

STATE OF NEW YORK)  
COUNTY OF ONONDAGA) ss:

JOHN P. CLINTON, being duly sworn, deposes and says:

1. I reside in Jamesville, New York. In July, 2006 I was elected pastoral council president of St. Mary's Church in Jamesville, New York. I was present at and I am personally familiar with the events in this affidavit.
2. On June 26, 2006, representatives of St. Mary's Pastoral Care Area (PCA), St. Therese, Our Lady of Solace, the Alibrandi (Neuman) Center at Syracuse University, Holy Cross and St. Mary's parish met for the first time at the Harrison Center to discuss how to begin addressing Bishop James M. Moynihan's call for plans to reconfigure the Diocese with 50% fewer priests. Plans were due by Thanksgiving, 2006. The Diocesan Vicar of Parishes, the Rev. James P. Lang, was present and answered questions on what the plans should incorporate and how the process would proceed.
3. The PCA representatives met at Our Lady of Solace Church on July 17 and 24, 2006. The effort in these early meetings was to acquaint each other with each parish, for example, its size, physical assets, finances, ministries, and any particular concerns.
4. On August 7, 2006, the group met at Holy Cross parish. Msgr. J. Robert Yeazel, pastor of Holy Cross, suggested that the PCA divide into two groups to accelerate the planning process. St. Therese and Our Lady of Solace which shared a pastor would join the near-by Alibrandi Center at Syracuse University to form one group. St. Mary's which was becoming a mission of Holy Cross would join with Holy Cross to form the other.
5. The next meeting of the full PCA occurred on August 28, 2006 at St. Mary's. That meeting concluded without scheduling a further meeting. Each group was to continue to meet on its own and inform the other when it was prepared to come back together with plans to discuss. That did not occur. This was the last meeting of the full PCA.
6. PCA representatives from St. Mary's and Holy Cross met at Holy Cross on September 12, and October 16, 2006.
7. At the October 16, 2006 meeting there was a brief discussion, lasting no more than 45 minutes, regarding four options: 1) two sites: a) St. Mary's and Holy Cross; b) St. Therese and Our Lady of Solace; 2) one site (combine all four parishes); 3) St. Therese to be part of Alibrandi Center with the goal of the Center returning back to the Diocese. Our Lady of Solace to have Masses at Holy Cross and use Our Lady of Solace as an outreach to the neighborhood; and

4) two sites: a) Holy Cross and b) St. Mary's. The meeting concluded without any decisions on the options.


8. I fully expected that the group would meet further to refine and develop what I believed was little more than a skeletal proposal. This did not occur. There were no further PCA meetings between St. Mary's and Holy Cross.

9. By letter dated October 26, 2006, Msgr. Yeazel submitted the four options to the Diocese as the recommendations of St. Mary's and Holy Cross. This action was taken without my knowledge, consultation or approval. I know of my own knowledge that at least one other representative was unaware of the action. It is also my belief that the other two representatives were unaware that Msgr. Yeazel would submit the four options as the PCA's recommendation.

10. On November 19, 2006, St. Mary's parish submitted a letter to the Diocese in support of option four. The letter addressed the criteria the plans were asked to consider. All four of St. Mary's PCA representatives signed the letter.

  
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John P. Clinton

Sworn to before me this  
4<sup>th</sup> day of February, 2008.

  
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Notary Public

**REGINA CLINTON**  
Notary Public in the State of New York  
Qualified in Onondaga Co. No. 01CL5042188  
My Commission Expires April 17, 2011