

Roman Catholic Diocese of Brooklyn

Independent Monitor's First Annual Report

June 3, 2026

StoneTurn

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I. Introduction

The Roman Catholic Diocese of Brooklyn (“Diocese”) Independent Monitor (“IM”, “Monitor”, “StoneTurn”, “Team” or “We”) submits this First Annual Report (“Report”) to the Attorney General of The State of New York Charities Bureau (“OAG”) required under the [Assurance of Discontinuance](#) (“AOD”) ¶71 dated April 16, 2024.¹ The AOD, which the Diocese entered voluntarily, resolves the OAG’s investigation into how the Diocese responded to allegations of sexual abuse (“Abuse”) and other Improper Conduct² (“Improper Conduct” or “Code of Conduct Violation”) involving minors and Vulnerable Persons by members of the Clergy, Employees and Volunteers.

The Team first wants to thank the Diocese for its full and proactive cooperation and note its commitment to creating and maintaining safe environments within the Church. We particularly want to acknowledge the Office of Protection of Children and Young People (“OPCYP”) Director and the Clergy Monitor/Victim Assistance Coordinator for facilitating timely access to documents and answering our many questions. They are highly qualified and committed to their roles and the Diocese’s mission of protecting youth.

Additionally, as we discuss below, the Diocese has been receptive to the Monitor’s feedback throughout the engagement and has been eager to continue to improve its prevention, detection, investigation, and remediation of Abuse and Improper Conduct involving children and Vulnerable Persons.

[Allegations Against Clergy](#)

Since the Diocese signed the AOD in April 2024, it has received several allegations involving Clergy. These include (i) present-day allegations of Improper Conduct, (ii) historical allegations of Clergy Abuse alleged to have occurred decades ago, and (iii) one present-day allegation under investigation that out of an abundance of caution, the Diocese has handled according to the procedures required for Abuse allegations.³ The Diocese investigated and resolved these allegations in compliance with the AOD and is investigating the present-day allegation, which will be sent to the independent Diocesan Review Board for an assessment as to whether the report credibly alleges Abuse or Improper Conduct.

[Allegations Against Employees and Volunteers](#)

We also tested the Diocese’s process for responding to allegations against Employees and Volunteers. The Diocese investigated the allegations it received and terminated all Employees and

¹ The AOD also required the Monitor to submit three quarterly reports to the OAG assessing the performance of key roles within the Diocese’s Office of Protection of Children and Young People (“OPCYP”), Office of Safe Environment (“OSE”), and Office of Victim Assistance Ministry (“OVAM”) to ensure they are (1) satisfying the requirements of the AOD and (2) are capable of, and are, fulfilling their respective roles in connection with the Diocese’s response to Abuse and Improper Conduct allegations. The Monitor concluded in each quarter the Diocese’s key roles as competent, qualified, and continued to meet the requirements to serve in their respective roles. The Monitor reported their actions and conduct remained consistent with the expectations of their respective positions and the obligations defined in the AOD. As part of the quarterly reports, the Monitor identified and subsequently discussed and agreed with the Diocese and Counsel on several opportunities to enhance the design of policies and procedures related to the OPCYP, OSE, and OVAM (“Agreed-Upon Enhancements”). AOD ¶71.

² As defined in the AOD, Improper Conduct is conduct that does not constitute sexual abuse but that nonetheless violates the provisions of the Diocese’s Codes of Conduct, which are intended to prevent improper sexual touching, sexual activity, or display or creation of pornography involving a minor or a nonconsenting adult. AOD p. 1.

³ Monitor’s Review of all Allegations Reports since the AOD effective date of April 16, 2024.

Volunteers found to have engaged in Abuse and terminated all but a small number of individuals found to have committed less serious misconduct (e.g., using inappropriate language). The Diocese permitted the few individuals who were not terminated to remain in place only after they had completed remedial training.⁴ As of the date of this Report, with respect to Employees and Volunteers, the Diocese is in the process of investigating one Abuse allegation and one alleged Code of Conduct Violation.

AOD Compliance

Our first year of our monitoring did not identify any material issues of non-compliance with the AOD. The Diocese promptly remediated technical compliance issues (e.g., updating procedures to reflect the process in operation) and, in certain respects, exceeded the requirements of the AOD.

AOD & Supplemental Enhancements

The Monitor shares feedback and makes suggestions contemporaneous to our work. As used in this Report, "AOD Enhancements" refer to improvements that will help facilitate and document ongoing compliance with the AOD. "Supplemental Enhancements" refer to improvements that go beyond the requirements of the AOD and which the Diocese designed and implemented to improve its compliance program. The Diocese has been receptive to feedback, which we regard as indicative of its commitment to developing a safe culture.

Besides feedback, the Monitor and Diocese identified 10 additional enhancements, which the Diocese agreed to implement ("Agreed-Upon Enhancements"). The Monitor classifies 8 Agreed-Upon Enhancements as Supplemental Enhancements and 2 as AOD Enhancements but notes the Diocese remains in compliance with the AOD. Rather these AOD Enhancements will enable the Diocese to better evidence its compliance with the related requirements. The Diocese implemented 13 of 15 opportunities for enhancement that we identified during our work,⁵ and is addressing the remaining two outstanding suggestions which the Monitor included in this Report.

In addition to these 15, the Report identifies 8 steps the Diocese can take to improve its policies, processes and controls ("Policies")⁶ to reduce the risk of future Abuse and Improper Conduct going forward. Many of these enhancements involve formally documenting processes, procedures, or practices that the Diocese already implemented. The Diocese has agreed to implement each enhancement.

In Year Two, the Monitor will shift to testing the sustained operating effectiveness of the Diocese's Policies, including continued testing of all new and open allegations of Abuse and Improper Conduct involving minors and Vulnerable Persons. Our testing will occur throughout the organization including parishes and schools.

⁴ Monitor's Review of all Allegations Reports since the AOD effective date of April 16, 2024.

⁵ The Monitor identified 13 enhancement opportunities which the Diocese addressed in Year One. This Report covers the enhancements made which primarily relate to updating the Diocese's documentation of job responsibilities and processes to reflect those already implemented, formalizing its investigation procedures, strengthening the DRB oversight and training and improving the effectiveness of training through knowledge checks.

⁶ StoneTurn's use of "Policies" refers to the Diocese's policies and procedures designed and implemented to identify, prevent and detect Abuse and other Improper Conduct involving minors and Vulnerable Persons. AOD p. 1.

II. Monitorship Engagement

A. Mandate

The AOD required the Diocese to propose three Independent Monitor candidates to oversee the Diocese's implementation of, and compliance with, the Diocese's Policies, as enhanced by the AOD.⁷ The OAG selected [Jonny Frank](#) and [StoneTurn](#) as the Independent Monitor.

The AOD requires the Monitor to prepare an annual report ("Report") for each of the three years of the monitorship. As noted above, the reports must (i) assess the Diocese's compliance with the AOD and (ii) identify any issues that, in the Monitor's judgment, should be addressed to strengthen compliance with the AOD or to improve the Diocese's policies.⁸

B. Procedures Performed

Assessment Criteria.

The Team's work during the first year of the monitorship ("Year One") began with creating an obligations register of the changes and enhancements the Diocese agreed to undertake ("AOD Requirements"). We then developed assessment criteria and a detailed workplan to assess the Diocese's compliance with the AOD Requirements.

Workstreams.

StoneTurn organized its work and report into six areas:

- Oversight, Governance and Foundational Components;
- Office of Protection of Children and Young People;
- Clergy Monitor;
- Office of Safe Environment;
- Office of Victims Assistance; and
- Allegations of Abuse or Improper Conduct.

Monitoring Procedures.

Year One monitoring procedures included interviews with the Bishop, Clergy and other Diocesan personnel; document review; walkthroughs of key control processes; meetings with victims, observation of Diocesan training, meetings and masses; and testing design and operating effectiveness of Diocesan preventive and detective policies, processes and controls relating to Abuse and Improper Conduct.⁹

The Monitor spent considerable time with Diocesan Review Board ("DRB"), an independent review panel constituted to advise the Bishop regarding claims of Abuse or Improper Conduct against Clergy involving minors or Vulnerable Persons.¹⁰ We attended every DRB meeting and met individually with DRB members.

⁷ AOD ¶68.

⁸ AOD ¶71.

⁹ StoneTurn Independent Monitor Workplan, 2025.

¹⁰ AOD ¶23.

Contemporaneous Feedback.

In Year One, the Monitor provided contemporaneous feedback to the Diocese as they developed and implemented enhancements to address requirements of the AOD and the Monitor's additional enhancements, which the Team validated.

The Diocese's receptiveness to the Monitor's feedback demonstrates its commitment to developing a safe culture. Besides feedback, the Monitor and Diocese identified additional enhancements, which the Diocese agreed to implement ("Agreed-Upon Enhancements").

C. Report Structure

For each of the six areas, our Report describes the:

- Background on Diocesan policies, processes and controls to prevent Abuse of and Improper Conduct with minors and other Vulnerable Persons;
- Year One updates, enhancements, Monitor testing; and
- Monitor's observations and enhancements agreed to between the Monitor and Diocese ("Agreed-Upon Enhancements" or "AUE").

See *Appendix A* for a summary of the Monitor's observations and Agreed-Upon Enhancements and *Appendix B* for a list of acronyms and defined terms.

III. Oversight, Governance and Foundational Compliance

A. Background

The Diocese's child protection program follows the national framework that the United States Conference of Catholic Bishops ("USCCB") established in 2002 through the Charter for the Protection of Children and Young People ("Charter"). The Charter set uniform standards for preventing child abuse, responding to allegations, and supporting victims. The Diocese adopted this framework and continues to implement its updated requirements to strengthen child safety and accountability.¹¹

The Bishop is responsible for oversight and enforcement of the Diocese's policies, processes and procedures relating to the prevention of Abuse of minors and other vulnerable people ("Policies"). To assist the Bishop in overseeing the design and execution of the Diocese's Policies, the Diocese created a new position, the Director of the Office of Protection of Children and Young People ("OPCYP Director").¹²

Similarly, the Diocese established the Clergy Monitor position within the OPCYP to monitor Clergy under investigation for Abuse or Improper Conduct and Clergy who have been credibly accused of Abuse of a minor or Vulnerable Person ("supervised Clergy members").¹³ In 2004, the Diocese established the: (1) Office of Safe Environment ("OSE") to oversee the implementation of its policies and procedures designed to prevent the abuse of minors; and (2) Office of Victim Assistance Ministry ("OVAM") to assist victim survivors or childhood Abuse.¹⁴

¹¹ AOD ¶2. Charter for the Protection of Children and Young People, USCCB, June 2018.

¹² AOD ¶81.

¹³ AOD ¶100b.

¹⁴ AOD ¶85a-b.

The OSE focuses on compliance areas including training, background checks, and certification of the Diocese's Codes of Conduct.¹⁵

Lastly, as required under the USCCB Charter, the DRB functions as a consultative body to the Bishop to advise on the Bishop's assessment of allegations of Abuse and Improper Conduct involving minors and Vulnerable Persons, his determination of a cleric's suitability for ministry and other aspects of addressing the allegations.¹⁶

The Bishop relies upon the professionals within the OPCYP (e.g., OPCYP Director, Clergy Monitor), OSE, OVAM and the DRB to assist and advise him in executing his oversight of the Diocese's Policies and overall Protecting God's Children program.¹⁷ The Monitor provides an overview of the key roles and responsibilities of the OPCYP, OSE, OVAM and DRB in **Sections IV – VIII** below.

B. Summary of Enhancements

Bishop's Oversight

The Diocese demonstrates consistent compliance with the AOD's Bishop's oversight requirements. To support the Bishop in fulfilling those responsibilities, the Diocese enhanced its Policies to require the Diocesan Review Board ("DRB") to expand its skill set and strengthen its advisory role. The Monitor discusses these enhancements in greater detail in **Section VIII**.

Policy Updates

As required by the AOD, the Diocese updated several Policies, including the Diocesan Policy and Procedures Regarding Sexual Abuse of Minors ("SAP Policy"), the Codes, the Whistleblower Policy, the Monitoring Procedures and the Reporting and Referral Policy in December 2024. In Year One, to complete a Supplemental Enhancement the Diocese consulted with the Monitor on the design and implementation of a process to review and update its Policies annually. This process includes clear communication of the review date and summary of any changes made to keep relevant stakeholders informed of the policy updates.¹⁸ In October 2025, the Diocese updated its Policies to document various Supplemental Enhancements made to its processes, as described within this Report. The Diocese published the updated policies to its website in January 2026 after receiving approval from the OAG.¹⁹

Vulnerable Persons

In accordance with the AOD, in December 2024, the Diocese expanded the scope of the Policies to protect "Vulnerable Persons" in addition to minors and added provisions addressing Improper Conduct allegations. The AOD adopts the Charter's definition of "Vulnerable Person" as an individual "who habitually lacks the use of reason."²⁰

Reporting Lines

As required by the AOD, the Diocese enhanced its allegation reporting process by:

¹⁵ AOD ¶85a. Discussion with Diocesan personnel, OSE.

¹⁶ DRB Bylaws, January 2026, p. 1.

¹⁷ Discussion with Diocesan personnel, Bishop, OPCYP.

¹⁸ SAP Policy, January 2026. DRB Bylaws, January 2026. DRB Protocols, January 2026. Monitoring Procedures, January 2026. Whistleblower Policy, January 2026. Discussions with Counsel.

¹⁹ *Id.* <https://www.dioceseofbrooklyn.org/protecting-our-children/policy/>.

²⁰ AOD, p. 1. Charter for the Protection of Children and Young People, USCCB, June 2018.

- Instituting a five-day period to respond to all Abuse allegations raised, regardless of mode (e.g., Reporting Line, direct communication);
- Creating an online form for receiving complaints accessible via the Diocese's website;
- Publicizing in all parishes and schools the Reporting Line and website to encourage reporting of concerns and complaints;
- Including in its weekly newspaper, the Tablet, and on its website, statements urging victims to report Abuse to the Diocese and local law enforcement;
- Communicating that all complainants are confidential and protected from retaliation; and,
- Memorializing its policy requiring Clergy, Employees, and Volunteers to instruct complainants to report any Abuse or Improper Conduct allegations (unless the report would violate the priest-penitent relationship of the Sacrament of Reconciliation) to the Reporting Line or online form.²¹

To comply with the AOD's requirements, the Diocese's updates to its Policies and implemented processes also enhanced the Diocese's allegation triaging and investigation processes by:

- Instituting a period of twenty business days following receipt of an allegation within which the Bishop makes an initial determination regarding whether the Abuse or Improper Conduct allegation at least appears to be true;
- Instituting a period of five business days following the Bishop's initial determination within which the Diocese refers any allegation that seems to be true to the DRB for deliberation;
- Memorializing a requirement to provide all relevant material information and documents pertaining to allegations to the DRB; and,
- Committing to publicize any decision to lift restrictions on a Clergy member who the Diocese administratively removed from public ministry for Abuse.²²

The Diocese maintained its Reporting Line, staffed by an independent attorney. StoneTurn noted no issues with the independent attorney's operation of the Reporting Line during Year One.

Codes of Conduct

The Diocese has three Codes of Conduct for Clergy, Employees and Volunteers ("the Codes"). The Diocese's website includes a section titled "Protecting Our Children," which in compliance with the AOD, posts the Codes and all policies relating to the prevention of Abuse of minors.²³ The Codes, as required by the AOD, articulate clearly that Clergy, Employees or Volunteers who disregard the Codes are subject to disciplinary and remedial actions, including removal from ministry or termination.²⁴ The Codes describe potential grooming behavior, including the behaviors noted below. Also as required by the AOD, they also include a technology policy, granting the Diocese inspection rights over its systems and providing guidelines for social media, cell phone, and text use.²⁵

²¹ SAP Policy, January 2026, pp. 4-5. AOD ¶89.

²² SAP Policy, January 2026, pp. 8-9. AOD ¶89.

²³ Diocese of Brooklyn Code of Pastoral Conduct for Clergy, December 2024. Diocese of Brooklyn Code of Pastoral Conduct For All Parish and Diocesan Employees, December 2024. Diocese of Brooklyn Code of Pastoral Conduct for Volunteers, December 2024.

²⁴ Diocese of Brooklyn Code of Pastoral Conduct for Clergy, p. 2, December 2024. Diocese of Brooklyn Code of Pastoral Conduct For All Parish and Diocesan Employees, p. 1, December 2024. Diocese of Brooklyn Code of Pastoral Conduct for Volunteers, p. 1, December 2024.

²⁵ Diocese of Brooklyn Code of Pastoral Conduct for Clergy, p. 8, December 2024. Diocese of Brooklyn Code of Pastoral Conduct For All Parish and Diocesan Employees, p. 2, December 2024. Diocese of Brooklyn Code of Pastoral Conduct for

The Codes specifically forbid, among other things;

- Communication with children by electronic means unless the materials are for programs at the church;
- Assisting children in accessing pornography;
- Photographing children without parental consent;
- Using or being under the influence of drugs or alcohol while with children; and
- Using profanity or sexual language around children.²⁶

In Year One, and in some instances prior to the AOD, in compliance with the AOD, the Diocese updated its Codes to expressly prohibit all forms of Abuse and Improper Conduct, including specific prohibitions against:

- Improper physical contact with minors or Vulnerable Persons;
- Extravagant or inappropriate gift-giving that shows favoritism;
- Having unaccompanied minors or Vulnerable Persons as guests in private living quarters;
- Providing alcohol or drugs to minors or Vulnerable Persons;
- Taking unrelated minors or Vulnerable Persons on trips without parental consent or other adults present; and
- Viewing or showing pornographic materials on Diocesan property or to minors and Vulnerable Persons.²⁷

The Codes require Clergy, Employees and Volunteers to promptly report any violations of the Codes related to potential sexual misconduct or Abuse involving minors and Vulnerable Persons to Diocese's reporting line or via the online form available.²⁸ As an AOD Enhancement, the Diocese strengthened the content of the Codes by describing potential grooming behavior and defining the consequences for violations.

StoneTurn understands the Diocese posts the Codes in publicly accessible places at Diocesan parishes and schools and will validate this as part of our monitoring procedures in Year Two and Year Three.

The Diocese historically maintained a Code of Conduct Violation Procedure which documented the Diocese's procedures to respond to allegations of Employee or Volunteer violations of the Codes.²⁹ As part of the December 2024 policy updates to comply with the AOD, the Diocese replaced the procedures with an enhanced SAP Policy to address Clergy Improper Conduct allegations. The updated policy provides that when the Diocese determines a Code of Conduct violation to be

Volunteers. p. 2, December 2024. AOD ¶95b.

²⁶ Diocese of Brooklyn Code of Pastoral Conduct for Clergy, pp. 2,3 and 9, December 2024. Diocese of Brooklyn Code of Pastoral Conduct For All Parish and Diocesan Employees, pp. 2-3, December 2024. Diocese of Brooklyn Code of Pastoral Conduct for Volunteers. p. 2, December 2024. AOD ¶29.

²⁷ Diocese of Brooklyn Code of Pastoral Conduct for Clergy, pp. 2,3 and 9, December 2024. Diocese of Brooklyn Code of Pastoral Conduct For All Parish and Diocesan Employees, pp. 2-3, December 2024. Diocese of Brooklyn Code of Pastoral Conduct for Volunteers. p. 2, December 2024. AOD ¶95a.

²⁸ The Clergy Code specifically requires Clergy to report violations of the Code related to Improper Conduct involving minors or Vulnerable Persons to the OPCYP Director and the reporting line. The Diocese requires these reports to be documented and maintained consistent with the Record Keeping Policies. Diocese of Brooklyn Code of Pastoral Conduct for Clergy, p. 7, December 2024. Diocese of Brooklyn Code of Pastoral Conduct For All Parish and Diocesan Employees, p. 2, December 2024. Diocese of Brooklyn Code of Pastoral Conduct for Volunteers. p. 2, December 2024.

²⁹ AOD ¶97.

credible, even in the absence of an Abuse allegation, the Clergy member, Employee, or Volunteer will be subject to appropriate consequences. Specifically, Clergy who are determined to have violated the Clergy Code of Conduct may be subject to monitoring in accordance with Diocesan Monitoring Procedures and other reprimands.³⁰

StoneTurn reviewed all allegations of Improper Conduct by Clergy raised since the AOD and confirmed the Diocese complied with its policies to require credible allegations be: (1) subject to appropriate consequences (e.g., remedial guidance and training, removal from ministry); and (2) documented and recorded consistent with the Record-Keeping Policies. In responding to the Monitor's information requests, the Diocese identified two instances ("Incident A" and "Incident B") which it did not refer to the DRB, as provided for in the Diocese's SAP.³¹

These two instances involved allegations of Improper Conduct, not Abuse. The Monitor reviewed these allegations and confirmed the Diocese implemented consequences for each Clergy (e.g., training, guidance, certain restrictions) and recommended the Diocese refer the allegations to the DRB, even though not required under the AOD.³² The Diocese agreed and hired independent investigators to revisit both allegations and perform an investigation. Through these follow-up investigative procedures, the investigators identified two new allegations, one against each Clergy member previously accused.³³

Regarding Incident A, the follow-up investigation revealed a new allegation alleged to have occurred in May 2024. Out of an abundance of caution, the Diocese has handled this allegation according to the procedures required for Abuse allegations, although, as noted above, the Diocese is currently investigating the alleged misconduct to determine whether it rises to the level of Abuse. The Diocese, as required, informed the local District Attorney's Office and the NYPD, which investigated the allegation. In line with the AOD and Diocesan policies and to avoid any interference with law enforcement, the Diocese paused its review of the allegation during the course of the NYPD investigation. After NYPD closed the case without making any charge, the Diocese resumed its investigation. The Diocese removed the Clergy's faculties and suspended his Diocesan assignment during the pendency of the DRB investigation.³⁴

Regarding Incident B, the follow-up investigation revealed new allegations of Improper Conduct. The Independent Investigator completed its investigation and presented the case to the DRB in March 2026. The DRB found the Clergy credibly accused of Improper Conduct and recommended the Clergy not remain at his current Diocesan location, complete remedial training and other remedial activity. The Diocese implemented these measures through a Clergy Monitoring Plan which restricts the Clergy's ability to minister, attend youth gatherings, teach or have any unsupervised contact with minors.

In **Section VII**, the Monitor suggests the Diocese consider additional criteria and a more defined process to decide whether to refer allegations to the DRB, even if not required under the AOD or SAP

³⁰ SAP Policy, January 2026, p. 11. Discussions with Diocesan personnel, OPCYP.

³¹ SAP Policy, January 2026, p. 7. Discussions with Counsel. RCD0B-0002349; RCD0B-0002889-2895; RCD0B-0002332; RCD0B-0002861.

³² Incident A was found to not be Improper Conduct or Abuse. The Clergy member in Incident B admitted the material facts underlying the Improper Conduct allegation.

³³ Monitor's Review of all Allegations Reports since the AOD effective date of April 16, 2024

³⁴ Monitor's Review of all Allegations Reports since the AOD effective date of April 16, 2024. Discussion with Counsel.

Policy. At a minimum, the Diocese should ensure sufficient documentation of its rationale for it establishing a process to define and document that DRB and Diocese consider retaining an investigator even when the Clergy member admits to the conduct—as it has in Incident B. Further investigation may help identify additional victims and determine whether red flags warranted earlier reporting.

Whistleblower Policies

In compliance with the AOD requirements, the Diocese maintains a Whistleblower Policy for reporting violations or suspected violations of the Codes or other Diocesan Policies and prohibits retaliation for good-faith complaints and other Abuse or Improper Conduct allegations concerning minors and Vulnerable Persons raised to the Diocese.³⁵

In Year One, the Diocese strengthened its speak-up program (i.e., a program that empowers individuals to raise concerns regarding unethical behavior or non-compliance with laws and policies via confidential and anonymous channels such as a whistleblowing line) by enhancing the “Protecting Our Children” section of its website. The website includes a statement from Bishop Brennan, identifies DRB members, maintains a list of credibly accused Clergy, and provides clear guidance on how and to whom Abuse should be reported. Reporting channels include a dedicated telephone reporting line and an online reporting form for Abuse or Improper Conduct. The site also features a prominent “Report Abuse” tab with direct access to reporting resources and the online form. In addition, the website provides access to the Whistleblower Policy, which affirms confidentiality and prohibits retaliation.³⁶

StoneTurn understands the Diocese, in compliance with the AOD, posts the Whistleblower Policy in publicly accessible places at Diocesan parishes and schools and will validate this as part of our monitoring procedures in Year Two and Year Three.

Allegations of Abuse and Improper Conduct

Pursuant to the AOD, the Diocese maintained and enhanced its current Policies for reporting and responding to all allegations of Abuse and Improper Conduct by Clergy, Employees and Volunteers. Please refer to **Section VIII** for more information on the Diocese’s enhanced processes for responding to allegations of Abuse and Improper Conduct.

Record Keeping Policies

In accordance with the AOD, the Diocese updated its Record-Keeping Policies and implemented an electronic record-keeping and tracking system, Incident Tracking System (“ITS”). The Diocese documents and manages Abuse and Improper Conduct Allegations in ITS. The Diocese programmed ITS to capture automatically all cases reported through the online reporting form and maintains processes to manually record in ITS any allegations reported through the Reporting Line or through direct communication with the OPCYP. These records document allegation attributes including, but not limited to, report date, incident date, location, victim name, incident type, and accused name.³⁷

³⁵ Whistleblower Policy, January 2026. AOD ¶101.

³⁶ <https://dioceseofbrooklyn.org/protecting-our-children/>.

³⁷ Discussion with Diocesan personnel, OPCYP.

Reporting and Referral Policies

The Diocese maintains a Reporting and Referral Policy, which it enhanced in December 2024 to comply with the AOD requirements to:

- Expand distribution of all allegations, regardless of the date of the alleged conduct, to the Bishop, and during the Monitorship Term, the Independent Monitor and the OAG.³⁸ Although not required under the AOD, the Diocese also includes the DRB Chair on distributions.
- Require all referral letters or references for Clergy, Employees, or Volunteers to be accurate and complete and include any credible Abuse or Improper Conduct allegations.³⁹

The Diocese also continued its policies of:

- Alerting the destination diocese when a Clergy member against whom a credible allegation has been made moves outside its territory; and
- Maintaining a list of credibly accused Clergy on its website and disclosing at a minimum the cleric's name, ordination date, assignments, status, and if deceased, the date of death.⁴⁰

The Monitor confirmed the Diocese maintains and appropriately updates its list of Clergy members credibly accused of Abuse of a minor or Vulnerable Persons, including the disclosures required under the AOD.⁴¹

For Employees and Volunteers the Diocese produces a letter of good standing noting the individual's training and Code certification status for any referral letter needed if the individual is leaving the Diocese (e.g., for a retreat).⁴²

The Diocese maintains protocols to ensure the accuracy of referral letters and the timely notice to other dioceses when Clergy move across territorial boundaries. The Chancellor's Office controls the issuance of Letters of Good Standing and conducts a comprehensive file review for any Clergy seeking ministry elsewhere. The Chancellor denies the letter if the file contains credible allegations of Abuse or Improper Conduct.⁴³ The Monitor planned to test this process for Clergy transfers out of the Diocese in Year One. However, because the Diocese misunderstood the Monitor's request, we did not receive the information required for its testing in time for inclusion in this Report. While drafting this Report the Diocese clarified and informed StoneTurn that there were long-term transfers out of the Brooklyn Diocese during Year One.⁴⁴ The Monitor plans to assess the Diocese's processes and controls for providing referral letters and confirming Compliance of Diocesan Clergy members transferring to other dioceses in Year Two. The Diocese confirmed there were no allegations of Abuse or Improper Conduct raised against a transferring Clergy member in Year One.⁴⁵

For incoming visiting Clergy, the Diocese requires a Letter of Good Standing, which the Chancery verifies against an official global directory of Diocesan contact information. The Diocese requires

³⁸ In addition to its newly expanded list, the Diocese continues to distribute the allegations to the prior recipients including the local District Attorney's Office, the Victim Assistance Coordinator, and the OPCYP Director.

³⁹ Reporting and Referral Policy, p. 1, December 2024.

⁴⁰ Reporting and Referral Policy, p. 2, December 2024. AOD ¶105.

⁴¹ <https://www.dioceseofbrooklyn.org/protecting-our-children/list-of-accused/>.

⁴² Discussion with Diocesan personnel, OPCYP, Chancery, Clergy Personnel.

⁴³ *Id.*

⁴⁴ Discussion with Diocesan personnel, Office for the Vicar for Clergy.

⁴⁵ *Id.*

direct communication from the diocese of origin rather than accepting documents from the visiting Clergy. After authenticating the document, the Diocese applies an official seal documenting the authentication. The letter includes the approved period for the Clergy members visitation.⁴⁶

The Diocese requires priests visiting for over one week to certify to the Clergy Code of Conduct. The Diocese also holds a cultural and boundary awareness workshop in the summer to help educate visiting Clergy on cultural boundaries and the Diocese's processes and controls. The Monitor believes the cultural workshop is important to strengthening the Diocese's overall culture of compliance. However, because the workshop is held in the summer, it is primarily accessible to Clergy who arrive during that period.⁴⁷ While summer is a timeframe in which a substantial majority of the Clergy who visit the Diocese are present, a once-annual session still leaves some visiting priests without access to it.

To address this issue, the Diocese is converting the cultural and boundary-awareness workshop into a recorded virtual format. This change will ensure that Clergy who arrive outside the June orientation cycle receive the required training promptly upon entry.⁴⁸

The Monitor's testing identified instances where visiting Clergy did not sign the updated Code of Conduct. To address this, the Diocese now requires all visiting Clergy to sign the Clergy Code of Conduct upon arrival.⁴⁹

StoneTurn's testing identified discrepancies in the recorded service periods for a sample of visiting Clergy. Oversight of departure dates currently relies on reports from local pastors. To strengthen this process, the Office of Clergy Personnel is consolidating the tracking of both short-term and long-term assignments to ensure that no Clergy remains in ministry beyond the authorized period.⁵⁰

The Monitor will continue to monitor and test the Diocese's processes related to visiting priests and test the operating effectiveness of the enhancements documented above in Year Two.

Religious Orders

The Diocese entrusts individual parishes or schools to Religious Orders to operate. The Diocese formalizes the arrangement with written agreements that define the requirements and operational protocols the Religious Orders must follow.⁵¹

The AOD required the Diocese to seek to update these agreements to add provisions requiring the Religious Orders to report all allegations of Abuse against minors or Vulnerable Persons committed by Clergy, Employees or Volunteers within the subject parishes and schools to the Diocese, appropriate law enforcement and relevant individuals within the Religious Order. The Diocese successfully updated the agreements to require each Religious Order to use its own internal investigation and review board processes for the allegations raised and to remove all Religious Order Clergy credibly accused of Abuse of a minor or Vulnerable Person from public ministry. The Diocese requires the Religious Orders to document the investigations, determination and other related documents and produce the documentation to the Diocese within 30 days of the investigation's

⁴⁶ Discussions with Diocesan personnel, OPCYP, Chancery, Clergy Personnel.

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ AOD ¶108.

conclusion.⁵² The Diocese publishes the names of all Religious Order Clergy found credibly accused of Abuse of a minor or Vulnerable Person and retains the agreements with the Religious Orders as well as any documentation required to evidence compliance with the Record-Keeping Policies.⁵³

The Monitor reviewed the Diocese's updated Religious Order agreements finalized in January 2026 and noted no issues. The Monitor will assess the operating effectiveness of these agreements and the implemented provisions in Year Two.

C. Observations and Agreed-Upon Enhancements

The Diocese should strengthen its oversight of Code of Conduct certifications because many Clergy, Employees, and Volunteers have not certified compliance with the 2025 Code of Conduct.

Our testing identified non-compliance with Code of Conduct certification requirements, including some Clergy who have not signed the Code since 2004. StoneTurn expanded testing to assess the entire active Clergy, Employee and Volunteer population and identified that approximately 27% of Clergy, 23% of Employees and 61% of Volunteers did not certify the updated 2025 Code of Conduct.⁵⁴ The Diocese acknowledged it does not have explicit disciplinary measures prescribed for non-compliance and identified this as a potential driver for the level of non-compliance. The Monitor agrees the significant instances of non-compliance are due to a lack of clear consequences for individuals who do not sign the Code.

The Diocese has agreed to address this issue through additional follow-up or imposing appropriate consequences for non-compliance (e.g., targeted outreach to out of compliance Clergy, Employees, and Volunteers) and is in the process of identifying appropriate remedial consequences. The OPCYP Director and OSE Coordinator are keen to implement processes to achieve greater compliance.

- **Agreed-Upon Enhancement 1.** The Diocese will enhance oversight of Code of Conduct certifications, including using manual or automated reminders and imposing appropriate consequences on individuals who fail to certify by a specified date. Within 60 days of this Report, the Diocese will provide the Monitor with a plan to implement the enhanced oversight and consequence management processes (e.g., distribution of the Code, monitoring completion).

The Diocese did not consistently document allegation details when the reporter could not identify the specific accused.

The Diocese received a small number of allegations that did not identify the accused. In such circumstances, the Diocese endeavored to identify the person but inconsistently retained records of the allegation. The Monitor suggested that the Diocese retain all known allegation details in its Incident Tracking System ("ITS") for future reference, should additional information become available or the allegations be linked to future reports. The Diocese acknowledged the value of this approach and agreed to incorporate these allegations into its system.

- **Agreed-Upon Enhancement 2:** The Diocese will record in ITS system allegations from

⁵² AOD ¶109.

⁵³ Signed Religious Order Agreement Addendums, RCDOB-0002820-2962.

⁵⁴ The Diocese's records reflect a small number of Clergy and Employees and a few hundred Volunteers out of approximately 35,000 have not signed the Diocesan Code of Conduct, even a prior one, during their ministry, employment, or volunteering relationship with the Diocese. Master Compliance Spreadsheet, RCDOB-0003086.

reporters it could not identify for future reference.

IV. Office for the Protection of Children and Young People ("OPCYP")

A. Background

During the course of the OAG's investigation the Diocese established the OPCYP Director role in November 2021 to oversee the Diocese's processes focused on the prevention of Abuse, victim assistance, and addressing allegations of Abuse.⁵⁵ The OPCYP Director oversees the OPCYP and is responsible for implementing, overseeing, and maintaining programs and policies in accordance with the Charter.⁵⁶ More specifically, the OPCYP Director oversees and monitors Clergy, Employees, and Volunteers' compliance with the Diocese's policies and procedures to ensure a safe environment for children, young people, and vulnerable adults within the Brooklyn Diocese. The Director is also responsible for overseeing the OSE, the Clergy Monitor, and ensuring the Diocese complies with its record retention policies.⁵⁷

B. Summary of Enhancements

OPCYP Director's Roles and Responsibilities

The Diocese demonstrates consistent compliance with the requirements set forth in the AOD regarding the Bishop's oversight and the Office of Protection of Children and Young People ("OPCYP") Director role. We found that the Bishop maintains a clear familiarity with all relevant Diocesan policies and actively engages with the OPCYP Director. Further, the Diocese continues to effectively utilize the OPCYP Director position to combine and coordinate its Abuse prevention, victim assistance, and related initiatives.⁵⁸

The OPCYP Director meets all required qualifications and reports directly to the Vicar General⁵⁹ who, in turn, reports to Bishop Brennan. The OPCYP Director leads a six-person team, including the OSE Coordinator, the Victim Assistance Coordinator ("VAC") and three program specialists and administrators focused on the Diocese's compliance processes.⁶⁰ The OPCYP Director holds no other position within the Office of Victim Assistance Ministry, thereby avoiding potential conflicts of interest.⁶¹

The Diocese implemented the Monitor's suggestion to revise the OPCYP Director's job description to include the responsibilities the Director handles in practice, which had been previously omitted (i.e., Supplemental Enhancement).⁶²

⁵⁵ AOD ¶81.

⁵⁶ OPCYP Position Description, pp. 1-2. RCDOB-0000038. Discussion with Diocesan personnel, OPCYP.

⁵⁷ AOD¶84. Discussion with Diocesan personnel, OPCYP.

⁵⁸ AOD¶84. Discussion with Diocesan personnel, Bishop, OPCYP.

⁵⁹ The Vicar General for the Brooklyn Diocese does not serve as the Vicar for Clergy. Diocese of Brooklyn Organizational Chart, RCDOB-0000717.

⁶⁰ Discussions with Diocesan personnel, OPCYP.

⁶¹ Discussions with Diocesan personnel, OPCYP.

⁶² OPCYP Position Description, RCDOB-0000038.

Qualifications and Experience

The OPCYP Director, appointed by the Diocese in March 2022, has over 20 years of experience. Before this role, the OPCYP Director served as the OSE Coordinator for 15 years and, prior to that, held several positions supporting the Diocese's ongoing compliance with the USCCB Charter and the implementation of related Diocesan policies. She also temporarily served as the VAC until the Diocese appointed a new VAC in August 2022.⁶³

Professional Development

To remain current with the latest developments and best practices in the field, the OPCYP Director completes and intends to continue completing professional development and continuing education training. In Year One, this training included attending conferences and completing the USCCB Child Abuse Prevention Empowerment ("CAPE") Program.⁶⁴ The Monitor assessed the OPCYP's trainings in 2025 and confirmed they satisfy the AOD requirements, affirming the Diocese's proactive approach to ongoing professional growth in this critical area.

Responsibilities

The OPCYP Director has many roles and responsibilities, including:

- Monitoring compliance with the Diocese's Policies;
- Notifying the Bishop and the Monitor of any AOD or Policies noncompliance;
- Reviewing and recommending policy updates;
- Advising the Bishop on Diocese compliance with the Policies;
- Coordinating the monitoring of accused Clergy and Clergy facing credible Abuse or Improper Conduct allegations;
- Maintaining records related to the Diocese's Policies;
- Overseeing the Diocesan Support and Safe Environment Offices;
- Ensuring timely updates and uploads to the Diocese's website;
- Keeping up to date on best practices; and
- Ensuring the Diocese trains all members of the DRB on the Diocese procedures and standards for its allegations reporting and investigation processes.⁶⁵

During Year One, the Monitor suggested enhancing the Diocese's policy review process to require an annual review of its Policies and documentation of updates made. The Diocese accepted these suggestions, reviewed its Policies, made several enhancements in October 2025 and published the updated Policies on the website in January 2026.⁶⁶

The OPCYP Director fulfilled her AOD obligation to train the DRB within two months of the AOD by providing an overview of the obligations imposed by the AOD for the Bishop, DRB, OPCYP Director, Victim Assistance Coordinator, and Clergy Monitor in May 2024.⁶⁷ As required under the AOD, the OPCYP Director provided subsequent training and professional development opportunities for the

⁶³ OPCYP Director Resume, RCDOB-0000055.

⁶⁴ Certification of Training Completion, RCDOB-0000792. Discussions with Diocesan personnel, OPCYP.

⁶⁵ AOD ¶84a-k, ¶93. OPCYP Position Description, RCDOB-0000038. Discussions with Diocesan personnel, OPCYP.

⁶⁶ SAP Policy, DRB Bylaws, DRB Protocols, Monitoring Procedures, Whistleblower Policy, January 2026. Discussions with Counsel.

⁶⁷ DRB Meeting Minutes, May 18, 2024, RCDOB-0000705. DRB Training Dates, RCDOB-0000733.

DRB in January and November 2025, and provided one-on-one training for the newest DRB member who joined in July 2025.⁶⁸ The OPCYP Director implemented the Monitor's suggestion (i.e., Supplemental Enhancement) that the Diocese require DRB members to annually acknowledge in writing that they have read and understand the Diocese's policies and procedures governing investigations into allegations of Abuse or Improper Conduct by Clergy members.⁶⁹ The training and additional professional development enhance the DRB's skill set and strengthen its advisory role. The Monitor discusses the DRB in greater detail in **Section VIII** below.

C. Observations and Agreed-Upon Enhancements

The Monitor did not identify any observations or Agreed-Upon Enhancements specific to the OPCYP during Year One that the Diocese had not already addressed.

V. Clergy Monitor

A. Background

The Diocese established the Clergy Monitor position within the OPCYP to oversee and enforce the Diocese's response to Clergy members who are under investigation for Abuse or Improper Conduct or have been credibly accused of Abuse or Improper Conduct and who continue to work for, or receive benefits from, the Diocese ("supervised Clergy members").⁷⁰ The AOD required the Diocese to create the role to prevent the recurrence of misconduct and to safeguard minors and Vulnerable Persons by limiting contact with such Clergy members.⁷¹ The Clergy Monitor meets regularly with supervised Clergy members to ensure compliance with agreed-upon plans and review their spiritual, psychological, and health needs.⁷²

The Diocese restricts Clergy members under investigation for Abuse or Improper Conduct from ministry and requires them to agree upon a Monitoring Plan with the Clergy Monitor. These Monitoring Plans typically include clauses prohibiting saying mass publicly at any parish, hearing confessions, remaining on school grounds, having unsupervised contact with persons under the age of 18, and requiring notification to the Clergy Monitor of any anticipated overnight travel outside the Diocese.⁷³ Clergy who are incarcerated are not subject to monitoring until they are released. The Clergy Monitor will be notified of their release, and the Diocese will resume its own monitoring upon release.⁷⁴

Clergy members who have been credibly accused of Abuse are: (1) prohibited from exercising priestly ministry in all forms (e.g., celebrating mass publicly, hearing confession, celebrating sacraments, wearing the Roman collar or clerical garb, or being introduced as "Father"); (2) prohibited from

⁶⁸ DRB Meeting Minutes, January 25, 2025, RCD0B-0000511, pp. 2-3. DRB Training Dates, RCD0B-0000733. Discussion with Diocesan personnel, OPCYP.

⁶⁹ DRB Protocols, January 2026, p. 4.

⁷⁰ AOD ¶100b.

⁷¹ AOD ¶100. Clergy Monitor Position Description, p. 2., RCD0B-0000184. Diocese of Brooklyn, Monitoring Procedures, January 2026, p. 1.

⁷² The Clergy Monitor conducts quarterly in-person visits for New York State-based supervised Clergy members and annual in-person visits, with bi-monthly telephonic check-ins, for out-of-state supervised Clergy members. Cover Letter, RCD0B-0000044. List of Monitored Clergy, RCD0B-0000002.

⁷³ Discussion with Diocesan personnel, Clergy Monitor. Example Clergy Monitor Plan, RCD0B-0000004.

⁷⁴ Discussions with Diocesan personnel, Clergy Monitor.

providing spiritual direction, pastoral care, counseling, and all other forms of ministry; and (3) required to report travel to the Clergy Monitor.⁷⁵

B. Summary of Enhancements

Clergy Monitoring Procedures and Clergy Monitor Role

The Diocese complies with the AOD's requirements governing the Monitoring Procedures and the Clergy Monitor's role, although in one instance, the Diocese did not maintain documentary evidence of compliance, as described below.

The Monitoring Procedures assign the Clergy Monitor responsibility for developing, documenting, and overseeing an individualized monitoring plan for each supervised Clergy member. The Clergy Monitor, who is a lay person with extensive law-enforcement training, performs and documents the required supervision of Clergy. The Monitoring Procedures also require each supervised Clergy member to have monthly contact with a designated Clergy member.⁷⁶ StoneTurn understands that a Diocesan priest who is also a licensed psychologist maintains periodic telephone contact with supervised Clergy members to fulfill this requirement. This periodic contact is meant as an additional check in on the supervised Clergy members' mental health and wellbeing as part of the Diocese's Monitoring. However, the Diocese was unable to provide documentation demonstrating that these calls occur monthly, as required under the AOD.⁷⁷ The Monitor and the Diocese agreed to enhancements to address the documentation issue as reported below under Agreed-Upon Enhancement 3.

During Year One, the Monitor worked with the Clergy Monitor to strengthen the Monitoring Procedures. The Diocese revised the Procedures to formally require approval of each Monitoring Plan by the OPCYP Director and the Bishop, consistent with existing practice (i.e., Supplemental Enhancement).⁷⁸

Monitoring of Employees and Volunteers

The Diocese complies with the AOD requirements for monitoring the activities of Employees and Volunteers who commit Code of Conduct violations during their service to the Diocese. Since the signing of the AOD, all Employees and Volunteers who violated the Code of Conduct have been terminated, with one exception. The exception involves a parish Volunteer who violated the Code in a matter not involving Abuse but rather by commenting on a minor's appearance. The Diocese suspended the Volunteer during the investigation. Following an investigation and admission of the conduct, the Diocese required the Volunteer to complete remedial training and implemented periodic check-ins.⁷⁹

⁷⁵ Diocese of Brooklyn, Monitoring Procedures, January 2026, p. 2.

⁷⁶ Diocese of Brooklyn, Monitoring Procedures, January 2026, p. 2.

⁷⁷ Discussions with Diocesan personnel, Clergy Monitor.

⁷⁸ Diocese of Brooklyn, Monitoring Procedures, January 2026. As noted above, the Diocese published its updated Policies on the website in January 2026.

⁷⁹ Separate from her role as a Volunteer, this individual also served as a substitute teacher in Diocesan schools. She was similarly suspended from this role during the investigation and subsequent remediation. Discussions with Diocesan personnel, OPCYP. Remediation Training Support, RCD0B-0003223, RCD0B-0003235, RCD0B-0003237.

Clergy Monitor Qualifications and Experience

The Diocese appointed the current Clergy Monitor in August 2022.⁸⁰ She dual-hats as the VAC position and brings over 20 years of experience in law enforcement and forensic services, including specialized work in child abuse investigation and sex offender monitoring.⁸¹ This background provides her with unique and relevant expertise that more than satisfies the requirements set forth in the AOD.

Although the AOD does not set forth any professional development or continuing education requirements, the Clergy Monitor attends USCCB conferences and calls with local Clergy Monitors of other Dioceses to remain current with the latest developments and best practices in the field.⁸²

C. Observations and Agreed-Upon Enhancements

The Monitor did not identify any observations or Agreed-Upon Enhancements specific to the Clergy Monitor during Year One that the Diocese had not already addressed. However, we identified one observation and AOD Enhancement to address documentation of these issues.

The Diocese does not retain documentation demonstrating that the required monthly calls with monitored Clergy occurred.

However, with respect to the requirement that supervised Clergy members have monthly contact with a designated member of the Diocese, the Diocese does not presently mandate the retention of documentation demonstrating that these periodic (i.e., monthly) phone calls occurred. This monthly contact is required under the AOD and the designated individual should have maintained records.⁸³

- **Agreed-Upon Enhancement 3:** The Clergy Monitor will ensure the Diocese documents and retain records of the designated Clergy member's phone calls with supervised Clergy members to demonstrate compliance with the AOD and Monitoring Procedures.

VI. Office of Safe Environment (“OSE”)

A. Background

The OPCYP Director previously held the positions of both OPCYP Director and OSE Coordinator until November 2025 when the Diocese promoted an experienced parish and OSE employee to serve as the OSE Coordinator. The Diocese expects the OSE Coordinator's onboarding transition to continue through June 2026. The Monitor understands the Diocese began its transition of the OSE Coordinator role and hired an experienced parish employee to join the OSE to support the process.⁸⁴

The Diocese established the OSE in 2004 to oversee the implementation of the Diocesan response to and compliance with the USCCB's Charter requirements. Further, the OSE oversees background checks, training requirements and knowledge-check bulletins, and Code of Conduct compliance among Clergy, Employees, and Volunteers (collectively “compliance requirements”).⁸⁵ The Diocese

⁸⁰ Clergy Monitor Resume, p. 1, RCD0B-0000044.

⁸¹ Clergy Monitor Resume, RCD0B-0000044.

⁸² Discussions with Diocesan personnel, OPCYP.

⁸³ AOD ¶100a. Correspondence with Diocesan personnel, Clergy Monitor.

⁸⁴ Discussions with Diocesan personnel, OSE.

⁸⁵ AOD ¶85a.

utilizes the VIRTUS-online platform to assign, track, and deliver these compliance requirements.⁸⁶

Background Checks

The OSE Coordinator maintains responsibility for background searches for incoming Clergy, Volunteers, and Employees.⁸⁷ The VIRTUS system prompts the Diocese to approve and provide basic personal information to initiate the search. The Diocese uses a vendor to perform initial background searches and retains the results for six years in VIRTUS. The vendor conducts quarterly database searches for all Clergy, Employees, and Volunteers after the initial check, which the OSE Coordinator reviews.⁸⁸ If a background check reveals history of sexual offenses or related misconduct, the OSE Coordinator must preclude individuals from commencing or serving in a position with the Diocese.⁸⁹

Training and Monthly Knowledge Checks

The OSE Coordinator also oversees the training of Clergy, Employees, and Volunteers to foster a safe environment by maintaining and administering modules through VIRTUS and the Child Lures Prevention program.⁹⁰ The trainings cover topics related to the protection of children, anti-harassment, and boundary awareness.⁹¹ During Year One, the OSE Coordinator administered required training both in-person and virtually to Clergy, Employees, and Volunteers.⁹²

Further, the OSE Coordinator uses VIRTUS to administer monthly knowledge check informational bulletins for Clergy and Employees to complete as part of their Compliance Requirements. Bulletins always include knowledge check questions. The Diocese established parameters for determining whether an individual is complying with the training, bulletins, and Code of Conduct certification. Volunteers may complete but are not required to complete these bulletins.⁹³

On-Site Audits

The OSE Coordinator is responsible for overseeing and conducting on-site audits of parishes, schools, and other entities' compliance with the Safe Environment Program and standards defined in the Charter.⁹⁴

B. Summary of Enhancements

i. Mandate for Office

The OSE Coordinator role fulfills the responsibilities required under the AOD. Specifically, she employs VIRTUS to maintain oversight of compliance requirements, including: (1) required acknowledgements with the Codes of Conduct; (2) monthly bulletins; (3) required Abuse prevention

⁸⁶ [Virtus](#) is a subsidiary of [The National Catholic Risk Retention Group](#), a nonprofit, tax exempt stock insurance company that provides risk management programs and insurance for dioceses, religious institutes, and other Catholic entities.

⁸⁷ OSE Coordinator Position Description, RCDOB-0000095.

⁸⁸ Discussions with Diocesan personnel, OSE. SAP Policy, p. 11, January 2026. Charter, Article 13, June 2018.

⁸⁹ Discussions with Diocesan personnel, OSE.

⁹⁰ Discussions with Diocesan personnel, OSE. The Monitor understands the Child Lures Prevention Program ended its operations in 2025. The Diocese purchased training content materials from Child Lures to implement the training for another two to three years. The OPCYP Director and OSE Coordinator created a training task force to replace the Child Lures Prevention Program training and are continuing to evaluate their options.

⁹¹ Discussions with Diocesan personnel, OSE. AOD ¶85a.

⁹² Observation of Diocesan Training.

⁹³ Discussions with Diocesan personnel, OSE.

⁹⁴ OSE Coordinator Position Description, p.1, RCDOB-0000095. Discussions with Diocesan personnel, OSE.

training; and (4) background checks.⁹⁵

Our review of training materials and observation of trainings confirmed that the trainings achieve the necessary objectives of helping to foster a safe environment. Specifically, StoneTurn observed the "Protecting God's Children" and "Protecting God's Children from Maltreatment" trainings and reviewed the training materials for the Child Lures Prevention and Teen Lures Prevention Trainings.⁹⁶

We suggested—and the Diocese agreed—that training should include knowledge checks to assess and reinforce participant comprehension. The OSE Coordinator worked with VIRTUS to enable knowledge checks in its training programs.⁹⁷ The Monitor inspected the knowledge checks implemented and confirmed the Diocese included the required updates.

The Monitor's testing identified several retired Clergy who remained active in ministry but were out of compliance with requirements for completing Compliance Training and Code of Conduct certifications.⁹⁸ The OSE Coordinator sent a letter to approximately 45 active senior Clergy emphasizing the importance of complying with all safe environment mandates and instructing them to log into their VIRTUS accounts to address any outstanding requirements.⁹⁹ The letters had an overall positive outcome, resulting in the Diocese narrowing the number of Clergy who have gaps in compliance. As noted above, the Diocese and the Monitor believe the instances of non-compliance can be attributed in part to a lack of clearly specified consequences for individuals who do not sign the Code or complete the Compliance Training. Additionally, the Monitor identified insufficient monitoring of the completion of the Compliance Training and Code of Conduct certification to be a root cause of the levels of non-compliance.¹⁰⁰ Similarly, the Monitor identified other gaps in the Diocese's completion rates for its annual compliance training requirements as documented below. The Monitor and the Diocese agreed to enhancements to address this issue as reported below under Agreed-Upon Enhancement 4 and 5.

The Monitor has no findings or recommendations regarding the OSE Coordinator's performance. However, the Monitor's assessment identified enhancement opportunities to improve the design of policies or processes within the OSE.

C. Observations and Agreed-Upon Enhancements

The Diocese reconciles its list of active and retired Clergy against the Clergy Personnel's updated list only once a year resulting in discrepancies that limit the Diocese's ability to oversee retired Clergy and ensure that those who continue to serve in ministry adhere to the Diocese's training and Code of Conduct requirements.

The Monitor identified discrepancies in the Diocese's internal records used to identify active, retired and inactive Clergy. The discrepancies result from reconciling the Clergy Personnel's list of retired

⁹⁵ AOD ¶85a. OSE Coordinator Position Description, p.1, RCDOB-0000095.

⁹⁶ Observation of Diocesan Training. Training Materials, RCDOB-0000198, RCDOB-0000486, RCDOB-0001833, RCDOB-0001865, RCDOB-0001868, RCDOB-0001871, RCDOB-0001873-0001878.

⁹⁷ Virtus Training Module Knowledge Checks, RCDOB-0001879-1889. Discussion with Diocesan personnel, OPCYP.

⁹⁸ The Monitor understands Clergy who are retired but active are those individuals who have retired from ministering but there is remaining activity in which the Clergy could potentially still have interactions with minors and vulnerable persons and they would still be in a position to receive disclosures from others of suspected Abuse or Improper Conduct and therefore must complete the VIRTUS training and bulletins. Discussion with Diocesan personnel, OPCYP.

⁹⁹ Letter to Senior Priests, RCDOB-0002383. Discussion with Diocesan personnel, OSE.

¹⁰⁰ Discussion with Diocesan personnel, OSE.

Clergy with the VIRTUS system only once per year. Increasing the reconciliation frequency to quarterly should address the underlying issues.¹⁰¹

- **Agreed-Upon Enhancement 4.** The Diocese will increase the frequency of the OSE Coordinator's reconciliation of Clergy Personnel's listing of retired Clergy to the VIRTUS system to occur on a quarterly basis.

The OSE Coordinator does not have the authority nor mechanisms to impose consequences upon Clergy members, Employees, and Volunteers who do not complete their assigned training and Code of Conduct certifications.

The Monitor's testing identified multiple instances in which Clergy, Employees, and Volunteers did not complete required training. StoneTurn expanded testing to assess the entire active Clergy, Employee and Volunteer population and identified that approximately 24% of Clergy, 19% of Employees and 77% of Volunteers did not complete the 2025 annual Compliance training.¹⁰² The Monitor understands that the OSE Coordinator follows up with these individuals to encourage completion and promote compliance. However, the OSE Coordinator does not have authority nor the mechanisms to impose consequences for noncompliance.

Similarly, the Diocese monitors the completion rates of its training bulletins and identifies where individuals are out of compliance. The Monitor's testing identified instances where Clergy and Employees were out of compliance for bulletin completion. StoneTurn expanded testing to assess the entire active Clergy and Employee population and identified that approximately 30% of Clergy and 44% of Employees assigned bulletins are out of compliance for 2025 compliance bulletins.¹⁰³

As noted above, the Diocese acknowledged it does not have prescribed disciplinary measures in place for non-compliance and identified this as a driver for the level of non-compliance. The Monitor agrees the instances of non-compliance can be attributed in part to a lack of consequences for individuals who do not sign the Code. We also identified a root cause to be insufficient monitoring of the completion of the Compliance training.

The Diocese acknowledges that it can develop and implement additional mechanisms to strengthen oversight of compliance requirements and improve completion rates among Clergy, Employees, and Volunteers. The Diocese has agreed to address this issue through additional follow-up (e.g., targeted outreach to out of compliance Clergy, Employees, and Volunteers) and is in the process of identifying additional remedial solutions. The OSE team will continue working with the Monitor to identify and implement measures designed to increase compliance. The OSE Coordinator defined a professional goal to achieve a significant improvement in compliance during the second year of the monitorship.¹⁰⁴

- **Agreed-Upon Enhancement 5:** The Diocese will implement processes for the OSE to impose appropriate consequences for Clergy, Employees, and Volunteers that remain out of compliance with the Diocese's Compliance Requirements for training and bulletins. Within 60 days of this Report, the Diocese will provide the Monitor with a plan to implement the

¹⁰¹ Discussion with Diocesan personnel, OSE. Lists of Retired Clergy, RCDOB-0001611-0001612.

¹⁰² Master Compliance Spreadsheet, RCDOB-0003086.

¹⁰³ *Id.*

¹⁰⁴ Diocese of Brooklyn Employee Self-Evaluation, March 2026, RCDOB-0003298.

enhanced oversight and consequence management processes (e.g., monitoring completion).

VII. Office of Victims Assistance Ministry (“OVAM”)

A. Background

The Diocese established the OVAM in 2004 to assist victim-survivors of childhood Clergy Abuse.¹⁰⁵ The OVAM reports to the VAC and is responsible for providing initial counseling, therapy referrals, and other services (e.g., healing intervention team) and facilitating the Survivor’s Advisory Board.¹⁰⁶

B. Summary of Enhancements

OVAM Mandate and VAC’s Roles and Responsibilities

The Diocese demonstrates consistent compliance with the AOD requirements, including:¹⁰⁷

- Providing initial counseling, therapy referrals, and other services to all minor and Vulnerable Person victim-survivors of Abuse by Clergy members, and adult victims of Abuse by Clergy members and victims of Abuse by Employees or Volunteers on a case-by-case basis in consultation with OPCYP Director and other appropriate Diocesan leadership.
- Facilitating the Survivor’s Advisory Board, which provides advice to the Bishop about responding to the needs of victim-survivors and coordinating the Mass of Hope and Healing.¹⁰⁸
- Coordinating the Healing Intervention Team for a mass where the congregation learns that a Clergy member was removed from service.
- Not participating in Diocese or DRB investigations.

The Monitor collaborated with the Diocese to revise the VAC’s position description and supporting process documents to align with the VAC’s actual responsibilities (i.e., Supplemental Enhancement).¹⁰⁹

VAC’s Qualifications and Experience

The Diocese appointed the current VAC in August 2022 to oversee the OVAM. She dual-hats as the Clergy Monitor position. The VAC’s prior experience (i.e., over 20 years of experience in law enforcement and forensic services, including specialized work in child abuse investigation and sex offender monitoring) more than satisfies the AOD’s requirement of at least three years of experience working with victims of Abuse and uniquely qualifies her to serve effectively in this role.¹¹⁰ The Monitor has no concerns with the VAC’s capacity to serve in both roles.

¹⁰⁵ AOD ¶85b.

¹⁰⁶ The Survivor’s Advisory Board is composed of victim-survivors of Abuse and others with relevant professional training. The Advisory Board provides advice to the Bishop for responding to the needs of victim-survivors by developing new resources and providing outreach. AOD ¶85b(iii). VAC Position Description, RCDOB-0000184.

¹⁰⁷ Updated VAC Position Description, RCDOB-0001571. Healing Intervention Team Process, RCDOB-0001616. Survivor’s Advisory Board Process, RCDOB-0001618. Therapy and Counseling Services, RCDOB-0001620.

¹⁰⁸ The Mass of Hope and Healing is an annual mass that takes place to provide prayer and support for survivors of Clergy sexual abuse, their families, and all those who are impacted. The Mass of Hope and Healing was established in 2015, and its goal is to send a message not only to those who have already come forward but also raise awareness that the Diocese is here to help now [Diocese of Brooklyn Website - Mass of Hope and Healing](#).

¹⁰⁹ Updated VAC Position Description, RCDOB-0001571. Healing Intervention Team Process, RCDOB-0001616. Survivor’s Advisory Board Process, RCDOB-0001618. Therapy and Counseling Services, RCDOB-0001620.

¹¹⁰ VAC Resume, RCDOB-0000044.

The AOD does not require professional development or continuing education requirements. The VAC nonetheless attends USCCB conferences and conference calls with other VACs to remain current with the latest developments and best practices in the field.¹¹¹

C. Observations and Agreed-Upon Enhancements

The Monitor has no findings or recommendations regarding the VAC's performance relating to specific AOD requirements. However, our discussions with a sample of victim-survivors, identified an opportunity to improve the VAC's communications with victims.

Some victim-survivors reported uniformly positive experiences with OVAM; others identified areas for improvement in the frequency, timing and transparency of communication from the Diocese during the allegation investigation and deliberation processes.

The Team met with a sample of victim-survivors to obtain feedback on their interactions with the Diocese and its efforts to offer support and services. Victim-survivors provided positive feedback on their interactions with the VAC and made suggestions for strengthening the Diocese's support and communication with victims during the investigation.¹¹² This improved communication, including thoughtful consideration of the timing and format (e.g., offering to schedule meetings to discuss DRB decisions/outcomes), would help keep reporters informed throughout the process, reduce the risk of misunderstanding that may arise from limited communication, and support the Diocese's commitment to a trauma-informed response. The Diocese has already made efforts to improve its communication with victims (e.g., gaining an understanding of preferred communication modes) and is committed to continuing to identify ways to improve.

- **Agreed-Upon Enhancement 6.** The Diocese will continue its efforts to improve the frequency, timing and format of its communications with victims during the investigation, DRB and Diocese deliberation and follow up.

VIII. Allegations of Abuse or Improper Conduct

A. Background

The Diocese has a long-standing reporting, investigation, deliberation, and disciplinary process for allegations of Abuse or Improper Conduct involving minors or Vulnerable Persons made against Clergy members, Employees, or Volunteers.¹¹³

The Monitor requested that the Diocese provide documentation related to allegations involving Clergy members, Employees, and Volunteers from the signing of the AOD in April 2024 through the Monitorship Term. Altogether, the Diocese received allegations of historic Abuse against 11 Clergy in the period since the AOD was signed in April 2024 which it determined "at least seems to be true" as per the AOD and therefore the Diocese followed its policies for handling allegations of Abuse by Clergy.¹¹⁴ These allegations against the 11 Clergy include 15 allegations of Abuse as two Clergy had several allegations raised against them. Each of these allegations involves historic conduct; there have been no allegations of Clergy Abuse that occurred during the period since the AOD was signed.

¹¹¹ Discussions with Diocesan Personnel, OVAM.

¹¹² Discussions with Victim Survivors.

¹¹³ SAP Policy, January 2026. AOD ¶88.

¹¹⁴ Monitor's Review of all Allegations Reports since the AOD effective date of April 16, 2024. AOD ¶88c.

As described above, there is one allegation of present misconduct currently under review; it is not clear at this time whether that allegation constitutes Abuse or Improper Conduct. The Diocese also received during the AOD period allegations against 6 Clergy related to Code of Conduct Violations involving minors that did not rise to the level of Abuse.¹¹⁵ Please see **Table 1** below for more details on the allegations reported against Clergy, the Diocese’s process for investigating and actions taken in compliance with the AOD.

Table 1 – Allegations Against Clergy

Abuse or Improper Conduct Allegation	Number of Allegations	Number of Accused	Action Taken
Abuse	15	11	<ul style="list-style-type: none"> • 11 allegations against Clergy who were either deceased, laicized, or who had previously been credibly accused of Abuse and therefore were not required to go to the DRB under the AOD. • 4 allegations required investigation and reporting to the DRB under the AOD. • 8 allegations (against 4 Clergy) investigated and sent to DRB: <ul style="list-style-type: none"> ○ 1 Clergy found not credibly accused ○ 3 Clergy found credibly accused and removed from ministry <ul style="list-style-type: none"> ▪ 1 Clergy (4 allegations) was already laicized in 2008 ▪ 2 Clergy (3 allegations) removed from ministry with monitoring plans implemented and included on the Diocese’s list of credibly accused on the website. Both Clergy sent to DDF.
Improper Conduct	5	4	<ul style="list-style-type: none"> • 5 allegations (against 4 Clergy) investigated and sent to DRB <ul style="list-style-type: none"> ○ All 4 Clergy found credibly accused ○ 2 Clergy were visiting priests and removed from the Diocese to return to their home diocese who was informed of the misconduct. ○ 2 Clergy removed from ministry with monitoring plans implemented. 1 of 2 Clergy sent to DDF.
In Progress	3	2	<ul style="list-style-type: none"> • The investigations for 2 Improper Conduct allegations of are currently in progress. • As noted above, the Diocese is handling one present day allegation according to its procedures for Abuse allegation; it is not clear at this time whether that alleged misconduct constitutes Abuse or Improper Conduct.

With regard to Employees and Volunteers, the Diocese received and addressed 6 allegations of Abuse and 23 allegations of Code of Conduct Violations that do not rise to the level of Abuse during this period.¹¹⁶ The Diocese is in the process of investigating and addressing one Abuse allegation and one Improper Conduct allegation reported against an Employee and a Volunteer, respectively.

Please see **Table 2** below for more details on the allegations reported against Employees and Volunteers, the Diocese’s process for investigating and actions taken in compliance with the AOD.

¹¹⁵ *Id.*

¹¹⁶ *Id.*

Table 2 – Allegations Against Employees and Volunteers

Abuse or Improper Conduct Allegation	Number of Allegations	Number of Accused	Action Taken
Abuse	6	6	<ul style="list-style-type: none"> • 6 allegations (against 6 Employees/Volunteers) investigated <ul style="list-style-type: none"> ○ 1 allegation determined unsubstantiated ○ 5 allegations determined to be credible and all 5 terminated
Improper Conduct	23	23	<ul style="list-style-type: none"> • 2 allegations raised against unknown accused individuals • 21 allegations (against 21 Employees/Volunteers) investigated <ul style="list-style-type: none"> ○ 18 allegations determined to be credible and terminated or resigned ○ 1 accused completed remedial training ○ 2 allegations unsubstantiated
In Progress	2	2	<ul style="list-style-type: none"> • The investigation for 1 Improper Conduct allegation is currently in progress. • The investigation for 1 Abuse allegation is currently in progress.

The Monitor will continue to test operational effectiveness, provide contemporaneous feedback to the Diocese, and report any outstanding agreed-upon enhancements in the Year Two report.

B. Summary of Enhancements

Allegations Receipt and Handling

As discussed, the AOD requires the Diocese to report all allegations of (1) Improper Conduct, defined as “conduct that does not constitute Abuse but that nonetheless violates the provisions of the Diocese’s Codes of Conduct (as revised in accordance with the requirements of th[e] Assurance of Discontinuance), which are intended to prevent improper sexual touching, sexual activity, or display or creation of pornography involving a minor or a nonconsenting adult,”¹¹⁷ and (2) Abuse to its Reporting Line, a telephone line staffed by an independent attorney.¹¹⁸

The Diocese receives allegations through the Reporting Line or online form. An independent attorney collects the facts of the allegation and prepares an allegation report, which the Diocese shares with Diocesan leadership (i.e., Bishop, VAC, OPCYP Director), and the Independent Monitor.¹¹⁹ The Diocese also notifies the local District Attorney’s office where the incident occurred for all allegations of Abuse against a minor or Vulnerable Person.¹²⁰ The Diocese logs all allegations received in its electronic filing system, Incident Tracking System (“ITS”), except for a small population of allegations (i.e., three allegations in Year 1) raised against an unknown accused.¹²¹ The Monitor receives periodic updates of the Diocese’s ITS records and confirmed that the Diocese documented all

¹¹⁷ AOD, p. 1.

¹¹⁸ AOD ¶88. SAP Policy, January 2026, p. 4. We note there is some ambiguity as to whether this language covers all provisions of the Codes of Conduct or only those intended to prevent improper sexual touching, sexual activity, or display or creation of pornography that involves a minor or a nonconsenting adult. For the avoidance of doubt, the Diocese has taken the position that it will report all allegations of Code of Conduct violations to the Reporting Line.

¹¹⁹ Discussions with Diocesan Reporting Line Independent Attorney.

¹²⁰ Pursuant to the Diocese’s OAG-approved Reporting & Referral Policy, the Diocese does not distribute reports of Code of Conduct allegations that do not entail Abuse or unlawful conduct to the District Attorney’s Office. AOD ¶88a-c. SAP Policy, January 2026.

¹²¹ SAP Policy and Record-Keeping Policies, January 2026, p. 12.

allegations raised with a known accused within the system.¹²²

The Monitor also met with the independent attorney to confirm his competency and understanding of his role and responsibilities.¹²³

The Diocese self-identified that it inconsistently reported Code of Conduct allegations to the Reporting Line from the start of the AOD in April 2024 through early September 2025.¹²⁴ These allegations did not involve allegations of Abuse, sexual touching, or the creation or display of pornography. The Diocese confirmed that although inconsistently reported through the hotline, all allegations were logged and tracked in ITS, thereby preserving the relevant information. The Diocese has since updated its process to ensure the consistent reporting of all allegations of Improper Conduct to the Reporting Line.¹²⁵

At the start of the Monitor Term, the Diocese did not document oral notifications of allegations to the Bishop. To address this gap, the Diocese updated its reporting process to include the Bishop directly on all allegation reporting from the independent attorney.¹²⁶

In Year One, the Monitor and OAG identified two allegations of Abuse where the Diocese requested the reporter to contact the New York State Central Registry (“NYS Central Registry”) which differed from the Diocese’s designed Policy and AOD requirement for the OPCYP Director to report the allegation to the Special Victims Unit (“SVU”) of the New York Police Department (“NYPD”). The NYS Central Registry operates a 24/7 hotline and tracks and refers the case to the local SVU of the NYPD and informs other agencies as needed (e.g., Administration for Children’s Services).¹²⁷ The Monitor understands that this is the standard method to report claims of child abuse in New York State.

The Monitor identified opportunities to streamline external reporting. Consequently, the Diocese updated its SAP Policy to ensure the OPCYP Director directly handles and documents all reports to the NYS Central Registry, ensuring consistent coordination with law enforcement.¹²⁸ This enhancement supports timely and consistent reporting and reduces the risk that matters go unreported to the NYPD’s SVU.

The Monitor continues testing the operational effectiveness of the Diocese’s allegation handling and investigation procedures for allegations against Clergy members, Employees, and Volunteers. The Monitor identified enhancements below but did not identify any material non-compliance issues with the Diocese’s allegation handling processes in Year One. The Monitor will present any additional agreed-upon enhancements identified in Year Two.

Allegations Against Clergy

DRB Oversight

The DRB consists of eight voting members with backgrounds in law enforcement, clergy, family law, medical and mental health, and victim advocacy.¹²⁹ In July 2025, the Diocese added a victim-

¹²² ITS Extracts, RCD0B-0001602, RCD0B-0002042, RCD0B-0002795, RCD0B-0003239.

¹²³ Discussion with Diocesan Reporting Line Independent Attorney.

¹²⁴ Discussions with Counsel.

¹²⁵ Discussions with Diocesan personnel, OPCYP. Discussions with Counsel.

¹²⁶ Discussions with Diocesan personnel, OPCYP. Discussions with Counsel.

¹²⁷ Discussions with Diocesan personnel, OPCYP and OVAM.

¹²⁸ SAP Policy, January 2026, p. 4.

¹²⁹ DRB Member Resumes, RCD0B-0000525, RCD0B-0000664, RCD0B-0000667, RCD0B-0000669, RCD0B-0000773,

survivor to the Board.¹³⁰

The Diocese enhanced its policies by requiring the DRB to enhance its skill set and strengthen its advisory role to the Bishop. To comply with the AOD, the Diocese updated the DRB Bylaws and Protocols to require the DRB to: (1) familiarize itself with the Diocese's Policies and the terms of the AOD; (2) meet with the Independent Monitor and OPCYP Director at least quarterly; (3) prepare agendas and minutes of all DRB meetings; and (4) maintain and preserve all documents distributed in connection with the DRB meetings.¹³¹

In Year One, the Monitor attended monthly DRB meetings, met individually with DRB members, and participated in quarterly meetings and trainings with the OPCYP Director.¹³² The DRB prepared agendas and minutes for all meetings—including those addressing Diocesan policies—and complied with the Diocese's record-keeping requirements.¹³³

Investigation

If the allegation is against a living Clergy member, the Diocese forwards the allegation to the Bishop for an initial assessment to determine if, on its face, the allegation “at least seems to be true.”¹³⁴ If the allegation meets that threshold, the Bishop initiates a canonical inquiry and forwards the case to the DRB.¹³⁵

The DRB independently evaluates the allegation. If the accused Clergy member denies the alleged Abuse or Improper Conduct, the Diocese retains an independent investigator to conduct a full investigation of the allegation(s).¹³⁶ As discussed below, the Monitor suggests that DRB and Diocese consider retaining an investigator even when the Clergy member admits to the conduct—as it has in one case. Further investigation may help identify additional victims and determine whether red flags warranted earlier reporting.

The Clergy Monitor, at the Bishop's direction, implements, documents, and oversees the accused Clergy member's compliance with the monitoring plan.¹³⁷

If the allegation is against a Clergy member who is deceased, laicized, or relegated to a life of prayer and penance, the Diocese determines whether to retain an independent investigator to conduct a full investigation and documents the reasons for its determination.¹³⁸ StoneTurn identified no issues regarding the Diocese's determination on whether to investigate an allegation based on the criteria

RCD0B-0000778, RCD0B-0001376, RCD0B-0001402.

¹³⁰ [Diocesan Review Board Member Webpage](#). New Member DRB Training, RCD0B-0001630. DRB Minutes July 2025, RCD0B-0001828.

¹³¹ DRB Bylaws and Protocols, January 2026. SAP Policy, January 2026, p. 12.

¹³² Observation of Diocesan meeting, DRB.

¹³³ Discussions with Diocesan personnel, DRB Members. Observations of Diocesan meeting, DRB. DRB Meeting Minutes and Agendas, RCD0B-0000511, RCD0B-0000705, RCD0B-0000709, RCD0B-0001322, RCD0B-0001492, RCD0B-0001664, RCD0B-0001747, RCD0B-0001810, RCD0B-0001822, RCD0B-0001828, RCD0B-0000510, RCD0B-0001486-0001489, RCD0B-0001599, RCD0B-0001626, RCD0B-0001892, RCD0B-0002988.

¹³⁴ AOD ¶88c.

¹³⁵ A canonical inquiry is an internal Church-law process used to gather and assess information about an allegation involving Clergy and to determine whether ecclesiastical action may be required. It is separate from any civil or criminal investigation [[Canons 1717-1718](#)]. AOD ¶88c. SAP Policy, January 2026.

¹³⁶ SAP Policy, January 2026, pp. 7-8. DRB Protocols, January 2026, p. 1.

¹³⁷ SAP Policy, January 2026, p. 5. Monitoring Procedures, January 2026, p. 1.

¹³⁸ The Diocese has an established process for determining whether to conduct the investigation into an allegation in consideration of certain factors (i.e., a deceased Clergy member, a Clergy member already relegated to a life of prayer and penance or a Clergy member who has admitted to the misconduct). SAP Policy, January 2026, p. 6.

defined in the AOD. In one case, the Diocese undertook an investigation of allegations against a laicized priest that the AOD did not require to be investigated.¹³⁹

Following the NYS Central Registry and DA Office reporting process detailed above, law enforcement may investigate. The Diocese does not retain the independent investigator until after law enforcement concludes any active investigations.¹⁴⁰ As a Supplemental Enhancement, the Diocese developed the DRB Investigative Protocol to document the organization's investigation procedure, including the steps the Diocese expects the independent investigators to take when investigating. The procedure requires the independent investigator to investigate, prepare a report detailing the procedures performed and facts collected, and present their findings to the DRB.¹⁴¹

The Diocese established procedures governing the DRB's roles and responsibilities for investigating all allegations of Abuse and Improper Conduct involving minors and Vulnerable Persons raised against Clergy.¹⁴²

As required by the AOD, in overseeing the DRB Investigation, the Diocese's DRB Bylaws and Protocols require: (1) the DRB to commence the investigation within five business days after the referral; (2) timely completion of the investigation; (3) retention of an independent investigator to conduct all DRB investigations; (4) DRB to be informed of the progress of DRB investigations; and (5) DRB to obtain and evaluate evidence collected as part of the investigation to enable the DRB to make its determination on the credibility of the allegation.¹⁴³

DRB Procedures and Deliberation

The DRB met monthly during Year One when there were matters to review, including, despite typically not meeting during July or August, a July meeting to resolve the remaining then-pending cases. No meetings were held in October and December because there were no cases to discuss. The Monitor attended all meetings, either in person or by video. The DRB members were well prepared,¹⁴⁴ paid close attention to the investigators' presentations, asked insightful questions, and requested additional information as needed.¹⁴⁵

We also observed the DRB deliberations and found that the DRB fully satisfied the AOD requirements and DRB Protocols to evaluate the evidence independently and to determine whether the allegations of Abuse or Improper Conduct were credible. When weighing the evidence, the DRB complied with defined AOD standards for determining if the allegations were credible, including (1) applying the standard of where the evidence supporting the Abuse or Improper Conduct allegation is "worthy of being believed"; (2) recognizing that only one Abuse or Improper Conduct allegation is not alone a sufficient basis to determine that an allegation is not credible; and (3) weighing evidence against all

¹³⁹ RCD0B-0002346. Discussions with Counsel.

¹⁴⁰ SAP Policy, January 2026, pp. 4-5 and 7. DRB Protocols, January 2026, p. 5. Discussions with Diocesan personnel, OPCYP and OVAM.

¹⁴¹ DRB Investigative Protocol, RCD0B-0001985.

¹⁴² DRB Bylaws and Protocols, January 2026.

¹⁴³ DRB Bylaws, January 2026, p. 7. DRB Protocols, January 2026, pp. 1-2.

¹⁴⁴ The DRB receives investigative reports prior to the meetings. These reports include a lengthy executive summary followed by hundreds of pages of appendices and exhibits. The DRB members impressed us as having read the materials in advance. Discussions with Diocesan personnel, DRB.

¹⁴⁵ Observations of Diocesan Meetings, DRB.

other evidence reviewed.¹⁴⁶

The DRB maintains minutes of all meetings and documents its conclusion and recommendation to the Bishop regarding: (1) the sufficiency of evidence in determining whether the allegation is credible; (2) whether the Clergy's actions violated the Code of Conduct; and (3) the Clergy's suitability for ministry considering the allegation and other aspects of the case.¹⁴⁷ StoneTurn concluded the DRB's documentation provides sufficient information for the Bishop to make his determination.

In Year One, the Monitor reviewed the independent investigator's reports, interviewed the investigators, and observed the presentations made to the DRB.¹⁴⁸ The Monitor found that the investigators conducted the steps outlined in the DRB Investigative Protocol and thoroughly documented and presented the cases to the DRB. Therefore, the Monitor concluded that the DRB received the necessary facts to fulfill its role in making its determinations.

The Monitor recommended the Diocese develop and implement training for the DRB, in addition to the training conducted by the OPCYP Director, to provide guidance covering: (1) criteria for evaluating the credibility of allegations; (2) Clergy members' suitability for ministry; (3) methods for weighing evidence; and (4) effective investigative practices. As a Supplemental Enhancement, the Diocese developed guidance concerning the DRB's responsibilities for assessing the credibility of allegations and recommending whether the accused Clergy member is suitable for ministry.¹⁴⁹ The Diocese also provided training to the DRB in January 2026 covering methods for weighing evidence and in February 2026 covering investigative practices. On its own initiative, the Diocese also provided a victimology training in November 2025.¹⁵⁰ The trainings were well received by the DRB.¹⁵¹ The Monitor agreed the trainings helped to provide additional guidance. The Monitor believes the Diocese can enhance the training in the future by including additional examples and case studies.

DRB Referrals

The AOD requires the Diocese to refer allegations to the DRB when the accused Clergy member is alive, not relegated to a life of prayer and penance, and has not admitted to the alleged Abuse or Improper Conduct. Accordingly, the Diocese is not required to investigate when the accused Clergy: (1) admits to the misconduct; (2) is deceased; (3) has been laicized; or, (4) is already included on the list of credibly accused Clergy.¹⁵² In Year One, the Monitor observed that, when these conditions are met, the Diocese typically handled the allegations administratively, including through a memorandum from the Bishop documenting the rationale for not investigating the allegation or presenting it to the DRB.

As discussed in **Section III**, the Diocese referred Incident A and B to the DRB even though the AOD did not require referral. The DRB process revealed additional allegations of misconduct, which the Diocese addressed and is addressing appropriately. In light of Incidents A and B, the Monitor

¹⁴⁶ DRB Protocols, January 2026, pp. 2-3.

¹⁴⁷ DRB Protocols, January 2026, pp. 3-4. SAP Policy, January 2026, pp. 7-8. See, for example, RCD0B-0001607, RCD0B-0001732, RCD0B-0001492.

¹⁴⁸ Discussions with Diocese's independent investigator.

¹⁴⁹ DRB Guidance, RCD0B-0003046. DRB Training, RCD0B-0003030.

¹⁵⁰ Observation of Diocesan Meeting, DRB, November 15, 2025. RCD0B-0001892.

¹⁵¹ Observation of Diocesan Meeting, DRB, January 17, 2026, RCD0B-0003030. Observation of Diocesan Meeting, DRB February 7, 2026.

¹⁵² AOD ¶91.

suggests that the Diocese define the process and criteria for deciding when allegations that do not require DRB referral should nevertheless be referred for DRB investigation.

Bishop Determination and Remedial Actions

The Bishop considers the DRB’s recommendation, investigative report, and other supporting evidence to determine whether to remove the Clergy member from active ministry. If the Bishop administratively removes the Clergy member from ministry, the Diocese posts a press release, adds the Clergy member’s name to the list of credibly accused Clergy on the Diocese’s website, and informs the parish where the Clergy member is assigned of the decision and basis for it.¹⁵³ The Diocese retains documentation, including the report, DRB voting sheet, and DRB and Bishop letters under the Diocese’s Recordkeeping Policies.¹⁵⁴

The Diocese ensures the Bishop makes his written determination as to whether he agrees with the DRB’s recommendations within 20 days of receiving the recommendation.¹⁵⁵ StoneTurn confirmed the DRB and Bishop complied with this Diocesan policy as part of our testing of the Diocese’s allegation reporting, triaging, and investigation process. StoneTurn identified no instances where the Bishop did not agree with the DRB’s recommendation. As noted above, there were 23 allegations of misconduct involving minors raised against 17 Clergy from the signing of the AOD through the date of this Report. Of these, the AOD did not require a DRB investigation for 11 allegations, based on their facts and circumstances. However, as also noted above, the Monitor suggested the Diocese bring to the DRB two of the allegations even though DRB review was not required.

As of the date of this Report, the 3 allegations against 2 Clergy remain under review. In addition to these two cases still under investigation, during the period since the AOD, the DRB has considered 13 allegations raised against 8 Clergy members as some were accused by multiple individuals.¹⁵⁶ The Monitor describes the allegations raised against Clergy and the Diocese’s response in more detail in **Table 3** below.

Table 3 –Diocese’s Response to Allegations Raised Against Clergy

Categorization	Number of Allegations	Number of Clergy	Diocese/DRB Response
Allegations raised against Clergy	23	17	<i>See below.</i>
Investigations and DRB process in progress	3	2	<i>In progress.</i>
Allegations against Clergy who were either deceased, laicized, or who had previously been credibly accused of Abuse	11	8	<ul style="list-style-type: none"> 1 Clergy had 4 Abuse allegations raised against him, but he was previously laicized in 2008. The Diocese still investigated and reported these to the DRB for deliberation. 7 Allegations against 7 Clergy who were deceased or previously credibly accused of Abuse.
Total Allegations considered by	13	8	<ul style="list-style-type: none"> This includes 8 allegations of Abuse and 5

¹⁵³ SAP Policy, January 2026, p. 8.

¹⁵⁴ SAP Policy, January 2026, p. 12. DRB Protocols, January 2026, pp. 4-5.

¹⁵⁵ SAP Policy, January 2026, pp. 8-10.

¹⁵⁶ Two of these eight accused Clergy were alleged to have abused more than one victim.

Category	Number of Allegations	Number of Clergy	Diocese/DRB Response
the DRB			allegations of Improper Conduct.
Allegations against Visiting Clergy	2	2	<ul style="list-style-type: none"> The Diocese found both to be credibly accused and revoked operational support, including visa-related support, removed the Clergy members from the United States, and notified their foreign dioceses of the alleged misconduct.
Remaining allegations involving Clergy	11	6	<ul style="list-style-type: none"> 1 Clergy had 4 Abuse allegations against him 1 Clergy had 2 Abuse allegations against him 1 Clergy had 2 Improper Conduct allegations against him
Allegations the DRB found credibly accused	10	5	<ul style="list-style-type: none"> 1 Clergy was already laicized in 2008. 4 Clergy removed from ministry with monitoring plans; 3 of which were referred to the DDF.
Clergy members the DRB found not credibly accused	1	1	<ul style="list-style-type: none"> No action taken as allegation was unsubstantiated.

When the Bishop determines an Abuse allegation is credible, he: (1) must prohibit the accused Clergy from exercising any public ministry; (2) may require the Clergy to vacate his living quarters owned or controlled by the Diocese; and (3) must publicize his determination, the bases, and the DRB’s recommendation.¹⁵⁷ The Monitor identified no issues with the Bishop’s compliance with the Diocese’s processes.

In Year One, the Monitor observed that the Diocese made timely press releases and updated the list of credibly accused when the Bishop determined to remove a Clergy member from active ministry.¹⁵⁸ In Year Two, to the extent the situation occurs, the Monitor will visit local parishes and will observe the Diocese’s process for informing a congregation and providing support through the Healing Intervention Team.

Dicastery for the Doctrine of the Faith Referrals

The Charter and Diocesan Policies provide that when there is sufficient evidence of Abuse of a minor, the Bishop must notify the Vatican, specifically, the Congregation for the Doctrine of the Faith, which has been renamed the Dicastery for the Doctrine of the Faith (“DDF”).¹⁵⁹

The Bishop’s referral to the DDF is governed by Church Law. If the referral results in a Clergy member no longer being able to publicly minister or have contact with minors or Vulnerable Persons, the Bishop is responsible for ensuring the Diocese publicizes the results of the trial and that all records are maintained in compliance with policies.¹⁶⁰

The Diocese, as required, provided the Monitor with a list of Clergy referred to the DDF during the

¹⁵⁷ SAP Policy, January 2026, pp. 9-10.
¹⁵⁸ Allegation reporting documentation. [List of Credibly Accused](#).
¹⁵⁹ AOD ¶24(d). SAP Policy, January 2026, p. 8.
¹⁶⁰ SAP Policy, January 2026, pp. 9-10. AOD ¶94.

Monitorship.¹⁶¹ Of the 5 Clergy credibly accused of misconduct against a minor in the period since the AOD was signed in April 2024, the Diocese reported 3 to the DDF. The results and outcome of these referrals are pending and StoneTurn will report on the results in Year Two.

Allegations Against Employees and Volunteers

The allegation reporting process for Employees and Volunteers is similar to Clergy allegations. The principal difference is that the OPCYP Director, assisted by the Victims Assistance Coordinator, the Deputy Superintendent of Schools, and any relevant supervisor, makes the determination based on the investigation rather than the Bishop and formal DRB, although the Bishop is informed of all allegations and outcomes.

Another difference is that the Diocese established a reporting chain to alert the VAC who then alerts the OPCYP Director or the Deputy Superintendent of Schools. The VAC or Deputy Superintendent must report the allegation to the Reporting Line if it was not previously reported through that channel.¹⁶²

The Diocese does not retain the independent investigator until after law enforcement concludes any active investigations.¹⁶³ The OPCYP Director, VAC, and school leadership review the allegation, meet frequently, and determine if any immediate action is required (e.g., classroom coverage by other teachers or personnel) to ensure the safety and integrity of the classroom or environment.

If law enforcement declines to investigate, or its investigation does not result in any actions, the Diocese investigates the allegation itself, including by retaining an independent investigator for complex or other appropriate cases. The OPCYP Director, VAC, and school leadership review the report, determine if a Code of Conduct violation or Abuse occurred, and enforce any required disciplinary actions (e.g., enhanced training or supervision, termination).¹⁶⁴

Allegations of Abuse

The Diocese maintained and enhanced its current policies for reporting and responding to all allegations of Abuse by Employees and Volunteers.¹⁶⁵ During Year One, the Diocese always reported all such allegations, regardless of the date of the alleged Abuse, to the local District Attorney's office, the OPCYP Director and the NYPD Special Victims Unit through the New York State Central Registry. Any Employee or Volunteer who has been determined, after an appropriate investigation, to have committed Abuse involving a minor or Vulnerable Person is removed from their position.¹⁶⁶

Allegations of Code of Conduct Violations

The Monitor asked whether the Diocese had written procedures describing how it handles allegations of Code of Conduct violations by Employees and Volunteers. In practice, the typical response is to terminate Employees and Volunteers found to have engaged in Code of Conduct violations.

¹⁶¹ List of DDF Referrals, RCD0B-0002192.

¹⁶² Employee/Volunteer Code of Conduct Violation Procedure, RCD0B-0002858. Discussions with Diocesan Personnel, OPCYP, OVAM, and School Leadership.

¹⁶³ SAP Policy, January 2026, pp. 3-4. Discussions with Diocesan personnel, OPCYP, OVAM, and School Leadership.

¹⁶⁴ SAP Policy, January 2026, p. 10. Discussions with Diocesan personnel, OPCYP, OVAM, and School Leadership.

¹⁶⁵ SAP Policy, January 2026.

¹⁶⁶ SAP Policy, January 2026, p. 10.

In 2025 Q4, the Diocese developed and implemented a formal Employee/Volunteer Code of Conduct Violation Procedure.¹⁶⁷ Under this procedure, the Diocese internally reports all Code of Conduct Violation Allegations to the Bishop, the OPCYP Director, and the VAC. If an Employee or Volunteer violates the Code of Conduct involving a minor or Vulnerable Person and the Diocese does not remove that individual, the Diocese applies its Monitoring Procedures and supervises the individual's activities as appropriate to the specific violation.¹⁶⁸

The Diocese conducts all investigations into Employee and Volunteer Code of Conduct violations under the supervision and direction of the OPCYP Director. The Diocese decides whether to engage an independent investigator to investigate the allegation by considering the complexity of the required investigation and the status of any law-enforcement investigation. Regardless of who performs the investigation, investigative steps include interviews with the victim, accused Employee or Volunteer, and others as needed; a visit to the site where the alleged violation occurred; and a review of relevant records or communications.¹⁶⁹

The OPCYP Director, VAC, and Deputy Superintendent of Schools consult to determine the appropriate consequence for any Employees or Volunteers found to have violated the Code of Conduct. The OPCYP Director makes the final determination of the appropriate consequence and disciplinary action.¹⁷⁰

As part of our testing, StoneTurn confirmed that all Employees and Volunteers alleged to engage in Improper Conduct with a minor or Vulnerable Person were terminated except for one Volunteer accused of Improper Conduct for which the Diocese required the Volunteer to complete a remedial training program as the Improper Conduct was viewed as less egregious and the accused admitted to the conduct and sought forgiveness. The Diocese and Principal monitored the individual and confirmed the individual completed the required training.¹⁷¹

C. Observations and Agreed-Upon Enhancements

The Diocese self-identified two instances where it investigated but did not timely refer to the DRB allegations of Improper Conduct that did not include Abuse.

As noted, the Diocese requires the Bishop to initiate a canonical inquiry and forward to the DRB all Abuse and Improper Conduct allegations with specific documented exceptions (i.e., a deceased Clergy member, a Clergy member already relegated to a life or prayer and penance or a Clergy member who has admitted to the misconduct).¹⁷²

The Monitor confirmed the Diocese's compliance with its Policies. During its review, the Monitor noted two instances where the Diocese was not required to refer the allegations and related investigation to the DRB but for which the Monitor suggested the Diocese consider DRB referral.¹⁷³

¹⁶⁷ Employee/Volunteer Code of Conduct Violation Procedure, November 2025, RCD0B-0002858.

¹⁶⁸ *Id.* Monitoring Procedures, January 2026, p. 3.

¹⁶⁹ Employee/Volunteer Code of Conduct Violation Procedure, RCD0B-0002858. Discussions with Diocesan personnel, OPCYP, OVAM, and School Leadership.

¹⁷⁰ Employee/Volunteer Code of Conduct Violation Procedure, RCD0B-0002858. Discussions with Diocesan personnel, OPCYP, OVAM, and School Leadership.

¹⁷¹ Allegation and Remediation Files, RCD0B-0002683, RCD0B-0002979, RCD0B-0002688, RCD0B-0003223, RCD0B-0003235, RCD0B-0003237.

¹⁷² AOD ¶88c. SAP Policy, p. 5, January 2026.

¹⁷³ Discussion with Counsel. Allegation Documentation. RCD0B-0002357, RCD0B-0002348 and RCD0B-0002332.

In both instances, the Diocese retained an independent investigative firm to conduct investigation before determining that DRB referral was not required. As noted above, the AOD and Diocesan Policy did not require DRB referral because the Bishop and his advisors determined that one allegation was not Improper Conduct nor Abuse and that the Clergy member in the second allegation admitted to the Improper Conduct. However, upon discussion with the Monitor, the Diocese discretionarily agreed to refer the cases to the DRB for consideration. Upon identifying these cases, the Diocese directed its independent investigative firm to reopen the investigations and plans to bring the cases to the DRB once the additional investigative procedures are complete.¹⁷⁴ The Diocese reported both allegations to the Diocese's Reporting Line and to the Kings and Queens County District Attorney's Offices at the time received in April and May 2024. Since January 2025—one month prior to the commencement of the Monitorship—the Diocese has referred to the DRB all allegations of Code of Conduct Violations against Clergy, regardless of whether or not they include Abuse. The Monitor will continue to oversee this process and identify any additional remedial efforts needed.

- **Agreed-Upon Enhancement 7.** The Diocese will implement defined parameters within its Incident Tracking System to document compliance with Diocesan Policies and to ensure that the Diocese satisfies each requirement for every allegation raised. Within 60 days of this Report, the Diocese will provide the Monitor with the defined parameters and its plan to address the AUE.

The Diocese does not have a defined and established root cause analysis process to identify systemic failures or similar misconduct following an investigation into Abuse or Improper Conduct.

The Diocese has significantly enhanced its procedures for investigating the credibility of allegations and imposing sanctions. However, although the DRB is empowered to recommend changes to Diocesan policies when it deems appropriate, the Diocese and DRB do not, in the ordinary course, evaluate potential policy failures in connection with specific allegations.

The Diocese lacks a formalized Root Cause Analysis ("RCA") framework to be applied during or once an investigation concludes. Specifically, there is no structured requirement to evaluate:

- **Historical Patterns:** Whether the alleged wrongdoer had a history of similar misconduct or "red flag" behaviors that were documented but not synthesized;
- **Environmental Accountability:** Whether other individuals within the parish or school were aware of the misconduct or grooming behaviors but failed to report their concerns; and
- **Control Gaps:** Whether specific Diocesan controls or policies—such as supervision requirements, guest policies, or technology restrictions—were ineffective, bypassed, or non-existent.

Without a formal RCA process, the Diocese risks addressing individual symptoms rather than any underlying systemic weaknesses, potentially allowing similar misconduct to occur in different contexts. An RCA is a preventive tool which can help the Diocese become more proactive in identifying systemic gaps before they are exploited.

- **Agreed-Upon Enhancement 8.** The Diocese will consider developing a written root cause analysis

¹⁷⁴ Observation of Diocesan Meeting, DRB, January 17, 2026, RCD0B-0003030. Observation of Diocesan Meeting, DRB February 7, 2026.

framework that defines when and how to conduct an RCA. Within 60 days of this Report, the Diocese will inform the Monitor on whether they will design and implement an RCA and if not document its rationale for not doing so.

Certain steps in the Diocese's allegation-investigation process took place verbally, and although the Monitor can identify the Diocese completed them timely, in those circumstances, the Diocese did not consistently maintain documentation.

During Year One, StoneTurn identified instances in which the Diocese completed required actions but did not create or retain documentation demonstrating compliance., e.g.:

- *Bishop Notification of Allegations:* The AOD requires the Diocese to notify the Bishop of all incoming allegations.¹⁷⁵ StoneTurn's testing found that, during a portion of Year One, notifications were often made orally. Nevertheless, StoneTurn observed the Bishop's engagement with allegations throughout the process and did not identify any material delays to the process.
- *Initial Determination:* The AOD requires that when the Bishop receives an Abuse or Improper Conduct allegation and determines that it at least seems to be true, the Bishop is to initiate a canonical inquiry and forward the case to the DRB. This initial determination must be within 20 business days of receipt of the complaint, and the Diocese must refer the allegations to the DRB within five business days of the Bishop's determination.¹⁷⁶ Although the Monitor can determine the Diocese engaged the DRB within the required time window by analyzing other supporting evidence, the Diocese did not document the Bishop's initial determination.
- *Independent Reporting Line for Improper Conduct:* As noted, the Diocese did not consistently refer allegations of Improper Conduct to the Reporting Line. Because these matters did not use the Reporting Line, the formal "Allegation Reports" do not exist for the allegations that were not referred to the Reporting Line—all of which involved violations of Diocesan Codes of Conduct that did not rise to the level of Abuse, and thus the Diocese was not required to distribute the Allegation Reports to the District Attorney's Office.¹⁷⁷ The Diocese logged these matters in its Incident Tracking System (ITS).

To address the Bishop notification issue, the Diocese modified its process to include the Bishop on all initial allegation report emails. The Diocese has agreed to further formalize its processes to document in writing its compliance with each of the phases required by the AOD in handling allegations.

- **Agreed-Upon Enhancement 9.** The Diocese will implement a standardized documentation protocol to ensure a contemporaneous audit trail for all notifications and reporting obligations required by the AOD and Diocesan Policies.

The Diocese does not document its determination for whether a victim meets the definition of "Vulnerable Persons."

As noted, the Diocese's youth-protection policies apply to both minors and Vulnerable Persons,

¹⁷⁵ AOD ¶88c.

¹⁷⁶ AOD ¶88c.

¹⁷⁷ Reporting & Referral Policy, p. 1.

defined as adults “who habitually lack[] the use of reason.” Allegations involving non-vulnerable adult victims are referred to the Adult Allegation Committee rather than the DRB, and there are different consequences for those determined to have committed Abuse or Improper conduct against an adult victim rather than a minor or Vulnerable Person. The Diocese, however, does not have a defined procedure outlining how it decides whether someone is a Vulnerable Person. Clear documentation evidencing the Diocese’s evaluations and determinations will ensure that all individuals covered by the Diocese’s enhanced safeguards are properly identified and have their allegations handled appropriately in light of the AOD and updated Policies.

- **Agreed-Upon Enhancement 10.** In relevant cases, the Diocese will document its evaluation and determination of whether a victim is, or should be considered, a Vulnerable Person, including what considerations the Diocese made as part of the determination.

IX. Conclusion

In Year One of the Monitorship, the Brooklyn Diocese demonstrated a commitment to the mandates of the AOD. The Diocese successfully established key oversight roles, updated core policies and maintained a high level of receptivity to the Monitor’s contemporaneous feedback. These actions reflect a genuine effort to foster a safer environment and improve responses to allegations of Abuse and Improper Conduct.

We have also identified additional work that can be done to achieve even stronger results, along with documentation thereof. Our testing identified areas requiring enhancement, most notably low certification rates for the 2025 Code of Conduct and low completion rates for Annual Compliance Training, and the inconsistent documentation in the Diocese’s response to allegations.

To address these areas of enhancement, the Monitor and the Diocese have established 10 Agreed-Upon Enhancements (AUEs). These enhancements are designed to formalize documentation protocols, institutionalize root cause analysis, and enforce appropriate consequences for non-compliance with training and certifications.

In Year Two, the Monitor’s focus will shift from the design and implementation of these policies to testing their sustained operating effectiveness. The Diocese’s continued transparency and the timely execution of the AUEs will be essential to maintaining and further enhancing full compliance with the AOD and the long-term protection of minors and Vulnerable Persons.

Appendix A – Summary of Observations and Agreed-Upon Enhancements

Section	Observation	AUE Type	AUE #	Agreed-Upon Enhancement
III. Oversight, Governance and Foundational Compliance	The Diocese should strengthen its oversight of Code of Conduct certifications because many Clergy, Employees, and Volunteers have not certified compliance with the 2025 Code of Conduct.	Supplemental	AUE 1	The Diocese will enhance oversight of Code of Conduct certifications, including using manual or automated reminders and imposing appropriate consequences on individuals who fail to certify by a specified date. Within 60 days of this Report, the Diocese will provide the Monitor with a plan to implement the enhanced oversight and consequence management processes (e.g., distribution of the Code, monitoring completion).
	The Diocese did not consistently document allegation details when the reporter could not identify the specific accused.	Supplemental	AUE 2	The Diocese will record in ITS system allegations from reporters it could not identify for future reference.
V. Clergy Monitor	The Diocese does not retain documentation demonstrating that the required monthly calls with monitored Clergy occurred.	AOD	AUE 3	The Clergy Monitor will ensure the Diocese documents and retain records of the designated Clergy member's phone calls with supervised Clergy members to demonstrate compliance with the AOD and Monitoring Procedures.
VI. Office of Safe Environment	The Diocese reconciles its list of active and retired Clergy against the Clergy Personnel's updated list only once a year resulting in discrepancies that limit the Diocese's ability to oversee retired Clergy and ensure that those who continue to serve in ministry adhere to the Diocese's training and Code of Conduct requirements.	Supplemental	AUE 4	The Diocese will increase the frequency of the OSE Coordinator's reconciliation of Clergy Personnel's listing of retired Clergy to the VIRTUS system to occur on a quarterly basis.

Section	Observation	AUE Type	AUE #	Agreed-Upon Enhancement
	The OSE Coordinator does not have the authority nor mechanisms to impose consequences upon Clergy members, Employees, and Volunteers who do not complete their assigned training and Code of Conduct certifications.	Supplemental	AUE 5	The Diocese will implement processes for the OSE to impose appropriate consequences for Clergy, Employees, and Volunteers that remain out of compliance with the Diocese's Compliance Requirements for training and bulletins. Within 60 days of this Report, the Diocese will provide the Monitor with a plan to implement the enhanced oversight and consequence management processes (e.g., monitoring completion).
VII. Office of Victims Assistance Ministry	Some victim-survivors reported uniformly positive experiences with OVAM; others identified areas for improvement in the frequency, timing and transparency of communication from the Diocese during the allegation investigation and deliberation processes.	Supplemental	AUE 6	The Diocese will continue its efforts to improve the frequency, timing and format of its communications with victims during the investigation, DRB and Diocese deliberation and follow up.
VIII. Allegations of Abuse or Improper Conduct	The Diocese self-identified two instances where it investigated but did not timely refer to the DRB allegations of Improper Conduct that did not include Abuse.	Supplemental	AUE 7	The Diocese will implement defined parameters within its Incident Tracking System to document compliance with Diocesan Policies and to ensure that the Diocese satisfies each requirement for every allegation raised. Within 60 days of this Report, the Diocese will provide the Monitor with the defined parameters and its plan to address the AUE.
	The Diocese does not have a defined and established root cause analysis process to identify systemic failures or similar misconduct following an investigation into Abuse or Improper Conduct.	Supplemental	AUE 8	The Diocese will consider developing a written root cause analysis framework that defines when and how to conduct an RCA. Within 60 days of this Report, the Diocese will inform the Monitor on whether they will design and implement an RCA and if not

Section	Observation	AUE Type	AUE #	Agreed-Upon Enhancement
				document its rationale for not doing so.
	<p>Certain steps in the Diocese's allegation-investigation process took place verbally, and although the Monitor can identify the Diocese completed them timely, in those circumstances, the Diocese did not consistently maintain documentation.</p>	AOD	AUE 9	<p>The Diocese will implement a standardized documentation protocol to ensure a contemporaneous audit trail for all notifications and reporting obligations required by the AOD and Diocesan Policies.</p>
	<p>The Diocese does not document its determination for whether a victim meets the definition of "Vulnerable Persons."</p>	Supplemental	AUE 10	<p>In relevant cases, the Diocese will document its evaluation and determination of whether a victim is, or should be considered, a Vulnerable Person, including what considerations the Diocese made as part of the determination.</p>

Appendix B – Acronyms and Defined Terms

Acronym / Term	Definition
Abuse	Sexual abuse involving minor and Vulnerable Persons
AOD	Assurance of Discontinuance
AUE	Agreed-Upon Enhancement
CAPE	Child Abuse Prevention Empowerment (Program)
Codes	Collectively refers to the three Codes of Conduct for Clergy, Employees, and Volunteers.
Charter	The USCCB Charter for the Protection of Children and Young People
Compliance Requirements	Training requirements, background checks, and Code of Conduct certifications.
DDF	Dicastery for the Doctrine of the Faith (formerly Congregation for the Doctrine of the Faith)
Diocese	The Roman Catholic Diocese of Brooklyn
DRB	Diocesan Review Board
IM	Independent Monitor
Improper Conduct	Conduct that violates the Codes of Conduct intended to prevent improper sexual activity but does not constitute Abuse (also "Code of Conduct Violation").
ITS	Incident Tracking System; the Diocese's electronic record-keeping and tracking system.
Monitoring Plan	An individualized plan for supervised Clergy members restricting their ministry and contact with minors.
NYPD	New York City Police Department
NYS	New York State
OAG	Office of the Attorney General of the State of New York Charities Bureau
OPCYP	Office for the Protection of Children and Young People
OSE	Office of Safe Environment
OVAM	Office of Victims Assistance Ministry
Policies	The Diocese's policies and procedures regarding the prevention of Abuse (e.g., SAP Policy, Codes, Whistleblower Policy).

Acronym / Term	Definition
Report	The Independent Monitor's First Annual Report.
Reporting Line	The dedicated telephone line staffed by an independent attorney for receiving allegations.
RCA	Root Cause Analysis
SAP Policy	Sexual Abuse of Minors Policy; The Diocesan Policy and Procedures Regarding Sexual Abuse of Minors.
Supervised Clergy Members	Clergy members under investigation for or credibly accused of Abuse who are subject to monitoring.
USCCB	United States Conference of Catholic Bishops
Vulnerable Persons	Individuals who "habitually lack the use of reason."
VAC	Victim Assistance Coordinator
Year One	The first year of the Monitorship engagement.