

STATE OF MICHIGAN 18 JUDICIAL DISTRICT 3RD JUDICIAL CIRCUIT	COMPLAINT FELONY	DISTRICT: CIRCUIT: CTN: 96-19900747-01 MSP #: 2019900747
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District Court ORI: MI820115J Circuit Court ORI: MI821095J AG ORI: MI820025A

THE PEOPLE OF THE STATE OF MICHIGAN v PATRICK CASEY 3782 DESKIN DR. BELLAIRE, MI 49615		Victim or complainant: JOHN DOE
Co-defendant(s)		Complaining Witness SA DAVID DWYER
City/Twp./Village WESTLAND	County in Michigan Wayne	Date: On or about 01/17/2013
Charge(s) See Below	Defendant SID	Defendant DOB 9/2/1963
		Maximum Penalty See Below

STATE OF MICHIGAN, COUNTY OF WAYNE
The complaining witness says that on the date and at 8200 N. Wayne Rd., Westland MI 48185, the defendant, contrary to law,

COUNT 1: CRIMINAL SEXUAL CONDUCT - THIRD DEGREE (Multiple Variables)
did engage in sexual penetration, to wit: Fellatio with John Doe, under the following circumstance(s), defendant effected sexual penetration through force or coercion; contrary to MCL 750.520d. [750.520D]

SORA NOTICE

This is a Tier III Offense under the Sex Offender Registration Act (SORA) unless the court finds that the victim was between the ages of 13 to 15 inclusive, consented to the conduct, and the defendant was not more than 4 years older than the victim. MCL 28.722(w)(iv).

HIV/STD TESTING NOTICE

Take notice that pursuant to MCL 333.5129, upon bindover to circuit court or recorder's court, the district court judge shall order the defendant to be tested for sexually transmitted infection, hepatitis B infection, and for the presence of HIV or an antibody to HIV if the judge determines there is reason to believe the violation involved sexual penetration or exposure to a body fluid of the defendant. If the district judge determines that testing is not required, upon conviction, the court must order the defendant to be tested.

FELONY: 15 Years; mandatory AIDS/STD testing; DNA to be taken upon arrest.

Court shall order law enforcement to collect a DNA identification profiling sample before sentencing or disposition, if not taken at arrest.

The complaining witness asks that defendant be apprehended and dealt with according to law.

Warrant authorized on <u>5/23/19</u>	
by: 	Date: _____ Complaining witness signature
Danielle Hagaman-Clark (P63017) Assistant Attorney General Criminal Division Mich. Dept. of Atty. General 525 W. Ottawa St., 7th Floor Lansing, MI 48933	Subscribed and sworn to before me on <u>MAY 23 2019</u> Date
<input type="checkbox"/> Security for costs posted	 Judge/Magistrate/Clerk Bar no. <u>P46434</u>

State of Michigan 18th Judicial District 3rd Judicial Circuit	AFFIDAVIT IN SUPPORT OF COMPLAINT	Case No: District: Circuit:
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THE COMPLAINING WITNESS, ON INFORMATION AND BELIEF, SAYS:

1. I, Affiant, Steven R. Standfest, am a Special Agent with the Criminal Division of the Michigan Department of Attorney General. I have 38 years' experience in law enforcement and criminal investigations. My job duties include the investigation of criminal activity as assigned by Supervisory Special Agent David Dwyre and Criminal Division Chief Richard Cunningham.
2. On October 3, 2018, the Michigan Department of Attorney General and the Michigan State Police executed search warrants at each of the seven dioceses of the Catholic Church in the state of Michigan. The search warrants were executed as part of the Department of Attorney General's investigation into allegations of sexual abuse, sexual assault, and the cover-up of these assaults by the Catholic Church.
3. Father Patrick Casey, born September 2, 1963, was ordained in May of 1997. In 2012, he served as the pastor of St. Thomas a' Becket in Canton, Michigan, before moving to St. Theodore of Canterbury, in Westland, Michigan in August of that year.
4. In early 2012, twenty-four-year-old John Doe reached out to Casey seeking spiritual guidance. Casey invited John Doe to meet with him in person. During that meeting, John Doe confided in Casey that he was gay.
5. John Doe and Casey continued to meet and communicate during the following months. John Doe requested Casey's counsel on a wide range of moral, theological, and spiritual topics regarding the teachings of the Catholic Church. Their in-person meetings consisted of similar discussions.
6. During the same time that John Doe was meeting with Casey, he was also enrolled in the Right of Christian Initiation for Adults (RCIA) at St. Thomas a' Becket in Canton, Michigan. John Doe asked the pastor at St. Thomas a' Becket to make confession, but the pastor declined because John Doe had not completed RCIA.
7. After his request was turned down, John Doe emailed Casey, explaining that he was in great emotional turmoil. John Doe requested to talk with Casey, even if it meant just a phone conversation.
8. Acknowledging John Doe's urgent need, Casey scheduled a meeting for a few days later, January 17, 2013.

9. John Doe visited Casey's office at St. Theodore of Canterbury on the afternoon of January 17, 2013, and asked Casey if he could give confession. Casey agreed, as it was not unusual for him to take confession in his office.
10. John Doe proceeded to tell Casey that he wanted to kill himself and that a voice was telling him that it would be better if he was dead. He told Casey that have difficulty living a celibate lifestyle required of a gay man seeking to live in the Catholic faith. He also confided in Casey that he attempted suicide several weeks earlier by wrapping a chord around his neck.
11. As John Doe spoke about his struggles with suicide and his concern about dying in mortal sin, Casey, who was dressed in black clerical garb, steered the conversation towards sex, telling him that he could not have a gay relationship and go to heaven. Casey told John Doe that he was also gay and shared a suicidal story of his own.
12. During this confession, Casey approached John Doe and told him to stand up. Casey then began massaging John Doe's genitalia before performing oral sex on him.
13. During John Doe's confession on January 17, 2013, the two engaged in various other sexual acts after Casey initiated groping and performed oral sex on John Doe.
14. John Doe disclosed the confessional incident to Catholic Church officials several years later. The Archdiocese began a formal investigation of the allegation. That investigation included an interview of Casey in which Casey admitted that the sexual acts occurred. At the conclusion of the investigation, officials petitioned to impose the most severe punishment possible: dismissal from the clerical state.
15. On August 1, 2018, the Archdiocese agreed with the recommendation, finding that Casey "took advantage of someone who was vulnerable." Explaining that "[a] confessor, who should be a father, teacher, and doctor . . . , cannot become a wolf who pulls sheep down and scatters them," the Archbishop found that "Reverend Casey's actions were predatory; he became a 'wolf.'"
16. Based on John Doe's detailed and credible allegations, I am seeking a warrant charging the following:

Count 1 – Third-Degree Criminal Sexual Conduct

17. On or about January 17, 2013, Patrick Casey did engage in sexual penetration, to-wit: fellatio, with John Doe, using force or coercion to accomplish the sexual penetration; contrary to MCL 750.520d(1)(b).

Reviewed on: 5/22/19


Danielle Hagaman-Clark, P63017
Assistant Attorney General
525 W. Ottawa St.
Lansing, MI 48909
(517) 335-7650

_____ (Affiant)

Subscribed and Sworn before me on: _____
Date

Honorable _____
Judge/Magistrate – 18th District Court