father Jeub is benefitting from his work with you people and from the several things he is trying to do as a part of his aftercare program at home.

Unfortunately, as I write this letter, we are waiting for a fairly major public story to break on Father Jeub and it's clearly going to complicate the issue.

Sincerely yours,

Most Reverend John R. Roach, D.D.
Archbishop of Saint Paul and Minneapolis

bcc- Fr. McDonough

cmh

July 28, 1992

Reverend Monsignor Richard Pates
Church of Our Lady of Peace
5425 11th Avenue South
Minneapolis, MN 55417

Dear Dick,

I think both your letter and the article concerning the Jeub situation are very well done.

They are open and inviting and have set exactly the right tone.

Sincerely yours in Christ,

Most Reverend John R. Roach, D.D.
Archbishop of Saint Paul and Minneapolis

bcc- Bishop Charron
Fr. McDonough
Jerry Klein

Jeub file, please

July 28, 1992

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Archbishop of Saint Paul and Minneapolis

bcc- Bishop Charron
Fr. McDonough
Jerry Klein

STRICTLY CONFIDENTIAL

DATE: August 21, 1992

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING: AUGUST 17, 1992

I met with Fr. Richard Jeub for a regular scheduled monitoring meeting on Monday, August 17. We spent most of our meeting on the fallout from the public announcement last month of the lawsuit against him. I was impressed that he was able to identify his response to all of this at an emotional level as well as at an intellectual level. He indicated to me that he is talking with his therapist, Dr. Dolore Rockers, as well as with his priest support group. This seems to be some real progress for him.

He told me that he had read the "expert testimony" offered in the [redacted] case. He said that there are major factual problems in the description of his relationship with [redacted], and that he fears that, if the Archdiocese is paying for counseling for her, then we are "paying someone to create a fiction".

Fr. Jeub believes that it is now time to step up his legal support. He spoke with me about the possibility of obtaining a loan from the Archdiocese so that he could pay counsel for more extensive help. I told him that I would work on the format of that and get back to him.

I was impressed that Jeub has been able to deal with the public revelations of the last month with what appears to be some emotional integrity. We have scheduled a further review meeting in several weeks.

cc: Archbishop Roach
Bishop Carlson
Bishop Charron

STRICTLY CONFIDENTIAL

DATE: August 21, 1992

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING: AUGUST 17, 1992

I met with Fr. Richard Jeub for a regular scheduled monitoring meeting on Monday, August 17. We spent most of our meeting on the fallout from the public announcement last month of the lawsuit against him. I was impressed that he was able to identify his response to all of this at an emotional level as well as at an intellectual level. He indicated to me that he is talking with his therapist, Dr. Dolore Rockers, as well as with his priest support group. This seems to be some real progress for him.

He told me that he had read the "expert testimony" offered in the [redacted] case. He said that there are major factual problems in the description of his relationship with [redacted], and that he fears that, if the Archdiocese is paying for counseling for her, then we are "paying someone to create a fiction".

Fr. Jeub believes that it is now time to step up his legal support. He spoke with me about the possibility of obtaining a loan from the Archdiocese so that he could pay counsel for more extensive help. I told him that I would work on the format of that and get back to him.

I was impressed that Jeub has been able to deal with the public revelations of the last month with what appears to be some emotional integrity. We have scheduled a further review meeting in several weeks.

cc: Archbishop Roach
Bishop Carlson
Bishop Charron

STRICTLY CONFIDENTIAL

DATE: August 21, 1992

MEMO TO: FR. AUSTIN WARD

FROM: FR. KEVIN MCDONOUGH

SUBJECT: FR. RICHARD JEUB

Austin, I need your help on two financial things with Dick Jeub. First, he indicated that he did not receive the usual annual increase that would have been expected in July. Unless there is some specific reasons to deny that to him, I would ask that he would have his pay increased accordingly. I believe we are only paying half of his salary, or some other portion of full salary, and so that should be considered in calculating the actual raise.

As legal issues start to become more pressing around him, he would also like to ask us to do what we have done for other clergy. That is, he has asked us to help him with a loan so that he can pay his legal fees. I know that you and Michael worked this out for several other priests in the past. Can you advise me on how we should do that in Jeub's case? If the information is in our files rather than in yours, we can certainly search for it and make the arrangements from here.

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
NANCY GOERING REILLY
JOHN C. GUNDERSON
CHARLES M. BICHLER

SUITE 2200, NORTH CENTRAL LIFE TOWER
445 MINNESOTA STREET
SAINT PAUL, MINNESOTA 55101-2100
TELEPHONE (612) 228-1911
FACSIMILE (612) 223-5483

WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(OF COUNSEL)

August 26, 1992

Mr. David Alsop
Attorney at Law
P.O. Box 5297
Minnetonka, MN 55343

Re: Mary Jane Doe vs. The Church of Our Lady of Grace of Edina

Dear Mr. Alsop:

COPY

To confirm our telephone conversation and to respond to your letter of August 25, 1992, I would indicate that the Archdiocese will be represented by Mr. James T. Martin who has been retained by the insurance carriers for the Archdiocese in connection with the above-referenced matter. I would ask that you keep me copied on all pleadings, discovery, correspondence, deposition notices, etc. because I am coordinating all the litigation involving Father Richard Jeub. By a copy of this letter to Mr. Martin, I am reminding and requesting that he do the same.

You should also know that Father Jeub is represented by Mr. William Lucas, 6640 Shady Oak Road, Suite 400, Eden Prairie, Minnesota 55344.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

/s/ ANDREW J. EISENZIMMER

Andrew J. Eisenzimmer

AJE:crb
cc: Mr. James T. Martin
The Most Reverend John R. Roach, D.D.
Reverend Kevin M. McDonough
Mr. William S. Fallon

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS
226 SUMMIT AVENUE
ST. PAUL, MINNESOTA 55102

22-1
960

GF [redacted]

ANNUAL CATHOLIC APPEAL

REG. 8P142286 11-91 TO 11-93 T 2808009 0 CTS

PAY	DATE	AMOUNT
	9 2 92	$12,808.90

TO THE ORDER OF [redacted]

GENERAL FUND
ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

[redacted]

DATE	INVOICE NO.		ACCOUNT NUMBER	TOTAL
		Reimbursement of Therapy Expenses from 12-20-83 thru 4-25-88 per Agreement with Fr Kevin McDonough		12,808.90

REMITTANCE VOUCHER

Please Detach Before Cashing Check

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS
Saint Paul, Minnesota 55102

VOUCHER GF № [redacted]

September 9, 1992 **STRICTLY CONFIDENTIAL**

[redacted]

Dear [redacted],

Please find enclosed a check to reimburse you for counseling costs incurred during the period you and I discussed earlier. As you know, Bishop Carlson made a commitment to you to assist with your counseling, and I am happy that we have the opportunity to follow through on that.

I apologize for the long delay in getting this money to you. Frankly, some of the issues that were delaying reimbursement still have not been resolved, but I did not want to try your patience any further.

I am sorry for the pain caused to you by Fr. Jeub. I know that it is possible that other issues will arise for you in the future in this regard. Please do not hesitate to contact me if I can be of some help to you.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

Enclosure

cc: Phyllis Willerscheidt
bcc: Mr. Eisenzimmer
Fr. Ward

[redacted]

Therapy expenses
Dates of services 9/14/92 – 12/31/92
Provider(s) [redacted]
Total cost $1380 + 600 = 1980
Amount to be reimbursed $990

OK KMD
2/18/93

STRICTLY CONFIDENTIAL

DATE: October 6, 1992

MEMO TO: THE FILE OF REVEREND RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: REGULAR MEETING

I met with Fr. Jeub on October 2 in one of our regularly scheduled accountability meetings.

He told me that he had spoken with Fr. Michael Stevens recently in one of the priest support meetings. Fr. Stevens was talking about how much work is involved in the computer instruction and systems development that he is doing at the Catholic Education Center. Fr. Jeub spoke with Stevens about the possibility that, on a volunteer basis, Jeub might assist Stevens. He and I discussed the importance of his not being involved in any isolated one-on-one instructional work with adult women, which might be difficult since so much of Fr. Stevens' work is with secretaries and teachers. I told him that I was not opposed to the idea in theory, so long as this problem could be prevented. He will speak with Fr. Stevens to get a clearer picture of what kind of help he may need, and then speak with me before getting involved in this way. I would discuss it with Sr. Nathalie before giving formal approval.

We discussed his further reactions to the publicity around the lawsuit against him. He indicated that he has received about 25 letters, all of them supportive. He had dinner with one older couple from St. Kevin's Parish. He indicated that several other people from that parish have invited him over. I asked him to speak with Msgr. Pates before accepting further invitations, in order to inform him of this and also to make certain that his presence would not be detrimental to Msgr. Pates' work.

We then talked about the legal situation. He indicated that he has worked things out to be fully represented by legal counsel separately from the Archdiocese.

He indicated that his work is going well, although some work may dry up during the winter. I urged him to be in contact once again with the job placement agency that he was working with before. He will do so. He continues to find the living situation with Fr. Tom Fitzgerald to be a positive one. He indicated that in therapy he is experiencing some plateauing. I challenged him to try to work at his therapy in a renewed way, especially now that there is more public knowledge of his situation. I suggested that he might want to explore his reactions to all of this with his therapist and his groups.

We clarified once again what his assignment situation is with the Archdiocese. He told me that he understands that we have made no commitment to him about future ministerial placement. He said that he understood that he would not have the position of pastor at any time in the near future. If a placement is in order, we have talked about a placement that would have him working apart from vulnerable women. It is impossible to discuss this in any realistic way as long as there are legal complications pending and while he is still only partially through with his therapy. He has a clear picture of all of this and does not believe that he is being led on falsely.

cc: Archbishop Roach
Bishop Carlson

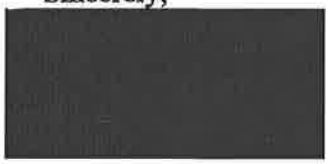
Dear Kevin,

Excuse the delay in acknowledging the receipt of the check in reimbursement for the past therapy expenses. I appreciate that you moved on paying me even before the matter was completely settled with the insurance companies and the courts. You have acted in good faith and that has meant a lot to me.

Life goes on and so does therapy. I am enclosing receipts from [redacted] and [redacted] with whom I have been doing group and individual work. They date through the end of September and total $1867.50. I should be reimbursed $933.75.

Thank you for your continued involvement in this matter.

Sincerely,



cc: Phyllis Willwersheid

OK [illegible]
11/13/92

STRICTLY CONFIDENTIAL

DATE December 2, 1992

MEMO TO: THE FILE OF REVEREND RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

I met with Richard Jeub on November 20. We talked about the following issues.

He received a letter from a former parishioner of St. Kevin's who had moved out of the parish in 1984. She wanted to see Jeub for counseling. Jeub consulted with Tom Fitzgerald, and then he called the woman. He immediately referred her to another counselor. He told her at the beginning of the phone call that he neither would nor could see her or help her, except with a referral. She accepted this and affirmed his clarity about his boundary. Jeub considered this a positive development for him and I told him I thought it was as well.

He has read the plaintiff's response to interrogatories in the [redacted] lawsuit. He noted that [redacted] claims that Monsignor William Baumgaertner had some knowledge about Jeub's transfer from Our Lady of Grace. Jeub understands that his transfer was motivated not by concerns about himself but by some other concerns, and he wonders whether the Archdiocese is aware of that.

We talked about his hope to do some volunteer work with Fr. Mike Stevens. He has not followed through on that yet.

We checked on his employment. At our last meeting, there was some concern that there might not be sufficient work to keep him busy through the winter. He said that new projects have been added in his carpentry work, and he has plenty to do.

I asked him about the aftercare group that was assembled as part of his plan from Saint Luke's Institute. I asked whether that group was supposed to be meeting on some sort of regular basis. He told me that he understood that the group as a whole was not supposed to meet necessarily, but he was to be in contact with all of the individuals regularly. He says that he is doing so.

We talked briefly about the state of the legal matters being brought against him.

cc: Archbishop Roach
Bishop Carlson
Mr. Fallon

file, please

December 9, 1992

MEMO TO: Father McDonough

FROM: Archbishop Roach

I am returning the form on Dick Jeub from St. Luke Institute. Why don't you fill out a response in my name. You know a lot more about that than I, since you have been monitoring him.

file, please

Last Will + Testament

Archdiocese

Rev. Richard Jeub

Dated 1993

1-6-93

Kevin

This is a proposal received from Jack Gilbert yesterday

It offers a possibility

I'd like to talk about it on Friday. See you then.

Dick

Please attach copies to the file memo re: Monitoring meeting.

Friday, January 22, 1993

Dear Dick,

I've been thinking about this, Dick, as a proposal and want to share it with you. If it is crazy, we can just forget it; if not, we can talk about it further.

You want to minister; I want to move on in a year or two to a different phase of my ministry. And I'm wondering if our two interests can't come together at Marystown.

You are much more aware of the tendencies that caused you difficulty in the past. That was made especially evident at our last group meeting (in December) when you talked about this.

My only point is saying this is that, with your awareness, there is very little possibility of your getting into the same kind of difficulty over again.

But the Chancery might want some supervision as you get back into full time parish ministry. I would be glad to provide that for a year at Marystown and then, having turned the parish over to you, I would be glad to continue in a supervisory role if Chancery people and you would like to continue that arrangement.

Since we could not afford the salary of another priest, this arrangement would call for the Chancery to pay your salary for the first year while the parish would pay room and board; then, the second year, I would live on my social security and the parish would pay your salary, benefits, room and board and, I would be under medicare for health and we would ask the diocese to suspend my retirement payments in exchange for supervision.

The following year, if you wanted to continue some kind of supervision, we could do that and I would retire completely from Marystown.

This is just an idea, Dick, and we can change it lots of ways. It seems to me, though, that you want to get back into parish life and that it would be a good thing for you to get back into parish life.

Needless to say, I don't want to complicate your life; I certainly don't want to play doctor toward you; and I realize the Chancery has its own set of problems. But I think Marystown is a great place to allow you to re-enter; I think you will enjoy ministry here very much; and I think the people here would accept you 100%.

I have a conflict with our support group...have a meeting at the seminary from 1 to 2:30; and, provided the seminary meeting does end at 2:30, I am going to try to get to the Cathedral by 2:45. So I may miss you...but I may see you, too.

Hope to see you, Dick — Study. As always, Jack

ARCH-013020

File, please

Saint Luke Institute

February 4, 1993

Confidential

Most Reverend John R. Roach, DD
Diocese of St. Paul-Minneapolis
226 Summit Avenue
St. Paul, MN 55102

Re: Reverend Richard Jeub
SLI #12198

Dear Bishop Roach,

Father Jeub attended a workshop with us from January 11-15, 1993 as part of his Continuing Care Program. We want to inform you at this time regarding his progress in recovery over the past six months. Also, we wish to take this opportunity to inform you of a recent change in the Continuing Care service as well. Jennifer Edmonson, LGSW has recently joined our service as a Continuing Care therapist, and Sharon FitzGerald, MA has joined the Continuing Care Department from the Inpatient Department.

The following is our perception of Father Jeub's progress in his ongoing recovery.

1. **Recovery Program:** This was Father Jeub's fourth Continuing Care Workshop. He reported no relapse into his addiction over the past six months, and no serious temptation towards relapse during that same period of time. Father Jeub continues to attend one SA meeting for clergy on Sunday evenings, and another Twelve Step meeting for clergy every other week. He also continues to attend a post-treatment therapy group facilitated by Dr. Delore Rocker, once a month, as well as ongoing individual therapy in a once-a-month priests support group.

2420 Brooks Drive • Suitland, Maryland 20746-5294 • (301) 967-3700 • FAX: (301) 967-3953
Affiliated with the Daughters of Charity, National Health System

Father Jeub reported concerns about the case filed against him last summer. Although he received many letters of support from friends and parishioners after the newspaper printed his story, he felt disappointed that he received so few letters of support from his fellow clergymen.

Father Jeub perceives himself as progressing well in his recovery. However, he mentioned a couple of situations where the opportunity to practice some caretaking behavior arose and said that he was able to back off from the situations. Since caretaking is an area of vulnerability for him in his addiction, and because it was in his original Continuing Care Contract, we urged Father Jeub to seek out SLAA meetings in his area, and to become reconnected with that program as soon as possible.

2. **Current Living Experiences/Vocational Experience**: Father Jeub reported that his current living situation continues to be excellent. He has been feeling somewhat down due to his not being back in ministry yet; but he continues at his current place of employment as a maintenance person. Father Jeub feels very positive about looking for some land to purchase, upon which he hopes to build a retirement home. He was very enthusiastic when describing his plans to his fellow group members, who also saw this as hopeful and positive for him.

3. **Medical**: During the course of the Workshop we evaluate a person's physical health via various laboratory indices. Father Jeub's test results were within normal limits and we noticed that his cholesterol level and triglycerides level has dropped since his last Workshop, which is a positive sign.

4. **Recommendations and Treatment Plan**: All in all, Father Jeub seems to be enjoying the benefits of his recovery, and he was affirmed by group members around the changes they had seen in him since he entered Saint Luke Institute for treatment. Father Jeub acknowledged shame around his legal matters, and we encouraged him to seek out the support of the SLAA Twelve Step fellowship during this difficult period of time, both because of its focus on relationships, as well as for the opportunity to become acquainted with a nonclergy group of recovering people. Otherwise, we look forward to seeing Father Jeub upon his return to the Saint Luke Institute for his next Continuing Care Workshop which will be held during the week of July 12-16, 1993.

A copy of this letter is being sent to Father Jeub for his reflections. If you have any questions regarding this report, please contact us.

We thank you for the support you offer to Father Jeub. We believe that a life of sobriety helps him to continue in his life-giving ministry with God's people. We ask

you for your prayers in behalf of the many clergy and religious persons whom we serve and for continued blessings on the work of the Institute.

Sincerely yours,

Sharon FitzGerald, MA

Sharon FitzGerald, MA
Continuing Care Therapist

Michael J. Brenneis, MA, MDiv, CPC

Michael J. Brenneis, MA, MDiv, CPC
Coordinator, Continuing Care
Services and Three-Quarter Way House

Stephen Montana, PhD

Stephen Montana, PhD
Director, Outpatient Department

Frank Valcour, MD

Frank Valcour, MD
Medical Director and
Vice-President for Medical Affairs

SF/bm
cc: Rev. Richard Jeub

STRICTLY CONFIDENTIAL

DATE: FEBRUARY 5, 1993

MEMO TO: THE FILE OF RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Jeub on January 29. We reviewed the after-care week that he had spent at Saint Luke's Institute. Neither of us has yet received a written summary of that week, but we discussed it based on Fr. Jeub's impressions. He indicated that he worked with Barbara Fitzgerald as his primary therapist. He thought that she paid good attention to him throughout the process. He noted that he had an excellent experience in a successful follow-through on a confrontation that he had had with another priest in the Saint Luke's setting. He sees this as an indication of his increasing ability to address problems head-on rather than allow them to fester.

He continues to meet with his various 12-step and support groups and with his therapist. He had two important moments of insight in December, during which he recognized some of the emotional patterns connected with his addictive behavior.

He is continuing to work on a regular basis and provide a significant portion of his own support.

He received the attached letter from Fr. Jack Gilbert. He and I discussed what we had discussed in the past, namely, that the Archdiocese has been thinking that any possible future assignment he might have (without making a commitment to such an assignment) would be in an all-male environment. I told him that I found Fr. Gilbert's offer to be intriguing, however, because of Gilbert's insight and also because Gilbert participates in the group with Jeub and knows him well. Jeub understands that we cannot give any serious consideration to an assignment while there are pending legal matters. I also checked with him to make certain that he understood that we have never promised that we can put him back into a priestly assignment. He understands both of those things.

Jeub continues to check out well. I believe he is growing in awareness and is acquiring some of the skills to maintain more healthy relationships.

cc: Archbishop Roach
Bishop Carlson
Mr. Fallon

Enclosure

STRICTLY CONFIDENTIAL

DATE: FEBRUARY 5, 1993

MEMO TO: THE FILE OF RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

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cc: Archbishop Roach
Bishop Carlson
Mr. Fallon

Enclosure

STATE OF MINNESOTA | DISTRICT COURT

COUNTY OF HENNEPIN | FOURTH JUDICIAL DISTRICT

Mary Jane Doe,

Plaintiff,

vs.

Archdiocese of St Paul & Minneapolis, et al,

Defendant.

SCHEDULING ORDER

File No.**PI 92-013148**

Pursuant to the Informational Statements of the parties, and based upon all the files, records and proceedings herein,

IT IS HEREBY ORDERED:

1. That joinder of additional parties, whether by amendment, third party practice or otherwise, shall be accomplished before **May 3, 1993.**

2. That all discovery shall be completed no later than **July 26, 1993**, including exchange of medical reports and an independent examination pursuant to Minn. R. Civ. P. 35.

3. That all dispositive motions shall be noticed and heard prior to **August 23, 1993.**

4. That a **JOINT** Statement of the Case pursuant to Rule 112 of the New General Rules of Practice shall be filed by **August 1, 1993.**

5. That this case is referred to **mediation** for further resolution at the following designated agency: **AMERICORD**, 3908 IDS Center, 80 South 8th Street, Minneapolis, Minnesota. **Susan Stingley** is named as the designated mediator.

6. That a pretrial settlement conference will be scheduled by the Court in the event this matter is not resolved through mediation.

THIS ORDER SHALL NOT BE AMENDED BY STIPULATION OF THE PARTIES. ANY REQUESTS FOR MODIFICATION SHOULD BE DIRECTED IN WRITING TO THE COURT.

DATED: March 22, 1993.

BY THE COURT:

Michael J. Davis
Judge of District Court

Clerk's Phone: 348-4174

PLEASE NOTE:

Copies of this Order have been sent to those parties/attorneys listed below.

If you are aware of any party and/or attorney not listed below please contact my office immediately. (348-3677).

JOINT STATEMENT OF THE CASE must be a joint statement, individual statements of the various parties are not acceptable.

cc: John L. Weyland, Esq.
Andrew J. Eisenzimmer, Esq.
William L. Lucas, Esq.
James T. Martin, Esq.

STRICTLY CONFIDENTIAL

DATE: MARCH 25, 1993

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Jeub on March 19, 1993. Primarily we reviewed the report from Saint Luke's Institute. This report was a summary of his aftercare workshop in January. Jeub indicated that he is following up on the recommendation from Saint Luke's that he participate in SLAA, and has been making contact through a Post Office Box number and through Dr. Rockers. We noted several positive things in the SLI report, including improved physical health and a greater willingness to talk about emotional issues with his peers and support group. He indicated that he has had some difficulty in scheduling appointments with his therapist, but they are now back on track. He also indicated that he is seeking out friendships with two or three adult women with whom he does not have a power relationship, attempting to establish a healthy friendship there. He is reviewing this process with his therapist. He is hopeful that he can maintain healthy, moral boundaries in those relationships.

He continues to work regularly and he finds the living situation in the rectory at St. Rita to be very positive.

cc: Archbishop Roach
Bishop Carlson

STRICTLY CONFIDENTIAL

DATE: MARCH 25, 1993

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Jeub on March 19, 1993. Primarily we reviewed the report from Saint Luke's Institute. This report was a summary of his aftercare workshop in January. Jeub indicated that he is following up on the recommendation from Saint Luke's that he participate in SLAA, and has been making contact through a Post Office Box number and through Dr. Rockers. We noted several positive things in the SLI report, including improved physical health and a greater willingness to talk about emotional issues with his peers and support group. He indicated that he has had some difficulty in scheduling appointments with his therapist, but they are now back on track. He also indicated that he is seeking out friendships with two or three adult women with whom he does not have a power relationship, attempting to establish a healthy friendship there. He is reviewing this process with his therapist. He is hopeful that he can maintain healthy, moral boundaries in those relationships.

He continues to work regularly and he finds the living situation in the rectory at St. Rita to be very positive.

cc: Archbishop Roach
Bishop Carlson

SIGNED ACKNOWLEDGMENTS

file please

APRIL 14, 1993

DEAR FR. McDONOUGH,

I AM A PERSONAL FRIEND OF FR. DICK JEUB AND I WOULD LIKE TO MAKE CONTACT WITH HIM.

WOULD YOU PLEASE ASK HIM TO CALL ME (OR WRITE) AT HIS CONVENIENCE? MY PHONE #

I WORKED WITH DICK FOR 4 YEARS AT ST. KEVIN'S AS HIS PARISH BUSINESS ADMINISTRATOR.

IF FOR SOME REASON YOU CANNOT CONTACT HIM AT THIS TIME, WOULD YOU PLEASE ADVISE ME?

THANK YOU FOR YOUR ATTENTION TO THIS MATTER.

YOURS TRULY,

MEMO: TO THE FILE OF FR. RICHARD JEUB

FROM: Marilyn Wagner

DATE: April 23, 1993

Phil Dracowski, a police officer from the Dakota County Jail, called the Chancery to speak to Fr. Kevin McDonough at the request of Fr. Richard Jeub. According to Phil, Fr. Jeub had been in contact with him earlier to obtain permission to do a 5th step for a male inmate of the Dakota County Jail. However, Phil says he had not been able to reach Fr. McDonough by phone in time and Fr. Jeub was now at the jail.

In Fr. McDonough's absence, I checked with Fr. Paul Jaroszeski, who in turn spoke with Archbishop Roach on this matter. Archbishop Roach did give his approval for Fr. Jeub to do this 5th step for the male inmate as Fr. Jeub had apparently already been doing some of this work.

The Archbishop did request that a notation be made in Fr. Jeub's file about this phone call request which I agreed to do.

STRICTLY CONFIDENTIAL

DATE: MAY 18, 1993

MEMO TO: THE FILE OF FR. JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Jeub on May 14 for a regularly scheduled monitoring meeting. We discussed a number of subjects.

He told me he had heard a rumor that [redacted] had been married. I told him that I could not either confirm nor deny that.

He said that Holy Week was difficult for him, since he was unable to participate as a priest in any of the public liturgies. He was able to acknowledge these feelings, however, and was able to talk about them with some friends.

He attended a wake and funeral at St. Kevin's Parish for someone who he was close to there. I believe that he consulted with Fr. Pates before doing so. He was able to visit appropriately with some people there. On a therapeutic level, he has missed a therapy appointment recently, but is back on schedule now. He has also looked into an SLAA group, but can only find one group scheduled at a convenient time. I challenged him to take a look at whether he is dragging his feet a bit on the therapeutic process. It may be that he has reached a plateau that is healthy, but he should raise this with his therapist. He agreed that he wanted to do that.

He continues to work with a spiritual director. He is also working three full days a week in electrical and repair work. He believes he is in the best physical and mental shape of his adult life.

He does seem to be doing well. I believe he is aware of the issues that he has to address and he is much more capable now of acknowledging emotion and dealing with it appropriately.

cc: Archbishop Roach
Bishop Carlson
Mr. Fallon

STRICTLY CONFIDENTIAL

June 4, 1993

Michael Brenneis
Saint Luke Institute
2420 Brooks Drive
Suitland, Maryland 20746-5294

Dear Mr. Brenneis,

I am writing to you in regard to Reverend Richard Jeub who will be participating in a continuing care workshop in July. I am responding in my own name and that of Archbishop Roach, since both of us have been asked to respond to a questionnaire.

Here are the responses to the questions you raise:

1. Father Jeub and I meet approximately every 6-8 weeks. We calendar the subsequent meeting at each meeting.

2. I believe that our relationship is open and positive. Father Jeub has worked to make it so. At one time, Father Jeub and I lived in the same rectory, but the difficulties of intervention in the last several years could have closed that relationship entirely. Father Jeub has made a deliberate effort to trust me in my work for the Archdiocese.

3. I believe that his progress in recovery is ongoing and positive. It is ongoing in that he continues to discover and express new insights. It is positive in that he has a far-increased ability to acknowledge to himself and to others his own emotions, particularly those that make him feel "out of control" of his life. In the past several months I have sensed what might be some "therapy burnout" in Father Jeub. This is a conclusion that I am making on the basis of insufficient evidence, but I would like to see the issue addressed in the continuing care workshop. I base this conclusion only on the fact that he has reported missing at least two therapy sessions and then having difficulty in each case in scheduling a subsequent session. While there were legitimate reasons to miss each of those sessions, he did not seem to me to be in a "great hurry" to re-schedule. Beyond this, there are no other issues that I would raise beyond those discussed in previous responses to questionnaires.

4. Father Jeub continues to keep himself occupied and maintain a portion of his financial care through part-time work. He understands that the Archdiocese of Saint Paul and Minneapolis still is not in a position to reassign him to a ministerial setting. He is able to express his frustration with this to me, but he is also able to express empathy and understanding with the reasons for that.

Once again, I believe that Father Jeub is making positive progress. I look forward to hearing the results of this continuing care workshop.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:mrw

cc: Archbishop Roach
Fr. Jeub

STRICTLY CONFIDENTIAL

DATE: JULY 14, 1993

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Jeub on July 9. We discussed the following matters:

1) He expressed some concern at the legal strategy being pursued by the attorneys representing the Archdiocese in the [redacted] case. He indicated that it was apparent to his own attorney that our lawyer is attempting to get the case dismissed on statute of limitations grounds, but Fr. Jeub insists that no misconduct occurred, whether the statute has been exhausted or not. He understands the desire of the Archdiocese to have the suit dismissed as soon as possible, but he simply asked that it be noted that he disputes the fundamental claim of misconduct against him in this case.

2) He indicated that the Conference at St. John's University was very positive. He believed that he was accepted by his fellow priests.

3) He indicated that his therapist, Dr. Dolore Rockers, has asked him this question: "What happens when this is all over and you do not get what you want?" I understand that to mean that she is challenging him to think of other options besides parochial priesthood and perhaps beyond priesthood at all. Fr. Jeub indicated that for the first time he is seeing that he has some real options. He has discussed this with his priest support group, and has begun to consider the possibility of applying for some parish business administrator positions. He would do so without spreading public knowledge in the parish about his ordination, functioning in the way that some of the resigned priests who hold similar positions do today. I told him that I thought it was positive that he was considering options other than priesthood, and that I would not see a major difficulty with his taking a job such as business administrator in the right parish setting. There would still be boundary issues that would have to be dealt with and some real attention to supervision.

4) He indicated that Fr. Fitztgerald, with whom he currently lives in Cottage Grove, will be on sabbatical in about a half a year. Jeub is not interested in remaining in the house alone, believing that that would not be heathy for him. As a result, he is now looking at options for other housing. We will continue to speak about this.

5) He continues to meet with his therapist and with his support groups.

I continue to see progress on Fr. Jeub's part as he addresses the issues of personal strength and emotional integrity that are part of his recovery.

cc: Archbishop Roach
Bishop Carlson
Mr. Fallon

To be paid
from Clergy
Benefit Fund

STRICTLY CONFIDENTIAL

DATE: JULY 14, 1993

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cc: Archbishop Roach
Bishop Carlson
Mr. Fallon

DATE: JULY 15, 1993

MEMO TO: FR. AUSTIN WARD

FROM: FR. KEVIN MCDONOUGH

SUBJECT: PRIESTS ON SPECIAL SUPPORT

Austin, one of the priests who is on special support just reminded me that July is the month when priest salaries normally go up. Can you arrange to have those few men who are being paid through the clergy benefit fund receive their normal raises during July. I understand that there has been some delay in that in the past. If this person was overreacting, I apologize for the hassle.

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS
EMPLOYMENT BACKGROUND CHECK

Church of St Kevin
(name and address of previous employer)
5844-28th Ave S
Mpls, Mn 55417

Re: Richard H Jeub
(name of former employee)
[redacted]
(Social Security number)
2-21-40
(date of birth)

Dear Employer:

Your former employee, Richard Jeub, identified above, has applied to be employed by us or continue to be employed by us. We have developed procedures which require that we request a background check with you as a previous employer to determine whether your former employee was ever the subject of a disciplinary action or investigation arising from the occurrence of misconduct including sexual abuse, physical abuse, sexual exploitation or sexual harassment. This would include occurrences of sexual misconduct involving a child or children, involving persons who sought counseling or therapy, involving persons who were vulnerable because of impairment of mental or physical function or emotional status, or involving other past or present employees.

Set forth below is an Authorization for Release of Information by your former employee and a Response By Employer form to be completed. Your cooperation is appreciated. An addressed, stamped envelope is provided for your response.

Thank you.

****

AUTHORIZATION FOR RELEASE OF INFORMATION

I, Richard Jeub, hereby authorize the above-named employer to release information for the purpose of evaluation of my application for or continuing employment. I agree not to hold my previous employer liable for release of any information in connection herewith.

Dated: 7-17-93, 1993.

Richard H Jeub
Signature

****

RESPONSE BY EMPLOYER

We, as a previous employer of the above-named employee, respond that while employed by us, the former employee

_____ was

_____ was not (please check one)

the subject of a disciplinary action or investigation arising from the occurrence of sexual abuse, sexual exploitation, or sexual harassment.

Dated: _____, 19___.

_____
Signature, Title

_____
Company or Agency

If we have checked "was", we are able to provide the following further information:

STATE OF MINNESOTA
BUREAU OF CRIMINAL APPREHENSION - CJIS SECTION
RECORD AND IDENTIFICATION SERVICES
1246 UNIVERSITY AVE, ST PAUL, MN 55104 - 4197
(612) 642-0670
TDD (612) 297-2100

Date: 011094

Name: JEUB, RICHARD HERMAN

DOB: 022140

This letter certifies that a search has been made of the criminal history files maintained in Minnesota by the Department of Public Safety, Bureau of Criminal Apprehension.

The search was performed by Name and Date of Birth.

The result of this search indicates that no record was found based on the above search criteria.

This does not preclude the possible existence of additional information located at county or city levels.

If you have questions about this record please contact the telephone number above.

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(name and address of previous employer)
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Richard H Jeub
Signature

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CONFIDENTIAL

DATE: July 23, 1993

MEMO TO: ARCHBISHOP ROACH, BISHOP WELSH

FROM: FR. KEVIN McDONOUGH

SUBJECT: FR. RICHARD JEUB

Fr. Jeub has just called and indicated that he has been offered a position as parish business administrator by Fr. Jack Gilbert. He is asking for your permission to accept the position.

Some of the conditions which they have discussed include these:

1. Jeub would under no circumstances do priestly work in the parish.

2. Most of the people in the parish who would ask would be told that he is a priest on a leave of absence, without permission to act as a priest, dealing with "personal issues".

3. A smaller group would know about his background specifically.

4. He would live in the rectory with Frs. Gilbert and Burns.

I want to recommend that you grant permission. He would be employed in a fundamentally "lay" position rather than as a priest. Gilbert knows him from support group, and understands his issues. The living situation would be helpful for his ongoing recovery/health.

Jeub would receive a regular salary from the parish, and no longer would be a liability on our Priests Benefit Fund.

CONFIDENTIAL

DATE: July 23, 1993

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FROM: FR. KEVIN McDONOUGH

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Jeub would receive a regular salary from the parish, and no longer would be a liability on our Priests Benefit Fund.

Jeub file,
please.
(note date to filing)

OK

AUTHORIZATION FOR RELEASE OF
CRIMINAL HISTORY RECORD INFORMATION

TO: Minnesota Department of Public Safety
Office of Information Systems Management
1246 University Avenue
St. Paul, MN 55104

RE: Subject of Data

Richard Herman Jeub
Person's Full Name--Last, First, Middle

February 21, 1940
Date of Birth

This is a full and sufficient authorization, pursuant to Minn. Stat. §13.05, Subd. 4, to release to:

Archdiocese of St Paul and Minneapolis
Name of Agency to Whom Information is to be Disclosed

226 Summit Ave
Street Address of Agency

St Paul, Mn 55102
City, State, and Zip Code

all Criminal History Record Information maintained by your agency, without exception.

This information is being released for the purpose of employment and includes records prepared prior to the date of this authorization. I do not authorize a subsequent release of this information by the agency to whom information is to be disclosed for purposes not related to my employment.

This authorization shall be deemed to be effective for one (1) year from the date hereof, at which time it shall automatically expire.

Dated this 26th day of July, 1993

Richard H Jeub
Signature of Subject of Data

Subscribed and sworn to before me this 26th day of July, 1993.

Janice J Griffith
Notary Public

JANICE J. GRIFFITH
NOTARY PUBLIC - MINNESOTA
WASHINGTON COUNTY
My commission expires 4-27-94

ok

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TO: Minnesota Department of Public Safety
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Janice J Griffith
Notary Public

JANICE J. GRIFFITH
NOTARY PUBLIC - MINNESOTA
WASHINGTON COUNTY
My commission expires 4-27-94

File, please

Saint Luke Institute

CONFIDENTIAL

July 30, 1993

Reverend Kevin M. McDonough
Chancellor
Diocese of Minneapolis-St. Paul
226 Summit Avenue
St. Paul, MN 55102

Re: Reverend Richard Jeub
SLI No: 12198

Dear Father McDonough:

During the week of July 12 - 16, Father Jeub attended a workshop with us as part of his Continuing Care program. We want to inform you at this time regarding his progress in recovery over the past six months. The following is our perception of Brother Jeub's progress in his ongoing recovery:

1. Recovery Program: This was Father Jeub's fifth Continuing Care workshop. He reported no relapse into his addiction over the past six months and no serious temptation towards relapse during that same period of time. However, Father Jeub mentioned noticing his pattern of attractedness emerging toward a single woman in his faith sharing group, but reported this as a positive sign of his recovery. One of Father Jeub's collateral letters referred to an incident where Father Jeub had had thoughts about buying a sexually explicit video; his ability to relate this to his support group is a positive sign of Father Jeub's recovery, and he did not act on this thought. However, he stated that he did not feel the need to share this information and struggle with his Continuing Care group members because he had resolved it successfully at home.

Father Jeub currently attends one SA meeting per week, a 12-step group for clergy every two weeks, a priest support group once a month, and a post treatment support group once a month, facilitated by Dolore Rocker (who Father Jeub also sees for individual therapy sessions once per month). Father Jeub mentioned that he could not get to any SLAA meetings (as recommended to him in our last letter) because they interfered with other obligations. This is unfortunate because relationships are an issue for Father Jeub, and this 12-step fellowship could provide much support for him

2420 Brooks Drive • Suitland, Maryland 20746-5294 • (301) 967-3700 • FAX: (301) 967-3953
Affiliated with the Daughters of Charity, National Health System

in this area as well as an opportunity for 12-step fellowship with lay persons.

Father Jeub expressed some anxiety regarding his upcoming therapeutic conference with a woman who stated she was victimized by him. He became visibly upset when talking about his attempts to communicate with his elderly mother, and her continued dismissal of his attempts to do so. It seemed that Father Jeub did not have the ongoing therapeutic support (i.e., weekly or twice weekly sessions) in which to more fully explore these still unresolved issues.

2. Current Living Experience/Vocational Functioning: Father Jeub continues to enjoy his living situation at the rectory. He mentioned that he has spoken with a priest friend about the possibility of working for him part time as a parish administrator. Father Jeub continues to hope for ministry at a time in the future after his legal issues are resolved. He will be buying some property in the near future upon which he hopes to build a retirement home and he feels very optimistic about this.

3. Medical: During the course of the workshop, we evaluate a person's physical health via various laboratory indices. We noted that Father Jeub's triglyceride and cholesterol levels were very elevated and that his cholesterol/HDL ratio was extremely high (8.06) In addition to this, Father Jeub received medical attention for irregular heartbeat while he was here at Saint Luke's. He received an ECG at the Institute, and our consulting internist suggested that he be taken to Southern Maryland Hospital, where he also received a series of ECGs, a chest x-ray and routing lab studies. He was strongly advised to bring this episode to the attention of his cardiologist back home, and given copies of his ECGs and other relevant clinical data. We recommend that he share his laboratory results with his local physician, and that he restrict his intake of animal and saturated fats, in addition to putting a program of aerobic exercise in place for himself.

4. Recommendations and Treatment Plan: Father Jeub presented his sobriety to the group in a very positive light. This seems to be a pattern with him, and one in which he exhibits shame about revealing any struggles that he has had in his sobriety in the preceding months. In our individual consultation, Father Jeub appeared to be much more forthcoming in acknowledging his struggles, and he appears to have many unresolved issues, i.e., his relationship with his mother, the anger at losing ministry, his fear of the upcoming conference with a former parishioner, and the loss of his support group facilitators, who will be soon moving to another state. This was particularly poignant, as this week group members were notably open and vulnerable with each other, and Father Jeub seemed challenged by this, rather than supported by it. Additionally, he suffered from medical difficulties the day after our individual consult; while we cannot say whether there was a correlation between these two occurrences, we would suggest that Father Jeub consider discussing these issues

with both his therapist and his physician upon his return home. We would recommend that Father Jeub ask for regular weekly psychotherapy sessions to help him explore some of the unresolved issues troubling him at this point, and we predict that this may be difficult for him to do. However, it is important for Father Jeub to realize that his sobriety could be disturbed by ongoing unresolved issues, as they will continue to surface if left unattended. We would like to thank Father Jeub for his participation in the workshop, and we look forward to seeing him at his next Continuing Care workshop, scheduled for the week of January 10-14,1994.

A copy of this letter is being sent to Father Jeub for his reflections. If you have any questions regarding this report, please contact us.

We thank you for the support you offer to Father Jeub. We believe that a life of sobriety helps him to continue in his life-giving ministry with God's people. We ask for your prayers in behalf of the many clergy and religious persons whom we serve and for continued blessings on the work of the Institute.

Sincerely yours,

Sharon FitzGerald, MA

Sharon FitzGerald, MA
Continuing Care Therapist
Outpatient Department

Michael J Brenneis, MA, MDiv, CPC

Michael J. Brenneis, MA, MDiv, CPC
Coordinator
Continuing Care Services

Stephen Montana PhD

Stephen Montana, PhD
Director
Outpatient Department

Frank Valcour MD

Frank Valcour, MD
Medical Director and
Vice President for Medical Affairs

SF/ng
cc: Reverend Richard Jeub

8-10-93

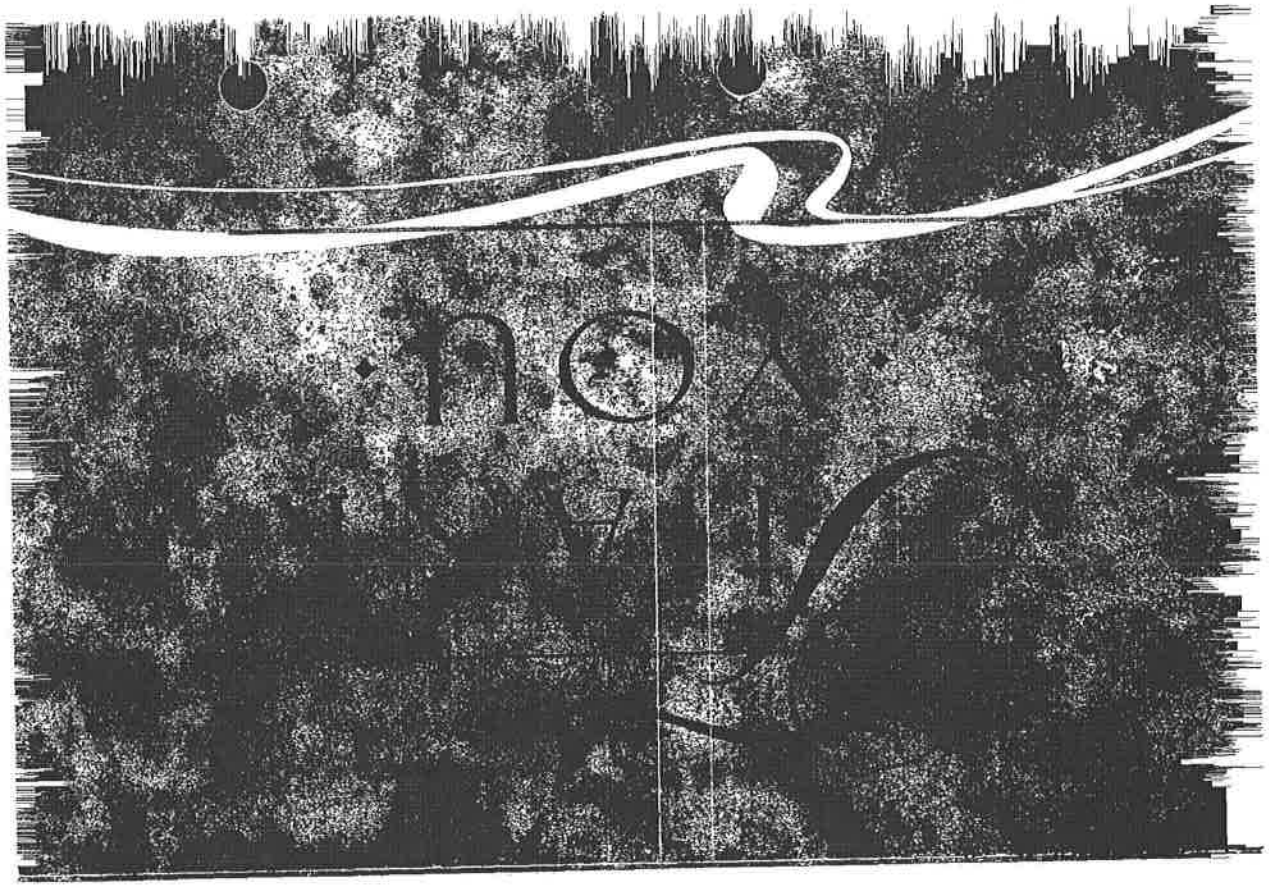
Dear Fr. McDonough,

Thank you so very much for the opportunity to meet with you and Dick Jeub on July 30th. I appreciated your kindness in allowing me to express my feelings and in your non-judgemental response. Although it was very painful, I am very glad that I was able to talk about what had happened in my relationship with Dick Jeub. It was only recently that I was able to tell some of the humiliating things that had happened. I am grateful for Dick Jeub's cooperation by attending the meeting. I very much appreciated his response and he seemed sincerely sorry. I believed him when he said nothing happened between him and my daughter. It was a healing experience for me and I'm no longer afraid of him hurting me or of running into him.

I am very grateful for the therapy you have allowed me to have and for being able to continue the healing process with I couldn't have possibly done this without his help. Again, thank you for meeting with me, and for all the support you have provided to me through

Sincerely,

[redacted]



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UNIVERSITY OF ST. THOMAS
THE CENTER FOR NONPROFIT MANAGEMENT

The Center For Nonprofit Management
University of St. Thomas
52 Tenth Street South
Minneapolis, Minnesota 55403-2001
612-962-4290

Richard Jeub
Archdiocese of St. Paul
8482 79th St. S.
Cottage Grove, MN 55016

Make check payable to:
University of St. Thomas

Thank you for this registration.

Date: 9/3/93 **Student Number:** 016026N
(Use this number when referencing your registration)

	Seminar Cost	Total Due
Seminar Information: 94003N Mini M.B.A.® for Nonprofit Organizations October 1, 1993 to January 14, 1994 Fridays - 1:00 - 4:00 p.m. 450 O'Shaughnessy Educational Ctr. St. Paul Campus	$425.00	
Participant: Richard Jeub		$425.00

OK KMD 9/10/93

Location:
- [ ] University of St. Thomas - Minneapolis Campus (Map enclosed)
- [x] University of St. Thomas - St. Paul Campus (Parking permit and map enclosed)
- [ ] University of St. Thomas - Gainey Conference Center (Map enclosed)
- [ ] University of St. Thomas - Chaska Education Center (Map enclosed)

Due Prior to Program Date

A non-refundable registration fee of $25.00 for seminars and $50.00 for special programs is included in each individual registration. Refunds excluding this fee will be issued if cancellation is received before the date of the program.

White copy - Program Invoice / Blue Copy - Participant Confirmation

Letter

UNIVERSITY OF ST. THOMAS
THE CENTER FOR NONPROFIT MANAGEMENT

The Center For Nonprofit Management
University of St. Thomas
52 Tenth Street South
Minneapolis, Minnesota 55403-2001
612-962-4290

Richard Jeub
Archdiocese of St. Paul
8482 79th St. S.
Cottage Grove, MN 55016

Make check payable to:
University of St. Thomas

Thank you for this registration.

Date: 9/3/93	Student Number: 016026N (Use this number when referencing your registration)	Seminar Cost	Total Due
Seminar Information: 94008N Bookkeeping Basics October 19, 1993 Tuesday 8:30 am to 4:00 pm 250 1000 LaSalle Avenue Minneapolis Campus		$125.00	
Participant: Richard Jeub			$125.00

OK KMM 9/10/93

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Letter and p

STRICTLY CONFIDENTIAL

DATE: SEPTEMBER 15, 1993

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Jeub on September 10 for another regularly scheduled meeting. We discussed several topics.

We reviewed briefly the meeting with [redacted] in late July. He indicated that he had talked that through with his counselor and that he understood the issues that [redacted] had raised.

We then reviewed the report from his July, 1993, continuing care workshop at Saint Luke's Institute. The recommendation from Saint Luke's suggests that there are emotional issues that Fr. Jeub is not facing, and that more frequent therapy would be helpful. Jeub told me that he took a copy of the letter to Dolore Rockers, his therapist. He and she have been talking about some of the issues that were brought up in the report for some time, and they are finding a monthly meeting frequent enough. Fr. Jeub theorizes that the concerns expressed by the Saint Luke's Personnel emerged primarily from a one-hour interview that he had with one of them. He became somewhat emotional during that meeting when talking about his mother, although this was in no way a new issue for him. He believes that part of his emotional reaction was that he was quite tired (the air conditioning system in his residence hall was broken and he had not slept for two nights) but the therapist in Washington was interpreting this as a new emotional discovery. He tells me that Dr. Rockers thinks they are meeting frequently enough.

We then discussed the loss of the administrative/maintenance position possibility with Fr. Gilbert. Jeub actually found that to be a helpful experience, since he had to face some issues for himself as a result of the breakdown of that possibility. In the meantime, Fr. Steve Ulrich has approached him about something similar, and they will be meeting on September 14 to discuss some options. Fr. Jeub will get back to me before any decisions are made.

He indicated that he thought the legal cases against him would be resolved in the next number of months. He believes he is being well represented, and he is cooperating and making preparations for depositions and for the possibility of trial.

I thought Fr. Jeub checked out well. We have scheduled the next meeting.

cc: Archbishop Roach
Bishop Carlson
Mr. Fallon

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Bishop Carlson
Mr. Fallon

[redacted]

Therapy expenses

Dates of services	Jan 1 - Aug 31, 1993	
Provider(s)	[redacted]	[redacted]
Total cost	$ 1600	$ 865
Amount to be reimbursed	$1232.50	

OK KMD
9/21/93

Harvey, Thorfinnson, Lucas & Olson
400 Marquette Bank Building
6640 Shady Oak Road
Eden Prairie, Minnesota 55344
(612) 941-1040

Father Richard Jeub
8482 79th Street South
Cottage Grove MN 55016

October 26, 1993

Invoice No.16335

CLIENT # J0139

			Hours	Amount
		Fees for Legal Services Rendered		
		MISCELLANEOUS 9101		
10/04/93	WLL	Prepare Statement of the Case	0.50	37.50
10/06/93	WLL	Prepare, serve and file statement of the case, prepare draft answer and letter to client	2.50	187.50
10/14/93	WLL	Review client's responses to the Mary Moe complaint and prepare answer.	2.00	150.00
10/15/93	WLL	Telephone conference with client and preparation of draft answer and letter to client	0.80	60.00
10/18/93	WLL	Review the Church of Our Lady of Grace Statement of the Case	0.20	15.00
10/25/93	WLL	Attend deposition of [redacted]	6.50	487.50
		Total Fees for Legal Services	12.50	$937.50

	Amount
Costs Incurred or Advanced:	
MISCELLANEOUS 9101	
10/25/93-parking	10.00
Total Costs	$10.00
Total Amount of this Invoice	$947.50
Previous Balance	$4,553.74
10/22/93-Payment Received - Thank you	($400.00)
Balance Due	$5,101.24

Your entire balance is due and payable upon receipt of this invoice, unless you have contracted otherwise. Interest on unpaid balances is computed at 8% APR, which is a periodic rate of 2/3% per month. In no event will interest charges exceed those authorized by law. If you have a question about your bill, please call us at (612) 941-1040.

Payments received in our office after the 25th day of the month may not be reflected in this invoice; full credit will appear on next month's statement.

Please make checks payable to Harvey, Thorfinnson, Lucas, & Olson P.A.

YOUR ACCOUNT IS SERIOUSLY PAST DUE, WITH ALL OR PART OF YOUR OUTSTANDING BALANCE AT LEAST 90 DAYS OVERDUE. UNLESS YOU HAVE ALREADY MADE ARRANGEMENTS WITH US FOR FUTURE PAYMENT, PLEASE CONTACT US IMMEDIATELY SO THAT WE CAN REACH A PLAN TO BRING YOUR ACCOUNT CURRENT.

HARVEY, THORFINNSON, LUCAS & OLSON

A PROFESSIONAL ASSOCIATION OF ATTORNEYS

THOMAS M. THORFINNSON
WILLIAM L. LUCAS
JEFFREY H. OLSON *

OF COUNSEL
ROSS L. THORFINNSON

SUITE 400
6640 SHADY OAK ROAD
EDEN PRAIRIE, MN 55344-3296

TELEPHONE (612) 941-1040
TELECOPIER (612) 941-8942

HOWARD E. HARVEY
(RETIRED)

LORRAINE TESLOW
LEGAL ASSISTANT

October 27, 1993

Andrew J. Eisenzimmer
Meier, Kennedy & Quinn
Suite 2200
North Central Life Tower
445 Minnesota Street
St. Paul, Minnesota 55101-2100

RE: Father Richard Jeub

Dear Mr. Eisenzimmer:

Enclosed is a current statement of Father Jeub's account with our firm. We have received some payments from Father Jeub but, as you can see, the current unpaid balance is $5,101.24. It is our understanding that you were to arrange for payment of the balance of this account by the Archdiocese, but we have never received any payments from the Archdiocese.

Please arrange for payment of this account.

Thank you.

Sincerely,

William L. Lucas

William L. Lucas

enc.

copy: Father Richard Jeub

12/28/93
Bill — understand from Andy's office that you are "sitting on" this paperwork!
?
Angie

* LICENSED IN WISCONSIN

DATE: NOVEMBER 23, 1993 **STRICTLY CONFIDENTIAL**

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: REGULAR MONITORING MEETING

I met with Fr. Jeub on November 19 for a regularly scheduled monitoring meeting. Here are some of the main points of that review.

1) Fr. Jeub continues to work in therapy with Dr. Dolore Rockers. He says that she has told him that most of the work that they can currently accomplish has been done. The question of vocational placement would provide more grounds for therapeutic discussion, but that is currently in abeyance. The post-therapy group that Father Jeub was doing with Dr. Rockers has now stopped meeting, since it had only two client participants. In exchange for that, he has picked up more time with her in individual counseling.

2) Fr. Jeub continues to meet with the priest recovery group every two weeks. That has been very helpful to him. He is also meeting with his priest support group on a regular basis.

3) He asked about several non-priestly church ministry job possibilities, such as business administrator placements. I told him that we were not opposed to all such possibilities, but that there were real sensitivities in particular cases. I suggested that he scout out various possibilities, and then bring a specific proposal for review by Archbishop Roach.

4) He is scheduled for his next review at Saint Luke's Institute in January. We have scheduled the next meeting for shortly before he goes.

5) He just returned from a retreat with the Loyola spiritual direction group last week. He reported a good deal of spiritual depth to the retreat. Particularly affecting was his mention of a meditation of gratitude he had to the women who had had the courage to come forward with complaints. He told me about his gratitude for the changes in his life, and recognizes that those women helped him to be willing to speak the truth.

Overall, I would say that Fr. Jeub is as healthy as I have ever seen. He spontaneously shows empathy for others, including the people he has hurt, and is able to speak in an adult and non-self-pitying way about his own real needs. I do not know how this reflects on the possibility of ministerial placement for the future, but there are signs of real improvement in him.

cc: Archbishop Roach
Bishop Carlson

DATE: NOVEMBER 23, 1993 **STRICTLY CONFIDENTIAL**

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FROM: FR. KEVIN MCDONOUGH

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cc: Archbishop Roach
Bishop Carlson

WILL

OF

RICHARD H. JEUB

I, Richard H. Jeub, of Washington County, Minnesota, revoke any prior wills and codicils, and make this my will.

ARTICLE ONE
PAYMENT OF EXPENSES AND TAXES

1. My personal representative shall pay from the residue of my estate:

1.1 the expenses of my last illness and funeral, valid debts, expenses of administering my estate, including nonprobate assets;

1.2 any estate taxes, as defined in this will, except to the extent paid from other sources.

ARTICLE TWO
SPECIAL GIFTS

2. If I have made one or more written lists which have been signed by me and otherwise prepared in accordance with the provisions of Minnesota Statutes Section 524.2-513, then I give the property described in such list or lists to the persons named in such lists who have survived me. I give all tangible personal property not effectively disposed of by the provisions of any such written list to [redacted] if he survives me.

ARTICLE THREE
RESIDUE

3. I give the residue of my estate (consisting of all the property I can dispose of by will that is not effectively disposed of by the preceding Articles of this Will) to [redacted] if he survives me, and if he does not survive me, to his heirs.

Richard H. Jeub

Richard H. Jeub

ARTICLE FOUR
PERSONAL REPRESENTATIVE

4. I nominate my brother, Bernard Jeub, to serve as my personal representative.

4.1 My brother shall have the power to nominate an additional or successor personal representative.

4.2 If there is no acting or nominated personal representative and my brother does not exercise his power within 14 days of such vacancy, I nominate a person designated by the Archbishop of Saint Paul and Minneapolis to serve as my personal representative.

ARTICLE FIVE
PERSONAL REPRESENTATIVE'S POWERS

5. The following shall apply to my personal representative:

5.1 Administrative powers. My personal representative, in addition to all other powers conferred by law that are not inconsistent with those contained in this will, shall have the power, exercisable without authorization of any court:

5.1.1 To sell at private or public sale, to retain, to lease, and to mortgage or pledge any or all of the real or personal property of my estate;

5.1.2 To make partial distributions from my estate from time to time and to distribute the residue of my estate in cash or in kind or partly in each, and for this purpose to determine the value of property distributed in kind;

5.1.3 To claim any expense of my estate as an income tax deduction or as an estate tax deduction and to make any other elections permitted by law, all without reimbursement or adjustment between principal and income or in favor of any beneficiary, even if the election directly affects the value of any beneficiary's share;

5.1.4 To settle, contest, compromise, submit to arbitration or litigate claims in favor of or against my estate.

5.2 Administrative Provisions.

Richard H Jeub

Richard H Jeub

5.2.1 Informal Administration. I request that my estate be administered in as informal a manner as my personal representative deems advisable.

5.2.2 Waiver of Bond. No bond or other indemnity shall be required of any personal representative nominated by my brother or by me.

ARTICLE SIX
GENERAL GOVERNING PROVISIONS

6. In applying the provisions of this document, the following shall govern:

6.1 Definitions.

6.1.1 "Surviving" All references to any person's surviving me mean that if such person dies within 90 hours after my death, such person shall be deemed not to have survived me.

6.1.2 "Tangible personal property" includes money having value in excess of its face value but does not include evidences of indebtedness, documents of title, securities or any property used in a trade or business.

6.2 Rules of Construction.

6.2.1 Governing law. Except as altered by this will, the law of Minnesota shall govern the meaning and legal effect of this will. Except as otherwise provided, all references to applicable law and Minnesota Statutes are to those in force on the date of my death and shall incorporate any amendments and successor provisions. References to the Internal Revenue Code are to the Internal Revenue Code of 1986, as amended. References to a particular section of the Internal Revenue Code shall incorporate any amendments and successor provisions.

6.2.2 Written Lists of Tangible Personal Property. To the extent that I may have written more than one list disposing of tangible personal property, the most recent written list shall control if there are inconsistent dispositions. If no such list is found by the later of (1) 60 days after the date of my death or (2) the date on which this will is admitted to probate, any dispositions made by such a list shall abate to the

Richard H. Jeub

Richard H. Jeub

extent that such property has been distributed by my personal representative.

6.2.3 Captions are for convenience only and are not intended to alter any of the provisions of this document.

6.3 Estate Taxes

6.3.1 "Estate taxes" means any estate or other death taxes that become due because of my death, including any interest and penalties.

6.3.2 Except as provided below there shall be no apportionment of any estate taxes and I waive on behalf of my estate any right to recover any estate taxes from any recipient, including any recipient of property passing apart from this will.

I have signed this will consisting of five (5) pages, including the following page, on November 29, 1993.

Richard H. Jeub

Richard H. Jeub

We certify that in our presence on the date appearing above in the State of Minnesota, Richard H. Jeub signed the foregoing instrument and acknowledged it to be his Will, that at his request and in his presence and in the presence of each other, we have signed our names below as witnesses, and that we believe him to be of sound mind and memory.

Robert Branchaud residing at Cottage Grove

Thomas P. Fitzgerald residing at Cottage Grove.

STATE OF MINNESOTA)
) ss.
COUNTY OF WASHINGTON)

We, Richard H. Jeub, the Testator, and Thomas Fitzgerald and Robert Branchaud, the witnesses, respectively, whose names are signed to the attached and foregoing instrument, consisting of five (5) typewritten pages, being first duly sworn, do hereby declare to the undersigned authority that the Testator

signed and executed the instrument as his last will and testament, that he signed willingly or directed another to sign it for him, that he executed it as his free and voluntary act for the purposes therein expressed, and that each of the witnesses, in the presence and hearing of the Testator, signed the will as witnesses and that to the best of their knowledge the Testator was at the time 18 or more years of age, of sound mind and under no constraint or undue influence.

Richard H. Jeub

Richard H. Jeub

Thomas P. Fitzgerald

Witness

Robert Branchaud

Witness

Subscribed, sworn to, and acknowledged before me by Richard H. Jeub, the Testator, and subscribed and sworn to before me by Thomas Fitzgerald and Robert Branchaud, witnesses, this 29th day of November, 1993.

Margaret Holmstrom

Notary Public

MARGARET HOLMSTROM
NOTARY PUBLIC—MINNESOTA
WASHINGTON COUNTY
MY COMMISSION EXPIRES 2-15-09

November 30, 1993 **STRICTLY CONFIDENTIAL**

Mr. Michael Brenneis
Saint Luke Institute
2420 Brooks Drive
Suitland, MA 20746-5294

Dear Mr. Brenneis,

I am writing to respond to your request for information that would be helpful for the continuing care workshop for Fr. Richard Jeub. I understand that he is scheduled to be with you January 8-14, 1994.

For your information, I am enclosing copies of notes I have made after our most recent monitoring meetings. Those notes will respond for the most part to the questions that you raise.

Permit me to make comments in three general areas. I want to say that I am very pleased with the progress that I have seen him making in two of those areas. First, he has spontaneously shown genuine empathy for his own victims and for others who have been similarly hurt. In the past I have thought that Fr. Jeub was excessively, if accurately, focused on the very real manipulation that one of the people he hurt also was carrying out against him. While he still brings that up from time-to-time, I have been pleased by added dimensions to his reflections. In particular, he told me about a prayer of thanks that he addressed to God on a recent retreat in which he acknowledged the grace that had come his way because several women had the courage to speak up. One of the women about which he prayed is a woman whom he and we believe is accusing him falsely. Still, he was able to express gratitude for the way in which even her false accusation helped break some of the secrecy around other aspects of his life.

Second, he has been very straightforward in owning up to his own misconduct, even in fairly public situations. Recently he preached at a retreat which he was making with a small group, and acknowledged twice during the homily that he had a history of victimization. That has been confirmed for me by another priest who was present on the retreat.

The third area I want to comment on is the only one which causes some ongoing concern for me. He has been fairly passive about seeking out productive and engaging work. In large part, this is certainly due to the fact that the Archdiocese has neither offered him a position nor told him that there would be no position open in the future. As he and I have made clear on several occasions, such a discussion is impossible while there are legal matters pending. Even if they are all resolved, I do not know that there would be any placement available, and Fr. Jeub understands this, but we cannot even intelligently enter into that discussion until the legal matters are resolved. That gives every appearance of being a matter of at least several months and perhaps more than a year. I cannot quantify exactly how much Fr. Jeub is working, but it seems to me to be significantly less than 20 hours a week. He keeps his days filled with activities, but I would think that an able-bodied man of his skill level would want to find some consistent and contributory activity, even though priestly ministry is not currently practical. In fairness, I want to note that Fr. Jeub has been a bit more aggressive in the past several months,

opening discussions about church-related employment with a couple of pastors. This would be employment primarily in the business/maintenance administration area. He has available to him an excellent secular placement service, however, and he has made no recent effort to be in touch with that resource.

These would be some of the key issues that I would like to see addressed in the continuing care workshop. Overall, I want to emphasize that I think his progress has been positive.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:jd

Enclosure

This is true in
advance of
Dick Jubé
visit to St Luke
June. 8-14, 1994

file, please

Saint Luke Institute

To: The Official Superior of Dick Jeub

Dick will be returning to Saint Luke Institute in the near future to participate in a Continuing Care Workshop. In order to assist us in assessing his/her progress, we would ask that you take a short period of time to answer the following questions and to return this form to us in the accompanying envelope.

1. How often have you been in contact with the client over the past six months? Have these contacts been initiated by them or by you?

2. How would you characterize the relationship between the client and yourself? To what do you attribute the character of this relationship?

3. How would you characterize his/her progress in recovery? You may want to address some issues such as ministerial functioning, relations with those with whom they live, relationships with authorities, participation in support group or recovery oriented activities, such as Twelve Step meetings, psychotherapy, priest's/religious support groups, community activities, etc.

4. What other information are you aware of that you feel would be relevant to our assessment that has not been covered by the first three questions?

You may also wish to share your concerns with the Continuing Care client at this time. We encourage our clients to seek out and take advantage of your observations.

Thank you again for your help, and do not hesitate to contact me with your concerns at (301) 420-7395.

Sincerely,
Michael Brenneis, MA, MDiv, CPC

Michael Brenneis, MA, M.Div, CPC
Coordinator, Continuing Care
Services and Three Quarter Way
House, Outpatient Department

Please identify yourself:

Name: _____
Relationship to Client: _____

2420 Brooks Drive • Suitland, Maryland 20746-5294 • (301) 967-3700 • FAX: (301) 967-3953
Affiliated with the Daughters of Charity, National Health System

HARVEY, TORFINNSON
A PROFESSIONAL ASSOCIATION OF
SUITE 400
ROAD
2296

12-9-93

Austin

~~Kevin~~,

Sorry to bother you about this but I'd like my lawyer paid by the end of the year. The enclosed was sent to Andy E. on Oct 27. as of today no payment has been received

Can you move this along?

Thanks

Dick

Anything to do here?

K.

12-13-93
Call Andy to see if they paid (or anticipating to pay) this bill-
Angie

• LICENSED IN WISCONSIN

DATE: December 27, 1993

MEMO TO: Fr. McDonough

FROM: Bill Fallon

SUBJECT: Richard Jeub

Andy has sent me a copy of the bill sent by Jeub's attorneys to Jeub for $5,101.24, non of which has been paid. I would guess that our arrangement with Jeub is that we would pay this and have him sign a note.

If such is the case, would you please confirm it and also advise me if Jeub is still living at 8482 79th St. So., Cottage Grove.

yes to both.

December 30, 1993

Richard Jeub
8482 79th St. So.
Cottage Grove, MN

Dear Dick:

We are in the process of paying the October 26th billing you received from your attorneys, and in order to document our understanding with respect to those fees, I am enclosing for your signature a promissory note in that amount, which you will note, is without interest.

Please sign the same and return it to me.

I things are going well for you, that you are keeping busy and constantly improving your skills with the hammer and saw. I, myself, have finally mastered the art of changing a light bulb and am now ready for the next step, tightening a screw on a door handle.

Best regards.

Very truly yours,

William S. Fallon
Chancellor

Enclosure

File, please

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
JOHN C. GUNDERSON
CHARLES M. BICHLER

SUITE 2200, NORTH CENTRAL LIFE TOWER
445 MINNESOTA STREET
SAINT PAUL, MINNESOTA 55101-2100
TELEPHONE (612) 228-1911
FACSIMILE (612) 223-5483

WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(RETIRED)

January 26, 1994

Mr. John L. Weyland
Attorney at Law
641 E. Lake Street
Suite 204
P.O. Box 740
Wayzata, MN 55391

Mr. James T. Martin
Attorney at Law
7600 Parklawn Avenue South
Suite 444
Minneapolis, MN 55435

Mr. Theodore J. Collins
Attorney at Law
W-1100 First National Bank Building
332 Minnesota Street
St. Paul, MN 55101

COPY

Re: Mary Jane Doe vs. Archdiocese, et al

Dear Gentlemen:

Enclosed herewith and served upon you by U.S. Mail please find Defendant The Church of Our Lady of Grace's Memorandum in Support of Motion for Summary Judgment along with the Affidavit of John C. Gunderson.

Thank you.

Very truly yours,

MEIER, KENNEDY & QUINN, CHARTERED

John C. Gunderson

John C. Gunderson

JCG:crb
Enclosure
bcc: The Most Reverend John R. Roach, D.D.
Reverend Kevin M. McDonough
Mr. William S. Fallon

Saint Luke Institute

CONFIDENTIAL February 1, 1994

Reverend Kevin M. McDonough
Chancellor
Archdiocese of St. Paul-Minneapolis
226 Summit Avenue
St. Paul, Minnesota 55102

RE: Reverend Richard Jeub
SLI NO: 12198

Dear Father McDonough:

During the week of January 10-14, 1994, Father Jeub attended a workshop with us as a part of his Continuing Care program. We want to inform you at this time regarding his progress in recovery over the past six months. The following is our perception of Father Jeub's progress in his ongoing recovery.

1. **Recovery Program:** This was Father Jeub's sixth Continuing Care Workshop. He reported no relapse into his sexually compulsive behavior over the past six months and no serious temptation towards relapse during that same period of time. He currently attends one SA group per week, one 12-step group for priests every two weeks, a priest support group that meets monthly, and a faith-sharing group that meets twice per month; Father Jeub also continues to meet with his therapist, Dr. Delore Rocker, on an individual basis.

Father Jeub comes to this workshop as one who has experienced some important insights over the past six months. One is his tendency to get into relationships with others based on a need for Father Jeub to rescue others from the consequences of their choices. Father Jeub stated that he has recognized this compulsion to rescue in his relationships with men as well as women, and that throughout his life he has been "driven by the need to be needed." The awareness of a compulsive need to rescue others has aided Father Jeub recently in making healthier choices that were more beneficial to his sobriety, as well as enhancing to his self-esteem.

Father Jeub also reported that he derived much benefit from his guided retreat in November; he was able to share some of his story with his fellow priests, feel support from some, and suggest a show of support for other priests now in treatment. Father Jeub also expressed gratitude about being on his personal journey; although he did

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Affiliated with the Daughters of Charity, National Health System

not like the fact that he was intervened upon at the time that it happened, he is now able to see how the accusations of his former victims has ultimately led to his being in recovery. Father Jeub stated that all his legal depositions are now completed; he feels able to face the possibility of trial in the near future with courage and faith.

Father Jeub was able to see how stressed he felt in July about his upcoming confrontation with a former victim, and how that had affected his physical condition at the July workshop. Father Jeub also acknowledged this to his peers, which was important, given his tendency to avoid feeling vulnerable with others. Indeed, Father Jeub's discharge summary alluded to his past ability to disconnect from his feelings, particularly shame, and to become cognitive when confronted with difficult feedback; when this mechanism would fail, Father Jeub would often somatosize chest pains in response to stress.

2. **Current Living Experience/Vocational Functioning:** Father Jeub continues to enjoy living at the Cottage Grove rectory; when the pastor recently went on vacation, Father Jeub stayed alone in the rectory and enjoyed his time there. His maintenance job has ended, and Father Jeub expressed some anxiety about what the future would hold for him, as well as more willingness to continue his ongoing job search in the secular world. Last fall, he took a mini-MBA course in nonprofit management, and is planning to take a course in bookkeeping. Father Jeub is also currently investing his time and energy in working with an architect on plans for the retirement home that he will build for himself this summer.

3. **Medical:** During the course of the workshop, we evaluate a person's physical health via various laboratory indices. While Father Jeub's cholesterol and triglyceride levels have decreased in the past six months, his cholesterol and LDL levels continue to be high. We remind Father Jeub of a need to avoid animal and saturated fats in his diet, and to engage in some form of aerobic exercise for twenty minutes nearly every day.

4. **Recommendations and Treatment Plan:** Father Jeub appeared to be feeling more confident this week than he was at the July Continuing Care Workshop. This seems partly to be due to a decrease in stress that Father Jeub has in his personal life; also, Father Jeub reported a greater awareness of how his need to rescue others has figured into his relationship, and he is managing to avoid acting in this compulsive way. Father Jeub also demonstrated more willingness to explore peer relationships, and an acceptance of the fact that his future is still uncertain. We commend Father Jeub for the progress he has made in his recovery in the past six months, and we remind him of the availability of therapy, 12-step meetings, and of support from Saint Luke Institute staff should he need them during the next 12 months.

We would like to thank Father Jeub for his positive participation in the workshop, and we look forward to seeing him at his next Continuing Care Workshop, which will be held the week of January 9-13, 1995. (According to the terms of Father Jeub's contract, he will now be returning to Continuing Care on an annual, rather than semi-annual basis.)

A copy of this letter is being sent to Father Jeub for his reflections. If you have any questions regarding this report, please contact us.

We thank you for the support you offer to Father Jeub. We believe that a life of sobriety helps him to continue in his life-giving ministry with God's people. We ask for your prayers in behalf of the many clergy and religious persons whom we serve and for continued blessings on the work of the Institute.

Sincerely yours,

Sharon FitzGerald, MA

Sharon FitzGerald, MA
Continuing Care Therapist
Outpatient Department

Michael J. Brenneis, MA, MDiv, CPC

Michael J. Brenneis, MA, MDiv, CPC
Coordinator
Continuing Care Services

Stephen Montana, PhD

Stephen Montana, PhD
Director
Outpatient Department
SF/MAZ
cc: Reverend Richard Jeub

Frank Valcour, MD

Frank Valcour, MD
Medical Director and
Vice President for Medical Affairs

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
JOHN C. GUNDERSON
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WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(RETIRED)

File, please

February 18, 1994

Mr. John L. Weyland
Attorney at Law
641 E. Lake Street
Suite 204
P.O. Box 740
Wayzata, MN 55391

Mr. William Lucas
Attorney at Law
The Marquette Bank Building
6640 Shady Oak Road, Suite 400
Eden Prairie, MN 55344

Mr. James T. Martin
Attorney at Law
7600 Parklawn Avenue South
Suite 444
Minneapolis, MN 55435

COPY

Re: Mary Jane Doe vs. Archdiocese, et al
Ct. File No. PI-92-013148

Dear Gentlemen:

Enclosed herewith and served upon you by U.S. Mail please find Defendant The Church of Our Lady of Grace's Reply Memorandum in Support of Motion for Summary Judgment along with the Affidavit of John C. Gunderson.

Thank you.

Very truly yours,

MEIER, KENNEDY & QUINN, CHARTERED

John C. Gunderson

JCG:crb
Enclosure
cc: The Most Reverend John R. Roach, D.D.
Reverend Kevin M. McDonough
Mr. William S. Fallon

STRICTLY CONFIDENTIAL

DATE: MARCH 14, 1994

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

I met with Fr. Jeub on March 11 for a regularly scheduled meeting. We discussed the following items:

1) In our previous meeting he told me that he had run into a woman whose family he had known over twenty years ago and with whom he had been sexually inappropriate on one occasion when she was a young adult. On the occasion of that chance meeting, she had suggested that they talk again, and he followed up. He found it a very powerful experience to apologize to her (she did not even recall the incident) and to renew her acquaintance. Subsequently, he has met two other members of her family. He is reviewing all of this with his therapist as he speaks with her. It should be noted that the woman is in a stable Lesbian relationship and so there certainly appears to be no reason to suspect sexual involvement between Fr. Jeub and her. I am pleased to see that he is recovering positively some past dimensions of his life, now freed from the manipulative dynamics of his sexual preoccupation in the past.

He indicated that he has begun working at Project for Pride and Living one day a week. In our prior meeting we had talked about the importance of his maintaining a more regular work schedule. This is one aspect of that.

He also met with the job hunter to whom I had previously recommended him and with whom he had met in the past. That person has helped him to start networking again in the hopes of expanding his work base. He is currently pursuing five possibilities of at least part-time work.

He will keep me informed of the progress in this regard. Most of them has some connection to Church, but none of them involves doing direct pastoral work. I think that they are all good opportunities for him.

I told him about conversations with Monsignor Boxleitner in the last six weeks concerning a part-time chaplancy at the Faribault State Prison. Fr. Jeub was somewhat concerned about the distance from his ailing mother, but was interested otherwise in pursuing the possibility. I told him that with Monsignor Boxleitner I would clarify where we are with the discussions with the State of Minnesota. Before we could ask him to take up that work,

however, we would have to bring all of this to Archbishop Roach. We have not done so yet because it is still in the idea stage.

We talked about the various self-maintenance issues that we review each time. He continues to be involved in therapy with Dr. Rockers and meets regularly with his priest support group and with the recovery support group of which he is a part. His living situation at Cottage Grove remains positive. He is able to maintain a more balanced relationship with his mother and family.

We discussed the progress of the lawsuits against him. He is aware that a dismissal motion was heard a couple of weeks ago in the case brought by [redacted]. There has been no progress in the suit brought by [redacted], but I told him that I have asked Bill Fallon to check on how that is doing.

Fr. Jeub checks out very well. He seems to continue to work at significant issues, and in my estimation is making some real progress. Before we would consider a formal assignment, that perception should be checked out by a professional with particular competency in this area.

cc: Archbishop Roach
Mr. Fallon

STRICTLY CONFIDENTIAL

DATE: MARCH 14, 1994

MEMO TO: THE FILE OF FR. RICHARD JEUB

FROM: FR. KEVIN MCDONOUGH

SUBJECT: MONITORING MEETING

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cc: Archbishop Roach
Mr. Fallon

May 10, 1994 **STRICTLY CONFIDENTIAL**

MEMORANDUM TO: **Archbishop Roach**

FROM: **Father McDonough**

SUBJECT; **FATHER RICHARD H. JEUB**

Archbishop, I met with Father Jeub for a regularly scheduled review on May 6. Much of this memorandum will simply be a summary of that meeting. I do want to address a particular question with you, however, and for that reason I am not simply making this a file memo.

Overall the meeting with Father Jeub went very well. As you can see below, he is doing the right things to grow in self knowledge and to stay healthy.

He is beginning a new job this week providing office support for a development project of the Catholic Youth Camps Inc. He will not be working at the camp itself, but rather at a Twin Cities office. It is a half-time position, and is a good response to our recent request that he step up his level of work.

In the process of getting that job, the people who operate the camp have asked whether he could regularly say their Mass on Friday at the camp. In recent years they have had to seek out priests from a whole variety of sources, and that apparently has become increasingly difficult. They would like to have Father Jeub come up to the camp on Friday to say Mass for those who are at the camp. I would recommend in favor of our permitting him to do so. I want to ask you whether you would give him permission to do so.

Here are some of the main things that we talked about in our review meeting:-

1) Father Jeub continues to participate both in therapy and in support/recovery groups. He is seeing Dr. Rockers on a regular basis and it is apparent to me, from a couple of points brought up in the discussion, that he is working at

therapy and paying attention to what he is learning there. He is participating in the biweekly priests' recovery group and is attending a recovery group at least twice a month on Sunday evenings. He is also part of a regular priests' support group.

2) In addition to the new job with Catholic Youth Camps, he continues to work with a Baptist Church in Hastings as a janitor. He is also serving as a volunteer at Project for Pride in Living one day each week.

3) He is making some efforts to take care of his physical health (he has shown elevated blood fat levels in the past), including walking on a treadmill several times a week.

4) His deposition was taken a little over two weeks ago in the [redacted] case. He said that this was a different experience for him, since he was in a position to acknowledge wrongdoing. Last year his deposition was taken in the [redacted] case, in which he remains convinced that he did nothing wrong. He said that the deposition was fairly short, lasting only about two and a half hours, and that he was honest in acknowledging his wrongdoing. He indicated, by the way, that it is his understanding that St. Richard's has now been dropped as a defendant in that case.

Overall, it strikes me that Father Jeub is doing the things he ought to be doing. He spent a good deal of time with friends and other helpers when he was processing the results of the deposition. He is obviously working at therapy. I think that he is doing the kinds of things that should be expected of him.

KMM:md

cc: Archbishop Flynn
Bill Fallon

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KMM:md

cc: Archbishop Flynn
Bill Fallon

GISLASON, MARTIN & VARPNESS, P.A.
ATTORNEYS AND COUNSELORS AT LAW

JAMES T. MARTIN*
JOHN E. VARPNESS+
PATRICK M. CONLIN
DAN T. RYERSON

*CERTIFIED CIVIL TRIAL SPECIALIST BY THE NATIONAL BOARD OF TRIAL ADVOCACY

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RETIRED
ROBERT W. GISLASON

7600 PARKLAWN AVENUE SOUTH
SUITE 444
MINNEAPOLIS, MINNESOTA 55435

TELEPHONE 612/831-5793
FAX 612/831-7358

LEGAL ASSISTANTS
GLORIA DEEB
JUDY THYREN

File, please

June 1, 1994

Mr. John L. Weyland
Attorney at Law
641 E. Lake Street
Suite 204
Wayzata, MN 55391

RE: ***Doe v. Archdiocese, et al***

Dear John:

I am enclosing a Memo dated November 17, 1987 from Father Bill Kenney to Father Michael O'Connell concerning the matter of Father Jeub's transfer to St. Mark's. I have been in back to back trials since late April and have simply overlooked getting this document to you before now. Sorry about the delay. If Father Kenney has not been previously listed as a trial witness, then please consider this letter as our informal amendment of previous Answers to Interrogatories. Father Kenney has a clear recollection concerning Father Jeub's re-assignment to St. Mark's. The re-assignment was <u>not</u> occasioned by any allegations of any kind of inappropriate conduct on Father Jeub's part.

This also confirms that you told me that if we want a deposition from the therapist and/or Ms. Westling, it will have to be done with the approval of the Court ... based upon the Pre-Trial Scheduling Order. We intend to take that up with the Court at the time of the settlement conference.

Very truly yours,

James T. Martin

JTM/aa
Enc.
cc: Andrew Eisenzimmer

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LEGAL ASSISTANTS
GLORIA DEEB
JUDY THYREN

June 14, 1994

Mr. John L. Weyland
Attorney at Law
641 E. Lake Street
Suite 204
Wayzata, MN 55391

RE: ***Doe v. Archdiocese, et al***

Dear John:

As I indicated, I am willing to stipulate to your naming [redacted]'s husband as a party plaintiff with the understanding that the parties will present arguments to dismiss as part of motions in limine to be filed in late October. Can we now agree to go forward with the deposition of your therapist?

Very truly yours,

James T. Martin

JTM/aa
cc: Andrew Eisenzimmer
William Lucas

STRICTLY CONFIDENTIAL

July 13, 1994

MEMO TO: The File of Father Richard Jeub

FROM: Father Kevin McDonough

SUBJECT: REGULAR MONITORING MEETING

I met with Father Jeub on July 1 for a regularly scheduled monitoring meeting. There were no extraordinary items to discuss. The main points of the discussion included these:

1) Father Jeub continues to meet regularly with two support groups and with Dr. Dolore Rockers. I was pleased to hear that he is making an effort to be available to his Sunday night group. In the past, I had raised a concern that he not allow group participation gradually to "slip away". He seems to be making a real effort to preserve that connection.

   We talked about the progress of the legal cases that he is involved in. He continues to be confident about the [redacted] case since he remains convinced that he never engaged in sexual behavior with her. He reported that he has heard nothing about the progress of the lawsuit brought by [redacted], and I indicated the same from the Archdiocesan perspective.

   He is looking at changing residence this fall, since Father Fitzgerald will be on sabbatical from Cottage Grove and he would prefer not to live alone. He will be speaking with Father Kevin Clinton about the possibility of his living at Mendota. Once again, I noticed a very positive desire on Father Jeub's part to seek a healthy living situation.

   He also continues to work on the lake property which he purchased in the last couple of years. He is constructing a home there.

Finally, we reviewed his office job with the development staff of Catholic Youth Camps. He indicates that that is going well. He has general office responsibilities. He is still working through the details of his role with his supervisor, but he thinks that all of that is going positively.

Overall, Father Jeub seems to be doing well.

KMM:md

cc: Archbishop Roach
Archbishop Flynn

STRICTLY CONFIDENTIAL

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cc: Archbishop Roach
Archbishop Flynn

STRICTLY CONFIDENTIAL

September 19, 1994

MEMO TO: Archbishop Roach and Archbishop Flynn

FROM: Father Kevin McDonough

SUBJECT: FATHER JEUB

I met with Father Richard Jeub on September 9 for a regularly scheduled review meeting. Here are the main points that we discussed:

1) I told him that our attorneys had notified us that the [redacted] lawsuit did not appear to be amenable to settlement. In spite of the generally favorable ruling on pretrial motions and the very limited credibility of her complaint, [redacted] seems bent on pursuing this matter to the end. We have offered a settlement basically covering only defense costs. She is asking for many times that amount. I warned Father Jeub that he ought to prepare for the publicity that would come with a trial. That is currently calendared to take place in November of this year.

2) We discussed what had happened with the idea that he might say Mass from time to time for the prisoners at Faribault. Monsignor Boxleitner and I had a chance to discuss this again recently. He told me that he had talked with his contact in the correctional system and given them a full briefing about Father Jeub's background. This senior official was uncomfortable with having Father Jeub be part of a prison ministry there because a number of the female guards have proven to be somewhat troubled and vulnerable people. Because Father Jeub's history involves exploitation of adult women, this does not seem like a healthy and safe place for him to work.

3) Father Jeub has moved out of the rectory at St. Rita in Cottage Grove and into the rectory at St. Peter in Mendota. He moved out because Father Fitzgerald in Cottage Grove is going on sabbatical. Father Jeub understands that it is better for him to live with other priests. His experience living at St. Rita was a basically positive one. He participated in a faith sharing group through the parish, but simply as a peer to the others and not in any official capacity. He will continue to relate to that prayer group.

4) Father Jeub continues to be part of the priests' support group that meets biweekly. He has been sporadic during the summer in his participation in the recovery group that meets on Sunday evenings, but pledges to become more regular in his weekly attendance as fall begins.

5) He has been seeing Dr. Rockers monthly for therapy. He spontaneously described to me a situation which illustrated to me that he is paying attention to and learning from the therapy that he is doing with Dr. Rockers.

6) His physical conditioning has improved with a good deal of outdoor work during the summer. He is unsure of his cardiovascular conditioning, but will undergo another physical when he returns to St. Luke's Institute in January.

7) His work has been slow during the summer. It was anticipated that he would be working about one-half time in the administrative offices of the CYC camps. To this point, the financial campaign that he was to assist with has not yet gotten underway, and he has been working only a few hours per week. He continues to work once a week for the Baptist Church in Hastings. He remains associated with Project for Pride and Living as a volunteer, but was not active during the summer months.

8) A good deal of his energy has been absorbed in developing a lake place. This has absorbed a good deal of his creativity and has been a life-giving experience for him. I continue to challenge him, however, on maintaining a solid work life even while he is excluded from priestly ministry.

Father Jeub is in a holding pattern at this point, although he seems to continue to make emotional and therapeutic progress. He understands that we have not made any commitment to him about long-run priestly ministry, but he hopes that we will be open to some sort of placement when the legal matters are resolved. If those matters were resolved today, I would not be opposed to our seeking a safe and well supervised assignment for him. If you would prefer that we give him some other direction, however, please let me know.

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cc: Bill Fallon

STRICTLY CONFIDENTIAL

October 24, 1994

MEMO TO: The File of Father Richard Jeub

FROM: Father Kevin McDonough

SUBJECT: MONITORING MEETING

I met with Father Richard Jeub on October 21 for a regularly scheduled meeting. We spent a good deal of time talking about the fact that he may be on trial in two weeks. We agreed that the Archdiocese would draft some communications to priests and to the parishes where he served in anticipation of that trial. We will give him and the pastors of the parishes a chance to review that before sending out any final information.

He reports that he has moved into the rectory at St. Peter's in Mendota. The other two priests in residence there are not at home as much as Father Fitzgerald was at St. Rita. On the other hand, their conversations when they are together are very helpful to Father Jeub.

He indicates that work is "picking up" He is continuing his work with the Baptist Church in Hastings and will be doing snow removal for them. His work at the Catholic Youth Camp Office is also growing. He has told his story to the board of that organization and he reports that they are still pleased to have him working there.

He continues to attend individual counseling with Dr. Rockers and to attend the support groups of which he is a part.

In summary, I would say that he is experiencing some discomfort anticipating the trial, but is in a healthy place spiritually and emotionally as he moves toward that possibility. He is the most mature and reflective that he has been in the time that I have known him.

KMM:md

cc: Archbishop Roach
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STRICTLY CONFIDENTIAL

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KMM:md

cc: Archbishop Roach
Archbishop Flynn
Mr. Fallon

Jeub file, please

October 26, 1994

MEMO TO: Father McDonough

FROM: Archbishop Roach

This is in regard to the letters going out to the priests and members of Our Lady of Grace parish about Father Jeub.

Regarding the priests' letter I like the letter except for the last paragraph. I really don't think that we need to continue to apologize for informing them. I would suggest that the last paragraph simply say, "If you have any questions about how to communicate with your people about these matters, feel free to call our Communications Office.

I continue to be proud to be associated with you in the work of the Church in this Archdiocese."

In regard to the letters to the members of Our Lady of Grace parish, I think that Joan Bernet's suggestion that this be sent out over the signature of the pastor rather than mine, is exactly correct. It should not be over mine. That does mean there is going to have to be some change in the text of the letter, but I think the point is well taken.

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
JOHN C. GUNDERSON
CHARLES M. BICHLER

SUITE 2200, NORTH CENTRAL LIFE TOWER
445 MINNESOTA STREET
SAINT PAUL, MINNESOTA 55101-2100
TELEPHONE (612) 228-1911
FACSIMILE (612) 223-5483

WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(RETIRED)

October 28, 1994

District Court Administrator
Hennepin County Government Center
1251 Court Tower
300 South Sixth Street
Minneapolis, MN 55487

ATTN: Civil Filing

Re: Mary Jane Doe vs. Archdiocese, et al.
Court File No.: PI-92-013148

Dear Sir or Madam:

Enclosed for filing in connection with the above-referenced matter please find the following:

1. - Notice of Motion and Motion for Summary Judgment;
   - The Church of Our Lady of Grace's Memorandum in Support of Motion to Dismiss Loss of Consortium Claim;
   - Affidavit of John C. Gunderson;
   - Proposed Order;
2. - Notice of Motion and Motion in Limine;
   - The Church of Our Lady of Grace's Motion in Limine;
   - Affidavit of John C. Gunderson;
3. The Church of Our Lady of Grace in Edina, Minnesota Proposed Jury Instructions;
4. The Church of Our Lady of Grace in Edina, Minnesota Proposed Special Verdict Form; and
5. Jury Questionnaire.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

John C. Gunderson

JCG:dma
Enclosures
cc: The Most Reverend John R. Roach, D.D.
Reverend Kevin M. McDonough
Mr. William S. Fallon

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
JOHN C. GUNDERSON
CHARLES M. BICHLER

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WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(RETIRED)

October 28, 1994

Honorable Andrew Danielson
Judge of District Court
Hennepin County Government Center
Room 705-C
300 South Sixth Street
Minneapolis, MN 55487

Re: Mary Jane Doe vs. Archdiocese, et al.
Court File No.: PI-92-013148
Trial Date: November 8, 1994

Dear Judge Danielson:

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(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR.
(RETIRED)

Jeub file, please

October 28, 1994

Mr. John L. Weyland
641 E. Lake Street
Suite 204
P. O. Box 740
Wayzata, MN 55391

Mr. William Lucas
The Marquette Bank Building
6640 Shady Oak Road, Suite 400
Eden Prairie, MN 55344

Mr. James Martin
7600 Parklawn Avenue South
Suite 444
Minneapolis, MN 55435

Re: Mary Jane Doe vs. Archdiocese, et al.
Ct. File No.: PI-92-013148

Dear Gentlemen:

Enclosed and served upon you in connection with the above-referenced matter by U.S. Mail please find the following:

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MEIER, KENNEDY & QUINN, CHARTERED

John C. Gunderson

JCG:dma
Enclosures
cc: The Most Reverend John R. Roach, D.D.
Reverend Kevin M. McDonough
Mr. William S. Fallon

Priests Full Name	Richard Herman Jeub

CURRICULUM VITAE

DIOCESE:	St. Paul/Minneapolis
SOCIAL SECURTIY #:	[redacted]
DATE AND PLACE OF BIRTH:	2/21/1940, Robbinsdale, MN
DATE AND PLACE OF BAPTISM:	
DATE OF ORDINATION:	3/5/1966, St. Paul Cathedral by Archbishop Leo Binz, St. Paul, MN
EDUCATION:	Nazareth Hall, St. Paul, MN St. Paul Seminary, St. Paul, MN
ASSIGNMENTS:	Associate Priest, St. Joseph, Hopkins, MN, 6/7/1966-2/7/1967 Associate Priest, Our Lady of Grace, Edina, MN, 2/7/1967-1/2/1970 Associate Priest, St. Mark, St. Paul, MN, 1/2/1970-6/15/1976 Associate Priest, Christ the King, Mpls, MN, 6/15/1976-6/14/1978 Chaplain, Methodist Hospital, St. Louis Park, MN, 6/14/1978-6/15/1982 Chaplain, Fairview Southdale Hospital, Edina, MN, 6/14/1978-6/15/1982 Pastor, St. Kevin, Mpls, MN, 10/27/1981-5/15/1990 Associate Priest, Sacred Heart, Robbinsdale, MN, 12/19/1996-6/1/1997 Associate Priest, St. Rose of Lima, Roseville, MN, 2/11/2000-2002
OTHER:	Leave of Absence, 5/15/1990-???? Resigned, May 2002
SAFE ENVIRONMENT:	Date of background check Date of VIRTUS training Date signed Code of Conduct

went to jury
jury ruled against claimant

Rev. Richard Jeub Case
10\31\94

Law Suit Filed?
April '92

Plaintiff
Mary Jane Doe (now in her) 15-16 at time of alleged incident

Defendants - Charges
1. Jeub charged with sexual assault, negligent counseling, and breach of fiduciary duty - Jeub denies

2. Archdiocese and Our Lady of Grace - co-defendants - Judge later throws-out major issues raised against the archdiocese and OLG.

Attorneys
Prosecution - John Wayland
Defense - Andy E.

When\Where
1966- 1972, Our Lady of Grace, Edina

Notification
1. Members of St. Kevin (now Our Lady of Peace) 7\22\92
2. Clergy - not sure sent

Statement
July 22, 1992 - archdiocese admitted knowledge of incidents with adult women; Jeub not reassigned; Jeub denies (see attached) - not certain released - clip says "no comment"

Misc.
* 1. Jeub's last assignment in archdiocese - St. Kevin's 10-27-81 to 5-15-90.
2. Complaint claims Jeub "had a pattern and history of negligence in pastoral counseling" that included sexually exploiting females, and that the pattern and history "eventually became known" to officials of OLG and the archdiocese.
3. Jeub not reassigned; not actively ministering

RE: Father Jeub

Father Jeub acknowledges a relationship with the woman who filed this claim against him several years ago.

In counseling and throughout the legal review since then, he has insisted that the relationship was a consensual one. The Archdiocese offered counseling for the woman and took various other steps consistent with archdiocesan policy on inapporpriate behavior as soon as information about the relationship came to archdiocesan attention several years ago.

Father Jeub has not been in active ministry since 1990.

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PPRO > `HÐ jf < < = µ Rev. Richard Jeub Case
10\31\94

Law Suit Filed?
April '92

Plaintiff
Mary Jane Doe (now in her 40s) 15-16 at time of alleged incident

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3. Jeub not reassigned; not actively ministering

QUESTIONS REGARDING JEUB CASE

1. Jeub has admitted misconduct with adult women. When? At what parish? How many women? How long did archdiocesan or parish officials know about these situations before he was removed from ministry?

2. Has Jeub ever been named in another law suit? Any cases settled out-of-court? Is this case (Mary Jane Doe) the first minor involved?

3. What is Jeub's current ministerial status? Is he still a priest? Does he live in the area?

4. Exactly how is the archdiocese connected with this suit? Which key complaints have been dismissed and which still apply? What about OLG?

5. Should a letter be sent to members of Our Lady of Peace? What about Christ the King, St. Mark or St. Joseph?

6. Exactly when did the archdiocese or other officials first become aware of sexual misconduct by Jeub with anyone?

7. What kind of treatment has Jeub received? Is he still receiving treatment?

8. Was Jeub's removal from ministry consistent with archdiocesan policies pertaining to sexual misconduct?

9. The complaint alleges that Jeub "had a pattern and history of negligence in pastoral counseling" that included sexually exploiting females, and that the pattern and history "eventually became known" to officials of OLG and the archdiocese. Is this accurate?

10. Steps in trial (judge?jury?) Anticipated timeline (this relates to release of information regarding endowment).

DRAFT

November 1, 1994

Dear member of Our Lady of Grace Parish:

Our parish may appear in the news soon in an unfavorable light. As your pastor, I wanted you to hear about this from me before the information is made public.

Father Richard Jeub has been named in a lawsuit charging him with sexual misconduct with a young woman in her late teens some 20 years ago while he was serving as associate pastor at Our Lady of Grace. The lawsuit also names Our Lady of Grace Parish and the Archdiocese. Father Jeub adamantly denies the charges, and in preliminary action, the judge has dismissed several key complaints made against Our Lady of Grace and the Archdiocese.

Given those circumstances, the large payment demanded by the plaintiff has been refused, and the matter is tentatively set for trial to begin November 8. Because Father Jeub had earlier acknowledged some misconduct with adult women, he currently is not assigned to any pastoral ministry in the Archdiocese.

I know that some other parishes have experienced the ordeal of this kind of negative publicity. Where that has been at least in part occasioned by the mistakes of poor judgment by the local church, we have expressed apologies. That is not the case here. It will be argued that Father Jeub abused a young woman and did so with the knowledge or through the negligence of his superiors. We do not have reason to believe that any of that is true.

Please pray for all involved in this situation. Our parish has a long tradition of deep faith and service. Let us continue that with pride.

Sincerely in Christ,

Fr. Robert Cassidy

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Jeub file, please

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Robert T. Cassidy

Rev. Robert T. Cassidy
Pastor

RTC/pk

5071 Eden Avenue, Edina, Minnesota 55436 / (612)929-3317

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Pastor

RTC/pk

5071 Eden Avenue, Edina, Minnesota 55436 / (612)929-3317

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Office of the Archbishop

Saint Paul, Minnesota 55102-2197

November 3, 1994

Reverend and dear Father,

As in the past, I am writing to you so that you will not be caught unaware by possible media attention to one of our priests. On Tuesday, November 8, a trial is scheduled to begin involving Father Richard Jeub, the Archdiocese, and the Church of Our Lady of Grace in Edina.

A woman now in her early claims that Father Jeub abused her sexually when she was a teenager. Father Jeub has adamantly denied this misconduct. As you know, he has been honest in admitting to some misconduct with adult women in other situations. It is because of these other situations, and not because of the allegations in the current lawsuit, that Father Jeub is currently not assigned to any pastoral ministry.

In preliminary motions the judge has already thrown out major issues raised against the Archdiocese and the parish. We believe that it is unlikely that the judgment in this case will go against Our Lady of Grace, the Archdiocese, or Father Jeub. For that reason, we have refused to accept the settlement demand for many hundreds of thousands of dollars that has been made against us. We expect a favorable result from the trial.

If you have any questions about how to communicate with your people about these matters, feel free to call our Communications Office. May God bless your continued service to the Church. I continue to be proud to be associated with you in the work of the Church in this Archdiocese.

Sincerely yours in Christ,

✠ John R. Roach

Most Reverend John R. Roach, D.D.
Archbishop of Saint Paul and Minneapolis

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Archbishop of Saint Paul and Minneapolis

Media Statement: Father John kapoun

11/8/94

The Archdiocese has been addressing this situation with Father Richard Jeub for over four years. Father Jeub adamantly denies the charges made against him. Based on his denial and information obtained through extensive professional evaluation and advice from legal counsel, the Archdiocese has refused to pay any settlement. The plaintiff will attempt to make the case that Father Jeub abused a young woman with the knowledge or through the negligence of his superiors. We do not believe any abuse occurred. The judge assigned to this case has already dismissed key complaints against the Archdiocese and Our Lady of Grace Parish. Because Father Jeub had earlier admitted some misconduct with adult women, he has not been assigned to any pastoral ministry in the Archdiocese since 1988.

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The Revenge of the Repressed: Part II

Frederick Crews

The Courage to Heal: A Guide for Women Survivors of Child Sexual Abuse (3rd edition)
by Ellen Bass and Laura Davis.
HarperPerennial,
604 pp., $22.50 (paper)

The Myth of Repressed Memory: False Memories and Allegations of Sexual Abuse
by Elizabeth Loftus and Katherine Ketcham.
St. Martin's, 290 pp., $22.95

Making Monsters: False Memories, Psychotherapy, and Sexual Hysteria
by Richard Ofshe and Ethan Watters.
Scribner's, 340 pp., $23.00

Victims of Memory: Incest Accusations and Shattered Lives
by Mark Pendergrast.
Upper Access, 603 pp., $24.95 (paper)
(to be published in February 1995)

Photograph © Bill Hall

Roane County, Tennessee, 1989: Dune Anne Rabe, accompanied by her hypnotist, left, and her husband, searches for graves on her father's former property. Rabe and her sister claimed to have "recovered" a childhood memory that their father had murdered several people. The criminal investigation against him was dropped for lack of evidence, and a lawsuit they later brought against him for $8 million was also dismissed.

1.

Throughout the American 1980s and beyond, the interrogation of small children for their memories of recent sexual abuse played a role in many a criminal case against accused molesters who had not, in fact, done anything wrong. The social and financial costs have been enormous. To take only the most famous example, staff members of the McMartin Preschool in Manhattan Beach, California, who were accused of every imaginable horror associated with devil worship, had to endure the longest (almost seven years) and most expensive ($15 million) trial in American history before the case collapsed from the weight of its accumulated absurdities. In other instances, draconian sentences are being served and plea bargains are still being coerced in the face of transparently clear signs that the charges are bogus. Even today, our criminal justice system is just beginning to erect safeguards against the error that makes such outrages possible: the assumption that children are still reliable witnesses after exposure to their parents' and inquisitors' not-so-subtle hints that certain kinds of revelations are expected of them.

Not even that much progress, however, is being made with respect to curbing parallel travesties involving the therapeutically manufactured memories of adults who decide that they must have been molested in their own childhood. On the contrary: by extending their statutes of limitations to allow for thirty years and more of non-recollection, our states have been codifying a pseudoscientific notion of repressed-yet-vividly-retrieved memory that can cause not merely injustice but enormous grief and havoc. Obviously, the impetus for such legislative backwardness is not coming from reputable psychological research—which, as we have seen, offers no support to the concept of repression even in its mildest form. The momentum comes rather from a combination of broad popular belief and a relatively narrow but intense crusading fervor.

Since 1988, the most successful communicators of both the belief and the fervor have been Ellen Bass and Laura Davis, coauthors of the "recovery manual" *The Courage to Heal*. A teacher of creative writing and her student, Bass and Davis were radical feminists who lacked any background in psychology. Their knowledge base consisted of stories they had heard from women who clearly remembered that they had been sexually abused in childhood but who had been rebuffed by uncaring therapists and family members. Noting the high numbers of such cases reported within women's collectives, and further noting that other women in such groups eventually produced incest "memories" of their own, Bass and Davis soon decided that repressed abuse must be even more pervasive than remembered abuse. The more likely explanation of the late-blooming cases—namely, that the dynamics of the group encouraged false memory formation by making victimhood into a test of authentic belonging—has yet to dawn on these collaborators.

Precisely because their minds were unclouded by research findings, Bass and Davis uncannily reflected the ideological spirit of their moment and milieu. As Mark Pendergrast relates in *Victims of Memory*, the mounting (and very legitimate) concern about the underreported incidence of real child molestation formed only one corner of the picture. Bass and Davis also spoke to a public mood of impatient moral absolutism; an obsession with the themes, popularized by John Bradshaw and others, of codependency, the "dysfunctional family," and the "inner child"; a widespread susceptibility to occult beliefs; the rise of "lookism" and other manifestations of hypersensitivity to the violation of personal space; and the angry conviction in some quarters that all men are rapists at heart. While Andrea Dworkin and Susan Brownmiller were hypothesizing that American fathers regularly rape their daughters in order to teach them what it means to be inferior, Bass and Davis set about to succor the tens of millions of victims who must have repressed that ordeal.

No single book, of course, can make a social movement. Although *The Courage to Heal* had already sold over three quarters of a million copies before its recent third edition appeared, and although its spinoff volumes constitute a small industry in their own right, Bass and Davis have been joined by a considerable number of other writers who share their slant.[1] Moreover, the recovered memory business quickly outgrew the motives of its founders. By now, as the critical new books by Pendergrast and by Richard Ofshe and Ethan Watters show, it has evolved into a highly lucrative enterprise not just of therapy and publishing but also of counseling, workshop hosting, custody litigation, criminal prosecution, forced hospitalization, and insurance and "victim compensation" claims.

The recovery movement, it must be plainly understood, is not primarily addressed to people who always knew about their sexual victimization. Its main intended audience is women who aren't at all sure that they were molested, and its purpose is to convince them of that fact and embolden them to act upon it. As for genuine victims, the comfort they are proffered may look attractive at first, but it is of debatable long-term value. *The Courage to Heal* and its fellow manuals are not about surmounting one's tragic girlhood but about keeping the psychic wounds open, refusing forgiveness or reconciliation, and joining the permanently embittered corps of "survivors."

In the eyes of the recovery movement's leaders, as many as half of all American women are veterans of sexual abuse. If so, the logic seems to run, you can hardly fail to unearth a victim wherever you look and by however desultory a means of detection. But a revealing game with definitions is being played here. For writers like Bass and Davis, Renee Fredrickson, and E. Sue Blume, sexual molestation occurs whenever the victim thinks—or later comes to believe that she must have thought—that an inappropriate kind of contact is occurring. Blume, indeed, denies that physical touching need be involved at all. "Incest," she explains, "can occur through words, sounds, or even exposure of the child to sights or acts that are sexual but do not involve her" (Blume, p. 5). And still another movement writer denounces what she calls "emotional incest," which can be committed by parents who "appear loving and devoted," "spend a great deal of time with their children and lavish them with praise and material gifts," but do so merely "as an unconscious ploy to satisfy their own unmet needs" (Love, p. 1).

From the standpoint of public health, what's most disturbing here is a likely growth in the number of "false positives"—women who were never molested but who are enticed into believing that they were. The mavens of recovered memory concern themselves almost entirely with means of *reinforcing* incest suspicions, not with means of checking them against solid evidence pro or con. Their advice to friends and counselors of a woman who has been led to suspect early molestation is generally the same: never cast doubt on those suspicions. So, too, she herself is urged to stifle all doubts. In Renee Fredrickson's words, "You may be convinced that your disbelief is a rational questioning of the reality versus unreality of your memories, but it is partially a misguided attempt to repress the memories again" (Fredrickson, p. 161).

It is little wonder, then, that Bass and Davis, through the first two editions of *The Courage to Heal*, had yet to encounter a single woman who "suspected she might have been abused, explored it, and determined that she wasn't."[2] Now, in a third edition that is beginning to sound nervous about "the backlash" in general and pending damage suits in particular, it is admitted that some therapists "have pushed clients to acknowledge abuse... that did not occur." But even those few bad apples, in Bass and Davis's still erroneous judgment, cannot "create new memories in their clients"; and the women who change their minds after leaving therapy "represent only a tiny fraction of the

[1] Other key movement documents include Renee Fredrickson, *Repressed Memories: A Journey to Recovery from Sexual Abuse* (Fireside/Parkside, 1992); E. Sue Blume, *Secret Survivors: Uncovering Incest and Its Aftereffects in Women* (Wiley, 1990); and Patricia Love, *The Emotional Incest Syndrome: What To Do When a Parent's Love Rules Your Life* (Bantam, 1990).

[2] Bass and Davis, *The Courage to Heal*, second edition (HarperPerennial, 1992), p. 347.

millions of actual survivors. . . ."

The "false positives" problem has been exacerbated by the checklists of telltale symptoms that adorn the movement's self-help manuals and advice columns. Smarting from criticism of their earlier checklists, Bass and Davis adopt a warier posture now; nevertheless, they still leave the implication that if you "feel different from other people," incest is a likely cause. E. Sue Blume tells you that you were probably molested if you speak too softly, or wear too many clothes, or have "no awareness at all" of having been violated (Blume, pp. xviii–xxi). If you have checked the questionnaire items "I neglect my teeth" or "There are certain things I seem to have a strange affection or attraction for," Renee Fredrickson knows why (Fredrickson, p. 49). And according to the ubiquitous John Bradshaw, a victim can be spotted either by her sexual promiscuity or, as the case may be, by her lack of interest in sex.[3] These are all sterling examples of what experimentally minded psychologists dryly call a "confirmatory bias."[4]

Once she is drawn into memory therapy, a client will find her suspicions of abuse verified by one or more techniques of investigation that are, in Fredrickson's words, "as unlimited as human creativity" (Fredrickson, p. 141). With or without the therapist's direct assurance that the patient's symptoms are "consistent with abuse," repression can supposedly be dislodged through "feelings work," "body work," "dream work," "imagistic work," "trance work," and "group work"; through the production of journals and pictures that are sure to yield symbols of violation; through the cultivation of flashbacks, which are always deemed to reveal the truth of a past situation rather than compliance with current expectations; through administration of the tongue-loosening "truth serum" sodium amytal; and, of course, through hypnosis, including its deep-end forms of "age regression" and even "past life regression." The considerable body of technical literature showing that none of these methods reliably leads to uncontaminated memories is simply ignored.

The recovery movement's feminist affinity should not lead anyone to suppose that its incitement to militant victimhood serves the best interests of women. It is precisely women who make up most of the movement's casualties. Once a patient is invited to believe that her inner child was suffocated at an early age, she may well put the major blame on her mother; that is just what we see in a significant minority of cases. Estrangement between sisters—one converted to hellishly revised memories of their years together, the other refusing to go along—is also a regular aftermath of therapy. But above all, the chief sufferer usually turns out to be the female patient herself.

Recovery manuals preach the doctrine of "abreaction," whereby a patient must painfully relive each repressed memory if she is to stand a chance of freeing herself from it. The experience is guaranteed to be rough. In Lenore Terr's version of this truth, "Clinicians find that once repression lifts, individuals become far more symptomatic. They become anxious, depressed, sometimes suicidal, and far more fearful of items suggestive of their traumas."[5] Bass and Davis agree. "Don't hurt or try to kill yourself. . . ," they feel compelled to advise. "Sit tight and ride out the storm." For many women, however, the storm doesn't end, or else it ends all too abruptly with suicide. And even in the best of cases, a "survivor" is coached to reject the happiest actual memories of her childhood as being inconsistent with the stark truth of molestation. The result is a lasting sacrifice of resilience, security of identity, humor, capacity to show affection, and connection to the people who have cared most steadily about this woman's happiness.

2.

Although much of this woe is irreparable, there is no need for fatalism about its indefinite extension to new cases. On the contrary: the tide is already being turned. The critical books before us follow upon influential exposés by such courageous journalists as Michael Morris, Stephanie Salter, the late Darrell Sifford, and Bill Taylor, along with trenchant warnings by academics like Carol Tavris, Paul McHugh, and Robyn Dawes. And a number of other book-length critiques are just now arriving on the scene.[6] Above all, steady progress in public enlightenment has been forged, over the past two-and-a-half years, by the False Memory Syndrome Foundation, most of whose members are themselves slandered relatives of "survivors."

All three of the most convincing new books on false memory—those by Elizabeth Loftus and Katherine

[3]John Bradshaw, "Incest: When You Wonder If It Happened to You," *Lear's*, August 1992, pp. 43–44.

[4]Controlled research indicates that there is nothing easy about identifying incest victims from their symptoms. See, e.g., Thomas M. Horner et al., "The Biases of Child Sexual Abuse Experts: Believing is Seeing," *Bulletin of the American Academy of Psychiatry Law*, Vol. 21 (1993), pp. 281–292. Horner found that forty-eight experts, all examining the same material, could reach no significant agreement as to whether a child had been molested by her father.

[5]Renee Fredrickson goes a step farther, remarking that patients may not notice *any symptoms at all* "until they are immersed in the process of dealing with their memories" (*Repressed Memories*, p. 36). Then the torment begins.

[6]See Michael D. Yapko's *Suggestions of Abuse: True and False Memories of Childhood Sexual Trauma* (Simon and Schuster, 1994); Hollida Wakefield and Ralph Underwager, *Return of the Furies: An Investigation into Recovered Memory Therapy* (Open Court, 1994); Claudette Wassil-Grimm, *Diagnosis for Disaster: The Devastating Truth about False Memory Syndrome and Its Impact on Accusers and Families* (Overlook, 1995); and Charles R. Kelley and Eric C. Kelley, *Now I Remember: Recovered Memories of Sexual Abuse* (K/R Publications, 1994). Other important recent books include Eleanor Goldstein and Kevin Farmer, *Confabulations* (SIRS Books, 1992) and *True Stories of False Memories* (SIRS Books, 1993).

Ketcham, Richard Ofshe and Ethan Watters, and Mark Pendergrast—address the full tragedy and folly of the recovered memory movement. All are astute, scientifically informed, and compassionate toward the movement's casualties; all contain wrenching accounts of sudden accusation and insult, alienation, family grief, false imprisonment, and death without reconciliation. Any of these overlapping works would serve a reader well as a survey, analysis, and call to corrective action. But the most unflinching and broadest-ranging studies appear to be Ofshe and Watters's *Making Monsters* and Pendergrast's *Victims of Memory*.

As befits a coauthor (Ofshe) whose research specialty has been the tactics of exerting undue influence, *Making Monsters* is finely attuned to the thralldom that would-be healers impose upon their clients, whose mundane initial complaints are typically supplanted by anxiety, suggestibility, and a desperate dependency. What distinguishes this book is its focus on the resultant psychological transformation of patients. For Ofshe and Watters, the speciousness of the so-called memories is incidental to the real tragedy, a "brutalization and psychological torture" of people who get stripped of their actual early memories, infused with fanatical hatred of their parents, and disabled for normal coping in the world beyond the drifting lifeboat of survivorship. The patients themselves become grotesque in the very act of "making monsters" out of the people who nurtured them.

Ofshe and Watters offer us the clearest account of how the very inefficacy of memory treatment—its indefinite postponing of an expected self-restoration—can lock the patient and therapist in an ever more macabre embrace. Thus:

> Therapists often find themselves forced to explain why, after the first series of recovered memories, the client's symptoms do not disappear as promised. The easiest answer is to presume that the abuse must have been more serious than originally thought, and that more repressed memories are hidden in the patient's unconscious. As the therapist pushes to find more hidden memories, the client, who is already trained in the process, often comes up with still more accounts of having been abused.... [Eventually,] the client's worst fears are forged into memories. What could be more psychologically damaging than being raped by one's father? Having to have his baby. What could be worse than having to give birth to your father's child? Having to kill the child. What could be worse than having to kill a baby? Having to eat the baby after you've killed it. What could be worse than all this? Having to do these things during ritualized worship of the Devil.

At such a juncture, readers may suppose, both parties to the "therapy" must surely awaken and realize that they have been taking a magic carpet ride. But for reasons that Ofshe and Watters supply, it doesn't happen. The therapist feels honor bound to avoid "revictimizing" the patient by expressing doubts, and the patient, precisely by virtue of having renounced the actual memories that used to moor her identity, has lost contact with reality and is desperate to retain the therapist's approval. The outcome is a potentially lethal *folie à deux*.[7]

Making Monsters is a book about iatrogenesis, or the molding of a patient's illness by the incompetent doctor's own ministrations. The authors carry this theme quite far, not just in explaining individual cases but also in challenging an entire disease entity linked to false memory cases, so-called multiple personality disorder (MPD). They are hardly the first parties to express misgivings about this staple of Hollywood, sensational TV, and the criminal courts, where "one of my other personalities did it" has become the murderer's last alibi. But Ofshe and Watters regard MPD as a pure product of suggestion. They see it as a behavioral pattern learned chiefly from hypnotherapists who tend themselves to be believers in Satanic possession and other forms of conspiratorial mind control, and who characteristically prod their patients not only to remember hideous ordeals but also to manifest the dissociated selves that must have been brought into being by flight from those ordeals. With MPD, Ofshe and Watters argue, we stand at the outer edge of medical derangement, yet well within the methodological boundaries of the recovery movement.[8]

In their assault on MPD, Ofshe and Watters are joined, independently, by the investigative journalist Mark Pendergrast, whose forthcoming *Victims of Memory* constitutes the most ambitious and comprehensive, as well as the most emotionally committed, of all the studies before us.[9] Pendergrast's book stands out from the others in several respects. For one thing, it transcribes his numerous interviews with therapists, "survivors," "retractors," and accused "perpetrators," allowing the cruel unreason of the recovery movement to be voiced with

[7] Ofshe and Watters rightly perceive the Satanic connection as "the Achilles' heel of the recovered memory movement." Radical feminists who prefer all-female "survivor families" to the nuclear family make strange bedfellows with abortion-hating fundamentalists, but the record speaks for itself. "None of us want to believe such stories," write Bass and Davis of the ridiculous tales about babies being forced to eat feces in Satan's honor, "but for the sake of the survivors we must." As *Making Monsters* shows, Bass and Davis's own carte-blanche approach to the authenticating of incest cases leaves them with no way of drawing a line between sane and crazy allegations made by their Christian counterparts from across the ideological tracks.

[8] In recently redesignating MPD as "dissociative identity disorder," the American Psychiatric Association has started to back away from the syndrome's more lurid implications. So long as MPD promoters remain influential within the association, however, fundamental criticism such as Ofshe and Watters's is not to be expected.

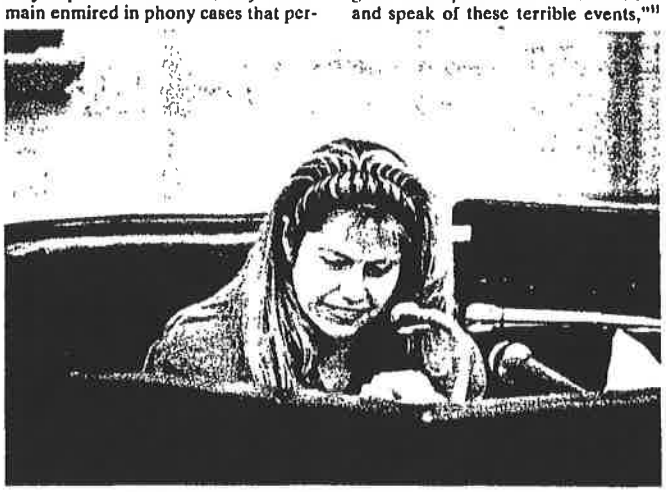
[9] Since this work is not yet in bookstores, interested readers may have to order it by phone: (800) 356-9315.

a minimum of editorial mediation. Second, he [illegible] author who delves most deeply [illegible] the movement's antecedents in witchcraft lore, mesmerism, early hypnotherapy, and the treatment of so-called hysteria—itself a faddish malady whose distribution was suspiciously well correlated with possession of the means to pay for treatment. Third, Pendergrast offers illuminating material about physiological states (sleep paralysis, panic attacks) that have traditionally been mistaken for "body memories" of one lurid kind or another. And it is Pendergrast who devotes the most effort to analyzing the contemporary *Zeitgeist* in which the recovery movement thrives.

Like Loftus and Ofshe and Watters, Pendergrast offers case histories that will wring the classic emotions of pity and terror from any unbiased reader. But here, too, there is a difference: the most affecting (though by no means the most drastic) of Pendergrast's stories is his own. He himself has lost his grown daughters to the recovery movement. Within therapy that featured the overcoming of repression, both of them came to believe that he did something awful—they won't say what—to one of them, and both have met his pleas for communication with the icy formalism inculcated by *The Courage to Heal*—a book, ironically, that Pendergrast bought and gave to one daughter when she first mentioned that uncrystallized sexual scenes were beginning to haunt her mind. Now both daughters have taken different last names, and in concluding his book with a poignant letter to them, Pendergrast further protects their identities by assigning them fictitious first names as well. Let us hope that they read not just that letter but the whole of *Victims of Memory*, which, though it is hardly addressed to them alone, rests partly on the desperate premise that a 603-page dose of history, logic, and exhortation may be able to turn well-coached zealots back into the amiable young women Pendergrast once knew.

Finally, and understandably, *Victims of Memory* is distinguished by the urgency and specificity of its call to action. Among other recommendations, Pendergrast wants professional associations and licensing boards to stop waffling about repression and to insist that therapists acquaint themselves with what is actually known about memory. He wants reconsideration of laws that have created standing "abuse bureaucracies" and that have rashly extended statutes of limitations. He favors third-party suits for damages against therapists whose implanting of false accusations has destroyed families and livelihoods.[10] He wants the adoption of higher standards for expert testimony and for the evaluation of therapists' claims that they were mere bystanders to their patients' mnemonic feats. And most pressingly, he asks for a special judicial review of criminal convictio[illegible] have been based solely on the a[illegible] retrieval of long-dormant memories or on the manipulated fantasies of small children.

Some people who have always remembered their own sexual victimization will regard the legal and legislative parts of this agenda as regressive, a signal to real molesters that they can exploit children with impunity. Such fears are understandable; pedophiles *will* undoubtedly try to portray any accuser as deluded by a trick of memory. But that only makes it more imperative that the air be cleared. Until our courts can learn to apply the same evidential criteria to abuse charges that they require for all others, they will remain enmired in phony cases that persecute the innocent and squander resources that are needed to address the real problem of child abuse. Meanwhile, simple justice demands that prison sentences resting on a combination of delusion and misinformation be overturned.



Holly Ramona in Napa County Superior Court, May 1994

Photograph © T. I. Salsman/Sygma

3.

Once the bizarre and sinister features of the recovery movement are widely known, sophisticated readers will not hesitate to distance themselves from it. But that very likelihood holds out another danger, that bobbing for repressed memories will be perceived simply as a ludicrous, dismissible aberration from a fundamentally sound psychotherapeutic tradition. If that view prevails, we will have learned little of lasting value from the recovered memory fiasco. It is essential to grasp that memory retrieval emerged from mainstream ideas about the psyche and that it bears a strong kinship with every other style of treatment that ties curative power to restoration of the patient's early past.

Despite their feminist affiliation, the champions of survivorship cheerfully acknowledge Sigmund Freud, the male chauvinist par excellence, as their chief intellectual and clinical forebear. They are quite justified in that opinion. Indeed, the ties between Freud's methods and theirs are more intricate and enveloping—and immeasurably more compromising to both parties—than they imagine. Precisely that kinship explains why other therapeutic descendants of Freudianism ought to be doing some soul-searching just now.

Needless to say, it is not classic psychoanalysis to which writers like Bass and Davis feel indebted. They have in mind the pre-psychoanalytic Freud, the one who supposedly took pity on his hysterical patients, found that they were all harboring memories of early abuse, "listened and understood and gave them permission to remember and speak of these terrible events,"[11] and cured them by unknotting their repression. Unfortunately (the story continues), he then suffered a failure of nerve; too many fathers were being identified as perpetrators, and patriarchy itself threatened to teeter on its throne. As a result, Freud withdrew into psychoanalysis, a doctrine that ascribes incestuous designs not to adult molesters but, grotesquely, to children themselves.

As I explained in these pages a year ago, this fable contains at least one nugget of truth: Freud had no empirical warrant for shifting to an oedipal perspective.[12] The founding of his signature doctrine was indeed a retreat—one designed, however, not to shield guilty fathers but to keep in play his favorite concept of repression—"the cornerstone," as he would later say, "on which the whole structure of psycho-analysis rests"[13]—after its already announced therapeutic victories had failed to materialize. Freud finally had to cope with the disagreeable thought that his hysterics' "stories" of very early abuse had been peremptory

[10]Earlier this year, Gary Ramona of Petaluma, California, was awarded a settlement against a therapist, a psychiatrist, and a hospital for their role in bringing about his daughter Holly's "memory" that he had molested her. Sued by Holly, Ramona had countersued the other parties for compensation of the loss of his job, marriage, and reputation. (Lenore Terr, incidentally, put in her customary court appearance, offering an expert opinion that Holly Ramona's current aversion to pickles and bananas confirms her childhood trauma of forced oral sex.) The Ramona verdict will be appealed, but for now, at least, it constitutes the darkest cloud hanging over the recovery movement.

[11]Jeffrey Moussaieff Masson, *The Assault on Truth: Freud's Suppression of the Seduction Theory* (Farrar, Straus and Giroux, 1984), p. 9.

[12]See Crews, "The Unknown Freud," *The New York Review*, November 18, 1993, pp. 55–66.

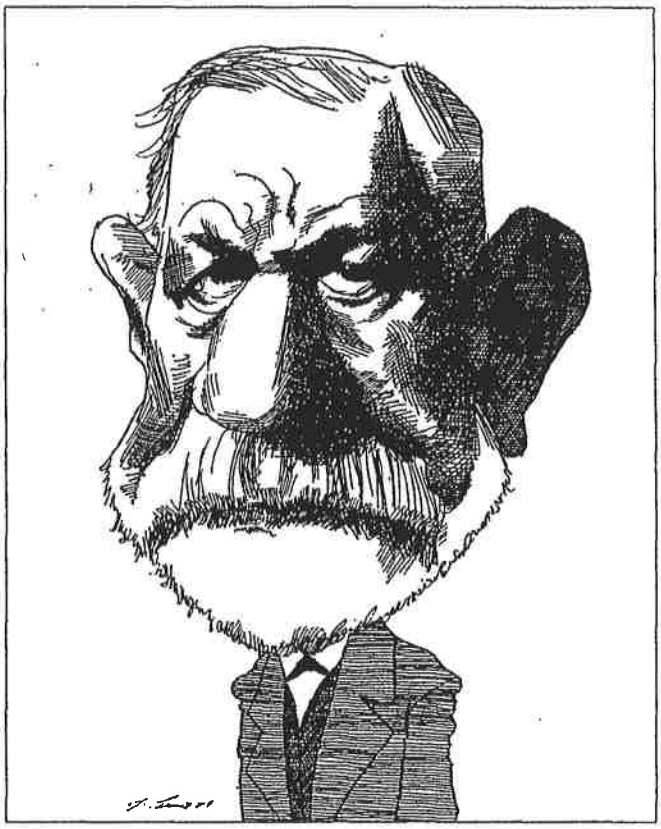
[13]*The Standard Edition of the Complete Psychological Works of Sigmund Freud*, 24 volumes, translated by James Strachey (Hogarth Press, 1953–1974), Vol. 14, p. 16. Subsequent parenthetic references to volumes of the Standard Edition will be designated "SE."

inventions of his own. He did so, however, [illegible]gh a dumbfoundingly illogical, hi[illegible]rically momentous expedient, ascribing to his patients' unconscious minds a repressed *desire for* the precocious couplings that he had hitherto urged them to remember having helplessly undergone. That is how psychoanalysis as we know it came into being.

Even people who accept this well-founded correction of the Freud legend may be slow to realize how high and dry it leaves the dogma of repression. Freud and Josef Breuer had first invoked repression in 1893 to cover miscellaneous symptom-producing "things which the patient wished to forget" (SE, 2:10); but Freud quickly became uncomfortable both with the random character of the offending thoughts and with his source of information about the repressed, namely, hypnosis. Then, with the seduction theory, he adapted the idea of repression to cover the failure of patients to remember molestations that he soon conceded to have been imaginary. Still later, it covered fantasies (and some events) whose existence could be known only by positing the action of repression itself. In none of these phases do we encounter raw behavioral data that an outsider would feel obliged to label "the repressed." Thus we really ought to redefine the repressed as follows: "inaccessible and possibly nonexistent psychic material to which the theorist or therapist is nevertheless determined to assign explanatory power." Exactly the same point applies to the repressed as it operates in the discourse of the recovery movement.

Among the many respects in which the memory retrievers' glorification of Freud's "seduction theory" misfires, the least noticed has to do with his alleged sympathy for incest sufferers. It is certainly true that he showed precious little pity for child sexual victims after he became properly "Freudian" and cast children as the would-be seducers.[14] Like Bass and Davis, however, the early Freud was less interested in comforting certified veterans of molestation than in rounding up converts to his all-purpose diagnosis. And the spirit of his interventions, as revealed in his papers and letters of the period, was not compassionate but monomaniacal. It is little wonder that Olshe and Watters regard him as having "cut the very figure of a recovered memory therapist."[15] Listen to Freud's own words:

> The work keeps on coming to a stop and they keep on maintaining that this time nothing has occurred to them. We must not believe what they say, we must always assume, and tell them, too, that they have kept something back.... We must insist on this, we must repeat the pressure an[illegible] resent ourselves as infallib[illegible] at last we are really told something.... There are cases, too, in which the patient tries to disown [the memory] even after its return. "Something has occurred to me now, but you obviously put it into my head."... In all such cases, I remain unshakably firm. I... explain to the patient that [these distinctions] are only forms of his resistance and pretexts raised by it against reproducing this particular memory, which we must recognize in spite of all this (SE, 2:279–280).[16]



The patient's typical response to such hectoring was an agitation that Freud, like his counterparts a century later, paraded as validation of his guesswork: "The behaviour of patients while they are reproducing these infantile experiences is in every respect incompatible with the assumption that the scenes are anything else than a reality which is being felt with distress and reproduced with the greatest reluctance" (SE, 3:204). Note as well how the psychoanalytic concept of resistance (the memory retrievers prefer to call it "denial") was already pulling its weight in the mid-1890s. When Renee Fredrickson now avers that the "existence of profound disbelief is an indication that memories are real" (Fredrickson, p. 171), she is manifesting loyalty to the sturdiest, as well as the most capricious, of Freudian traditions.

Critics of recovered memory have remarked on the movement's puritanical alarmism, whereby a mere touch or look gets invested with traumatic consequences that supposedly remain virulent for thirty years and more. In this respect, too, Freud anticipated the contemporary trend. So long as he cared at all about molestation as an etiological factor, he completely overlooked its real psychological effects, such as fear, moral confusion, and a diminished sense of selfhood. Instead, he dwelt on mechanical cause-and-effect relations between symptomatology and the premature stimulation of one body zone or another. And he regarded masturbation not only as a cause of indigestion, headaches, and lassitude but also as a sign of prior "seduction." The early Freud's truest contemporary heirs are those adults who see toddlers playing doctor and immediately phone the police.[17]

It was Freud, too, who pioneered the modern memory sleuths' technique of thematically matching a patient's symptom with a sexually symmetrical "memory." Before he decided that it made no difference whether a trauma was real or imaginary, Freud was tireless in his pursuit of such causal linkages. Lesions in the mouth were signs that a penis had been there first; dyspepsia or "worm irritation" must have stemmed from the insertion of a tongue or a finger in the former baby's anus; a paralysis of

[14] Before 1897, for example, Freud could hardly have condemned the fourteen-year-old Dora as abnormal for spurning "an occasion for sexual excitement" proffered by her father's married friend (SE, 7:28).

[15] Mark Pendergrast, too, understands the deep affinity between Freud's methods and those of our contemporary retrievers. The odd book out in this respect is Elizabeth Loftus's, which puts a maximum distance between memory therapy and what she calls Freud's "spare, elegant theories."

[16] This passage is cited in a pertinent new article by Russell A. Powell and Douglas P. Boer, "Did Freud Mislead Patients to Confabulate Memories of Abuse?" *Psychological Reports*, Vol. 74 (1994), pp. 1283–1298.

[17] This is not a fanciful example. Last year Kenneth Bruce Perkins, a Texas grandfather, was convicted and sentenced to four concurrent thirty-year terms in prison after his daughter spotted her children engaging in sexual exploration and inferred that he must have been molesting one or more of them.

the lower limbs meant that the sufferer had been "required to stimulate the genitals of a grown-up woman with his foot"; and so forth.[19] Freud apparently arrived at such quack conclusions in the same way that his incest-happy legatees do, by taking the symptom as a puzzle to be jointly addressed with the patient and then solving it through direct probing, dream analysis, and the study of tactically selected verbal associations.[19]

The early Freud must also be awarded precedence for the cluster of ideas about memory that has landed so many of our fellow citizens in litigation and/or prison. I refer not just to repression but to the mind's ability to take snapshots of extremely early scenes and reproduce them in detail several decades later. When Lenore Terr, for example, uncritically accepts a man's "memory" from babyhood of his sadistic mother having totally submerged him in the bathtub as he was noticing "light gray walls all around me, a foul smell in the air," she may be defying what is known about brain development, but she is perfectly in key with Freud. Let one example, a letter from 1897, suffice:

> The early period before the age of one and one half years is becoming ever more significant. I am inclined to distinguish several periods even within it. Thus I was able to trace back, with certainty, a hysteria that developed in the context of a periodic mild depression to a seduction, which occurred for the first time at 11 months[,] and [I could] hear again the words that were exchanged between two adults at that time! It is as though it comes from a phonograph. (Freud-Fliess Letters, p. 226)

Given that Freud here accepts a "phonographic" memory of an adult conversation recorded when the patient was presumably still struggling to say "mama," this passage must rank among his most credulous ever. Yet the claim being made is scarcely more inane than any number of others from the same epoch.

Even the most adventuresome of modern memory enthusiasts, those who believe in Satan cults and who induce "past regression" in their clients, had a predecessor of sorts in Freud. Though he didn't go in for reincarnation, Freud subscribed to the Lamarckian idea that memory traces from prehistory are passed along genetically *ad infinitum*, predisposing us to traumas analogous to those once endured by our hominid forebears and their progeny. Thus, in the same letter (cited in my 1993 article) where he reported having "obtained a scene" from a patient who saw herself being forced to eat a morsel of her circumcised labium minor, he mused: "it is as though in the perversions, of which hysteria is the negative, we have before us a remnant of a primeval sexual cult, which once was—perhaps still is—a religion in the Semitic East..." (Freud-Fliess Letters, p. 227).

In theory, Freud could have fed upon such prehistoric psychic material while exploring any given hysteric's repressed unconscious. That is presumably why he added, "I dream, therefore, of a primeval devil religion with rites that are carried on secretly, and understand the harsh therapy of the witches' judges" (Freud-Fliess Letters, p. 227). As I have previously shown, Freud, amazingly indifferent to the effects of suggestion, believed that the torture of accused witches elicited from them uncontaminated fantasies deriving from their own sexual molestation in childhood. Only the absence of a theological commitment, it seems, prevented him from stumbling over the final step and unearthing "Satanic ritual abuse."[20]

A Freudian's predictable way of

[19]See, respectively, *The Complete Letters of Sigmund Freud to Wilhelm Fliess, 1887–1904*, edited by Jeffrey Moussaieff Masson (Harvard University Press, 1985), pp. 220, 223, and SE, 3:215.

[19]It must be admitted, however, that no one has yet approached Freud's level of ingenuity in turning *his own* punning associations into knowledge about his patients' histories. See, e.g., the letter of 1899 in which he tells Fliess about a patient who "deflowers" women because he failed botany and who, as a teen-ager, once masturbated in a contorted position so that he could keep the Jungfrau in view (Freud-Fliess Letters, p. 346). As Robert Wilcocks remarks in a brilliant new book, "Surely *only Freud* (or perhaps Alfred Jarry?) could have imagined a 14-year-old boy masturbating with a view of that massive rugged rockpile, his adolescent ardor aroused to ejaculation by the provocative mountain *because its name means 'virgin.'*" See *Maelzel's Chess Player: Sigmund Freud and the Rhetoric of Deceit* (Rowman and Littlefield, 1994), p. 198.

[20]Or did it? Freud's muddled prose about his self-cannibalizing patient (probably Emma Eckstein) makes her look like an actual victim of such abuse. The "scene" in question includes an apparently ritualistic drinking of blood from the girl's mutilated vaginal lip, which, Freud informs Fliess, "is even shorter today" (Freud-Fliess Letters, p. 227). That assertion may or may not have been true (just how could Freud have known?), but in either case it pertains to the realm of fact, not fantasy. The anatomical detail would seem to imply Freud's literal belief in his patient's devilish "scene." If, on the other hand, he was trying to correlate a false memory with a real disfiguration, his very sanity stands in doubt.

handling a[illegible]h embarrassments will be to say [illegible]ey predated the birth of psychoanalysis. Yes, but most of them also persisted far beyond it. Long after 1897, Freud continued to badger his patients with ready-made hypotheses and to dismiss their objections as mere resistance; he still took their distress at his morbid insinuations as a further signal of his correctness; he still regarded symptoms as allegories of repressed mental contents; his Flintstones Lamarckism became more rather than less extravagant; and he never flagged in his quest to forge precise causal links between vividly reconstructed sexual events from infancy (either witnessed or personally endured) and adult mental disturbance.[21] Without the éclat of psychoanalysis, moreover, our memory gurus would never have been drawn to the molestation-minded Freud whom they now prefer. Nor, lacking his imprimatur, could they have bandied about notions of repression, abreaction, and unconscious symbolism without feeling a need to argue for their cogency.

A chasm does yawn, however, between the principles of the recovered memory movement and psychoanalysis in Freud's most familiar articulation of it. In contrast to Freud's own habit, the ideal Freudian therapist is supposed to be cool, nonjudgmental, and slow to reach closure about diagnoses and thematic connections. He is also asked to honor a number of methodological niceties that deter simplistic translations between any given sign and the event or wish that supposedly brought it into being. There is, for instance, the concept of "screen memories" that are not to be taken at face value, and there are numerous posited defense mechanisms that supposedly warp dreams, symptoms, and errors into relatively obscure compromise formations. Although these refinements brought about an ominous problem of their own—in the full labyrinth of hermeneutic possibilities, how can we ever know which is the true path back to the supposedly originating scene?—they do militate against Bass and Davis's model of extracting repressed truths from the unconscious like so many bills from an automatic teller. Thus a classically trained psychoanalyst would hesitate to claim, as the memory therapists do, that a dream—supposedly a mosaic of infantile and diurnal residues, of wish and defense, of confession and concealment—could be regarded as a *direct* source of information about the dreamer's early history or the identity of her suspected molester.

Then, too, there is the saving fact that psychoanalysis, in continual retreat from its founding (but unfounded) therapeutic claims, has long since ceased advertising itself as curative in any straightforward sense of the term. That development minimizes the risk that Freudian patients will be devastated in the ways that once beset Freud's personal practice[22] a[illegible] that now beset the recovered mem[illegible]ofession. "Hysteria," of course, has vanished along with the doctors who battened on it; the psychic mysteries into which Freudian patients now get initiated are reassuringly universal, banal, and devoid of clear implications for changing behavior; and fastidious criteria of selection tend to weed out nearly all applicants who are suffering from anything more wrenching than a wish to know themselves better. Though many recovered memory clients, too, enter therapy with only vague and mild complaints, the incest stories that are forced upon them guarantee a more brutal jarring of their equanimity and identity than any Freudian patient can now undergo.

When all this is said, however, there remains an important core of shared assumptions between psychoanalysis and its hyperactive young successor. These are:

1. To become mentally healthy, we must vent our negative feelings and relive our most painful psychic experiences. The deeper we delve, and the harsher and more bitter the truths that we drag to the surface, the better off we will be.

2. Through the aid of an objective therapist in whom we invest authority, trust, and love, we can not only arrive at an accurate diagnosis of our mental problems but also retrieve the key elements of our mental history in substantially accurate form, uncontaminated by the therapist's theoretical bias.

3. Our minds don't simply keep functioning when consciousness is absent; they feature *an* unconscious, a unique agency possessing its own special memories, interests, and rules of operation.

4. Everything that we experience is preserved in either conscious or unconscious (repressed) memory; "even things that seem completely forgotten are present somehow and somewhere..." (SE, 23:260).

5. The content of our repressions is preponderantly sexual in nature. Therefore, sexual experiences can be regarded as bearing a unique susceptibility to repression and can accordingly be considered the key determinants of psychic life.

6. The difficulty we meet in trying to recall our earliest years is attributable not, as neurologists believe, to the incomplete infantile development of our hippocampus and prefrontal cortex, but rather to extensive repression (see, e.g., SE, 7:174–176), which in some instances can be successfully lifted. Inability to recall any other part of our past may therefore be assigned to that same cause.

7. The repressed unconscious continually tyrannizes over us by intruding its recorded-but-not-recalled fantasies and traumas upon our efforts to live in the present. "A humiliation that was experienced thirty years ago acts exactly like a fresh one throughout the thirty years..." (SE, 5:578).

8. Symptoms are "residues and mnemic symbols of particular (traumatic) experiences" (SE, 11:16), and "dreaming is another kind of remembering" (SE, 17:51). Consequently, a therapist's methodologically informed study of symptoms and dreams can lead (through however many detours) to faithful knowledge of an originating trauma.

9. Challenging though it may be, this work of reconstruction is made easier by the existence of a universally distributed store of unconscious equations between certain symbols and their fixed sexual meanings.

10. As a result of all these considerations, the most prudent and efficient way to treat psychological problems is not to address the patient's current situation, beliefs, and incapacities but to identify and remove the repressions that date from much earlier years.

All ten of these principles are, I believe, erroneous or extremely open to doubt. Yet they are so widely believed as to constitute what Richard Wollheim and Thomas Nagel, among others, regard as the psychological common sense of our era.[23] For Nagel, indeed, this popularity serves as actual proof that Freud must have been on the right track; if the Freudian revelation has convinced people as savvy as ourselves, Nagel thinks, there must be something to it.[24] He might entertain second thoughts after realizing how the common sense of the 1990s, not unlike that of the 1690s, has run amok when taken literally by demonologists.

As Freud well appreciated when he chose as his epigraph for *The Interpretation of Dreams* Virgil's line about stirring up hell, psychoanalysis is already demonology.[25] That is, it allegorizes the psychologically unknown as a dark power that must be coaxed forth, scrutinized, and kept in check by professionals who, incorruptible them-

[21]Indeed, as Frank J. Sulloway has pointed out, after the seduction fiasco Freud's "theory of the neuroses became, in significant part, a theory about infantile...masturbation." See *Freud, Biologist of the Mind: Beyond the Psychoanalytic Legend*, revised edition (1979; Harvard University Press, 1992), p. 185.

[22]To take an admittedly extreme example, Freud once treated a teen-age girl for what he called "an unmistakable hysteria, which did in fact clear up quickly and radically under my care." But her abdominal pains had the ingratitude to recur, and two months later she was dead of cancer—a fact that caused Freud a rare access of chagrin but prompted no second thoughts about the correctness of his diagnosis (SE, 6:146n.). Today, the borderline psychotics, epileptics, and victims of Tourette's Syndrome who used to fare so badly under psychoanalysis are safely steered into more appropriate regimens. But for a sense of the way Freudian treatment was still wreaking major havoc as late as the 1960s, readers could learn much from John Bait, *By Reason of Insanity* (Heinemann, 1963).

[23]See Wollheim, *The Mind and Its Depths* (Harvard University Press, 1993), and Nagel, "Freud's Permanent Revolution," *The New York Review*, May 12, 1994, pp. 34–38.

[24]"I believe that the pervasive Freudian transformation of our modern working conception of the self is evidence of the validity of his attempt to extend the psychological far beyond its conscious base. Common sense has in fact expanded to include parts of Freudian theory. This in turn makes it credible that more extensive and systematic insights of the same type can be developed by analysts who probe far more deeply and uncover far more material for interpretation" (Nagel, p. 36).

[25]Note Freud's question to Fliess in 1897: "Do you remember that I always said that the medieval theory of possession held by the ecclesiastical courts was identical with our theory of a foreign body and the splitting of consciousness?" (Freud-Fliess Letters, p. 224).

selves by virtue of their faith and training, sniff out the hidden corruption of others. This sanctioned prurience is the thread that Mark Pendergrast traces from witch persecutions through mesmerism to hypnotherapy to psychoanalysis itself and, full circle, to the detection of Satanic abuse. Exactly that same compatibility between preindustrial and modern forms of superstition, we may recall, proved the undoing of the Freudian Christian Paul Ingram, who wrote in his diary after conferring with his fundamentalist pastor, "John thinks several spirits are in me yet, still in control of my unconscious.... [It] may take someone like John to guide me around my defenses."

According to his confidant Sándor Ferenczi, the early Freud used to hurl himself body and soul against the forces that had invaded his patients' minds. He "worked passionately, devotedly, on the curing of neurotics," wrote Ferenczi in his diary, "(if necessary spending hours lying on the floor next to a person in a hysterical crisis)." Those were the work habits not of a fifty-minute psychoanalyst but of an exorcist. It was only after many therapeutic setbacks, Ferenczi reminded himself, that Freud came to call patients "a rabble," good for nothing but "to provide us with a livelihood and material to learn from."[26] Eventually, his private pessimism about ever being able to cast out our psychic demons crept over his whole affluent institution, which now, in the 1990s, stands suddenly naked before the only skeptics it can't ignore, the insurers who decide what is and isn't a reimbursable form of treatment. The exorcist's fervor has passed into coarser and more passionate hands such as those of Bass and Davis.

But this is not to say that psychoanalysis is doomed to stand by helplessly while young fanatics strut upon the stage that Freud built. Since every Freudian concept and commitment is revisable in a pinch, we may yet see the emergence of a hybrid psychoanalysis that has borrowed new vitality from the recovered memory movement. Portents of such an eventuality can already be found. The psychoanalyst Lawrence Hedges, for example, has recently proposed that therapeutically retrieved molestation scenes are *not* exactly false; they may be screen memories for inferrable bad experiences suffered "[i]n utero and in the earliest months of life."[27] In a new book from the Analytic Press, Lynda Share similarly proposes that the interpretation of adult dreams can give us detailed knowledge of real traumas from early infancy.[28] And in *Feminist Psychoanalytic Psychotherapy*, Charlotte Krause Prozan, who sensed which way the wind was blowing long ago, reports that whereas analysts used to be watchful for penis envy in women patients, today "we are looking for sexual abuse."[29]

In a follow-up book, Prozan offers a case history that dramatically embodies the blending of elements from standard psychoanalysis and therapy for repressed abuse. Prozan's treatment of "Penelope" was classically Freudian in its ground rules, in its heavy reliance on dream interpretation, and in its length—fourteen years. Although Penelope never did recall any molestation, Prozan wasn't fazed; as she reminds us, "[t]he phenomenon of not remembering...is in itself a symptom indicative of a severe traumatic experience."[30] As an appointed termination date loomed, the frantic Penelope surrendered at last to Prozan's thirteen-year insistence that her dreams—of setting fires, of a van crashing into a house, of being shot by a man, of sex with Prozan herself—admitted of no other explanation than the enduring of anal rape by a family friend when she was nine years old.

Exiting psychoanalysis at age forty-nine, Penelope was still smoking, drinking, and binge eating—the behaviors she had entered treatment to bring under control. Now, as well, she was estranged from her unbelieving mother and sister. But she was glad, at least, to have puzzled out the identity of her abuser, "[t]hat SON OF A BITCH! It's totally his fault!" And she was eagerly looking forward to full-throttle survivorship in what she called "the days of being powerfully angry" (Prozan, *Technique*, pp. 303, 308).

The disapproval that most psychoanalysts would feel upon reviewing this case is less significant than their substantial sharing of Prozan's axioms about the repressed unconscious, its modus operandi, and its amenability to symbolic decoding. Their confidence about such matters stems from the same source that encourages writers like Bass and Davis to trust their own findings—once again, "clinical experience" and its replication by other members of their sect. As Thomas Nagel innocently puts it, each doubtful hypothesis "has to find its empirical support in countless other applications to other patients in other settings." That is exactly the home-team approach to validation that produces abundant support for "facilitated communication," Satanic mind control, UFO abductions, previous incarnations, and telepathy—this last a favorite pastime of Freud's.

In a refreshingly sane essay, Paul R. McHugh, director of the Department of Psychiatry and Behavioral Science at the Johns Hopkins Medical Institutions, recently depicted a long-term struggle, within the mental health disciplines, between what he called empiricists and romanticists—between, that is, those who bind themselves to methodical study of facts and those who "rely upon feelings for evidence, on metaphors for reality,

[26] *The Clinical Diary of Sándor Ferenczi*, edited by Judith Dupont, translated by Michael Balint and Nicola Zarday Jackson (Harvard University Press, 1988), p. 93.

[27] Lawrence E. Hedges, "Taking Recovered Memories Seriously," *Issues in Child Abuse Accusations*, Vol. 6 (1994), pp. 1–31. The quoted phrase is from p. 15.

[28] Lynda Share, *If Someone Speaks, It Gets Lighter: Dreams and the Reconstruction of Infant Trauma* (Analytic Press, 1994).

[29] Jason Aronson, 1992, p. 207.

[30] Charlotte Krause Prozan, *The Technique of Feminist Psychoanalytic Psychotherapy* (Jason Aronson, 1993), p. 270.

on inspirati[illegible]nd myth for guidance."[31] Th[illegible]y is especially pertinent because it relegates both psychoanalysis and recovered memory therapy to the romanticist camp, where they surely belong. But it also relegates them to history's ashcan. In McHugh's opinion, the empiricists are winning hands down, because their insistence on real-world testing allows them to deliver what they promise, proven remedies for sp[illegible]ific complaints.

In the long run this victory doe[illegible]k inevitable. For now, however, I remain mindful of an earlier observation of McHugh's—that every ten years or so, "psychiatric practice has condoned some bizarre misdirection, proving all too often the discipline has been captive of the culture."[32] Out in the rough-and-tumble psychotherapeutic marketplace, to which our mental health associations discreetly turn their backs, Freudian clichés are breeding promiscuously with those of religious zealots, self-help evangelists, sociopolitical ideologues, and outright charlatans who trade in the ever seductive currency of guilt and blame. So long as "Freud's permanent revolution," as Nagel calls it, retains any sway, the voodoo of "the repressed" can be counted upon to return in newly energetic and pernicious forms. □

(This is the second of two articles.)

[31]Paul R. McHugh, "Psychotherapy Awry," *The American Scholar*, Vol. 63 (Winter 1994), pp. 17–30; the quotation is from p. 17.

[32]Paul R. McHugh, "Psychiatric Misadventures," *The American Scholar*, Vol. 61 (Autumn 1992), pp. 497–510; the quotation is from p. 498.

'Wallace Redeemed?': An Exchange

To the Editors:

C. Vann Woodward's review of my book, *George Wallace: American Populist* [*NYR*, October 20], combines misinformation, innuendo, and suggestions that I am a closet racist. Much of his criticism appears to be based on material furnished to him, and accepted by him as unvarnished truth, by a fellow academic whom he does not identify, raising the possibility of his source's personal or pecuniary interests in demeaning and undermining my work.

Professor Woodward dismisses me as "misinformed as well as uninformed about the relevant past," and yet relies entirely on my text in crafting a 2,500-word cogent summary, including quotes and descriptive scenes, of the personal and political history of Wallace and the Wallace family dating to Reconstruction. Additionally, he concurs in my essential argument—that many of Wallace's non-racial positions have become mainstream and that no serious presidential candidate dares ignore Wallace's views regarding such issues as taxes and big government.

Professor Woodward finds fault with my research, specifying my extensive use of "'recollections' of witnesses of events that took place a quarter of a century or more ago. Such off-the-cuff testimony is notoriously unreliable and often self-serving." In each and every instance, these "recollections," including my own, were derived not from memory but from extensive notes recorded, for the most part, by professional journalists within hours of the events they witnessed. Even a casual reading of this material, much of it never before published, demonstrates that it is hardly "off-the-cuff."

He also complains that I "failed to see...such highly relevant manuscript collections" as the papers of Presidents Kennedy, Johnson, and Nixon. In fact, I used materials from both the John and Robert Kennedy papers and from the Johnson papers; the abundance of materials available to me concerning Nixon's obsession with Wallace obviated my need for his papers, many of which, in any event, were inaccessible to the public.

As the backnotes in my book testify, I interviewed dozens of key people, was given extensive access to Wallace, consulted scores of works of history and, in addition to the Wallace papers, thousands of published and unpublished reports, documents, and collections. The result was a book recognized by one respected academician (Alan Brinkley of Columbia University) as "the first...serious study of one of the 20th century's most important political figures," by a second (Abigail Thernstrom of Boston University and the Manhattan Institute) as "both a serious book on American politics and a good old-fashioned yarn," and a third (Douglas Brinkley of the Eisenhower Center and the University of New Orleans) as "a well-written and judiciously researched biography (that) enables us to understand the paradoxic influence that Wallace had on American politics."

Professor Woodward, apparently questioning the book's validity, both misstates the terms of my financial arrangement with

Wallace and neglects to mention its central condition—that I possessed total editorial control. My open discussion of this arrangement dates to an Associated Press report of January 9, 1987, shortly after I signed a contract with a publisher. The editors and publishers with whom I worked over the years on this project were fully aware that I was compensating Wallace for his time, expenses, and access to his papers. If I had it to do again, I would have mentioned the agreement in my acknowledgements, and am doing so in the next edition of the book. But I suspect that those eager to do me and the book harm will continue to ignore or distort the truth.

Employing a technique better suited to the *New York Post* than to *The New York Review of Books*, Professor Woodward uses an unnamed source to excoriate my sources and research. "Checked for accuracy by a well-informed scholar who has sent me his findings, [Lesher's] footnotes revealed an appalling amount of error and carelessness..." Neither he nor his unidentified source offers a single, specific example of error, so I don't know what they are talking about and am unable to respond. If, indeed, there are specific allegations, a journalist receiving them from a source wishing to remain in the shadows would have given the accused an opportunity to reply or explain; apparently, such standards do not obtain in academia.

In failing to disclose his source, Professor Woodward opens himself to questions about the motivations of this "well-informed scholar" who, apparently, believes that his or her identity as critic-in-the-wings might prove embarrassing. Among other possibilities, this "scholar" might lack credible credentials in regard to Wallace (in which case Professor Woodward is dissembling), or bear a grudge for something I wrote in an earlier book or article (obligating Professor Woodward to provide me an opportunity to reply). Or the anonymous source could be preparing a competing biography of George Wallace and would profit handsomely if someone of Professor Woodward's stature denounced my work and decried what he acknowledges is "the virtually unanimous praise the book has received, both here and in England." (An academician has been under contract with Simon & Schuster since 1990 to produce a Wallace biography that its author says will appear next year.) If the source is indeed writing a competing book of which Professor Woodward was unaware, then he has been deceived; if he did know, he should be ashamed.

Lastly, Professor Woodward, trying to demonstrate that I am a Wallace apologist, uses loaded words to imply that I might harbor "ambiguities" in my racial attitudes. He writes that "Mr. Lesher *admits*" that the 1970 Alabama governor's race was dirty and racist, and that "Lesher... *admits*" Wallace, "thundered his racial policies" in a 1962 campaign (emphases added), implying that I defended Wallace's racism except when forced to do otherwise. He says that I recorded Wallace's "ugly record of racism" with "*seeming* candor" (emphasis added), as if my real agenda were to cagily excuse that record. Professor Woodward accuses me of presenting Wallace's racist policies with "tones of exoneration," but no fair reader could possibly reach that conclusion. Wallace himself issued a statement disputing my portrait of him as a racist. And in my epilogue (p. 501, and reproduced on the dust jacket of the book), I write that "though (Wallace) had purported to be the champion of the poor and the helpless, he had trampled on the poorest and most helpless of all his constituents—the blacks." If that constitutes "tones of exoneration," Professor Woodward must be tone deaf.

Professor Woodward goes so far as to describe me as Wallace's "friend" making my best effort to "provide [him] some measure of rehabilitation." "To judge by the book's reception in the press," Woodward concludes, "Lesher has so far been remarkably successful." The book makes no effort to rehabilitate Wallace but, rather, to delve into his impact on modern American politics. I maintain only that "had Wallace not reached beyond race, he could not have aroused the tens of millions who either voted for him or who switched only when mainstream candidates adopted many of

Jeub file, please

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

226 Summit Avenue

Office of the Archbishop Saint Paul, Minnesota 55102-2197

December 6, 1994

Dear Father,

On November 3, 1994 I wrote to you indicating that one of our priests, Father Richard Jeub, had been accused of sexual abuse of a minor girl during the time that he served at Our Lady of Grace in Edina. The woman who brought the suit engaged an attorney and the issue went to court three weeks ago. Last Thursday the court dismissed all charges against the Archdiocese, and the jury found that Father Jeub had not abused the plaintiff.

It was important that I let you know that that trial was pending, and now even more important that I let you know that Father Jeub was found to be not guilty.

As we prepare to celebrate the Feast of Our Savior's Birth let's keep each other in prayer. I am deeply thankful to you for all you do. May your Christmas be a joyous and blessed one.

Sincerely yours in Christ,

+ John R. Roach

Most Reverend John R. Roach, D.D.
Archbishop of Saint Paul and Minneapolis

Job file, please

GISLASON, MARTIN & VARPNESS, P.A.

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LEGAL ASSISTANTS
GLORIA DEEB
JUDY THYREN

December 9, 1994

Mr. John L. Weyland
Attorney at Law
641 E. Lake Street
Suite 204
Wayzata, MN 55391

Re: ***Doe v. Archdiocese, et al***

Dear John:

I know that the verdict came as a major surprise to you. I think you tried the best case possible under the circumstances.

I have written a letter to your client and it is now enclosed. You may forward it to her or dispose of it as you see fit. I recognize that it is somewhat extraordinary for the defense lawyer to be writing to the plaintiff directly, but, of course, everything about this case was quite extraordinary.

Very truly yours,

James T. Martin

JTM/ks

Enc.

cc: Father Kevin McDonough
Andrew Eisenzimmer

P.S. John, I have a bill for and it is now enclosed. Having in mind our right to costs and disbursements, do you have a proposal for how to handle her bill?

GISLASON, MARTIN & VARPNESS, P.A.
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LEGAL ASSISTANTS
GLORIA DEEB
JUDY THYREN

December 9, 1994

[redacted]

Dear [redacted]:

The jury didn't see the case your way. I am writing, however, to let you know that neither the Archdiocese nor I have ever believed that you were not legitimately aggrieved by what happened back in 1968-70. I am convinced that you, [redacted], were hurt by whatever did occur between you and Father Jeub. The Archdiocese acknowledges that fact and it is unfortunate if that message was not clearly communicated to you long before the lawsuit was started.

I hope and pray that you will be able to come to terms, in due course, with the jury's verdict. Father McDonough asks me to assure you that you are in his prayers as well.

Very truly yours,

James T. Martin

JTM/ks

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James T. Martin

JTM/ks

STRICTLY CONFIDENTIAL

December 19, 1994

MEMO TO; The File of Father Richard Jeub

FROM: Father Kevin McDonough

SUBJECT: REGULAR MEETING

I met with Father Jeub on December 16. As usual, we reviewed aftercare and ministry issues.

A major portion of our conversation was devoted to a review of his reactions to the trial just concluded involving the accusations by [redacted]. The jury had ruled entirely in Father Jeub's favor. I was impressed in our conversation by his ability to react in emotionally appropriate ways to that whole experience. He seemed genuinely pained both for himself and for other people associated with [redacted], but he also is not taking on a great deal of shame about something that he honestly believes he did no wrong in. He reported that he kept in regular touch with his support system throughout the trial.

He recently saw his therapist, Dr. Rockers, and continues to work with her. He also meets regularly with the priest support group for priests with an offense history. He is going to St. Luke Institute for one of the aftercare meetings on January 8.

On his own he has spoken with Father Jerry Grieman about whether Grieman would be open in the future, if clearance were received from the Archbishop, to having Father Jeub work as an associate pastor at that parish. My understanding is that he is trying to get a grasp of what the issues around reassignment might be from the parish point of view. Once again, I have indicated to him that we have not promised him an assignment, but will want to look at this question when the legal matters are resolved.

His new living situation at St. Peter in Mendota is going well. He finds that Father Clinton and Father Gustafson give him a lot to think about in their conversations together. He is providing voluntary help with a building project that the parish Liturgy Committee is investigating. He is not functioning in the parish as a priest, however.

Insofar as work goes, he missed most of his work at Catholic Youth Camps during November because of the trial. He is back now in the fund-raising support position that he has had there for several months. He is also doing work for the Baptist Church in Hastings as a janitor.

I believe that Father Jeub checks out well. He appears to be doing the things that are necessary to keep his recovery in place.

KMM:md

cc: Archbishop Roach
Archbishop Flynn

STRICTLY CONFIDENTIAL

December 19, 1994

MEMO TO; **The File of Father Richard Jeub**

FROM: **Father Kevin McDonough**

SUBJECT: **REGULAR MEETING**

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His new living situation at St. Peter in Mendota is going well. He finds that Father Clinton and Father Gustafson give him a lot to think about in their conversations together. He is providing voluntary help with a building project that the parish Liturgy Committee is investigating. He is not functioning in the parish as a priest, however.

Insofar as work goes, he missed most of his work at Catholic Youth Camps during November because of the trial. He is back now in the fund-raising support position that he has had there for several months. He is also doing work for the Baptist Church in Hastings as a janitor.

I believe that Father Jeub checks out well. He appears to be doing the things that are necessary to keep his recovery in place.

KMM:md

cc: Archbishop Roach
Archbishop Flynn

STRICTLY CONFIDENTIAL

December 19, 1994

MEMO TO; **The File of Father Richard Jeub**

FROM: **Father Kevin McDonough**

SUBJECT: **REGULAR MEETING**

I met with Father Jeub on December 16. As usual, we reviewed aftercare and ministry issues.

A major portion of our conversation was devoted to a review of his reactions to the trial just concluded involving the accusations by [redacted]. The jury had ruled entirely in Father Jeub's favor. I was impressed in our conversation by his ability to react in emotionally appropriate ways to that whole experience. He seemed genuinely pained both for himself and for other people associated with [redacted], but he also is not taking on a great deal of shame about something that he honestly believes he did no wrong in. He reported that he kept in regular touch with his support system throughout the trial.

He recently saw his therapist, Dr. Rockers, and continues to work with her. He also meets regularly with the priest support group for priests with an offense history. He is going to St. Luke Institute for one of the aftercare meetings on January 8.

On his own he has spoken with Father Jerry Grieman about whether Grieman would be open in the future, if clearance were received from the Archbishop, to having Father Jeub work as an associate pastor at that parish. My understanding is that he is trying to get a grasp of what the issues around reassignment might be from the parish point of view. Once again, I have indicated to him that we have not promised him an assignment, but will want to look at this question when the legal matters are resolved.

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KMM:md

cc: Archbishop Roach
Archbishop Flynn

Jeub file, please

Saint Luke Institute

CONFIDENTIAL

January 23, 1995

Reverend Kevin M. McDonough
Vicar General and
Moderator of the Curia
Archdiocese of St. Paul and Minneapolis
226 Summit Avenue
St. Paul, Minnesota 55102

RE: Reverend Richard Jeub
SLI NO: 12198

Dear Father McDonough:

Father Richard Jeub recently attended a workshop with us the week of January 9 - 13, 1995 as part of his Continuing Care Program. We want to inform you at this time regarding his progress in recovery over the past year. The following is our perception of Father Jeub progress in his ongoing recovery:

1. Recovery Program: This was Father Jeub's seventh Continuing Care workshop according to the terms of his Continuing Care contract and, therefore, it should be noted that Father Jeub's next Continuing Care workshop will be his final workshop according to his contractual obligation. Father Jeub states that he would like to return for his final Continuing Care workshop in July rather than next January because several members of the group will be returning in July but not in January and Father Jeub would like to terminate with his full group. Therefore, it was agreed that he could return in January and appropriate arrangements will be made. Father Jeub states that he currently sees his individual psychotherapist on a monthly basis, that he attends a monthly support group for priests, that he attends a weekly 12-step meeting for priests, and that he also participates in a post treatment follow-up group every two weeks. Father Jeub reports no relapse into inappropriate sexual behavior over the past year and reports no significant temptation to relapse during that same period of time. He came to this workshop seeming to appreciate the opportunity to be here and to be with his recovery peers, but when asked what he needed out of the experience of being here, Father Jeub was not as clear in being able to identify his needs. At the same time, he states that he is aware that he needs more to do on a daily basis back home, because he used to rely on the external requirements of the ministry to structure his day and he still experiences some difficulty in doing this for himself. He states that he has been able to do some of this on a one day ahead basis, but that he continues to have a challenge in initiating the events of his day and deciding what he needs out of each experience. We observed this tendency in Father

2420 Brooks Drive • Suitland, Maryland 20746-5294 • (301) 967-3700 • FAX: (301) 967-3953
Affiliated with the Daughters of Charity, National Health System

Jeub during this workshop and we encouraged him to continue to participate in activities that enable him to become more self-directed and to initiate more of the circumstances and directions of his life. Father Jeub seemed open to this feedback and seemed to be affirmed by the fact that the attempts that he has made in this area have been recognized by people in Minnesota and also by the Continuing Care staff here at Saint Luke Institute. Father Jeub states that he feels that he has received a lot of support from his fellow priests and from others over the past several months after the conclusion of a legal action that he had participated in and he was able to receive and to appreciate this support more fully than he has been able to in the past. During his legal situation, he was able to observe the situation and to observe his own feelings in response to the situation and he seems to have gained some increasing insight into his own reactions to others, particularly to those who he perceives as vulnerable or who need his help in some way. He was affirmed for the insight that he gained during this time and was encouraged to continue observing these responses in himself and learning from them.

2. Current Living Experiences/Vocational Functioning: During the past year, Father Jeub decided to move from the rectory at Cottage Grove to the rectory at Mendota because the pastor at Cottage Grove was going on sabbatical and Father Jeub did not feel it would be positive to live alone. He states that the people with whom he now resides are aware of and participate in recovery activities themselves and he seems to enjoy the mutual support he can gain from his fellow priests in his new home. At the same time, he states that he experienced some positive connections and friendships in Cottage Grove which he has been able to continue and he seems to take satisfaction from doing this also. Beyond this, Father Jeub has spent a considerable amount of time over the past year building a retirement cottage for himself and feeling affirmed by the opportunity to do something useful and something which he enjoyed as well as something that would benefit him in the long run. He hopes that the winding down of his legal situation will lead to resolution that will enable him to return to ministry and he seems to experience some frustration at the fact that the situation in the courts has not ended in 1994 as he expected it to. At the same time, Father Jeub states that he felt free this year to attend the Archbishop's Christmas party, which he had avoided in the past because of his sense of shamefulness and guilt at his difficult circumstances and he was able to enjoy himself much more than he thought he would. He was affirmed for this initiative and encouraged to do more of this type of thing in the future.

3. Medical: During the course of the workshop we monitor physical health through the use of various laboratory indices. Father Jeub's indices indicate several values that fall outside of the reference range, the most significant of which is a considerable elevation in his cholesterol level. While the other elevations are probably not large enough to be significant from a health perspective, we would strongly suggest that Father Jeub share these results with his personal physician in Minnesota as soon as he returns in order to determine whether further attention to any of these values is required. Beyond this, we would strongly suggest that Father Jeub reduce his intake of high fat, high cholesterol food in order to reduce his cholesterol level. As he reports that he is currently receiving regular aerobically-based

exercise, we would simply point out that adjusting his diet would further enable him to improve his physical well-being.

4. Recommendations and Treatment Plan: Collateral letters which we received from Father Jeub's housemate and from his sister-in-law seem to indicate that for the most part, Father Jeub is being perceived as recovering positively but that sometimes he can become perfectionistic or seem to want to be perceived as more "right" than others. Therefore, we would suggest that he maintain his awareness of this and that he use his recovery-related resources to work on his ability to let go of these struggles and to live life on its own terms. Beyond this, we would encourage Father Jeub to continue working toward a more proactive and less passive approach to life and that he seek to experience his ability to take initiative and to assert himself as positive. We would like to thank Father Jeub for his positive participation in this workshop and we look forward to seeing him at his next scheduled workshop which will take place in July, 1995.

A copy of this letter is being sent to Father Jeub for his reflections. If you have any questions regarding this report, please contact us.

We thank you for the support you offer to Father Jeub. We ask for your prayers in behalf of the many clergy and religious persons whom we serve and for continued blessings on the work of the Institute.

Sincerely yours,

Michael J Brenneis, MA, MDiv, CPC

Michael J. Brenneis, MA, MDiv, CPC
Coordinator
Continuing Care Services

Stephen Montana, PhD

Stephen Montana, PhD
Director
Outpatient Department

Frank Valcour MD

Frank Valcour, MD
Medical Director and
Vice President for Medical Affairs

MB/MAZ
cc: Reverend Richard Jeub

March 1,1995

Dear Archbishop Roach,

Please find enclosed as a courtesy my correspondence to Father Cassidy and also correspondence by your counsel, James T. Martin, to [redacted] My reason to writing you is twofold. One, I feel you should be made aware of the significant impact and damage that occurs to people in reporting prior sexual abuse to this church and how the judicial process revictimizes these individuals. Two, to share how I feel about Father Cassidy's letter to the parishioners of Our Lady of Grace.

It is apparent Father Cassidy was instructed by counsel in his correspondence to the parishioner's. Facts of prior sexual abuse had been acknowledged by this church to me, in fact I believe I received money as a token of this church's belief that I had been wronged. However, Father Cassidy never mentions any wrongdoing on the part of Richard Jeub. Continuing to hide the truth only exacerbates this significant problem.

The judicial process is difficult and of course justice and truth are worlds apart. This process was devastating for [redacted] and her family. I feel terrible that I approached her with such strong conviction that our church would indeed be there to help her. Significant and pertinent facts were left out in this process that should have been admitted at trial. So be it-I need to share with you that I personally feel extremely used by this church. This case centered on [redacted] and I had duty to come forward and share the truth. I went by the rules in my settlement agreement and didn't discuss my agreements made with you. I found Mr. Eizenzimmer to be more than honorable. Mr. Martin was harsh and cruel. I feel he was unprofessional in asking Dr. VerSteeg if she was aware that I was an This type of questioning occurred 2 times during the trial. This was unnecessary, especially since I had no legal representation and it was something I had shared trusting it would not be public information.

I believe this case would never had to go to the lengths it has had there been acknowledgment of wrongdoing. I know [redacted] and her family have suffered. I know the church has suffered by continuing to hide by its unwillingness and obvious inability to admit wrongdoing.

You know through the AA program that part of the healing process requires us to take a fearless moral inventory and when we have wronged someone to make amends. I believe you have always known the truth and take your commitment to guide this church with honesty and sincerity. Your lack of insight and honesty in this case does not reflect what I had known to be true about you.

Father McDonough has stated that this church would really like to be a serving church and not an abusing church. However, I reflect and continue to ask whom you are really serving when you maintain the posture you have in this case?

I would appreciate any insight you may be able to share with me. Thank you.

Sincerely,

[redacted]

March 1,1995

Dear Father Cassidy,

Please find enclosed a copy of a letter that [redacted] received from counsel representing the Archdiocese and Richard Jeub. My reason for sending this to you involves your correspondence to the parishioner's of Our Lady of Grace Church.

You infer in your letter that Richard Jeub was found innocent of the claimed charges- although you leave out significant facts as follows:

1. The Archdiocese did in fact pay me money as a result of inappropriate sexual behavior on the part of Richard Jeub.
2. The Archdiocese required and paid for Richard Jeub's therapeutic treatment at the St. Luke's Institute to deal with his inappropriate sexual misconduct.
3. Now counsel to the church agrees [redacted] was indeed hurt and damaged by whatever occurred in 1968-1970.

My issue is that the facts you choose to cover up only further perpetuates the issue of sexual abuse as a reality in our society and in our fellowship community. I have come to terms with my own situation but I must admit it is very difficult to not feel reshamed by your inability to share the truth of what really occurred at Our Lady of Grace Church many years ago.

I appreciate the opportunity to share my thoughts with you and I do hope you will reflect upon this matter.

Sincerely, [redacted]

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
THOMAS B. WIESER
JOHN C. GUNDERSON
CHARLES M BICHLER

SUITE 2200, NORTH CENTRAL LIFE TOWER
445 MINNESOTA STREET
SAINT PAUL, MINNESOTA 55101-2100
TELEPHONE (612) 228-1911
FACSIMILE (612) 223-5483

WILLIAM C. MEIER
(1920-1981)
TIMOTHY P. QUINN
(1921-1991)
ALOIS D. KENNEDY, JR
(RETIRED)

March 3, 1995

COPY

Mr. Ronald I. Meshbesher
MESHBESHER & SPENCE
Attorneys at Law
1616 Park Avenue
Minneapolis, Mn 55404

Re: Mary Moe [redacted] v. Archdiocese, et al.
Our File No.: 3841.82

Dear Mr. Meshbesher:

On November 30, 1993, I wrote to you advising you that my client, the Archdiocese of Saint Paul and Minneapolis, intended to terminate certain monthly payments being made to your client during the time her claims against my client relating to Father Richard Jeub were being litigated. Through some administrative oversight, those payments were not terminated and were continued until recently. My client has now ceased making any further payments.

I would encourage you to evaluate this case to see if it might be resolved. While settlement will depend upon your position and that of my client's insurer and its defense counsel, recent appellate decisions certainly may be relevant to an evaluation of everyone's position in this case.

Please let me hear from you.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

Andrew J. Eisenzimmer

AJE:dma
[redacted]

MEIER, KENNEDY & QUINN
CHARTERED
ATTORNEYS AT LAW

ANDREW J. EISENZIMMER
LEO H. DEHLER
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(RETIRED)

March 3, 1995

COPY

[redacted]

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Our File No.: 3841.82

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Please let me hear from you.

Thank you.

Best regards,

MEIER, KENNEDY & QUINN, CHARTERED

Andrew J. Eisenzimmer

AJE:dma
bcc: Mr. William S. Fallon
Reverend Kevin M. McDonough

Priests Full Name	Richard Herman Jeub

CURRICULUM VITAE

DIOCESE:	St. Paul/Minneapolis
SOCIAL SECURTIY #:	[redacted]
DATE AND PLACE OF BIRTH:	2/21/1940, Robbinsdale, MN
DATE AND PLACE OF BAPTISM:	
DATE OF ORDINATION:	3/5/1966, St. Paul Cathedral by Archbishop Leo Binz, St. Paul, MN
EDUCATION:	Nazareth Hall, St. Paul, MN St. Paul Seminary, St. Paul, MN
ASSIGNMENTS:	Associate Priest, St. Joseph, Hopkins, MN, 6/7/1966-2/7/1967 Associate Priest, Our Lady of Grace, Edina, MN, 2/7/1967-1/2/1970 Associate Priest, St. Mark, St. Paul, MN, 1/2/1970-6/15/1976 Associate Priest, Christ the King, Mpls, MN, 6/15/1976-6/14/1978 Chaplain, Methodist Hospital, St. Louis Park, MN, 6/14/1978-6/15/1982 Chaplain, Fairview Southdale Hospital, Edina, MN, 6/14/1978-6/15/1982 Pastor, St. Kevin, Mpls, MN, 10/27/1981-5/15/1990 Associate Priest, Sacred Heart, Robbinsdale, MN, 12/19/1996-6/1/1997 Associate Priest, St. Rose of Lima, Roseville, MN, 2/11/2000-2002
OTHER:	Leave of Absence, 5/15/1990-???? Resigned, May 2002
SAFE ENVIRONMENT:	Date of background check Date of VIRTUS training Date signed Code of Conduct

March 13, 1995

[redacted]

Dear [redacted],

I received your letter of March 1. That was a difficult letter to read, and I imagine also difficult to write. You provide an absolutely necessary challenge to us that we be fully integral about our response to clergy misconduct. Permit me to add some things without taking away from your challenge.

I believed what you reported to us several years ago about Father Jeub's behavior with you. My recollection is that you described a kind of emotional intimacy that was very confusing and harmful to you. You did not describe directly sexual behavior, or at least not while you were a minor. All of this is consonant with Father Jeub's admissions. Because I believed that you had been harmed, I thought that the support you requested was absolutely legitimate.

[redacted] described a set of behaviors that were much more directly sexual than what you indicated. As you know, she claimed that things happened or were said that other evidence simply contradicts. She also denied things that her own records clearly established to be true.

When she first met with Father McDonough, [redacted] was, I believe, warmly and respectfully received. Only as her story grew more contradictory were firmer lines drawn with her. Regrettably, she decided to pursue this matter in the legal forum.

I appreciate your good words about Mr. Eisenzimmer. As the direct representative of the Archdiocese, he has learned to be especially sensitive to pastoral concerns. Mr. Martin was hired by our insurers, as is their right to do, and he responded to their direction and priorities. It is for this reason that I regret [redacted]'s decision to pursue a lawsuit: the courts are a very adversarial world.

Father Cassidy's letter was reviewed here before it was brought to the parish, and my understanding is that it was accurate. While Father Jeub quite apparently violated your personal boundaries and, in a similar way, those of [redacted], we understand him not to have engaged in child abuse. He has acknowledged very serious misconduct with adults, a fact which Father Cassidy's letter also acknowledges.

I do not want to nitpick, but rather to reflect honestly the things we know to be true. As you may know, Father Jeub has been punished by five years of inactivity in his priesthood. We take very seriously the harm he has caused.

I hope this information is helpful. Thank you for taking the time to write.

Sincerely yours in Christ,

Most Reverend John R. Roach, D.D.
Archbishop of Saint Paul and Minneapolis

STRICTLY CONFIDENTIAL

March 15, 1995

MEMO TO: The File of Father Richard Jeub

FROM: Father Kevin McDonough

SUBJECT: REGULAR MONITORING MEETING

I met with Father Jeub on March 10. We reviewed the report from his latest continuing care workshop at St. Luke Institute in detail. That was a quite supportive report, although I challenged him on the physical health issue raised there.

He indicated that he has been seeing his therapist and participating in support group regularly. He has been working for the Catholic Youth Camp in its fund raising office, and a reunion is planned in May. There is a significant amount of work for him between now and then but it will tail off after that. The work at the Baptist Church in Hastings has been minimal this winter because of the lack of snowfall. Overall, he identifies a certain amount of "winter malaise".

I challenged him to increase his workload. I told him that, while we would not make an absolute demand of this, I wanted to ask his cooperation in being able to reduce the monthly Archdiocesan support that he receives. I told him that we are facing a difficult budget year and that we needed to be careful about managing our costs. We agreed to an immediate $100 a month reduction in his support, based in the reduced costs involved in his living at St. Peter's in Mendota. I told him that I wanted to talk more about this in the next meeting.

We discussed the legal issues that he continues to face. He had not yet heard that [redacted] had filed an appeal, and this news discouraged him. The various attorneys apparently had spoken about waiting to move on the [redacted] matter until the time limit for filing an appeal in the [redacted] case expired. Now that an appeal will be filed, however, we probably need to unlink the timing on those two cases. I indicated that I would talk to our attorneys about that possibility.

Father Jeub is plainly discouraged by the delay in the moving ahead of his case. I am somewhat sympathetic to that, but also want to encourage him to spend his energy in productive work elsewhere.

KMM:md

cc: Archbishops Roach and Flynn
Mr. Fallon

STRICTLY CONFIDENTIAL

March 15, 1995

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KMM:md

cc: Archbishops Roach and Flynn
Mr. Fallon

March 15, 1995

STRICTLY CONFIDENTIAL

MEMO TO: Father Ward

FROM: Father Kevin McDonough

SUBJECT: COMPENSATION FOR FATHER JEUB

Austin, as you and I discussed briefly a few days ago, I would like to see an immediate reduction of $100 per month in the support that we are providing to Father Jeub. I am going to do some further negotiating with him and see if we can't reduce that significantly further. For the time being, however, could you please make the arrangements for that reduction?

KMM:md

cc: Archbishop Roach
Archbishop Flynn

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

Chancellor's Office 291-4405/291-4424

DATE: May 9, 1995

MEMO TO: Joan Bernet

FROM: Bill Fallon

Recently, we have been making some efforts to get the remaining Fr. Richard Jeub case settled, and an offer is currently pending. The plaintiff's attorney has advised, however, that if the case is not settled by May 16th, he is going to file it.

This is a case that was originally sued in 1992, and it is my recollection that at that time there was some press coverage, and that we prepared a news release, but it's possible I may be thinking of another case. In any event, with this new filing, if there is one, there may again be some media interest.

This case involves a long time relationship between Fr. Jeub and an adult female. Some years ago, he was evaluated, received treatment, and has been in an aftercare program since then. As you know, he has not been engaged in active ministry.

DATE: May 10, 1995

MEMO TO: Fr. Austin Ward

FROM: Fr. Kevin McDonough

SUBJECT: Fr. Richard Jeub

Recently the maintenance man at St. Peter's in Mendota quit his job unexpectedly. Fr. Kevin Clinton asked Richard Jeub, who is in residence there, to take over the position. Dick has been doing it now for a couple of weeks, and apparently it is working out well.

My understanding is that he has taken over what is already budgeted as a full-time position for that parish, and he is providing that service. He agreed with me that it would be appropriate that all of his compensation now come through St. Peter's. Austin, could you be in touch with Fr. Clinton and/or the business administrator at St. Peter's. I would like to work out the details of a transfer of that obligation as soon as possible. As long as Dick is providing essentially full-time work for them, he should be compensated as such.

cc: Archbishop Roach
Archbishop Flynn
Fr. Clinton

STRICTLY CONFIDENTIAL

DATE: May 10, 1995

MEMO TO: Archbishop Roach

FROM: Fr. Kevin McDonough

SUBJECT: Fr. Richard Jeub

Archbishop, I met on May 5 with Dick Jeub for a regularly scheduled supervisory meeting. We discussed a number of things of importance, which I will summarize below. I am sending this memo to you to raise a particular question.

For the last 18 months or so I have been recommending against a serious consideration of a pastoral placement for Jeub (except for a very restricted prison chaplaincy). Before 18 months ago, I also was opposed to a placement, but during that period because I did not think he had made sufficient progress in demonstrating empathy for victims and showing a consistent pattern of personal responsibility. Since late 1993 or early 1994, however, my opinion has changed. I have recommended against a pastoral placement, nevertheless, simply because the legal matters were pending and I did not want a parish to be exposed to that. Were it not for the potential difficulty in a parish, I would be prepared to recommend him for an associate pastor position.

It now looks as if the legal matters are going to be dragged out longer than I had expected. The [redacted] case is under appeal, and we would not expect a court of appeals decision in that much before the end of this year. We are attempting now to push the [redacted] case to some resolution, but if the [redacted] case is indicative there may be many months yet before all of that is resolved. If we continue to wait for legal matters to be cleared up before we even consider reassignment, then this may drag out into 1997, and I do not believe that there is a genuine rehabilitative reason to do so. Jeub has been deprived of his ministry for five years, which is a fairly heavy punishment, probably heavier than would have been laid against him in other professions. We may be now depriving the Church of the service of a capable priest who would come at his ministry from a very different perspective now than in the 1980s.

You will see by the copy of another memo that Jeub is currently working full-time as the maintenance man at St. Peter's in Mendota. As a result, he is not a financial burden on the Archdiocese. From that point of view, there is no time pressure to reduce costs. I am also not recommending that we move him into parochial work immediately. There are some intermediate steps, including discussing this with the Clergy Review Board and sounding out some parishes on the possibility, and

these would take some time. Would you be willing to have some discussion at the Council about whether to initiate those steps?

For the record, let me note here that in our review meeting Fr. Jeub indicated he continues to meet regularly with the priests' recovery group and with his therapist, Dr. Dolore Rockers. He has been working part-time for the Catholic Youth Camps in a fund-raising assistant position and has had good feedback about a reunion that he organized. He will return to Saint Luke's Institute in July for the final aftercare workshop, and after that he will have no further relationship with Saint Luke's. He and I have scheduled a next monitoring meeting for shortly before the Saint Luke's workshop.

cc: Archbishop Flynn
Bill Fallon

STRICTLY CONFIDENTIAL

DATE: May 10, 1995

MEMO TO: Archbishop Roach

FROM: Fr. Kevin McDonough

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For the last 18 months or so I have been recommending against a serious consideration of a pastoral placement for Jeub (except for a very restricted prison chaplaincy). Before 18 months ago, I also was opposed to a placement, but during that period because I did not think he had made sufficient progress in demonstrating empathy for victims and showing a consistent pattern of personal responsibility. Since late 1993 or early 1994, however, my opinion has changed. I have recommended against a pastoral placement, nevertheless, simply because the legal matters were pending and I did not want a parish to be exposed to that. Were it not for the potential difficulty in a parish, I would be prepared to recommend him for an associate pastor position.

It now looks as if the legal matters are going to be dragged out longer than I had expected. The [redacted] case is under appeal, and we would not expect a court of appeals decision in that much before the end of this year. We are attempting now to push the [redacted] case to some resolution, but if the [redacted] case is indicative there may be many months yet before all of that is resolved. If we continue to wait for legal matters to be cleared up before we even consider reassignment, then this may drag out into 1997, and I do not believe that there is a genuine rehabilitative reason to do so. Jeub has been deprived of his ministry for five years, which is a fairly heavy punishment, probably heavier than would have been laid against him in other professions. We may be now depriving the Church of the service of a capable priest who would come at his ministry from a very different perspective now than in the 1980s.

You will see by the copy of another memo that Jeub is currently working full-time as the maintenance man at St. Peter's in Mendota. As a result, he is not a financial burden on the Archdiocese. From that point of view, there is no time pressure to reduce costs. I am also not recommending that we move him into parochial work immediately. There are some intermediate steps, including discussing this with the Clergy Review Board and sounding out some parishes on the possibility, and

these would take some time. Would you be willing to have some discussion at the Council about whether to initiate those steps?

For the record, let me note here that in our review meeting Fr. Jeub indicated he continues to meet regularly with the priests' recovery group and with his therapist, Dr. Dolore Rockers. He has been working part-time for the Catholic Youth Camps in a fund-raising assistant position and has had good feedback about a reunion that he organized. He will return to Saint Luke's Institute in July for the final aftercare workshop, and after that he will have no further relationship with Saint Luke's. He and I have scheduled a next monitoring meeting for shortly before the Saint Luke's workshop.

cc: Archbishop Flynn
Bill Fallon

Council call up, please

May 15, 1995

MEMO TO: Fr. Kevin McDonough

FROM: Archbishop Roach

I believe it is time to turn the Jeub case over to the Clergy Review Board. Incidentally, I would hope that that Review Board would act with some dispatch about these cases. Once it's been turned over I think that there is an expectation that things are done without a lot of delay.

In a conversation with Cardinal Bernardin a few months ago I asked him how the Clergy Review Board was going there. He thought it was going extremely well, and I suspect there is some difference between the composition of their board and ours, but he indicated that they were able to make their review and their recommendation in a reasonable amount of time.

I have no problem with bringing this up at the Council, but I am prepared to follow your recommendation that this be turned over to the Review Board very quickly. The question of what kind of re-assignment is really going to be the trick.

Council call up, please

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ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

Chancellor's Office 291-4405/291-4424

DATE: May 18, 1995

MEMO TO: Fr. McDonough

FROM: Bill Fallon

cc: Archbishop Roach
Archbishop Flynn

I have placed Fr. Jeub's file on the agenda for the next Clergy Review Board Meeting on May 31st. Because there are three other cases ahead of it, I do not know that it will in fact be reached that evening, but there is a good probability as two of those cases should not take too long. I don't know whether the Review Board will feel it is advisable to take any affirmative action with respect to Fr. Jeub until the pending law suit is finally resolved, but as there is a 50/50 chance that that resolution may occur in the next several months, we should move ahead on a recommendation.

As you know, we had to cancel the last meeting of the CRB because of lack of a quorum, even though seven of nine members had previously indicated they could attend. We have meetings scheduled for the next three months, but with summer vacations and the like, there is always the chance that we may have to cancel a meeting.

I will keep you posted on the progress of this matter.

AUTHORIZATION FOR RELEASE OF INFORMATION

Re: Richard Jeub
(Name)

2-21-40
(Date of Birth and/or Soc. Sec. No.)

This is a full and sufficient authorization to permit The Archdiocese of Saint Paul and Minneapolis to release to its Clergy Review Board all information, including but not limited to medical, psychological, personnel or information which involves treatment for alcohol or drug abuse, HIV, or mental problems. The undersigned hereby waiving all of his rights under federal and state law in relation thereto. The information is needed for the purpose of review of present status, accusations of misconduct and related purposes.

This authorization specifically includes records prepared prior to the date of this authorization and records prepared after the date of this authorization during the pendency of this proceeding, including claims and potential claims.

I understand that I may revoke this consent in writing at any time, but that such revocation may adversely affect the course of the proceeding requiring these records.

Date: 5-27-95

Richard H Jeub
Signature

TAB 26

AUTHORIZATION FOR RELEASE OF INFORMATION

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(Name)

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Richard H. Jeub
Signature

TAB 13

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

Chancellor's Office 291-4405/291-4424

DATE: June 26, 1995

MEMO TO: Clergy Review Board

FROM: Bill Fallon

SUBJECT: Fr. J.R.

Fr. J.R. was born in 1940, ordained in 1966, and has served in variety of assignments including associate pastor, hospital chaplain, and pastor. He was relieved from assignment as pastor in 1991 because of two law suits brought against him by adult women alleging sexual misconduct.

The first of several other complaints against Fr. J.R. was received in 1987 alleging sexual exploitation against an adult woman between 1976 and 1982. At that time, he was confronted by Bishop Carlson and Fr. O'Connell. He admitted to the relationship which grew out of a counseling meeting in The relationship was intimate and apparently sexual. She alleged, and he later admitted, that he had an interest in pornography.

Fr. J.R. was evaluated by the Servants of the Paraclete in New Mexico in September, 1987. He stated that the sexual portion of the relationship had been distorted, as it occurred only during a few years of their many year relationship. He did, however, admit that he had been sexually involved with nearly a dozen women during the past twenty years. "They have all started with him being in a helping or counselling role which extended to friendship and ultimately resolved in sexual contact." He stated that he cares too much for people, is too generous to them, and cannot say "no" to other people. A summary of the report from the Servants is attached.

Thereafter, Fr. J.R. was referred to Dr. Gary Schoener, who reported in April, 1988, that as he has gotten older, Fr. J.R. has become aware that he experienced drives for family and sex which would be normal for a lay person to be able to satisfy by being married. This nature of his relationship has often been very much that of something like a husband as much as a helper. Dr. Schoener recommended that he continue to abstain from sex with a parishioner, who he was then in a relationship with, that he see Fr. (doctor) Ken Pierre, another psychologist, to explore what's going on in his life, and that he seek strong spiritual direction. Subsequently,

Fr. O'Connell reported to the Archbishop that, in his view, Dr. Schoener's evaluation basically presented a judgement of Fr. J.R's not having any psychological problems, but rather a fundamental issue of moral choice around his state in life and his celibacy. He recommended that he immediately begin counselling with Fr. Eugene Merz. (At the same time Fr. J.R. was placed under ministerial probation, which entailed not being able to have unsupervised relationships with females.)

In October, 1989, the Chancery was advised by a third party that Fr. J.R. was and had been involved in a relationship with [redacted] for the past four years. This apparently the woman mentioned in Dr. Schoener's report.

On November 8, 1989, Fr. McDonough memoed Fr. O'Connell concerning his meeting with Fr. J.R. the previous week concerning his relationship with [redacted]. He stated he had continued his relationship with her because she had threatened otherwise. Fr. McDonough tried to help him see how unbalanced his relationship with her was, as well as pointing out that he was violating the terms of his probationary status. On November 13th Fr. McDonough advised Fr. O'Connell that he had met with Fr. J.R. that day and that the latter wanted to terminate his relationship with [redacted]. On November 27th Bishop Carlson and Fr. McDonough met with Fr. J.R. He recognized that in order to stay in the priesthood he had to terminate his relationship with [redacted]. They wanted him to get her back to her counselor and to meet her only in the presence of the counselor. Regarding Fr. J.R's support systems: he is working with Fr. Merz as a spiritual director and as a support group, in which he has a good deal of reliance. Consequently, he advised [redacted] hat he would no longer visit with her, but they continued to talk on the phone. She had returned to her counselor, who apparently didn't feel it was a good idea for her to meet with Fr. J.R. in his presence.

On December 8, 1989, Fr. McDonough memoed Archbishop Roach, Bishop Carlson and Fr. O'Connell that he had met with Fr. J.R. and [redacted] on that date. Fr. J.R. previously told Fr. McDonough that he had been unsuccessful in meeting with her and her therapist. [redacted] stated that she was angry at Fr. J.R. for attempting to break up their relationship, and she wanted to be sure that he would not in a position to victimized anyone else. Fr. J.R. again advised her that he wanted the relationship to end. She said that she did not believe that the relationship was over. Fr. J.R. had put himself in a position of providing relatively substantially economic support to her, which he was willing to continue for some months. She said she was not interested in receiving any more money. They then discussed disciplinary measures for Fr. J.R., including the restriction of unsupervised meetings with women. [redacted] had no special requests.

On January 17th [redacted] advised Fr. McDonough that she and Fr. J.R. were unable to carry out their decision to end their sexual relationship. She stated that she still loved and cared about him, and believed that he still loved and cared about her. She stated

also that since the December meeting they have continued to talk, and both were having a very hard time of letting go. On February 9th Fr. McDonough advised [redacted] that he was concerned that Fr. J.R. was not moving quickly enough to clarify his relationship with her, and that he had asked Fr. J.R. to go to St. Luke's Institute for evaluation, which he did.

February 26, 1990, Fr. McDonough memoed Archbishop Roach and others concerning his meeting on February 23rd with a psychiatrist at St. Luke's. Tests suggest relatively major psychopathology, serious impulse control problems and unmodulated emotional display. He had very strong un-met affection needs and loneliness, as well as evidence of low self-esteem and low ability to deal with stress. He has an impulse control disorder, particularly in regard to affection needs. He is immature, has a striking lack of empathy in regard to the effect of his actions in others and a real lack of effective boundaries. He concluded by recommending inpatient treatment.

On March 30th, Ron Meshbesher advised Fr. McDonough that he was representing in a law suit against Fr. J.R. and the Archdiocese. He asked for a preliminary meeting.

On May 30, 1990, Fr. J.R. began his treatment at St. Luke's Institute. On July 31st, St. Luke's Institute reported that he was making good progress, exploring his compulsive behaviors, and the impact of those behaviors on himself and others.

On September 12, 1990, Andy Eisenzimmer advised Ron Meshbesher that the Archdiocese will pay [redacted] a month until her claim was resolved. (These payments continued until Spring 1995.)

On September 19th St. Luke's advised Fr. McDonough that Fr. J.R. was making satisfactory progress. Some conerns remained concerning his participation in group therapy.

On November 30th Fr. McDonough reported to Archbishop Roach that he had met on November 28th with Fr. J.R. and his therapist at St. Luke's. The news was relatively good. He had made important progress, but "specific agenda items remain to be addressed before he is ready to return to work." He concluded by recommending that he remain at St. Luke's for six to eight additional weeks.

On November 30th, Fr. McDonough met with [redacted], her therapist and attorney. She recounted three incidents in which Fr. J.R. had engaged her in sexual conduct, though not intercourse. The first was when she was in the [redacted] grade. He wrapped his arms around her and later kissed her. Two other similar incidents followed. (These incidents apparently occurred some years earlier.) She also reported that she saw Fr. J.R. passionately kissing and embracing on a trip to Cedar Rapids, Iowa. The meeting concluded with a discussion of financial damages and compensation, but without resolution.

On December 28, 1990, met with Phyllis Willerscheidt and Bishop Welsh to express her concerns that others would not have to experience the pain she has had, and what assignment is planned for Fr. J.R. (In the file at this point, are a number of memoed back and forth between various diocesan officials and St. Luke's concerning future work for Fr. J.R., recognizing that he could not return to full time ministry for some time, and including the memo from the Archbishop that he not return to public ministry for some time.)

Fr. J.R. was discharged from St. Luke's on January 15, 1991, subject to a continuing care contract which he signed relating to future work in psycho-sexual health, physical health and well being, emotional and intra-psychic health, vocational development and spiritual growth.

It should be noted that since his discharge from St. Luke's until the present time (July 1995) Fr. J.R. has not returned to either full or part-time ministry, although he has been permitted on occasion to con-celebrate funeral masses. He has been employed and largely self-supporting through a variety of maintenance and similar type work. He has resided principally in several parish rectories.

March 15, 1991, Phyllis Willerscheidt memoed the Archbishop advising him of the complaint of [redacted] who claims to have been sexually exploited by Fr. J.R. prior to 1987. She also had information about other victims.

May 22, 1991, Fr. McDonough wrote to a former pastor of a parish to which Fr. J.R. was assigned concerning allegations of sexual exploitation by Fr. J.R. of [redacted] and what his recollection was of that situation.

The pastor responded that he had no recollection of the allegation.

August 19, 1991, St. Luke's Institute wrote the Archbishop advising of Fr. J.R. attendance at a workshop. It concluded that he has made solid efforts to begin the process of recovery. He has made efforts to establish a recovery network. He will return in five months.

April 11, 1991, Fr. McDonough memoed the Archbishop concerning allegations of [redacted] of sexual abuse by Fr. J.R. She was a friend of [redacted], and their stories were similar. She as a teenager, both being explicitly aimed at showing Fr. J.R. how badly he had hurt her. She struggled with problems as an adult. She stated that they had engaged in fairly explicit sexual contact. She was later hospitalized for

(Beginning in November of 1991 and periodically to the present time, there appear memos in the file concerning monitoring meetings between Fr. McDonough and Fr. J.R. which contained very general information concerning his progress, activities, employment and related matters, which in the interest of brevity, will not be summarized.)

In April of 1992 there is further correspondence in a memo concerning the continuing support for counselling costs being provided to [redacted] and a letter from Andy Eisenzimmer raising the question as to whether she had been abused by Fr. J.R. in the 1980's or earlier in 1976, while he was assigned in St. Paul. Fr. McDonough responded by stating that the abuse occurred in the beginning of 1976.

November 1991, Andy Eisenzimmer advised Fr. McDonough that he has settled the [redacted] claim for $[redacted].

In a memo dated February 1, 1991, Fr. McDonough indicated that [redacted] first contacted Bishop Carlson in 1987 and provided the first information about Fr. J.R's pattern with women. At that time, she had an appointment with the Archbishop, but she cancelled it. In 1991 she wrote to reschedule that appointment as part of her process of returning to the Church. That meeting was held in March 1991. Therapy for this victim has been paid since Bishop Carlson committed to it in 1987, concluding reiteration for earlier costs -- a total of over $12,000.00

February 4, 1993, St. Luke's Institute wrote the Archbishop that Fr. J.R. attended a workshop in January, and that he seemed to be enjoying the benefits of his recovery. He was affirmed by group members around the changes they had seen in him since he entered St. Luke's for treatment. He acknowledged shame around his legal matters.

July 14, 1992, St. Luke's wrote the Archbishop that Fr. J.R. recently attended a workshop and that he appeared to be benefiting from various activities that support his ongoing recovery. He was making notable progress in his ability to recognize his own needs and feelings. The only specific concern discussed is that he was attending somewhat fewer twelve step fellowship meetings than is usually the case with persons at his point in recovery.

April 1, 1992, Fr. McDonough advised Archbishop Roach that he had met with [redacted] on March 30th. She stated that she is healing, and that she was getting married in two weeks.

In a memo dated November 18, 1991, Fr. McDonough indicated another complaint about Fr. J.R. by [redacted], which he mistakenly believed to be by another priest. This victim was primarily concerned with the treatment Fr. J.R. was receiving. Fr. J.R. had not been confronted about this complaint. No details of her complaint were stated.

November 30, 1993, Fr. McDonough wrote to St. Luke's institute in response to their request for information for a workshop with Fr. J.R. in January 1994. He stated that he is pleased with the progress Fr. J.R. has made in two of three areas. First he has spontaneously shown genuine empathy for his victims, and other similarly injured. Second, he has been straightforward in owning up to his own misconduct, even in fairly public situations. In the

third area, he comments that he has ongoing concern. Fr. J.R. has been passive about seeking out productive and engaging work. In large part, this is due to the fact that the Archdiocese has not been of great financial assistance, but he has not found any consistent activity, although he seems to be a little more aggressive in recent months.

February 1, 1994, St. Luke's wrote Fr. McDonough indicating Fr. J.R. attended a workshop the previous month, and that he appeared to be more confident than six months earlier, partly due to a decrease in stress in his personal life. He reported a greater awareness of how his need to rescue others has figured into his relationships, and he has managed to avoid acting in this compulsive way.

In November 1994, the law suit filed by [redacted] was tried to a jury in Minneapolis. Fr. J.R. testified that while he may have on one or two occasions kissed [redacted] that was the extent of his sexual contact with her. After a five week trial, the jury found in favor of Fr. J.R. and the other defendants after deliberating for approximately 25 minutes.

January 23, 1995, St. Luke's wrote to Fr. McDonough indicating Fr. J.R. attended a workshop the preceding month, and that based on information from his sister-in-law and others, he seems to be recovering positively, but can occasionally become perfectionistic or seem to want to be perceived more right than others. He suggested that he maintain his awareness of this, and that he use his recovery related resources to work on his ability to let go of these struggles. He should continue to work towards a more proactive and less passive approach to life.

May 10, 1995, Fr. McDonough wrote to Archbishop Roach following his May 5th regular supervisory meeting, stating that for the 18 months or so, he had been recommending against serious consideration of a parish placement. However. since late 1993 or early 1994, his opinion has changed. Were it not for the potential difficulty in a parish because of pending legal matters, he would recommend him for an associate pastor position. Now, because it was going to take longer than anticipated to resolve the legal matters, he does not believe there is a genuine rehabilitative reason to delay any further. Fr. J.R. has been deprived of his ministry for five years, and the Church may be deprived of the services of a capable priest, who has now comes at his ministry with a very different perspective, than in the 1980. He does not recommend moving him to parochial work immediately. There are intermediate steps, such as working with the Clergy Review Board to be taken. Fr. J.R. continues to meet regularly with his recovery group and his therapist. He will return next month to St. Luke's for the final aftercare workshop.

Sub File

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

Chancellor's Office 291-4405/291-4424

DATE: June 26, 1995

MEMO TO: Clergy Review Board

FROM: Bill Fallon

SUBJECT: Fr. J.R.

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Thereafter, Fr. J.R. was referred to Dr. Gary Schoener, who reported in April, 1988, that as he has gotten older, Fr. J.R. has become aware that he experienced drives for family and sex which would be normal for a lay person to be able to satisfy by being married. This nature of his relationship has often been very much that of something like a husband as much as a helper. Dr. Schoener recommended that he continue to abstain from sex with a parishioner, who he was then in a relationship with, that he see Fr. (doctor) Ken Pierre, another psychologist, to explore what's going on in his life, and that he seek strong spiritual direction. Subsequently,

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Summary & Conclusions

Fr. J. R[redacted] has been accused not only of being a priest who has been in sexual relations, but also as an individual who takes advantage of his more powerful position and "victimizes" women who are feeling weak and vulnerable. That is a very serious allegation in general, and also to him personally. Even in considering any possible truth to this, R[redacted] finds it extremely noxious and painful to think about. He discusses very honestly the involvements he has had, the pattern of those and how they have occurred, and expresses regret over these relationships. He does not, in my opinion, fully understand all the dynamics and factors which have led him to repeatedly be involved in sexual and romantic relationships, even presently. His own underlying needs and motives seem to be quite out of his grasp, and his view is that it is always part of his response in a helping and giving context.

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Thank you for the opportunity of participating in the evaluation of Father J R[redacted]. I hope that these suggestions are helpful in determining a final recommendation, so that he can receive the help that he wants and needs.

Sarah Gaughan, Ph.D.
Certified Psychologist

Sub File

ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS

Chancellor's Office 291-4405/291-4424

DATE: June 26, 1995

MEMO TO: Clergy Review Board

FROM: Bill Fallon

SUBJECT: Fr. J.R.

Fr. J.R. was born in 1940, ordained in 1966, and has served in variety of assignments including associate pastor, hospital chaplain, and pastor. He was relieved from assignment as pastor in 1991 because of two law suits brought against him by adult women alleging sexual misconduct.

The first of several other complaints against Fr. J.R. was received in 1987 alleging sexual exploitation against an adult woman between 1976 and 1982. At that time, he was confronted by Bishop Carlson and Fr. O'Connell. He admitted to the relationship which grew out of a counseling meeting in the . The relationship was intimate and apparently sexual. She alleged, and he later admitted, that he had an interest in pornography.

Fr. J.R. was evaluated by the Servants of the Paraclete in New Mexico in September, 1987. He stated that the sexual portion of the relationship had been distorted, as it occurred only during a few years of their many year relationship. He did, however, admit that he had been sexually involved with nearly a dozen women during the past twenty years. "They have all started with him being in a helping or counselling role which extended to friendship and ultimately resolved in sexual contact." He stated that he cares too much for people, is too generous to them, and cannot say "no" to other people. A summary of the report from the Servants is attached.

Thereafter, Fr. J.R. was referred to Dr. Gary Schoener, who reported in April, 1988, that as he has gotten older, Fr. J.R. has become aware that he experienced drives for family and sex which would be normal for a lay person to be able to satisfy by being married. This nature of his relationship has often been very much that of something like a husband as much as a helper. Dr. Schoener recommended that he continue to abstain from sex with a parishioner, who he was then in a relationship with, that he see Fr. (doctor) Ken Pierre, another psychologist, to explore what's going on in his life, and that he seek strong spiritual direction. Subsequently,

Fr. O'Connell reported to the Archbishop that, in his view, Dr. Schoener's evaluation basically presented a judgement of Fr. J.R's not having any psychological problems, but rather a fundamental issue of moral choice around his state in life and his celibacy. He recommended that he immediately begin counselling with Fr. Eugene Merz. (At the same time Fr. J.R. was placed under ministerial probation, which entailed not being able to have unsupervised relationships with females.)

In October, 1989, the Chancery was advised by a third party that Fr. J.R. was and had been involved in a relationship with [redacted] for the past four years. This apparently the woman mentioned in Dr. Schoener's report.

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On December 8, 1989, Fr. McDonough memoed Archbishop Roach, Bishop Carlson and Fr. O'Connell that he had met with Fr. J.R. and [redacted] on that date. Fr. J.R. previously told Fr. McDonough that he had been unsuccessful in meeting with her and her therapist. [redacted] stated that she was angry at Fr. J.R. for attempting to break up their relationship, and she wanted to be sure that he would not in a position to victimized anyone else. Fr. J.R. again advised her that he wanted the relationship to end. She said that she did not believe that the relationship was over. Fr. J.R. had put himself in a position of providing relatively substantially economic support to her, which he was willing to continue for some months. She said she was not interested in receiving any more money. They then discussed disciplinary measures for Fr. J.R., including the restriction of unsupervised meetings with women. [redacted] had no special requests.

On January 17th [redacted] advised Fr. McDonough that she and Fr. J.R. were unable to carry out their decision to end their sexual relationship. She stated that she still loved and cared about him, and believed that he still loved and cared about her. She stated

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February 26, 1990, Fr. McDonough memoed Archbishop Roach and others concerning his meeting on February 23rd with a psychiatrist at St. Luke's. Tests suggest relatively major psychopathology, serious impulse control problems and unmodulated emotional display. He had very strong un-met affection needs and loneliness, as well as evidence of low self-esteem and low ability to deal with stress. He has an impulse control disorder, particularly in regard to affection needs. He is immature, has a striking lack of empathy in regard to the effect of his actions in others and a real lack of effective boundaries. He concluded by recommending inpatient treatment.

On March 30th, Ron Meshbesher advised Fr. McDonough that he was representing [redacted] in a law suit against Fr. J.R. and the Archdiocese. He asked for a preliminary meeting.

On May 30, 1990, Fr. J.R. began his treatment at St. Luke's Institute. On July 31st, St. Luke's Institute reported that he was making good progress, exploring his compulsive behaviors, and the impact of those behaviors on himself and others.

On September 12, 1990, Andy Eisenzimmer advised Ron Meshbesher that the Archdiocese will pay [redacted] $750.00 a month until her claim was resolved. (These payments continued until Spring 1995.)

On September 19th St. Luke's advised Fr. McDonough that Fr. J.R. was making satisfactory progress. Some conerns remained concerning his participation in group therapy.

On November 30th Fr. McDonough reported to Archbishop Roach that he had met on November 28th with Fr. J.R. and his therapist at St. Luke's. The news was relatively good. He had made important progress, but "specific agenda items remain to be addressed before he is ready to return to work." He concluded by recommending that he remain at St. Luke's for six to eight additional weeks.

On November 30th, Fr. McDonough met with [redacted], her therapist and attorney. She recounted three incidents in which Fr. J.R. had engaged her in sexual conduct, though not intercourse. The first was when she was in the [redacted] grade. He wrapped his arms around her and later kissed her. Two other similar incidents followed. (These incidents apparently occurred some years earlier.) She also reported that she saw Fr. J.R. passionately kissing and embracing on a trip to Cedar Rapids, Iowa. The meeting concluded with a discussion of financial damages and compensation, but without resolution.

On December 28, 1990, [redacted] met with Phyllis Willerscheidt and Bishop Welsh to express her concerns that others would not have to experience the pain she has had, and what assignment is planned for Fr. J.R. (In the file at this point, are a number of memoed back and forth between various diocesan officials and St. Luke's concerning future work for Fr. J.R., recognizing that he could not return to full time ministry for some time, and including the memo from the Archbishop that he not return to public ministry for some time.)

Fr. J.R. was discharged from St. Luke's on January 15, 1991, subject to a continuing care contract which he signed relating to future work in psycho-sexual health, physical health and well being, emotional and intra-psychic health, vocational development and spiritual growth.

It should be noted that since his discharge from St. Luke's until the present time (July 1995) Fr. J.R. has not returned to either full or part-time ministry, although he has been permitted on occasion to con-celebrate funeral masses. He has been employed and largely self-supporting through a variety of maintenance and similar type work. He has resided principally in several parish rectories.

March 15, 1991, Phyllis Willerscheidt memoed the Archbishop advising him of the complaint of [redacted] who claims to have been sexually exploited by Fr. J.R. prior to 1987. She also had information about other victims.

May 22, 1991, Fr. McDonough wrote to a former pastor of a parish to which Fr. J.R. was assigned concerning allegations of sexual exploitation by Fr. J.R. of [redacted] and what his recollection was of that situation.

The pastor responded that he had no recollection of the allegation.

August 19, 1991, St. Luke's Institute wrote the Archbishop advising of Fr. J.R. attendance at a workshop. It concluded that he has made solid efforts to begin the process of recovery. He has made efforts to establish a recovery network. He will return in five months.

April 11, 1991, Fr. McDonough memoed the Archbishop concerning allegations of [redacted] of sexual abuse by Fr. J.R. She was a friend of [redacted], and their stories were similar. She [redacted] as a teenager, both being explicitly aimed at showing Fr. J.R. how badly he had hurt her. She struggled with [redacted] as an adult. She stated that they had engaged in fairly explicit sexual contact.

(Beginning in November of 1991 and periodically to the present time, there appear memos in the file concerning monitoring meetings between Fr. McDonough and Fr. J.R. which contained very general information concerning his progress, activities, employment and related matters, which in the interest of brevity, will not be summarized.)

In April of 1992 there is further correspondence in a memo concerning the continuing support for counselling costs being provided to [redacted] and a letter from Andy Eisenzimmer raising the question as to whether she had been abused by Fr. J.R. in the 1980's or earlier in 1976, while he was assigned in St. Paul. Fr. McDonough responded by stating that the abuse occurred in the beginning of 1976.

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Sent File

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Fr. J.R. was discharged from St. Luke's on January 15, 1991, subject to a continuing care contract which he signed relating to future work in psycho-sexual health, physical health and well being, emotional and intra-psychic health, vocational development and spiritual growth.

It should be noted that since his discharge from St. Luke's until the present time (July 1995) Fr. J.R. has not returned to either full or part-time ministry, although he has been permitted on occasion to con-celebrate funeral masses. He has been employed and largely self-supporting through a variety of maintenance and similar type work. He has resided principally in several parish rectories.

March 15, 1991, Phyllis Willerscheidt memoed the Archbishop advising him of the complaint of [redacted] who claims to have been sexually exploited by Fr. J.R. prior to 1987. She also had information about other victims.

May 22, 1991, Fr. McDonough wrote to a former pastor of a parish to which Fr. J.R. was assigned concerning allegations of sexual exploitation by Fr. J.R. of [redacted] and what his recollection was of that situation.

The pastor responded that he had no recollection of the allegation.

August 19, 1991, St. Luke's Institute wrote the Archbishop advising of Fr. J.R. attendance at a workshop. It concluded that he has made solid efforts to begin the process of recovery. He has made efforts to establish a recovery network. He will return in five months.

April 11, 1991, Fr. McDonough memoed the Archbishop concerning allegations of [redacted] of sexual abuse by Fr. J.R. She was a friend of [redacted], and their stories were similar. She a teenager, both being explicitly aimed at showing Fr. J.R. how badly he had hurt her. She struggled with as an adult. She stated that they had engaged in fairly explicit sexual contact.

(Beginning in November of 1991 and periodically to the present time, there appear memos in the file concerning monitoring meetings between Fr. McDonough and Fr. J.R. which contained very general information concerning his progress, activities, employment and related matters, which in the interest of brevity, will not be summarized.)

In April of 1992 there is further correspondence in a memo concerning the continuing support for counselling costs being provided to [redacted] and a letter from Andy Eisenzimmer raising the question as to whether she had been abused by Fr. J.R. in the 1980's or earlier in 1976, while he was assigned in St. Paul. Fr. McDonough responded by stating that the abuse occurred in the beginning of 1976.

November 1991, Andy Eisenzimmer advised Fr. McDonough that he has settled the [redacted] claim for $[redacted].

In a memo dated February 1, 1991, Fr. McDonough indicated that [redacted] first contacted Bishop Carlson in 1987 and provided the first information about Fr. J.R's pattern with women. At that time, she had an appointment with the Archbishop, but she cancelled it. In 1991 she wrote to reschedule that appointment as part of her process of returning to the Church. That meeting was held in March 1991. Therapy for this victim has been paid since Bishop Carlson committed to it in 1987, concluding reiteration for earlier costs -- a total of over $[redacted]

February 4, 1993, St. Luke's Institute wrote the Archbishop that Fr. J.R. attended a workshop in January, and that he seemed to be enjoying the benefits of his recovery. He was affirmed by group members around the changes they had seen in him since he entered St. Luke's for treatment. He acknowledged shame around his legal matters.

July 14, 1992, St. Luke's wrote the Archbishop that Fr. J.R. recently attended a workshop and that he appeared to be benefiting from various activities that support his ongoing recovery. He was making notable progress in his ability to recognize his own needs and feelings. The only specific concern discussed is that he was attending somewhat fewer twelve step fellowship meetings than is usually the case with persons at his point in recovery.

April 1, 1992, Fr. McDonough advised Archbishop Roach that he had met with [redacted] on March 30th. She stated that she is healing, and that she was getting married in two weeks.

In a memo dated November 18, 1991, Fr. McDonough indicated another complaint about Fr. J.R. by [redacted] which he mistakenly believed to be by another priest. This [redacted] was primarily concerned with the treatment Fr. J.R. was receiving. Fr. J.R. had not been confronted about this complaint. No details of her complaint were stated.

November 30, 1993, Fr. McDonough wrote to St. Luke's institute in response to their request for information for a workshop with Fr. J.R. in January 1994. He stated that he is pleased with the progress Fr. J.R. has made in two of three areas. First he has spontaneously shown genuine empathy for his victims, and other similarly injured. Second, he has been straightforward in owning up to his own misconduct, even in fairly public situations. In the

third area, he comments that he has ongoing concern. Fr. J.R. has been passive about seeking out productive and engaging work. In large part, this is due to the fact that the Archdiocese has not been of great financial assistance, but he has not found any consistent activity, although he seems to be a little more aggressive in recent months.

February 1, 1994, St. Luke's wrote Fr. McDonough indicating Fr. J.R. attended a workshop the previous month, and that he appeared to be more confident than six months earlier, partly due to a decrease in stress in his personal life. He reported a greater awareness of how his need to rescue others has figured into his relationships, and he has managed to avoid acting in this compulsive way.

In November 1994, the law suit filed by [redacted] was tried to a jury in Minneapolis. Fr. J.R. testified that while he may have on one or two occasions kissed [redacted], that was the extent of his sexual contact with her. After a five week trial, the jury found in favor of Fr. J.R. and the other defendants after deliberating for approximately 25 minutes.

January 23, 1995, St. Luke's wrote to Fr. McDonough indicating Fr. J.R. attended a workshop the preceding month, and that based on information from his sister-in-law and others, he seems to be recovering positively, but can occasionally become perfectionistic or seem to want to be perceived more right than others. He suggested that he maintain his awareness of this, and that he use his recovery related resources to work on his ability to let go of these struggles. He should continue to work towards a more proactive and less passive approach to life.

May 10, 1995, Fr. McDonough wrote to Archbishop Roach following his May 5th regular supervisory meeting, stating that for the 18 months or so, he had been recommending against serious consideration of a parish placement. However. since late 1993 or early 1994, his opinion has changed. Were it not for the potential difficulty in a parish because of pending legal matters, he would recommend him for an associate pastor position. Now, because it was going to take longer than anticipated to resolve the legal matters, he does not believe there is a genuine rehabilitative reason to delay any further. Fr. J.R. has been deprived of his ministry for five years, and the Church may be deprived of the services of a capable priest, who has now comes at his ministry with a very different perspective, than in the 1980. He does not recommend moving him to parochial work immediately. There are intermediate steps, such as working with the Clergy Review Board to be taken. Fr. J.R. continues to meet regularly with his recovery group and his therapist. He will return next month to St. Luke's for the final aftercare workshop.

STRICTLY CONFIDENTIAL

July 5, 1995

MEMO TO: **THE FILE OF RICHARD JEUB**

FROM: **Father Kevin McDonough**

SUBJECT: **REGULAR REVIEW MEETING**

I met with Father Jeub on June 30. This was our regularly scheduled review meeting. Among issues discussed were these:

We talked about the status of the lawsuit being brought by [redacted]. We had had correspondence from her attorney a week before the meeting with Father Jeub, and the attorney indicated his intention to file the lawsuit. I had communicated this by telephone to Father Jeub earlier in the same week, but we reviewed it again in my office.

We then discussed the question of his possible reassignment being reviewed by our Archdiocesan Clergy Review Board. He told me that Bill Fallon had already called him to obtain a release, and that he was curious to have more information about the purpose and functioning of the board. I gave him history of the board concept and told him how its procedures were evolving. I indicated that they were advisory to the Archbishop. I told him that I believed we were ready to recommend a return to parochial ministry for him, although as an associate pastor rather than as a pastor. He was pleased with this news, but also understood the necessity of having other people review his history.

Third and finally, we reviewed the usual issues that go into a regular review meeting. He indicated that he is participating in both of his support groups and in therapy with Dr. Rockers. He is now working full-time as the maintenance man for St. Peter's Parish in Mendota and is able to accommodate the schedule there so that he can do all of his work and still participate in therapy and other responsibilities. He has been doing some part time work still in the fund raising organization for Catholic Youth Camps Incorporated, but that has diminished as the responsibilities at St. Peter's have become full time. He continues to enjoy the living situation at St. Peter's and has found genuine support and encouragement in recovery there. He is working on his lake cabin and spending a good deal of time with his brother in doing so.

Father Jeub "checked out" very well in the meeting. I continue to be supportive of our looking at his working in a parish setting, under supervision, as the legal and publicity factors make that more possible.

KMM:md

cc: Archbishop Roach, Archbishop Flynn, Mr. Fallon

JEUB6

STRICTLY CONFIDENTIAL

July 5, 1995

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KMM:md

cc: Archbishop Roach, Archbishop Flynn, Mr. Fallon

JEUB6

July 5, 1995

Mr. Michael Brenneis, MA, M.Div, CPC
Saint Luke Institute
2420 Brooks Drive
Suitland, Maryland 20746-5294

Dear Mr. Brenneis,

I understand that Father Richard Jeub is returning to Saint Luke for a Continuing Care Workshop in early July. I am his ecclesiastical supervisor and therefore I am writing to provide you with background information about him.

Rather than duplicate other work that has already been done, I am enclosing copies of final memoranda created as a follow-up to supervisory meetings that I have held with Father Jeub. I think that that will give you a good summary of how we have worked together, what issues have been addressed and how he seems to be following through on his responsibilities. As you can see, I believe that in general he has been very cooperative and is recovering well.

Thank you for your work with Father Jeub. I look forward to receiving the results of your review with him.

Sincerely yours in Christ,

Reverend Kevin M. McDonough
Vicar General
Moderator of the Curia

KMM:md

Encl.

faxed
mailed

Saint Luke Institute

July 14, 1995

Confidential

Reverend Kevin M. McDonough
Vicar for Priests
Archdiocese of St. Paul-Minneapolis
226 Summit Avenue
St. Paul, Minnesota 55102

Re: Reverend Richard Jeub
SLI #12198

Dear Father McDonough,

Father Jeub attended a workshop with us the week of July 10-14, 1995 as part of his Continuing Care program. We want to inform you at this time regarding his progress in recovery.

The following is our perception of Father Jeub's progress in his ongoing recovery:

1. Recovery Program: This was Father Jeub's eighth and final Continuing Care workshop according to the terms of his Continuing Care Contract. He reports no relapse into inappropriate sexual behavior over the past six months and reports no significant temptation toward relapse during that same period of time. He comes to this workshop feeling a greater sense of centeredness and self-awareness than he has ever felt in the past, but, at the same time, experiences a certain sense of discouragement around the fact that his legal difficulties seem to go on and on without any sign of ending, and this results in the possibility of his return to ministry being put off for longer and longer periods as the legal situations continue. Father Jeub seems to be coping with his discouragement in acceptable ways, by using his support systems, by keeping himself busy with other employment, and by keeping in communication with the diocese about his situation. He has also been hearing accurately the message that some ministry could eventually be possible for him if the legalities could be settled. Father Jeub seems to have taken a great deal of encouragement from this message and it seems to keep him going even while he continues to wait for the resolution of these issues.

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Affiliated with the Daughters of Charity, National Health System

Father Jeub stated, appropriately, that he will miss continued participation in Continuing Care because it has been a great support and encouragement for him, but he also seems ready to move on to other things and to depend more on his support system in Minnesota for what he needs. Presently, he sees his individual psychotherapist on a monthly basis and, as he was doing earlier in the year, he continues to attend a monthly support group for priests, a weekly 12-Step meeting, and a post-treatment followup group that meets twice a month. These resources seem to be of increasing help to Father Jeub and he seems to be making positive use of them in his ongoing recovery efforts.

2. Current Living Experience/ Vocational Functioning: Father Jeub has continued to live in the rectory at Mendota and has recently been employed as the maintenance director for the parish where he lives. In addition to this, he does some part-time work doing fund raising for the Catholic youth camps, and between both positions, he seems to be staying appropriately busy with productive jobs. He has maintained a helpful level of contact with the diocese and with fellow priests and seems to be encouraged by the continued contact and affirmation that he has received there. As always, he hopes for a resolution of his issues so he can move back into ministry and he experiences himself as one who now has a greater ability to minister than he has ever had in the past. Our impressions of Father Jeub are that this is an accurate observation, and we hope for him the opportunity to use these new resources in the future.

3. Medical: During the course of the workshop we monitor physical health through the use of various laboratory indices. For the most part, Father Jeub's laboratory results fell within normal limits. The exceptions to this were probably chance fluctuations that have little to do with overall health, but, at the same time, we recommend that he share these results with his personal physician so that they might become part of his permanent medical record and, if further interventions are needed, they can be determined at that time. However, for the most part, Father Jeub seems to be taking good care of himself from a physical perspective and we would like to commend him for this.

4. Recommendations and Treatment Plan: All in all, we wish to affirm Father Jeub for his positive use of our Continuing Care program over the past several years, and we wish to reflect that collateral letters that we have received from you, Father McDonough, from Father Jeub's pastor, from his psychotherapist, and from another of his fellow priests all seem to indicate that Father Jeub is being perceived as one who is making good progress, coming to grips with the circumstances of his life in a positive way, and who is doing positive things in order to care for himself on a regular basis. He seems to have grown in his ability to empathize with the women with whom he had relationships in the past and, at the same time, seems to be able to stand his ground and affirm himself for the positive attempts that he has made to recover from his negative behavior. All in all, it would seem that if Father Jeub continues to work at his recovery program, if he continues to practice self-care, and if he continues to receive the feedback of others

with respect to his ongoing personal issues, then his recovery should continue and the risk of further acting out will be low. Therefore, we encourage Father Jeub to guard himself against complacency, to continue working at his recovery program, and to reap the benefits of doing so. All in all, we would like to congratulate Father Jeub on the completion of his Continuing Care program and wish him the best in the future.

A copy of this letter is being sent to Father Jeub for his reflections. If you have any questions regarding this report, please contact us.

We thank you for the support you offer to Father Jeub. We believe that a life of sobriety helps him to continue in his life-giving ministry with God's people. We ask for your prayers in behalf of the many clergy and religious persons whom we serve and to continued blessings on the work of the Institute.

Sincerely,

Michael J Brenneis, MA, MDiv, CPC

Michael J. Brenneis, MA, MDiv, CPC
Continuing Care Therapist

Stephen Montana PhD

Stephen Montana, PhD
Director of Clinical Services

Frank Valcour, MD
Medical Director and
Vice-President for Clinical Affairs

MB/bml
cc: Rev. Richard Jeub

Saint Luke Institute

July 14, 1995

Confidential

Reverend Kevin M. McDonough
Vicar for Priests
Archdiocese of St. Paul-Minneapolis
226 Summit Avenue
St. Paul, Minnesota 55102

Re: [redacted]

Dear Father McDonough,

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A copy of this letter is being sent to Father [redacted] for his reflections. If you have any questions regarding this report, please contact us.

We thank you for the support you offer to Father [redacted]. We believe that a life of sobriety helps him to continue in his life-giving ministry with God's people. We ask for your prayers in behalf of the many clergy and religious persons whom we serve and to continued blessings on the work of the Institute.

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