

Ratzinger's Responsibility for the Sex Scandals

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(Adapted from the book, *Sons of Perdition*)

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Pope Benedict XVI is no stranger to controversy. Yet until now, he has floated serenely aloof from the clergy sexual abuse crisis that has shaken his Church around the world. But fresh questions about his role as a bishop have arisen recently in the wake of scandals in his Bavarian homeland. However, history already proves that Joseph Ratzinger bears a unique personal burden for this entire calamity, one never suspected before now.

New research surprisingly revealed that he has had a far greater impact on these distressing scandals than is widely believed. In some ways, this mammoth tragedy is partly his doing, even before he became pope. For a speech written by Ratzinger over forty years ago helped set the stage for their eruption in the first place. Two decades later, his patient efforts as a powerful cardinal to undo those fateful words may cause the whole sorry spectacle to eventually fade away like smoke in sunshine.

In any case, these events at the time remained unrecognized simply because their immediate effect was limited to the most powerful and secretive department in the Vatican. Now it is called the Congregation for the Doctrine of the Faith, before that, the Holy Office. But for centuries, this agency had been branded with the sinister title of the Inquisition.

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The old Monty Python punch line rings true: no one expected the Spanish Inquisition, or any other, for that matter. As the American crisis unfolded, nobody realized that along with heresy and witchcraft, the Inquisition had ever bothered with clergy sex crimes. And for good reason: it had become a closely guarded secret.

Until 2003, that is. During the Boston scandals, which brought the crisis to national awareness, a curious document was found among diocesan legal papers. Known in English generally as *Crimes of Solicitation*, it was a typed translation of instructions from the Holy Office. Sent secretly to all the world's bishops with the blessing of Pope John XXIII mere months before the opening of the Second Vatican Council, the document revealed an entirely unsuspected aspect to the ongoing crisis.

It was nothing less than a guide for bishops on handling clerical sex crimes, laying out a set of do-it-yourself directions to hold secret trials. Though reassuring them that troubling cases could always be sent to Rome, the manual authorized covert tribunals for clergy accused of soliciting sex in the confessional, along with "the worst crime," that is, homosexual sex, plus sodomizing children and bestiality for good measure.

Rigorous secrecy was its overriding concern, virtually every page repeating dire warnings of automatic excommunication for anyone who divulged the proceedings in any way, including victims or their families. Like current anti-terrorist legislation, this blanket order of secrecy even covered anyone who found out about the trial, however accidentally. These instructions were so secret that the document first directs that it be locked in the most secret archives of the diocese, accessible only to the bishop and approved priests, but not even listed in the index of files.¹

Initially denied, then grudgingly admitted by authorities, apologists claimed that few bishops even knew of the instructions. But it hardly seems likely that orders so secret from the Holy Office would be so casually ignored.

Even so, it was the first sign in modern times of the Church's thought police's interest in the sexual sins of its clergy. Since then, historical research – some, ironically enough, with the blessing of Ratzinger himself – has pushed that concern ever further back. Inquisitorial meddling in the sex lives of priests has been shown to extend at least four centuries earlier, all the way back to the Counter-Reformation.

At the time the Inquisition was granted that authority, the Roman Church was in big trouble. For centuries before Luther's revolt, the moral reputation of the clergy had steadily declined. Discipline faltered as repeated harvests by the Black Death reaped the most saintly while rival claimants to the papacy busily cursed each other. Corruption became as open as it was rife. Prelates could easily purchase dispensations to keep female housekeepers, for instance, and then later buy bishoprics on credit for their resulting illegitimate sons.

In such an environment, the sacraments of the Church were often misused. Most abuses took place during the most intimate situation priests and laity share – Confession, or Penance, or as its now called, Reconciliation. By whatever name, the encounter is a sacred tribunal, where the priest, taking the place of Christ, hears a recounting of a sinner's misdeeds and forgives them, ordering a token repayment by prayer, fasting, or good works.

In Catholicism, the rite is considered an essential means of returning to and maintaining a state of grace. Since the twelfth century, every Catholic has been duty-bound to endure it at least once a year. For centuries, also, they were allowed to confess only to their parish priest. This allowed ample scope for sexually predatory confessors to advance their designs against anyone, male or female, that they desired in the community.

Confronted with the successful Protestant rebellion in the sixteenth century, however, Rome tried hard to clean up its act. But the Council of Trent merely fortified its established positions on clerical celibacy, offering little new beyond prescribing seminary training for all priests. The pope badly needed all the tools to enforce discipline that he could find.

One was an actual physical device: the confessional. Around 1565, St. Charles Borromeo had a simple screen placed between seats to frustrate physical contact during the sacramental encounter in Milan.² The confessional was so effective that within half a century the device was ordered to be installed in every Catholic church in the world.

Though security was the intention, its very privacy may have made verbal assaults on chastity that much easier. But sterner measures, however, were already available. In 1561, before the confessional had even been invented, prosecution of clerical sexual activity by the Inquisition was first tested out in Spain when Pope Pius IV authorized trials in Granada.

A powerful, well-organized, and effective heresy-hunting machine, the Spanish Inquisition seemed a ready instrument to apply against this difficult problem. And it apparently worked. Pius expanded its warrant two years later, along with that of the recently revived papal Inquisition in Rome, to sniff out clerical depravity wherever they could reach.

In a break from traditional secrecy, solicitation at first was published in the Inquisition's lists of crimes that anyone who knew anything about was required to denounce under pain of excommunication. This caused such a huge public sensation that the number of women coming forward in Spain completely overwhelmed the scribes taking accusations. The notice, like the confessional, also met with considerable resistance by the clergy. The confessional remained; the entry, however, was soon discreetly removed from the list.³

Following popes, however, also quietly expanded the range of sex crimes covered as well as the powers of the inquisitors. More cardinal inquisitors were put on staff to cope due to the increased workload. Their minions could go anywhere and arrest anyone, even high churchmen or those in religious orders. By 1622, though priests were still obliged to tell their penitents of their duty to denounce, the process became cloaked in secrecy. Bishops in regions where neither inquisition was active were ordered to set up their own secret tribunals along similar lines.⁴

Both varieties of Inquisition had similar terrible processes, jails, a passion for secrecy, and a hard-earned reputation for ruthlessness. The mere evocation of that despised name was enough to resolve many cases. And they had a ready rationale for intervening in clergy sex crimes. If a priest seduced a woman by saying that sex with him was no sin or if he absolved her afterwards, these blasphemous actions automatically made him liable for the Inquisition's remedies.

Clergy were the sole targets. Victims were not even to be questioned as to their own roles by the Roman Inquisition though considered fair game by the Spanish. However, in Italy, two, later three, separate secret denunciations were required, so bishops could often reassign a rapacious confessor before his activities became notorious.⁵

Once convicted, sexual misdeeds were generally treated far more leniently than "true" heresy, especially if the cleric voluntarily confessed at any point. If he did so even before being accused, he could often get virtual immunity no matter how many women he had propositioned. If two women fingered him and he admitted it, he might only be deprived of the right to hear confessions. Though none seem ever to have been burnt just for solicitation, an unrepentant condemned cleric could be sent indefinitely to the Inquisition's own prisons. If penitent, they might be banished to some distant mission or committed to a monastery of strict observance.

Some abbeys were loose, notorious hotbeds of homosexuality, but these places were much tougher. They essentially served as clerical prisons. A medieval gulag of such penitentiary convents once peppered Christendom. Many cloistered inmates in the most austere houses were not saintly but disgraced, seeking redemption by anonymous lives of rigorous penance under constant surveillance. For many men, the prospect of colonial exile might well have seemed a more pleasant alternative.

Priests did get caught. In the mid-seventeenth century, the Roman Inquisition even took down an entire religious order for child sexual abuse. The Piarists, an honored, successful teaching congregation of priests with schools for poor boys across Italy, had been taken over by a pedophile ring. This was largely due to the founder, St. José Calasanz, the ascetic patron saint of Catholic education, covering up molestation like so many later prelates would by quietly promot-

ing and transferring the offenders. Finally the situation became so offensive that the entire order was put out of business for several decades – despite the ringleaders probably having bribed certain inquisitors for years.⁶

If even huge outrages such as this could be successfully contained, the effectiveness of avoiding scandal through secrecy cannot be doubted. It has been justly called a “secret system,” a true policy of cover-up from the highest levels of the hierarchy on down. For centuries the rule of silence held, despite rare exposés by runaway nuns, ex-priests, and the occasional Protestant historian. Only that can explain the psychological shocks from disclosures of priestly sex abuse around the globe in recent years.

However, the full extent of the Inquisition's sexual suppression may never be known, as open access to Roman records is most unlikely. The archives of the Spanish Inquisition, however, show a continuing obsession with sex until its end in the 1820s.

But the system itself not only survived, it thrived. In 1908, the now-Universal Roman Inquisition was re-christened as the Holy Office and given global authority. By the 1920s, however, knowledge of its jurisdiction over sex abuse was apparently deemed too scandalous. New rules were written which are still secret today.⁷ Whatever happened to cause this is still unknown.

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Perhaps prompted by such incidents – and the advent of criminal reporting laws – the system received stiff reinforcement in the form of *Crimes of Solicitation*. On March 16, 1962, the prefect of the Holy Office, Cardinal Alberto Ottaviani, brought it by the Apostolic Palace for Pope John XXIII's signature.

It's easy to picture them chatting pleasantly over tea or coffee as old friends. Perhaps they didn't even discuss the document; probably a reissue of old rules anyway, but rather the exciting ecumenical council coming that fall. Ottaviani was to prepare the proposed agenda intended to guide the discussions.

Neither man had any reason to suspect that this historic assembly to modernize the Church's image would quickly slip from their control. Nor could they have imagined how it would set the stage for a mass exodus of priests, brothers, and nuns, followed by seemingly endless sex scandals.

But no sooner had the great council begun in October than popular opposition to the official agenda appeared. On the very first working day, Cardinal Josef Frings of Belgium, the chief spokesman for the progressive camp, spoke out against the proposed plans.⁸

Ottaviani replied the next day in a classic exchange. Both old men were nearly blind yet orated in perfect Latin. But the delegates were clearly not on the prefect's side. He sat down baffled and hurt as his proposals were spurned. As *Time* magazine said in his obituary, “His power seemed to evaporate in one humiliating and dramatic day.”⁹

Piqued, the cardinal boycotted the event for several weeks. The unexpected absence of the head of the Holy Office proved critical, giving the council members time, freedom, and confi-

dence to form their own opinions. There would be real debates and the hopes of the liberal faction rose.

Frings, of course, had not acted alone. Due to his impaired vision, the cardinal was especially dependent on a team of trusted theological advisors for help. These young lions included Hans Küng, Karl Rahner, and a liberal Bavarian named Joseph Ratzinger. For them, however, wresting the agenda from the grip of the curia was just the beginning. And it was Ratzinger, already a rising theological star, who wrote the celebrated oration that delivered the decisive stroke.

Just two weeks before the murder of a Catholic president in Dallas would shock the world; there was an almost equal surprise from Rome. On November 8, 1963, Frings rose again to confront the prefect. Undoubtedly largely composed by Ratzinger, his speech firmly denounced the Holy Office and its medieval methods, calling it a “cause of scandal to the world.” Loud applause and cheering broke out among the assembly – itself unheard of. “No one should be judged and condemned without being heard,” Frings declared, “without knowing what he is accused of, and without having the opportunity to amend what he can reasonably be reproached with.”¹⁰

He sat down to a noisy ovation. Ottaviani's impassioned but impromptu reply was greeted with stone cold silence. The confrontation, as John L. Allen, Jr., a long-time Vatican observer, put it, “became in some ways the defining moment of the entire council and the question of the Holy Office's future became symbolic of everything else at stake.”¹¹ That evening, the new pope, Paul VI, personally called to congratulate Frings: the reformation of the Holy Office would proceed.

The council still had a long way to go, however. The most contentious issues – even more than birth control – were those surrounding the clergy. Celibacy, lifestyle, and training were all disputed. The documents were argued over until the end of the very last session. When it was done, a single easily-overlooked paragraph buried in the “Decree on the Life and Ministry of Priests,” proclaimed an enormous change:

*Finally, ... priests ... are obliged in a special manner toward those priests who labor under certain difficulties. They should give them timely help, and also, if necessary, admonish them discreetly. Moreover, they should always treat with fraternal charity and magnanimity those who have failed in some matters, ... and continually show themselves as true brothers and friends.*¹²

Simply put, priests caught acting out sexually would henceforth be given therapy, not punishment. Hard to believe, but this coded bit of pious banality is therefore the smoking gun of the Catholic sex scandals.

Yet an even bigger bombshell was laid just a few paragraphs later. It was an astounding admission that celibacy “is not demanded by the very nature of the priesthood.” This was intended to reassure Eastern-rite priests – who traditionally could be married – that nothing would change for them. However, no break was given their Western counterparts, of whom celibacy would still be required as before.

So Latin-rite clergy were suddenly informed that the greatest sacrifice of their lives, which they had always been assured was absolutely vital to their role in salvation, exalting them above all others, was actually unnecessary. The Roman Church's venerable demand of absolute chastity was abruptly revealed to be both arbitrary and unenforceable.¹³

This must have been a bewildering double blow to clerical morale. For already sexually active priests, it was nothing less than a license to party. But for other unhappy clerics, it was the writing on the wall. In the following years, diehard traditionalists would trickle out amidst a far greater flood of despairing progressives.

The decree did not make it any easier for disgruntled clergy to actually leave, however. Several more years passed before Paul bowed to the swelling discontent. He finally wrote an encyclical that half-heartedly backed away from that embarrassing admission about celibacy, claiming it was actually "virginity" which was not required for the priesthood. But even so, the pontiff reluctantly waived the roadblocks of the Holy Office and the exodus began.¹⁴

The intention of Ratzinger and his liberal allies at the time was doubtless simply to protect freedom of discussion among theologians. It surely was not to unleash priestly sex predators upon the laity. But the signal that the guard dogs of the Holy Office would indeed be muzzled came on the very last day of the council. Paul changed its name to the "Congregation for the Doctrine of the Faith" (CDF). It was to be a kinder, gentler Inquisition.

The pope said he wanted it to continue its good theological work but not in such a punitive manner as before. The secrecy of its inner workings would be finally ended along with the *Index of Forbidden Books*, accused priests would have rights of appeal and judicial representation, and bodies of consultative experts would be employed.

Most ominously but overlooked during the jubilation, the CDF would henceforth have a say over all issues that touched on faith and morals, even those traditionally reserved to other Vatican departments. Intended to ensure that the entire bureaucracy lived up to the reforms, this essentially gave the CDF the crucial power of judicial review over the entire Roman Catholic Church. Only the pope himself now had more power. In Ratzinger's hand, this whip to enforce the Council's decrees would serve to sharply rein them in.¹⁵

Vatican II thus planted not only the seeds of the clergy sex scandals but provided a means for their conclusion. Yet the signs that the council had inadvertently mishandled perpetrator priests did not become apparent until a generation later, when the bitter tree bore its first fruits.

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Joseph Ratzinger himself had grown far more pessimistic in the two decades following the Second Vatican Council. He began doubting the directions the reforms were leading even before the assembly's conclusion. But it was the upset of student rebellions in 1968 that decisively spurred his defection to the conservative camp.¹⁶

By the time the Polish pope was elected a decade later, now-Cardinal Ratzinger's reactionary transformation was complete. John Paul II soon made him prefect of the Congregation for the Doctrine of the Faith. The protestor against the intolerance of the Inquisition had become the grand inquisitor himself; in Allen's words, the "Vatican's enforcer."

If Ratzinger ever sensed this irony, he has kept it well hidden. But the prefect soon launched a number of extremely serious public crusades against certain liberal movements that had arisen in the wake of Vatican II. Liberation theology, women's hopes for ordination, gays'

demands for inclusion, the ecumenical dreams of Anglicans, even the legislative ambitions of national bishops conferences, all came in for official condemnation, one by one.

Cutting-edge theologians, from liberationist Leonardo Boff to former liberal friends and colleagues including Küng and Rahner, were silenced, denied employment, even forced out of the priesthood.¹⁷ Ratzinger was justly criticized in much the same terms as he had used against Ottaviani. Arbitrariness, lack of defense afforded to the accused, the only options being submission or exile – all the old familiar complaints returned, to little avail.

Though Ratzinger has never acknowledged his repentance, his turnabout was complete as it was dramatic. His struggle to redefine the Council's teachings to enhance papal power seems like some self-imposed penance to pay for his former liberality.

Although the cardinal strongly objected to John Paul II's millennial apology for the excesses of the Inquisition, he gladly refurbished the Holy Office. He implemented some of the Council's recommended changes by modernizing procedures, hiring consultants, and ending some secrecy. Seminars were held where approved scholars nicely minimized the Inquisition's terrors. Its own secret archives were opened to select historians who soon found confirmation of its early involvement in clergy abuse cases.¹⁸

But the most powerful doctrinal police chief ever was out to fix all of Vatican II's "mistakes." As threats to papal authority, he claimed early on that the national bishops conferences the council had authorized had no power. His behind the scenes effort to thwart this perceived peril might be the ultimate cause of the failure of various episcopal initiatives.¹⁹

In 1992, American bishops again found their plans frustrated by Rome. Their "zero-tolerance" policy then took another decade and much negative publicity to pass, running into substantial obstacles behind the Vatican's closed doors.²⁰ Apparently the danger of bishops acting together on their own was seen as an even greater threat to Rome than that of pedophile priests.

By then Ratzinger had already dealt with the latter problem himself anyway, drafting new secret instructions and a cover letter. Signed by John Paul II in 2001, the decree clandestinely replaced the old *Crimes of Solicitation* document as if the latter had remained in force all along.²¹

This new policy seems even more repressive than the old one. Whereas the earlier document detailed instructions for a D-I-Y inquisition, this simply mandates the CDF to do its thing.²² It still covers sexual solicitation in the confessional and associated offenses such as priests granting absolution to their lovers or having sex with minors of either gender. But the "worst crime" of clerical homosexuality is no longer even mentioned at all – perhaps because now, according to some experts, almost half the clergy is gay and probably sexually active?²³

New offenses, however, are listed. The faithful are shielded not only from priestly seduction, but sorcery and even promiscuous ecumenism. There's a sacred statute of limitations of a decade for those offenses, as opposed to only three years for lesser crimes. Actually, this is an upgrade for child abuse, as it had a limit of just five years in the 1983 *Code of Canon Law*. This was the same as the worst crimes thought most likely by priests: murder, kidnapping, rape, and rather tellingly, living with a woman or procuring an abortion.²⁴

Previously three denunciations by different victims within a month of occurrence were needed to initiate a case; nowadays any suspicion, rumor, or complaint will do. A bishop or supe-

rior seems free to act against an underling for apparently any reason. But once wheels are in motion transfers are still forbidden.

Everything, including the leaked policy itself, remains wrapped in profoundest pontifical secrecy. Automatic excommunication is still the unholy fate for any who dare breach the silence. The only outward sign that such ecclesiastical trials are even taking place might be the cessation of new civil cases – which indeed seems to be happening. For the third year in a row, the number of new lawsuits has declined even while settlement amounts have climbed to record highs.²⁵

The evidence suggests that the traditional methods of coping by secrecy, shame, and fear, now accompanied by substantial payoffs with confidentiality clauses, may be once again concealing crimes. Perhaps clerical child molesters once again permitted to opt for harsh private discipline over public disgrace.

A few old scandals still smolder. However, the current solution seems to be simply washing their hands of infamous offenders by ejecting them. High-profile incarcerated offenders are now occasionally involuntarily laicized as if in a modern *auto de fe*. Meanwhile, Church spokespeople are quick to point out that most cases these days relate to events decades past, as if great moral progress has been made. But without genuine reform, however, how could it?

Little evidence suggests that reporting laws are being observed any better than before when the Church is not publicly compelled or that transferring problem priests has ceased. In any case, the CDF's global backlog for involuntary laicization is now said to be so great that it takes a bishop eighteen months to even get a reply.²⁶

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Two years before it was even discovered, then-Cardinal Joseph Ratzinger secretly replaced the inquisitorial lid he had accidentally helped dislodge. Whether or not he acknowledges it even to himself, in some ways the perceived crisis is partially his doing, coming and going. Since he is now currently the Supreme Pontiff, there is little reason to hope for true openness of any kind any time soon.

Whether such medieval policies can succeed in modern democratic societies is an open question. Survivors have led the struggle for openness but many have been content to accept the Church's cash in secret settlements. Justice has not been well served. But the immeasurable fortune mortgaged on the laity's offerings and the shame of victims that the Catholic Church has spent on lawyers and payouts is the least portion of the high, horrific price paid for these crimes.

The coin of untold misery has most dearly bought a far more prudent understanding of human frailty and the potential misuses of God. The gravest sin of all would be to squander that by allowing the Roman Catholic Church to again privately tidy up its messes.

In the end, it's not up to victims and survivors to demand a true and faithful rendering of their clergy. Nor should this burden be limited to Catholic laity, or even all Christians. These issues affect everyone in our society alike. Independent civil watchdogs are needed to guard the flock, not just against erring shepherds, but also their deep purses.

The manner in which this all came about, however, raises alarming questions about transparency, accountability, and justice, and not just for Roman Catholics, either. It forms an unspoken challenge to the basic relationship of Church and State today. For the lack of the scandals probably doesn't mean that priests have stopped molesting children. More likely, it means that the Catholic Church is once again handling crimes as it used to, in secret.

How long will the Supreme Pontiff try to continue the cover-up in the face of growing global outrage? Perhaps only God – and Pope Benedict – know.

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Notes

1. Summary of Ottaviani, A. Cardinal, *Instruction on the Manner of Proceeding in Cases of Solicitation*, known as *Crimen sollicitationis*, (The Vatican Press, Rome, 1962).
2. Lea, Henry Charles, *A History of Auricular Confession and Indulgences in the Latin Church*, (Lea Brothers & Co., Philadelphia, 1896), v. 1, p. 395.
 Lea, Henry Charles, *A History of Sacerdotal Celibacy in the Christian Church*, (originally in 3 vol., Lea Brothers & Co., Philadelphia, 1867), these citations are from a one-volume 1966 University Books reprint; p. 499.
3. Lea, *Confession*, pp. 500-1, *Celibacy*, v. 1, p. 385.
4. Liebreich, Karen, *Fallen Order: Intrigue, Heresy, and Scandal in the Rome of Galileo and Caravaggio*, (Grove Press, New York, 2004), p. 144.
 Lea, *Celibacy*, pp. 500-1.
5. Lea, *Celibacy*, p. 517.
6. Summary of Liebreich, *Fallen Order*.
7. Doyle, Thomas, P., et al. *Sex, Priests, and Secret Codes: The Catholic Church's 2000-year Paper Trail of Sexual Abuse*, (Volt Press, Los Angeles, 2007), p. 47.
8. On Frings and the Council, Allen, John L., Jr., *Pope Benedict XVI: A Biography of Joseph Ratzinger*, originally published as *Cardinal Ratzinger: the Vatican's Enforcer of the Faith* (Continuum, New York, 2000), pp. 52-53.
 Laughlin, Corrina, *The Second Vatican Council*, reminiscences of Abp. Connally at <http://www.stjames-cathedral.org/Prayer/vatican2-3.htm>
 "The Cardinal's Setback," *Time Magazine*, Friday, Nov. 23, 1962.
 Filtreau, Jerry, "U.S. experts at Vatican II recall history-making years", Catholic News Service, at <http://www.catholicnews.com/data/stories/cns/0505792.htm>.
9. "A Cardinal Carabinieri," *Time Magazine*, Monday, Aug. 13, 1979.
10. Allen, *Benedict*, pp. 64-65.
11. Ibid.

12. Pope Paul VI, *Presbyterorum ordinis*, "Decree on the Life and Ministry of Priests," promulgated Dec. 7, 1965, chap. 1, sect. 7.8, para. 3.
13. Op. cit., chap. 2.16, para. 1, 3.
14. Pope Paul VI, *Sacerdotalis caelibatus*, "Encyclical on the Celibacy of the Priest," issued June 24, 1967, sect. 17, 88.
15. Pope Paul VI, *Integrae servandae*, Apostolic Letter "Preserving Intact," issued Dec. 7, 1965, described in Allen, *Benedict*, pp. 260-261.
16. Allen, *Benedict*, pp. 82-83.
17. Ratzinger's record summarized from Allen, *Benedict*, pp. 89-294.
18. Allen, *Benedict*, pp. 312-313.
"Ratzinger explains opening of Inquisition files," *Catholic World News*, Jan. 23, 1998.
Liebriech, *Fallen Order*, pp. xxxix.
19. Allen, *Benedict*, pp. 61-64.
20. Yallop, David, *The Power and the Glory: Inside the Dark Heart of John Paul II's Vatican*, (Carroll & Graf Publishers, New York, 2007), pp. 320-323.
21. Doyle, *Sex*, p. 50.
22. Pope John Paul II, Apostolic Letter *Sacramentorum sanctitatis tutela*, "Safeguarding the Sanctity of the Sacraments", April 30, 2001.
Ratzinger, Joseph Cardinal, "Letter ... On More Grave Delicts Reserved to the Same Congregation for the Doctrine of the Faith," May 18, 2001.
23. Doyle, *Sex*, p. 211.
24. *Code of Canon Law*, 1983, can. 1362.
25. Zapor, Patricia, "Annual abuse audit and survey find soaring costs, fewer allegations" Catholic News Service, March 7, 2008.
26. Yallop, *Power*, p.351.