

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN COLIN COLLETTE,)
)
Plaintiff,)
)
v.)
)
THE ARCHDIOCESE OF CHICAGO,)
And)
HOLY FAMILY CATHOLIC PARISH,)
)
Defendants.)

Case No. 1:16-cv-2912

Judge Charles P. Kocoras

**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF HIS RESPONSE TO
DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

NOW COMES, the Plaintiff, JOHN COLIN COLLETTE, by and through his attorneys, LAVELLE LAW, LTD., and for his Memorandum of Law in Support of his Response to Defendants’ Motion for Summary Judgment, states as follows:

INTRODUCTION

At the time of his termination, Plaintiff John Colin Collette (“Mr. Collette” or “Plaintiff”) was employed by Defendant Holy Family Catholic Parish (“Holy Family”) for over 17 years. [Defendants’ SOF, 6, 38]. During that time, Plaintiff was “out” as a gay man since the time he was hired [Exhibit 1, Affidavit of John Colin Collette]. Present at many of the Parish’s functions and events was Plaintiff’s partner, Will Nifong (“Mr. Nifong”) [Exhibit 1]. Nifong, now Plaintiff’s husband, attended Holy Family Functions as Plaintiff’s partner, and sang in the Holy Family Choir on occasion [Exhibit 1]. In July 2014, Mr. Collette was terminated by Holy Family’s pastor, Fr. Terence Keehan, (“Fr. Keehan”) after Mr. Collette announced that he and Nifong had become

engaged to be married [Defendants' SOF, 37-38]. Mr. Collette brought the instant case on the basis of violations of sex discrimination pursuant to Title VII as well as for violations of state and local statutes barring discrimination on the basis of sex, sexual orientation, and marital status.

For its part, Holy Family and The Archdiocese of Chicago (hereinafter, collectively "Defendants") allege that the Ministerial Exception is a complete affirmative defense to Mr. Collette's discriminatory termination based on his sex, sexual orientation, and marital status because, they allege, Mr. Collette is a "minister" as defined in *Hosanna Tabor Evangelical Lutheran Church & School v. EEOC*, 565 U.S. 171 n.4, 132 S. Ct. 694, 709 (2012). Defendants claim that in his role at the church, Mr. Collette was a minister and, therefore, can be terminated for any reason, even a discriminatory one. Mr. Collette wholly denies that he was a minister in any capacity at Holy Family, maintaining that his role at Holy Family was to support Holy Family's "lay-empowerment" program of turning over the creation of the liturgy plan and music selections for Holy Family services to committees of volunteer parishioners, who set the theme of the season and individual masses, chose prayers and programs, selected music, and devised the flow of the liturgy for Holy Family Mass and other services. [Exhibit 1; Exhibit 2, Affidavit of Lisa Mersereau.] While typical music directors and directors of worship at Catholic parishes choose music and design the liturgy each week, such was not the case at Holy Family [Exhibit 2; Exhibit 3, Affidavit of Jill Piccolino].

Defendants have, for their part, attempted to color Mr. Collette as a minister with a penumbra of facts and circumstances that, they allege, fit Mr. Collette squarely within the title of minister. However, Defendants have declined to refer to Mr. Collette as a minister in several key documents. Mr. Collette's own Form I-360 to the United States Bureau of Citizenship &

Immigration Services, prepared by attorneys hired by Defendants, shows that when Defendants were faced with a choice of applying Mr. Collette as a “minister” or “religious professional,” Defendants chose to define Mr. Collette’s role as “religious professional,” **and did not define Mr. Collette’s role as “minister”** [Exhibit 4, Form I-360 for John Colin Collette].

Mr. Collette’s role within Holy Family was not one of a minister. Accordingly, this Honorable Court must deny Defendants’ Motion for Summary Judgment as to the ministerial exception.

STATEMENT OF UNDISPUTED FACTS

When Mr. Collette began his employment at Holy Family, he did so as an openly gay man [Exhibit 1]. He held the title of Director of Worship and eventually assumed the title Director of Music as well. Mr. Collette was terminated on July 27, 2014 [Defendants’ SOF, 38]. At all times relevant to these proceedings, there existed at Holy Family a Liturgy Planning and Preparation Committee and a Music Selection Committee, both of which Mr. Collette was a part [Exhibit 1]. During Mr. Collette’s employment, the Liturgy Planning and Preparation Committee had twenty-six (26) members, most of which were lay volunteers, not employed by the Church [SOF, 2-3]. In July 2014, Mr. Collette took a vacation to Rome, Italy, where he became engaged to marry his longtime partner, Nifong [SOF, 4]. Mr. Collette announced the news via Facebook [SOF, 4]. Defendants learned of Mr. Collette’s engagement via a post on the website Facebook.com [Exhibit 5, Keehan Deposition, 76:23-78:19]. Fr. Keehan asked for Mr. Collette’s termination, and Mr. Collette refused [Defendants’ SOF, 38]. Fr. Keehan then terminated Mr. Collette [Defendants’ SOF, 38]. During the meetings regarding Mr. Collette’s engagement and employment, Fr. Keehan showed Mr. Collette an email from then-Archbishop Francis Cardinal George (“Cardinal George”)

dated July 23, 2014, which stated “Father Keehan: The need to resolve this issue is evident. Keeping an objectively immoral situation sponsored by the parish will continue to divide the Church. Especially at this time, clarity is needed. The clarity comes from the Church’s moral teaching. Let me know *this week* when you plan to resolve this. Thanks, Francis Cardinal George, O.M.I.” [Exhibit 6, HFP0001; Exhibit 5, 76:23-78:19]. On October 22, 2014, Holy Family published in its weekly church bulletin a statement by Cardinal George stating that Mr. Collette had been terminated due to his “participation in a form of union that cannot be recognized as a sacrament by the Church.” [Exhibit 7, Holy Family Church Bulletin dated October 22, 2014]. At no time throughout this proceeding have Defendants identified any other reason for Mr. Collette’s termination other than his intent to marry Mr. Nifong.

As for Mr. Collette’s job responsibilities – for which Defendants devote a significant amount of argument – Defendants produced not just one job description for Mr. Collette, but rather, fifteen (15) different job descriptions describing Mr. Collette’s job duties. [Exhibit Set 8, Job Descriptions]. The job description cited by Defendants as Mr. Collette’s official job description is dated July 16, 2014 – a mere eight (8) days prior to Mr. Collette’s termination [Exhibit Set 8, page 1-2].

STANDARD OF REVIEW

“The court shall grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.” Fed. R. Civ. P. 56(a). “A genuine issue of material fact exists when, based on the evidence, a reasonable jury could find in favor of the non-moving party.” *Herzog v. St. Peter Lutheran Church*, 884 F. Supp. 2d 668, 672 (N.D. Ill. 2012) (citing *Trinity Homes LLC v. Ohio Cas. Ins. Co.*, 629 F.3d 653,

656 (7th Cir. 2010)). “In considering a motion for summary judgment, a court construes all facts and draws all reasonable inferences in favor of the non-moving party.” *Id.* (citing *Smith v. Hope Sch.*, 560 F.3d 694, 699 (7th Cir. 2010)).

ARGUMENT

There remain significant issues of material fact in dispute regarding whether or not Plaintiff’s role as Director of Worship and Director of Music at Holy Family were ministerial roles as defined by *Hosanna-Tabor Evangelical Lutheran Church & Sch. v. EEOC*, 565 U.S. 171 n.4, 132 S. Ct. 694, 709 (2012). While *Hosanna-Tabor* provides broad deference to religious organizations to choose their own ministers, the ruling is careful to note that there is no strict formula for what constitutes a minister. “We are reluctant, however, to adopt a rigid formula for deciding when an employee qualifies as a minister.” *Id.* at 190.

The four-part test that is provided in *Hosanna-Tabor*, however, calls for the Court to consider four elements of a test that determine, on a case-by-case basis, whether an employee was or was not a minister. *Hosanna-Tabor*, 132 S. Ct. at 708 n.4 (2012). They are (1) the formal title given to the employee by the Church, (2) the substance reflected in that title, (3) his/her own use of that title, and (4) the important religious functions he/she performed at the church.” *Id.* at 192. To consider whether a person is or isn’t a minister under the exception, the Court must take into account “all the circumstances of ... employment.” *Id.* at 190. In Mr. Collette’s case, all the circumstances of his employment when viewed in aggregate show that Mr. Collette was not a minister, but rather, a highly educated lay person employed by Holy Family to facilitate its mission of lay empowerment [Exhibit 16, Holy Family’s Mission and History].

1. Mr. Collette’s Title was a Lay Person Title

When the *Hosanna-Tabor* court considered its plaintiff, a teacher at an Evangelical Lutheran Church, to be a minister, it took into account the fact that her title was that of a “called teacher.” *Id.* at 192. The process of becoming “called” included a “formal commissioning process” that required the teacher to obtain the endorsement of the local Synod district, pass an oral examination by a faculty committee, and then be called by the congregation. The title of “called teacher” denotes someone who has satisfied all these elements. *Id.*

In the present case, Plaintiff held no title of commissioning or being called [Exhibit 1]. He was not the “Minister of Worship,” nor the “Minister of Music,” but rather, a director [Exhibit 1]. Holy Family employs multiple directors, overseeing various functions of the church, including a Director of Operations and a Director of Marketing [Exhibit 9, Various Holy Family Church Bulletins]. Moreover, nothing of Plaintiff’s hire required him to complete any sort of commissioning process by which he became called by Holy Family or the Archdiocese of Chicago [Exhibit 1]. Plaintiff’s process of becoming the Director of Worship and Director of Music was to apply for his job, be interviewed by Holy Family’s pastor, and be hired. [Exhibit 1]. The job was not the variety that required him to be called to the vocation “by God through a congregation” as the Plaintiff in *Hosanna-Tabor*. *Id.* at 177.

In fact, Plaintiff attended the Archdiocese’s Lay Ecclesial Ministry Program in hopes of obtaining a Pastoral Associate Certification and Call to Ministry [Exhibit 1]. This program did not require Plaintiff to have completed any ministry work, as Defendants’ allege [Exhibit 1; Exhibit 18, Office of Lay Ecclesial Ministry Criteria for Eligibility]. Rather, it required such ministry work to be completed before a candidate could receive a Pastoral Associate Certification and Call to Ministry [Exhibits 1, 18]. Mr. Collette never completed the Lay Ecclesial Ministry Program, and

therefore was never eligible to receive the Pastoral Associate Certification or be Called to Ministry [Exhibit 1]. Accordingly, he was not “called” like the *Hosanna-Tabor* and *Herzog* plaintiffs.

The differences between Mr. Collette’s title and the title of the *Hosanna-Tabor* plaintiff’s title are further analyzed by this Court’s ruling in *Herzog v. St. Peter Lutheran Church*, 884 F.Supp.2d 668, 673 (2012). In *Herzog*, the plaintiff also had been “called” to her vocation of teaching and “commissioned” by the congregation, as was the *Hosanna-Tabor* plaintiff. *Id.* at 670. No such commissioning is present in the instant case, and the title of Mr. Collette’s employ reflected no such commissioning [Exhibit 1].

While it is true that Mr. Collette referred to himself as a “minister” in various contexts related to Church life, he was using Holy Family’s preferred terminology, and there was no dearth of individuals using the term “minister” at Holy Family [Exhibit 9]. Holy Family considers dozens, if not hundreds of parishioners to be “ministers” of God’s word [Exhibit 9]. Ministers are as young as 17 years old [Exhibit 9]. More than thirty (30) ministers are named in the “leadership structure” of Holy Family in the bulletin each Sunday, in addition to the priests and clergy who work at Holy Family [Exhibit 9]. The church appoints “liturgical ministers” to oversee seventeen (17) different committees, including a sewing committee and a projection and sound committee [Exhibit 9]. In addition, Holy Family has ministers who are juniors and seniors in high school, sign language leaders, and wedding ministers [Exhibit 9]. It names people “hospitality ministers” for providing snacks after Mass at the Church [Exhibit 9]. Holy Family also has ten (10) Table & Light ministers and eighteen (18) Eucharistic ministers, twelve (12) of whom are teens, and Ministers of Care to the Sick [Exhibit 9]. The Church advertises in its bulletin that parishioners can become members of the Church’s “ministry” by cooking their favorite meals for Fr. Keehan or

by volunteering in the Church gift shop [Exhibit 9].

None of the “ministers” listed herein who are children, teens, gift shop volunteers or potluck participants are true “ministers” under the framework set forth in *Hosanna-Tabor*, so it is a facile analysis at best to claim that the use of the term “minister” makes Mr. Collette a minister under the *Hosanna-Tabor* standard. Mr. Collette’s title did not reflect a calling and commissioning [Exhibit 1]. Moreover, Holy Family’s mission of empowering its laity encouraged lay people such as Mr. Collette to participate in the Church in ways not commonly found at other Catholic Churches [Exhibits 2; 16]. Accordingly, Mr. Collette’s title does not denote a “ministerial” role at Holy Family under the *Hosanna-Tabor* standard.

Hosanna-Tabor provides a precedential definition of minister, the term is not used nearly so sparingly at Holy Family, where dozens, if not hundreds, of people are referred to as “ministers” The terms “minister” and “ministry” are used so frequently in Holy Family’s parlance that the Court should disregard Defendants’ claims that Plaintiff has already “admitted” he was a minister due to his previous uses of the word to describe himself in a non-legal context.

2. Plaintiff’s Theological Training Was Not a Requirement of His Employment

It is undisputed that Plaintiff had theological training [Exhibit 10, Collette Resume]. But such thorough theological training was not a requirement of the positions of Director of Worship and Director of Music that Plaintiff held [Exhibit 1; Exhibit 8]. Unlike the plaintiffs in *Hosanna-Tabor* and *Herzog*, at no time was Plaintiff required to complete specific theological training for the purposes of holding his position [Exhibit 1]. The job descriptions provided by Defendants provide that the Director of Worship and Director of Music must have the following experience: “experienced background in liturgical ministry. Background in music is needed;” “a

strong understanding of the liturgical norms and traditions of the church;” and “commitment to the principles of Vatican II.” [Exhibit 8]. But there was no requirement of any specific courses, specific recommendation, or specific prerequisites that Plaintiff needed to qualify for his duties. [Exhibit 1; Exhibit 8]. Conversely, the plaintiff in *Herzog* was required to complete specific training and commissioning. *Herzog* at 673. The plaintiff in *Hosanna-Tabor* was required to complete a “colloquy” program at a Lutheran college or university, take eight (8) courses of theological study, obtain the endorsement of their local synod district and complete an oral examination. *Hosanna-Tabor* at 177. There was simply no such comparable process for Mr. Collette to take on these roles at Holy Family [Exhibit 1]. To be sure, Mr. Collette was hired with the academic accomplishments listed on his resume [Exhibit 10]. The only academic requirement of his position, as described in the job posting provided by Defendants, was that he have a “graduate degree in Liturgy/Theology or equivalent.” [Exhibit 8]. And, as a lifelong student, Mr. Collette continued his religious studies in hoping to become a pastoral associate at Holy Family [Exhibit 1]. But he did not complete that process, and it was simply not a requirement of the positions Mr. Collette held [Exhibit 1]. Mr. Collette took training outside the church, but the training was in furtherance of goals he had to become a pastoral associate, not a requirement of his job [Exhibit 1]. Accordingly, the religious education that Mr. Collette completed after his hiring must be disregarded because it was not a requirement of his positions within Holy Family.

3. Plaintiff held himself out as laity, not a minister.

Mr. Collette possessed no power to choose the music or design the liturgy independent of Fr. Keehan at Holy Family [Exhibits 1-3; Exhibit 12, Affidavit of Sue Brach; Exhibit 13, Affidavit of Denise Logan]. At each opportunity for such decision making to occur, Mr. Collette required final

approval from Fr. Keehan [Exhibits 1-3, 12-13]. Unlike the plaintiffs in *Herzog* and *Hosanna-Tabor*, Mr. Collette never accepted a call to religious service [Exhibit 1]. The *Hosanna-Tabor* plaintiff was "held out" by her employer, a parochial school, as a minister, "with a role distinct from that of most of its members." *Id.* at 191. The *Hosanna-Tabor* plaintiff received "diploma of vocation" that granted her the title "Minister of Religion, Commissioned." *Id.* Her "skills of ministry" and "ministerial responsibilities" were periodically reviewed by the congregation. *Id.* The Court found that for these reasons, the church and school "held out" the *Hosanna-Tabor* plaintiff as a minister. *Id.*

Defendants have cited Plaintiff's pages in the bulletin, videos on YouTube.com, and teaching sessions at Holy Family as indicating that Mr. Collette "held himself out" as a minister at Holy Family. While these actions may be reserved only for ministers at other parishes in the Archdiocese of Chicago, at Holy Family church bulletin contributions, YouTube.com videos, and teaching sessions are also performed by the laity [Exhibit 14, Holy Family YouTube.com page; Exhibit 1; Exhibit 5, 46:1-21]. In the instance cited by Defendants in which Mr. Collette presented a seminar entitled "The Beauty of Worship and Liturgy," another lecture in the same Adult Faith Series was given by Rabbi Taron Tachman, a Jewish Rabbi of the nearby Beth Tikvah Congregation in Hoffman Estates, Illinois [Exhibit 19, Upcoming Events in Adult Faith; Exhibit 20, Beth Tikvah Congregation Clergy Listing].

While Mr. Collette's videos have been removed from the Holy Family YouTube.com page, the videos of literally dozens of other lay people – many of them not even Holy Family employees – remain posted on the Holy Family YouTube.com page. [Exhibit 14]. The videos, called "Reflections on Readings," are frequently recorded by Holy Family parishioners with little to no

religious training [Exhibit 5, 46:1-21]. These videos, again, were aimed at furthering the Holy Family mission of empowering the laity [Exhibit 1]. Contributions to the Holy Family church bulletins were also common by many staff members, not just Mr. Collette. [Exhibit 1]. Mr. Collette did not, as Defendants allege, hold himself out as a minister on his 2014 federal income tax returns by paying self-employment tax [Exhibit 1]. Mr. Collette's floral business, Surroundings by Colin, was a sole proprietorship at the time, and therefore required he pay self-employment tax [Exhibit 1]. (The business has since been incorporated [Exhibit 1; Exhibit 15, Corporation File Detail Report].) In addition, his immigration application, supported by Defendants, reflected that he was a "religious worker" at the exclusion of choosing the title "minister" [Exhibit 4, Form I-360 for John Colin Collette]. Because Mr. Collette did not hold himself out as a minister, the Court must not grant summary judgment in favor of Defendants.

4. Plaintiff Did Not Hold Ministerial Duties, but Instead Assisted with Holy Family's Lay Empowerment Mission.

While Mr. Collette was a Director of Worship and Director of Music at Holy Family, those roles were not typical of other directors of worship and directors of music at other Catholic parishes in the Archdiocese of Chicago [Exhibit 2]. The *Hosanna-Tabor* plaintiff's job duties "reflected a role in conveying the Church's message and carrying out its mission." *Hosanna-Tabor* at 192. Mr. Collette's job duties did not. He did not write the Liturgy Plans for Holy Family; they were drafted by Jill Piccolino, Assistant Director of Worship, and reviewed by all the directors at Holy Family, including Mr. Collette, through a collaborative process that was supervised and reviewed by Fr. Keehan [Exhibits 1-3; 12-13]. The *Hosanna-Tabor* plaintiff taught religion four days a week, led students in prayer three times a day, selected hymns, chose the liturgy, and

delivered short messages from the bible. *Id.* Mr. Collette did not have any comparable duties. He did not select the music for services, the music was instead selected by the Music Selection Committee -- of which Mr. Collette was a member – and approved by Fr. Terry. [Exhibit 1]. While Fr. Keehan steadfastly insisted that he received the Holy Family liturgy plans on Thursday or Friday of each week as a *fait accompli*, and never received them on Tuesday or prior to Tuesday, for the meeting of Holy Family’s directors [Exhibit 5, 23:20-30:16]. Plaintiff’s witness affidavits contradict Fr. Keehan’s account, with multiple former employees attesting that they and Fr. Keehan received the Liturgy Plans each week no later than Tuesday at noon in advance of meetings regarding the Liturgy Plans each Tuesday at 12 p.m. and 1:30 p.m., allowing for a collaborative liturgy process that did not give any special weight to Mr. Collette’s contributions [Exhibits 1-3; 12-13]. The initial draft of each Liturgy Plan was drafted and supplied by Ms. Piccolino on Monday or Tuesday of each week. [Exhibit 3]. It was then reviewed by Mr. Collette, Ms. Piccolino, and Fr. Keehan at a meeting each week at 12 p.m. on Tuesday [Exhibits 3; 12]. It was then reviewed by Fr. Terry and all the Holy Family directors at a meeting at 1 p.m. each Tuesday [Exhibits 1-3, 12-13]. Holy Family’s collaborative process of creating the Liturgy Plans left the job in the hands of no one person, but instead in the hands of the lay members of the Liturgy Planning and Preparation Committee, the Holy Family directors (including Mr. Collette and, depending on the relevant time, seven to eight other directors), priests who presided over the Holy Family Masses, Ms. Piccolino, Ms. Brach, and Fr. Keehan, with Fr. Keehan possessing the *sole ability* to change or approve the liturgy plans [Exhibits 1-3; 12-13]. While Defendants portray Mr. Collette as the “central figure” in the Holy Family staff who lead the church in directing its liturgy plans and music selections, such assertion ignores the duly-supported fact that Holy Family empowered its

congregants and laity to be their own ministers, with Fr. Keehan the final arbiter on approving their decisions. [Exhibits 1-3; 12-13]. Mr. Collette does not contest that he had religious duties, but he contends that his religious duties at Holy Family were those that were also performed by the laity at Holy Family, and there existed no duty and obligation that Mr. Collette had that was not also performed by parishioners and congregants at Holy Family. [Exhibits 1; 3]. If Holy Family insists that someone who recorded YouTube.com videos, drafted Liturgy Plans, contributed to the church bulletin, and participated in seminars at Holy Family is a minister, then the title of minister applies to dozens, if not hundreds of people who attend and work at Holy Family. Accordingly, Mr. Collette cannot be deemed a minister under the *Hosanna-Tabor* standard. At the very least, there exists a genuine issue of material fact that prevents this Honorable Court from granting summary judgment in favor of Defendants.

5. The Court Must Not Apply a Formula for Determining if Plaintiff was a Minister

It should be noted that the *Hosanna-Tabor* court specifically noted that there could be no “rigid formula” to determine if a Plaintiff is a minister under the standards set forth in its ruling. *Id.* at 190. But with each Court ruling that has been published since *Hosanna*, Defendants have attempted to use the job description and job title of each case’s plaintiff as a bright-line designation as “minister.” The fact is that just as no case has the same facts, no two churches operate in the same fashion, no congregation is the same, and no employment role is the same. *Hosanna-Tabor*’s instruction is clear that no “rigid formula” should be applied to its test. *Id.* Therefore, it is not enough to say that because the plaintiff in Tomic v. Catholic Diocese of Peoria (442 F.3d 1036, 1037 (7th Cir. 2006)) played the organ and so did Mr. Collette, that Mr. Collette is therefore a minister under *Hosanna-Tabor*. In fact, the very opposite is true. There is no rigid formula, and the

Court must consider all the circumstances of employment to determine whether Mr. Collette was a minister. *Fratello v. Roman Catholic Archdiocese of N.Y.*, 175 F. Supp. 3d 152, 163 (S.D.N.Y. 2016). Accordingly, the Court must take into account the dynamic described by Lisa Mersereau, who explained that in working with fifteen (15) Catholic parishes, she had never seen a Catholic church in the Archdiocese of Chicago give more duties and deference to the lay members of its congregation. [Exhibit 2]. The facts are simple – Mr. Collette did not design the liturgy nor the liturgy plans at Holy Family; and he did not choose the music for the Masses as Holy Family [Exhibit 1]. These decisions were made by the laity that Holy Family empowered with these decisions [Exhibits 1-3; 12-13]. And Mr. Collette did not have the final say in any decisions made as to Music or Liturgy [Exhibits 1-3, 12-13]. Holy Family’s pastor, Fr. Keehan, held this right alone, a fact supported by multiple affidavits from Holy Family’s former employees. [Exhibits 1-3, 12-13].

Plaintiff does not deny that he is well educated in the subject of the Catholic faith. But his education and training alone did not designate him as a minister. And he does not dispute that he was conferred the title of Director of Worship and Director of Music by Holy Family. He used his title. However, the functions Mr. Collette performed at Holy Family were not typical of the functions of a music director at other Catholic parishes [Exhibit 2]. The functions Mr. Collette performed at Holy Family were to facilitate Holy Family’s mission of lay-empowerment of its congregation [Exhibit 2].

CONCLUSION

Plaintiff was not a minister under the analysis required by *Hosanna-Tabor*, and accordingly, the ministerial exception must not apply in the present case. Holy Family’s parish

structure did not allow Plaintiff to assume the typical duties of a Director of Worship and Director of Music. While someone who held those positions in another Catholic parish may be considered a minister, Mr. Collette's duties at Holy Family did not rise to the level of "minister" pursuant to *Hosanna-Tabor's* ruling. The Court must review these matters on a case by case basis, and in the present case, Plaintiff was not type of minister contemplated by the ministerial exception.

WHEREFORE, Plaintiff John Colin Collette respectfully requests that this Court deny Defendants summary judgement, finding that the ministerial exception does not apply as an affirmative defense in the instant case, proceed to conduct discovery on the remaining matters in dispute, and grant any other and further relief as this Court deems equitable and just.

Respectfully submitted,

LAVELLE LAW LTD.

/s/ Kristina B. Regal

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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN COLIN COLLETTE,)
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Plaintiff,)
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v.)
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THE ARCHDIOCESE OF CHICAGO,)
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HOLY FAMILY CATHOLIC PARISH,)
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Defendants.)

Case No. 1:16-cv-2912

Judge Charles P. Kocoras

AFFIDAVIT OF JOHN COLIN COLLETTE

I, JOHN COLIN COLLETTE, under oath, state the following are true and accurate statements to the best of my personal knowledge:

1. I was an employee of Holy Family Catholic Parish in Inverness, Illinois (“Holy Family”), for approximately 17 years.
2. At the time of my hiring, and throughout my employment at Holy Family, I was openly gay.
3. During my time working for Holy Family, my longtime partner, Will Nifong (“Will”), attended many Holy Family functions as my partner, and sang in the Holy Family choir on occasion.
4. When I was hired by Holy Family the process was as follows: I applied for the position, and I was telephoned by Holy Family’s pastor at the time, Fr. Pat Brennan; I was interviewed by Fr. Brennan, and I was offered the position.
5. At no time do I go through any formal commissioning process, and my positions at Holy Family did not require me to do so.
6. I never accepted a “call to religious service,” and my positions at Holy Family did not require me to do so.
7. The requirements of my position did not include the completion of any specific coursework.
8. My employment was not contingent on me completing any additional education.

9. I sought to attend the Lay Eccelsial Ministry Program to further my position within the church in hopes of becoming a pastoral associate, but it was not a requirement of my position as Director of Worship or Director of Music.
10. As director of Music and Director of Worship, I held a role at Holy Family equal in weight to the other Holy Family employees who were directors, which was approximately seven (7) to eight (8) people during the time period I was employed by Holy Family.
11. I was terminated in July 2014.
12. I became engaged to my longtime partner, Will Nifong, in July 2014 in Rome.
13. I posted the news of my engagement on my Facebook page.
14. Upon my return from Rome, Holy Family's pastor, Fr. Terence Keehan, asked for my resignation.
15. When I refused to resign, Fr. Keehan terminated my employment.
16. At the time of my resignation, I was the Director of Worship and Director of Music at Holy Family.
17. My job duties in these positions included primarily facilitating the work of the Liturgy Planning and Preparation Committee and the Music Selection Committee.
18. At the time of my employment, the Music Selection Committee comprised myself and five (5) to six (6) other individuals who were volunteers and not employees of Holy Family.
19. The purpose of this committee was to choose the music for Holy Family's Masses and services.
20. I was among the members of the Music Selection Committee and, as a member, contributed my ideas and thoughts about the best selections for music for Holy Family's Masses and Services.
21. I did not select the music for Holy Family's Masses and services – the music was selected by the Music Selection Committee.
22. The selections of the Music Selection Committee were always subject to the approval of Fr. Keehan.
23. Fr. Keehan supported the concept of a Music Selection Committee because it furthered Holy Family's policy and practice of "lay empowerment," aiming to create Masses and

- services from the ideas and contributions of the congregation itself.
24. The goal of the Liturgy Planning and Preparation Committee was also to further Holy Family's "lay empowerment" mission by allowing members of the congregation to design the liturgy, including its themes, prayers and other elements.
 25. The Liturgy Planning and Preparation Committee comprised more than 20 individuals, most of whom were not employees of Holy Family, but volunteers.
 26. This committee would meet ten (10) to fifteen (15) times per year with Fr. Keehan to determine themes, prayers, and other elements of upcoming liturgies to develop Liturgy Plans.
 27. The Liturgy Plan is the agenda that Priests follow at Masses at Holy Family.
 28. The Liturgy Plan includes the songs, the readings, the Gospel, the homily, and other celebratory parts of the weekly mass.
 29. Holy Family hosted presider (priest) dinners at least twice a year for priests who would be celebrating Christmas, Advent, Easter and Lent Masses.
 30. I attended these dinners with Fr. Terry and Jill Piccolino, the assistant director of worship at Holy Family.
 31. During these dinners, the participants would discuss upcoming liturgies and share ideas for themes and collaborative conversation.
 32. Based on the collaboration from these dinners and meetings, each week Jill Piccolino would prepare the Liturgy Plan in a written document.
 33. I did not assist Jill Piccolino with drafting the Liturgy Plan written document..
 34. Jill would develop the Liturgy Plan on Monday morning of each week in anticipation of Mass the following weekend.
 35. I received the Liturgy Plan from Jill Piccolino via email.
 36. Jill Piccolino would also send the weekly Liturgy Plan to Holy Family's Pastor, Fr. Terence Keehan ("Fr. Terry"), Holy Family's Parish Manager Rosemary Geisler ("Geisler"), Holy Family's directors, and other members of the Holy Family staff.
 37. The purpose of this email was to make the process of designing the Liturgy Plans "collaborative," which was a value that Fr. Terry instilled in all members of the Holy Family

staff.

38. Fr. Terry told us on multiple occasions that no one person should be responsible for the Liturgy Plans, but instead that they should be created with the input of all Holy Family's directors, including but in no way limited to myself.
39. With that week's Liturgy Plan in hand, Jill Piccolino, Fr. Keehan and I discussed the Liturgy Plan at noon each Tuesday
40. At 1 p.m. each Tuesday all the directors of Holy Family would meet to discuss that week's Liturgy Plan.
41. The directors, Fr. Terry, Geisler, and I would all give input on the Liturgy Plan during this meeting.
42. Every single element of the weekly Liturgy Plan was subject to Fr. Terry's approval.
43. Jill Piccolino would send the final Liturgy Plan document on Wednesday or Thursday.
44. However, Fr. Terry would change the Liturgy Plans at any time.
45. On occasion, he would change it on Friday afternoon, or even a half hour before the first Mass of the weekend.
46. I recorded videos for Holy Family's YouTube.com page, called "Reflections on Readings."
47. I was not the only person who recorded such videos for the Holy Family YouTube.com page.
48. "Reflections on Readings" recordings were also recorded by dozens of parishioners and congregants of Holy Family who volunteered to participate in this program, aimed at engaging laity at Holy Family.
49. I contributed materials for publication in Holy Family's weekly church bulletins.
50. During the time of my employment at Holy Family, each of the seven (7) to eight (8) directors at Holy Family had his or her own page in the bulletin, I was not alone in contributing to the Holy Family bulletins.
51. Other parishioners, employees, and laity contributed materials for Holy Family's weekly church bulletin, as this was another opportunity for Holy Family to further its goal of lay empowerment.
52. I gave lectures at Holy Family as a member of the church's lay community, as did many

other parishioners and community members, including Rabbis and others who did not follow the Catholic faith.

53. Holy Family's mission statement is "to engage all in the sacramental life through vibrant worship, life-long learning and passionate community."
54. Holy Family espouses four "Heart Values" of ministry, stewardship, community and evangelization, meaning to encourage laity to discuss their religious knowledge and faith with others to further the goals of the church.
55. I shared my education and knowledge of the scripture, liturgy and Catholic church with the Holy Family community insofar as Fr. Keehan and Holy Family encouraged all laity to share their knowledge of scripture, liturgy and the Catholic church to further its mission of lay empowerment; not as part of my employment with Holy Family.
56. On my 2014 Federal tax returns, I paid self-employment tax on income from my floral business, Surroundings by Colin, which was a sole proprietorship during 2014.
57. Surroundings by Colin, Inc. is now incorporated with the State of Illinois, but it was not incorporated in 2014, therefore I was required to pay self-employment tax.
58. I did not pay self-employment tax for any income from Holy Family.
59. I did not hold myself out as a minister on my Federal tax returns, in 2014 or in any other year.
60. I applied to the Archdiocese's Lay Ecclesial Ministry Program.
61. It was not a requirement that I complete two years of work in ministry to apply to this program.
62. Two years work in ministry was a requirement to become a candidate for a Pastoral Associate Certification and Call to Ministry.
63. I did not complete the Archdiocese's Lay Ecclesial Ministry Program, which was also a requirement to obtain a Pastoral Associate Certification and Call to Ministry.
64. I did not obtain a Pastoral Associate Certification, and I was not Called to Ministry.
65. I oversaw "ministries" at Holy Family, but many of them were not spiritual in nature, such as the Sewing Ministry, which handmade pillowcases and baptismal bibs; and the Hospitality Ministry, which set out cookies and coffee after Masses.

66. If called upon as a witness, I would testify as aforesaid.



JOHN COLIN COLLETTE

SWORN TO AND SIGNED before me
this 6th day of December, 2016.



NOTARY PUBLIC



LAVELLE LAW LTD.

Kerry M. Lavelle (Ill. Bar # 6201522)
Matthew J. Sheahin (Ill. Bar # 6243872)
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kregal@lavellelaw.com
ATTORNEYS FOR PLAINTIFF

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN COLIN COLLETTE,)
)
Plaintiff,)
)
v.)
)
THE ARCHDIOCESE OF CHICAGO,)
And)
HOLY FAMILY CATHOLIC PARISH,)
)
Defendants.)

Case No. 1:16-cv-2912

Judge Charles P. Kocoras

AFFIDAVIT OF LISA MERSEREAU

I, LISA MERSEREAU, under oath, state the following are true and accurate statements to the best of my personal knowledge:

1. I was an employee of Holy Family Catholic Parish in Inverness, Illinois (“Holy Family”), for approximately nine (9) years.
2. I began working at Holy Family in August 2004.
3. I resigned from my employment at Holy Family in June 2013.
4. At the time of my resignation, I was the Director of Religious Education.
5. I am presently employed at St. Cecilia Catholic Church as Pastoral Associate / Director of Religious Education full time and at St. Bruno Catholic Church as Director of Religious Education part time. I am also a paid catechetical consultant at St. Joseph the Worker Catholic Church and a contracted writer with Liturgy Training Publications, a publisher owned by the Archdiocese of Chicago.
6. I am a per diem catechetical consultant with Sadlier Publishing.
7. My work with Catholic parishes includes, among other things, training catechists and mentoring catechetical leaders.
8. Over the years as an Archdiocesan employee and as a consultant with the Archdiocese and with Sadlier, I have worked in or with approximately 15 churches within the Archdiocese of Chicago.

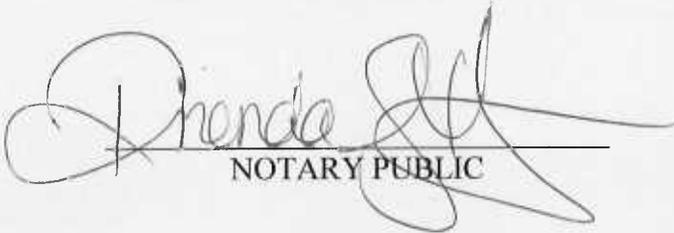
9. As the Director of Religious Education, I was a “director” at Holy Family who attended weekly directors meetings at 1p.m. each Tuesday with other directors, Jill Piccolino, John Colin Collette (“Colin Collette”) and Fr. Terence Keehan (Fr. Terry).
10. The Liturgy Plan is the “order of service” that priests follow at Masses at Holy Family.
11. The Liturgy Plan includes the songs, the readings, the Gospel, the homily, and other celebratory parts of the weekly mass.
12. While I was employed at Holy Family, each week at the directors’ meetings, we read the upcoming Sunday Gospel. This helped Fr. Terry to prepare his homily every week and helped formulate ideas regarding possible implementation for the weekly Mass.
13. Jill Piccolino would then draft a Liturgy Plan based upon these ideas.
14. The final draft of the Liturgy Plan would be sent to Fr. Terry on Thursday or Friday.
15. At all times that I worked at Holy Family, Holy Family had a policy of “lay empowerment” whereby the parishioners, also known as the laity, would participate in a collaborative model of ministry to choose the elements of the Catholic Mass celebration, including readings, themes, prayers, and songs.
16. This “lay empowerment” policy was spearheaded by Holy Family’s former pastor, Fr. Patrick Brennan, and then by Fr. Terry.
17. Both these pastors expressed to me a belief that the call of Holy Family was to involve lay people parishioners in the planning of Masses and celebrations.
18. The result of this lay empowerment policy was that the selections for liturgy plans, music, and other elements of the Masses were chosen by parishioners and directors alike.
19. The laity designed these plans with Colin Collette.
20. Colin Collette participated in the planning of the liturgy the way other directors and members of the Liturgy Planning and Preparation Committee did.
21. Colin Collette would set the agenda and bring in readings that the committee needed to discuss.
22. All the meeting attendees had a say in how the liturgy would be designed. Many times, the ideas of Fr. Terry or the committee members would be chosen for implementation in lieu of Colin Collette’s idea.

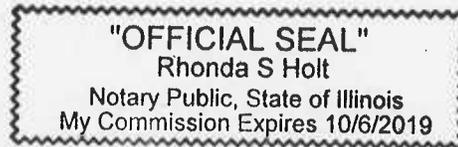
23. Colin Collette suggested many ideas for the liturgical elements, including how music, environment and prayers would be set or used.
24. However, it was not always Colin Collette's ideas which were used in the Liturgy Plan or as a liturgical season theme (such as for Advent).
25. It was Fr. Terry, not Colin Collette, whose approval was required for a Liturgy Plan to be set.
26. I have worked at many Catholic Churches in the Archdiocese of Chicago, some as an employee and some as a consultant.
27. The lay empowerment policy in effect at Holy Family is unique to Holy Family.
28. In working at approximately 15 parishes over the years within the Archdiocese of Chicago, I can say that with confidence that Holy Family is unique in its style of liturgy by involving parishioners.
29. No other parish at which I have ever worked has the pastor considered or implemented the suggestions of the laity as to the preparation of the parish liturgy.
30. Other parishes allow the laity to give input regarding music selection, but not liturgy.
31. At Holy Family, every suggestion from the laity is considered.
32. There is nothing that happens at Holy Family which is not collaborative or tries to be collaborative.
33. The liturgy plans would be informed by the laity on both a weekly and monthly basis.
34. The only time anything would ever change in the Liturgy Plan is if Fr. Terry would direct that it should be changed.
35. Once the final draft of the Liturgy Plan left Jill Piccolino's desk to go to Fr. Terry, no one could make changes to it, except for Fr. Terry.
36. This was due to the fact that many times, Fr. Terry wanted to add something in which helped the people connect to the message in his homily.
37. We always worked collaboratively on the liturgy plan among directors and the laity under Holy Family's lay empowerment policy.
38. At Holy Family, the laity feel free to speak up about a variety of issues and to call any staff member or priest on the carpet (especially if they feel disrespected, unheard, or treated

- unjustly). If the laity at Holy Family do not like something, most say something immediately.
39. To my knowledge, Colin Collette did not make independent decisions regarding the liturgy.
40. However, Fr. Terry could, and often would, change the Liturgy Plans any time he wished to add something in order to help the people connect to the message in his homily.
41. He often would add props or media.
42. Colin Collette was never the final voice on the Liturgy Plans, but Fr. Terry was..
43. If called upon as a witness, I would testify as aforesaid.


LISA MERSEREAU

SWORN TO AND SIGNED before me
this 6th day of December, 2016.


NOTARY PUBLIC



LAVELLE LAW LTD.
Kerry M. Lavelle (Ill. Bar # 6201522)
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ATTORNEYS FOR PLAINTIFF

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN COLIN COLLETTE,)
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Plaintiff,)
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THE ARCHDIOCESE OF CHICAGO,)
And)
HOLY FAMILY CATHOLIC PARISH,)
)
Defendants.)

Case No. 1:16-cv-2912

Judge Charles P. Kocoras

AFFIDAVIT OF JILL PICCOLINO

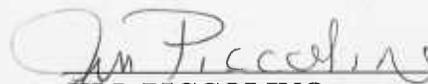
I, JILL PICCOLINO, under oath, state the following are true and accurate statements to the best of my personal knowledge:

1. I was an employee of Holy Family Catholic Parish in Inverness, Illinois (“Holy Family”), for approximately 17 years.
2. I resigned from my employment at Holy Family in June 2015.
3. At the time of my resignation, I was the Assistant Director of Worship at Holy Family.
4. I held the position of Assistant Director of Worship for more than a decade prior to my resignation.
5. My job duties included assisting the Director of Worship, John Colin Collette (“Colin Collette”), in his work at Holy Family.
6. My job duties also included managing the “Liturgy Plan” for Holy Family on a weekly basis.
7. The Liturgy Plan is the agenda that Priests follow at Masses at Holy Family.
8. The Liturgy Plan includes the songs, the readings, the Gospel, the homily, and other celebratory parts of the weekly mass.
9. Holy Family hosted presider (priest) dinners at least twice a year for priests who would be celebrating Christmas, Advent, Easter and Lent Masses.
10. I attended these dinners with Fr. Terry and Colin Collette.

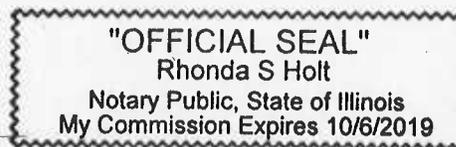
11. During these dinners, the participants would discuss upcoming liturgies and share ideas for themes and collaborative conversation.
12. Fr. Terry, Colin Collette and I would meeting with the seven different communities – each with a lay person as the head of that ministry – and various Holy Family staff members between five (5) to ten (10) times each year to discuss upcoming liturgies to collect the group’s collaborative ideas for prayers, themes, and other parts of the liturgy.
13. Based on the collaboration from these dinners and meetings, each week I would prepare the Liturgy Plan in a written document that I myself drafted without assistance.
14. I would draft the weekly Liturgy Plan by reviewing Liturgy Plans from previous years, along with notes that people had left from previous years about what elements of previous Masses were deemed to be successful and those that were not deemed to be successful.
15. I would develop the Liturgy Plan on Monday morning of each week in anticipation of Mass the following weekend.
16. Colin Collette did not participate in this initial drafting of the Liturgy Plan.
17. Colin Collette received the Liturgy Plan from me via email, when I would also send it to Holy Family’s Pastor, Fr. Terence Keehan (“Fr. Terry”), Holy Family’s Parish Manager Rosemary Geisler (“Geisler”), Holy Family’s directors, and other members of the Holy Family staff.
18. The purpose of this email was to make the process of designing the Liturgy Plans “collaborative,” which was a value that Fr. Terry instilled in all members of the Holy Family staff.
19. Fr. Terry told us on multiple occasions that no one person should be responsible for the Liturgy Plans, but instead that they should be created with the input of all Holy Family’s directors, including but in no way limited to Colin Collette.
20. I emailed the Liturgy Plans I drafted on Monday or Tuesday morning, prior to a meeting between Colin Collette, Fr. Terry and myself to discuss the Liturgy Plan at noon each Tuesday
21. At 1 p.m. each Tuesday all the directors of Holy Family would meet to discuss that week’s Liturgy Plan.
22. The directors, Fr. Terry, Geisler, and Colin Collette would all give input on the Liturgy Plan

during this meeting.

23. Every single element of the weekly Liturgy Plan was subject to Fr. Terry's approval.
24. I would send the final Liturgy Plan document on Wednesday or Thursday.
25. Fr. Terry took every Thursday off work, and during that times, I could not reach him to discuss the Liturgy Plan.
26. As a result, the Liturgy Plan would not ordinarily be changed or emailed by Fr. Terry on Thursdays.
27. However, Fr. Terry would change the Liturgy Plans at any time.
28. On occasion, he would change it on Friday afternoon, or even a half hour before the first Mass of the weekend.
29. If called upon as a witness, I would testify as aforesaid.


JILL PICCOLINO

SWORN TO AND SIGNED before me
this 6th day of December, 2016.




NOTARY PUBLIC

LAVELLE LAW LTD.

Kerry M. Lavelle (Ill. Bar # 6201522)

Matthew J. Sheahin (Ill. Bar # 6243872)

Kristina B. Regal (Ill. Bar # 6300647)

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ATTORNEYS FOR PLAINTIFF



U.S. Department of Justice
Immigration and Naturalization Service

Nebraska Service Center
P.O. Box 82521
Lincoln, NE 68501-2521

April 18, 2003
Refer To File No
LIN0228653317

ARCHDIOCESE OF CHICAGO
C/O SCOTT D. POLLOCK & ASSOC. PC
105 W. MADISON ST., STE 2200
CHICAGO IL 60602

Dear Sir or Madam:

Case Type: 1360 PETITION
Beneficiary: COLIN COLLETTE

REQUEST FOR EVIDENCE

PLACE THIS LETTER ON TOP OF YOUR RESPONSE. SUBMISSION OF EVIDENCE WITHOUT THIS LETTER WILL DELAY PROCESSING OF YOUR CASE AND MAY RESULT IN A DENIAL.

The documentation submitted is not sufficient to warrant favorable consideration of your petition/application. The following information is also required:

In this petition, you are seeking to classify the beneficiary as a **Special Immigrant Religious Worker**.

Please indicate below which specific religious category you are requesting:

- Minister
- Religious Professional
- Religious Occupation
- Religious Vocation

If the beneficiary is a minister, please submit a letter from an authorized official of the religious organization in the United States to establish that the beneficiary has authorization to conduct religious worship and to perform other duties usually performed by authorized members of the

EXHIBIT 4

clergy including a detailed description of the authorized duties. In addition, submit a copy of the beneficiary's certificate of ordination or authorization as a minister.

If the beneficiary is a **religious professional**, please submit evidence that the beneficiary holds a U.S. baccalaureate degree (or a foreign equivalent degree) in the form of an official college or university record showing the date the degree was awarded and the area of concentration of study. Please include evidence to show that the minimum of a baccalaureate degree is required for entry into the occupation.

If the beneficiary is involved in a **religious vocation or occupation** please submit a letter from an authorized official of the religious organization in the United States to establish that the beneficiary is qualified in the religious vocation or occupation. In addition, submit evidence that the beneficiary is a monk or religious brother, or engaged in a similar position requiring a religious commitment, or that the type of work to be done relates to a traditional religious function.

Your response must be received in this office by **July 11, 2003**. Your case is being held in this office pending your response. Within this period you may:

1. Submit all of the evidence requested;
2. Submit some or none of the evidence requested and ask for a decision based upon the record; or
3. Withdraw the application or petition. (It is noted that if you request that the application or petition be withdrawn, the filing fee cannot be refunded).

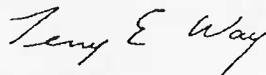
You must submit all of the evidence at one time. Submission of only part of the evidence requested will be considered a request for a decision based upon the record. No extension of the period allowed to submit evidence will be granted. If the evidence submitted does not establish that your case was approvable at the time it was filed, it can be denied.

If you do not respond to this request within the time allowed, your case will be considered abandoned and denied. Evidence received in this office after the due date may not be considered.

PLACE THIS LETTER ON TOP OF YOUR RESPONSE. SUBMISSION OF EVIDENCE WITHOUT THIS LETTER WILL DELAY PROCESSING OF YOUR CASE AND MAY RESULT IN A DENIAL.

PLEASE USE THE ENCLOSED ENVELOPE FOR MAILING THIS EVIDENCE BACK TO THIS OFFICE.

Sincerely,



Terry E. Way
Director
NSC/PWN272/kzh020

97250146
COPY

LAW OFFICES OF
SCOTT D. POLLOCK & ASSOCIATES, P.C.

105 W. MADISON STREET, SUITE 2200
CHICAGO, IL 60602

TEL: (312) 444-1940 FAX: (312) 444-1950

SCOTT D. POLLOCK
ADMITTED IN ILLINOIS AND NEW YORK

MARTA DELGADO
ADMITTED IN ILLINOIS AND WISCONSIN

MARIA BALDINI-POTERMIN
ADMITTED IN ILLINOIS AND MINNESOTA

RECEIVED

MAY 09 2003

DEPARTMENT OF CITIZENSHIP
OFFICE OF LEGAL SERVICES

E-MAIL: info@lawfirm1.com
WEB: http://www.lawfirm1.com

JULIE T. EMERICK, OF COUNSEL
ADMITTED IN ILLINOIS AND MICHIGAN

May 8, 2003

Bureau of Citizenship & Immigration Services
Nebraska Service Center
P.O. Box 82521
Lincoln, NE 68501-2521

Re: Form I-360, Special Immigrant Religious Worker
As a *Religious Professional*
Petitioner: Archdiocese of Chicago
Beneficiary: Colin Collette
File No.: LIN-02-286-53317

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION AND
REQUEST FOR PROMPT APPROVAL**

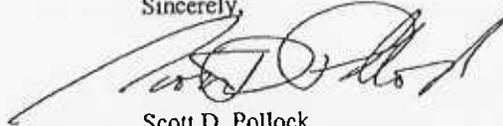
Dear Sir or Madam:

You have requested additional evidence to continue with the processing of the I-360 petition filed by the Archdiocese of Chicago on behalf of Mr. Colin Collette. In response to your request dated 04/18/03, we enclose the following documentation to support Mr. Collette's eligibility for special immigrant status as a Religious Professional:

1. Mr. Collette's Official Transcript of Credits from The Catholic Theological Union at Chicago. Page 3 of the transcript indicates that he was "awarded Master of Divinity Degree with Word and Worship Concentration" on June 1, 1995. This document was included with our original submission as Exhibit #4.
2. Excerpt from the Archdiocese of Chicago's publication, *Coordinating Parish Ministries*, for the position of Director of Music Ministry. This book provides a description of traditional religious functions within the Catholic Church and indicates that at a minimum a Bachelor's degree or its equivalent is required for this position, however "a more professional qualification such as the equivalent of a Master's Degree" is preferred.

I trust that this documentation is more than sufficient evidence to warrant a favorable consideration of the I-360 petition filed by Archdiocese of Chicago on Mr. Collette's behalf. I request that you approve Mr. Collette's I-360 petition in the category of "Religious Professional" as soon as possible. In the event that you require additional information, please do not hesitate to contact me. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott D. Pollock", written in a cursive style.

Scott D. Pollock
Attorney at Law

SDP/lm
encl.

cc: Archdiocese of Chicago, Office of Legal Services

Collette vs The Archdiocese of Chicago and Holy Family Catholic Parish

1:16-cv-2912

Deposition of: Father Terence Keehan

Taken on: October 17, 2016

JENSEN LITIGATION SOLUTIONS

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Chicago, IL 60601

312.236.6936

877.653.6736

www.jensenlitigation.com



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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOHN COLIN COLLETTE,)
)
Plaintiff,)
)
vs.) No. 1:16-cv-2912
)
THE ARCHDIOCESE OF CHICAGO)
and HOLY FAMILY CATHOLIC)
PARISH,)
)
Defendants.)

The deposition of FATHER TERENCE KEEHAN, called
by the Plaintiff, for examination, taken pursuant
to notice and pursuant to the Federal Rules of
Civil Procedure for the United States District
Courts pertaining to the taking of depositions,
taken before Joan M. Burke, Certified Shorthand
Reporter and Registered Professional Reporter, at
Lavelle Law, Ltd., 501 West Colfax Street,
Palatine, Illinois, commencing at 1:50 p.m., on
the 17th day of October, A.D. 2016.

1 APPEARANCES:

2 LAVELLE LAW, LTD.
3 MS. KRISTINA B. REGAL
4 501 West Colfax Street
5 Palatine, Illinois
6 Phone: (847) 705-7555
7 E-mail: kregal@lavellelaw.com

8 On behalf of the Plaintiff;

9 BURKE, WARREN, MacKAY & SERRITELLA, P.C.
10 MR. ALEXANDER D. MARKS
11 330 North Wabash Avenue
12 Suite 2100
13 Chicago, Illinois 60611
14 Phone: (312) 840-7022
15 E-mail: amarks@burkelaw.com

16 On behalf of the Defendants.

17

18 ALSO PRESENT:

19 MR. JOHN COLIN COLLETTE
20 MS. ROSEMARY GEISLER
21 MR. HANEY NOURELDIN

22 * * * * *

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I N D E X

WITNESS	PAGE
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EXHIBITS
(Continued)

KEEHAN EXHIBIT PAGE

No. 16 (E-mail, HFP0608) 95

* * * * *

1 (Witness sworn.)

2 MS. REGAL: Okay. This is the deposition --
3 I'm Kristina Regal of Lavelle Law. I represent
4 John Colin Collette. This is the deposition of
5 Father Terence Keehan taken in the case of
6 John Colin Collette versus The Chicago Archdiocese
7 and Holy Family Parish pursuant to notice and it's
8 taken pursuant to Rule 30 of the Federal Rules of
9 Civil Procedure and all other applicable federal
10 and local rules of civil procedure.

11 WHEREUPON:

12 FATHER TERENCE KEEHAN,
13 called as a witness herein, having been first duly
14 sworn, was examined and testified as follows:

15 EXAMINATION

16 BY MS. REGAL:

17 Q. I would ask you if you've ever taken a
18 deposition before, but you just sat through one.
19 So you probably heard the rules in terms of giving
20 audible responses only, waiting until everyone
21 else has completed speaking or I've asked the
22 question, and if you could, wait until after
23 you've answered any pending questions before we
24 take a break. Okay?

1 And, again, your attorney will make
2 objections as he deems fit, but in most cases,
3 we'd like to see you answer the question even if
4 there is an objection.

5 Okay. So that being said, can you
6 just state your name for the record, please?

7 A. Father Terence Keehan.

8 Q. And what is your address?

9 A. 2515 Palatine Road, Inverness 60067.

10 Q. And does anyone live with you at that
11 address?

12 A. No.

13 Q. Have you ever been involved in a lawsuit
14 previously?

15 A. No.

16 Q. Have you ever given a deposition
17 previously?

18 A. No.

19 Q. And what is your educational background?

20 A. I have a Bachelor's in education and a
21 master's in organizational communication and a
22 master's of divinity.

23 Q. And where did you receive your master's
24 of divinity?

1 A. From the University of St. Mary of the
2 Lakes Seminary in Mundelein.

3 Q. And where did you receive your master's
4 degree?

5 A. University of Nebraska.

6 Q. Where did you receive your undergraduate
7 degree?

8 A. University of Nebraska at Omaha.

9 Q. Okay. How long have you been working at
10 Holy Family Parish?

11 A. Seven years.

12 Q. And what is your employment title now?

13 A. Pastor.

14 Q. Did you have any previous employment
15 titles at Holy Family before you became pastor?

16 A. No.

17 Q. Where did you work prior to beginning
18 working at Holy Family?

19 A. I was the pastor of St. Matthias and
20 Transfiguration, two parishes in Lincoln Square on
21 the north side of Chicago.

22 Q. I'm sorry. Is one called St. Matthias
23 and the other is called --

24 A. Transfiguration.

1 Q. It's called Transfiguration. Okay.
2 They're both Catholic parishes?

3 A. Yes.

4 Q. And they're both in Lincoln Square?

5 A. Yes.

6 Q. When did you work at St. Matthias?

7 A. From 1999 to 2009.

8 Q. And then when did you work at
9 Transfiguration?

10 A. Well, I was at St. Matthias the whole
11 time and I was the pastor of both parishes from --
12 oh, boy. 2004 to '09.

13 Q. So the two churches combined --

14 A. No. I was just the pastor of both of
15 them.

16 Q. They had some economies of scale?

17 A. They are five blocks apart.

18 Q. Okay. And you were pastor at those?

19 A. Yes.

20 Q. Okay. And to whom did you report at that
21 time?

22 A. Well, I guess kind of the reporting
23 structure is -- was the Vicar who was Bishop Kane
24 and then ultimately the Cardinal.

1 Q. Who hired you for Holy Family's pastor --
2 pastor job?

3 A. Well, I guess that would be the Cardinal.
4 It's an appointment with the consultation of the
5 priest placement board.

6 Q. Okay. Do you recall the month in which
7 you started working?

8 A. The appointment was effective July 1st of
9 2009.

10 Q. How long have you known Mr. Collette?

11 A. Since 2009.

12 Q. You met him when you were hired as the
13 pastor at Holy Family?

14 A. Yes.

15 Q. What was Mr. Collette's role at that
16 time?

17 A. He was the Director of Worship and Music.

18 Q. Was his job similar at the time of your
19 hiring to what it was at the time of his
20 termination?

21 A. Yes.

22 Q. And as pastor, what are your job
23 responsibilities?

24 A. Well, I'm responsible for the -- the

1 spiritual welfare of the parish, all of the
2 operations of the parish, all of the ministries of
3 the parish. I don't know if I've ever been asked
4 that before. I am ultimately responsible for the
5 hiring of employees. And in Holy Family's case,
6 working collaboratively with the directors of each
7 major part of the ministries of the church.

8 Q. How many employees does Holy Family have?

9 A. About 110.

10 Q. And that's not including the school?

11 A. That is including the school.

12 Q. That is including the school?

13 A. Yes.

14 Q. Do you oversee the school as well?

15 A. Yes.

16 Q. How many parishioners does Holy Family
17 have?

18 A. We have almost 4,300 families so roughly
19 between 12 and 15,000 people.

20 Q. You were here for Ms. Geisler's
21 deposition, I know, but we'll have to go over some
22 of the same materials.

23 A. Sure.

24 Q. To the extent that you've heard some of

1 these before, I apologize for the redundancy;
2 however, we are doing a whole separate process
3 here.

4 A. Sure.

5 MS. REGAL: So I have what I'd like to mark as
6 Exhibit 1.

7 (Keehan Deposition Exhibit No. 1
8 marked as requested.)

9 BY MS. REGAL:

10 Q. Again, you'll recall these documents were
11 tendered to me by your attorneys pursuant to our
12 discovery requests and I'd just like you to take
13 an opportunity to review these documents and see
14 if any of them look familiar to you?

15 A. As I look at the dates -- the only ones
16 that I'm really familiar with are the ones that
17 would begin on 0034.

18 Q. Okay. And what is that that you
19 recognize?

20 A. The job description for Director of Music
21 and Worship.

22 Q. When is the first time you saw this
23 document?

24 A. When Ro was drafting it or, you know,

1 beginning to do some basics of it. Skeleton of it
2 and then so I -- I can't really tell you clearly,
3 but sometime around in June of '14.

4 Q. Okay. You don't see in this packet a job
5 description that described Mr. Collette's job
6 prior to -- or the previous job description prior
7 to June of 2014?

8 MR. MARKS: Objection. Just to the extent it
9 mischaracterizes the document which I believe
10 previously was testified that was memorializing a
11 prior job description. But if you're talking --
12 are you asking like another written one?

13 BY MS. REGAL:

14 Q. Yes, I'm asking do you see in that packet
15 Mr. Collette's written job description that
16 existed prior to June of 2014?

17 A. Yes. There's one that's -- I'm sorry.
18 There's one that's --

19 MR. MARKS: Are you going back to the
20 beginning? I mean like the entire packet?

21 MS. REGAL: The entire packet, yes. I just --
22 there are multiple job descriptions here and I'm
23 just trying to figure out which, if any, was
24 Mr. Collette's job description prior to June to

1 July of 2014.

2 BY THE WITNESS:

3 A. I'm familiar with the basics of the job
4 description, but I can't tell you if -- any one of
5 these in particular.

6 Q. Do you know if he had a job description
7 prior to June of 2014?

8 A. Yes, I believe he did.

9 Q. He did. And would that be kept at your
10 offices?

11 A. Yes.

12 Q. Okay. But you don't know if any of the
13 documents in this packet are that document?

14 A. I can't -- I can't really say.

15 Q. Okay.

16 A. I'm kind of relying on the dates on these
17 documents, so I --

18 Q. Certainly. What was the purpose of
19 rewriting or -- I'm sorry, writing this document
20 dated July 16th, 2014, the one that's on Page 34?

21 A. Yes. One of the reasons that I asked --
22 really felt confident with asking Ro to come and
23 assume the title of parish manager was to help to
24 clarify with job descriptions for all the

1 employees.

2 Q. Okay. And when was it that you asked her
3 to do that?

4 A. Not long after she was hired.

5 Q. And that was February 2013?

6 A. She was hired in February of 2013. I
7 can't give you an exact date about that
8 conversation, but --

9 Q. Okay. And what part -- you said that you
10 wanted Ms. Geisler to help you clarify the
11 employee's job descriptions. I mean that means --
12 that includes Mr. Collette?

13 A. Yes.

14 Q. What part of his job description prior to
15 June 2014 or July 2014 needed clarity?

16 A. In my mind there were only a couple of
17 the ministries that are listed that we weren't
18 sure if they should fall under Colin's
19 directorship or another director's.

20 Q. What were those ministries?

21 A. I'm not really sure. There were pastoral
22 care things; for example, funeral liturgies or --
23 we weren't really sure where that should be
24 listed. That's not the only one that I can think

1 of. There were some discussion about Small
2 Christian Communities and where they should be.
3 But ultimately I thought they would be best that
4 they would fall under Colin.

5 Q. What do you mean by Small Christian
6 Communities?

7 A. So we have about 80 groups in the parish
8 composed of 10 to 15 people that gather regularly
9 and the idea is that they read the scriptures for
10 the coming weekend's liturgy and we generate
11 discussion questions and some other resources like
12 video for them to watch so that they can -- it can
13 stimulate their discussion about the reading so
14 they can, A, have some discussion, B, learn some
15 more about scripture, and then, C, they hear the
16 scripture reading before they come to Mass on the
17 weekends.

18 Q. So these are just groups of parishioners?

19 A. Mm-hmm.

20 Q. They're not focused in any one way,
21 they're just people that get together to study --

22 A. Yeah, not every one of them uses the
23 resources all the time. Some of them use
24 different resources like a book or another

1 supplement. And the -- the discussion was whether
2 that should fall under Adult Faith or Liturgy
3 and/or Worship and --

4 Q. Okay. And so ultimately it resulted
5 Colin over --

6 A. Yes.

7 Q. Was to oversee that?

8 A. Yes.

9 Q. How about this funeral preparation?

10 A. That remained in what was at the time
11 pastoral care. And then now I'm recalling a
12 third, our Children's Liturgy of the Word, which
13 is a little program that after the opening prayer
14 at Mass, we ask the children to come up to the
15 altar and then we send them out and the children
16 have a little catechist that presents the
17 scriptures kind of on their level and then they
18 come back at the offertory of the Mass. And I
19 think that was the other one that we were thinking
20 maybe that should go under Family Faith as opposed
21 to Worship.

22 Q. Do you review all the job descriptions of
23 employees at Holy Family?

24 A. I review the directors. And then the

1 directors review the --

2 Q. The descriptions or performance reviews,
3 do you mean?

4 A. Well, kind of both.

5 Q. I want to be clear. What I'm asking
6 about is the documents, the job description
7 documents. Do you review and approve those for --
8 well, who --

9 A. I don't approve them for every employee
10 of the church.

11 Q. Okay.

12 A. But the only ones I do are the directors
13 themselves. And they do the same process with the
14 people -- the assistant directors and those that
15 work under them or work with them in their
16 department.

17 Q. And did you review Colin's job
18 description, the document that's on Page 34 here?

19 A. Yes, I believe I did.

20 Q. And is it an accurate representation of
21 what Colin was doing at that time?

22 A. Yes.

23 Q. Was there anything that you -- in reading
24 this that you can say was omitted from this

1 document?

2 A. Nothing really jumps out at me, no.

3 Q. Does Holy Family have a called class
4 program?

5 A. We used to. Not anymore.

6 Q. When did you have a called class program?

7 A. It was in place when I got there. I
8 cannot tell you we -- kind of trimmed it down a
9 bit. Because we had less people participating in
10 it and then we -- we eliminated it altogether.

11 Q. When was that that it was eliminated
12 altogether?

13 A. Boy, I can't -- I can't really tell you.

14 Q. Did Mr. Collette ever teach any of the
15 classes in that called class program?

16 A. I believe he did, yes.

17 Q. Which ones were they?

18 A. Well, we try to put people in terms of
19 things that they know, so it was liturgy and
20 worship and music. I'm not sure about music in
21 particular, but definitely liturgy and worship.

22 Q. And how many times did he teach that
23 class?

24 A. I -- I can't really give you a specific.

1 I know he taught them.

2 Q. Okay.

3 A. The called class is -- we had different,
4 you know, sessions like a fall session and a
5 spring session every year.

6 Q. Okay. And it's not listed under Colin's
7 job duties in the 2014 document?

8 A. No.

9 Q. Was it part of his job or was it
10 something that he volunteered for to teach a
11 called class?

12 A. He was teaching them before I got there.

13 Q. Okay.

14 A. So I think we try to -- we tried to --
15 generally when we ask speakers to come in, you
16 know, we're trying to balance people's schedules
17 and part of paring it down was to use our own
18 staff more.

19 Q. What is the purpose of a called class
20 program? What is that about?

21 A. To give people some education and some
22 training and some formation on being involved in
23 the church in some kind of ministry.

24 Q. Was -- to your knowledge were the

1 teachers ever paid to teach a called class? Paid
2 extra?

3 A. I believe some were and some were not.

4 Q. And as for Mr. Collette, was he
5 compensated for teaching that class?

6 A. I don't think so. For us as staff we
7 would not -- any of us on staff that taught, I --
8 I know I wasn't, so I don't know -- I can't
9 remember if others were or were not.

10 Q. Okay. Is Juvod HR a company that was
11 hired by Holy Family to your knowledge?

12 A. Juvod was a -- an instrument that Ro was
13 familiar with.

14 Q. Okay.

15 A. And she thought that would bring some
16 consistency to creating job descriptions in
17 helping us in evaluating doing performance
18 reviews.

19 Q. Was the company hired as a consultant?

20 A. No.

21 Q. When was Mr. Collette's last performance
22 review as an employee at Holy Family?

23 A. I can't remember.

24 Q. Do you remember ever conducting a

1 performance review for Mr. Collette?

2 A. I do.

3 Q. And approximately what year was that?

4 A. I really don't remember.

5 Q. How many times did you give performance
6 reviews to Mr. Collette during the time that you
7 and he both worked at Holy Family Parish?

8 A. Twice.

9 Q. So two times in five years?

10 A. Yes.

11 Q. Were they favorable?

12 A. Yes.

13 Q. And do you recall the last time
14 Mr. Collette received a raise in his employment at
15 Holy Family?

16 A. I don't.

17 Q. Do you remember what his raise may have
18 been?

19 A. We were pretty consistent with raises
20 until, I would say, about -- I got there in '09.
21 Let's say about 2012.

22 Q. What about 2012?

23 A. I think we pretty consistently gave
24 people raises until 2012. We cut back on the

1 amount of raises. The Archdiocese usually gives
2 us a recommendation of a percentage of raises.
3 One year we cut that in half -- two years we cut
4 that in half, one year we didn't give raises at
5 all. I can't remember which ones, but it was
6 around that time. '11, '12, '13.

7 Q. Who at Holy Family keeps track of an
8 employee's performance evaluation? Keep a copy of
9 it, rather?

10 A. Ro does.

11 Q. Are they kept in a personnel file?

12 A. Yes.

13 Q. Is there any reason to believe that
14 Mr. Collette's wouldn't be in his personnel file?

15 A. No.

16 Q. Do you send a copy of the performance
17 review to the Archdiocese?

18 A. No.

19 Q. How about the job description, was that
20 kept by the Archdiocese in any way?

21 A. No.

22 Q. What tasks of Mr. Collette's as during
23 his employment were done in a way that
24 Mr. Collette was representing Holy Family Parish

1 before parishioners or --

2 MR. MARKS: I'm going to object just to the
3 extent it's calling for a legal conclusion.

4 You can answer the question.

5 MS. REGAL: Can read back the question?

6 (Requested record read.)

7 BY MS. REGAL:

8 Q. I guess what I'm asking is what of
9 Mr. Collette's tasks were not behind the scenes in
10 nature?

11 MR. MARKS: Objection. Vague.

12 Do you understand what she's asking?

13 BY THE WITNESS:

14 A. I do. He was the key person in planning
15 liturgies, Sunday Masses and other liturgies and
16 the selection of music and was a resource to other
17 directors who would have input at certain times
18 about how we should celebrate Sunday liturgies
19 particularly.

20 Q. And when -- when Mr. Collette planned a
21 liturgy, how were you involved in that process?

22 A. The Liturgy Planning Committee would --
23 we would gather and kind of strategically
24 throughout the year. There's two key seasons, you

1 know, Advent and Christmas and then Lent and
2 Easter. So the liturgy planning committee would
3 gather at certain times to give us a theme, we'd
4 read the scriptures, we would -- it was a
5 collaborative process that I would -- I would say
6 he and I led together.

7 Q. Okay.

8 A. Out of his office came the details of
9 when these meetings should be and inviting those
10 to come and then certain kinds of subprocesses
11 like, you know, it's Advent and Christmas so we
12 need to think about this, or it's Lent and Easter
13 so we need to think about this. And I would rely
14 on him to give the overall invitations of the
15 larger church for those things to happen. And
16 then as we gathered, then we would say, well, how
17 do we celebrate this year at Holy Family.

18 Q. And you met with Mr. Collette every
19 Tuesday at noon; is that correct?

20 A. Correct. It wasn't always Tuesday at
21 noon, but we -- we had a regular time to meet
22 every week.

23 Q. Frequently you met at Tuesday at noon?

24 A. Yes.

1 Q. And what was the purpose of those
2 meetings?

3 A. To look more proximately at the coming
4 week's liturgy or the next couple of weeks'
5 liturgy and to evaluate the previous week's.

6 Q. And who was providing input at those
7 meetings?

8 A. The weekly meetings?

9 Q. The Tuesday-at-noon meetings?

10 A. Yes, it was usually -- it was Colin,
11 myself, at the time Jim Bannon who was our
12 director of operations, Jill Piccolino, the
13 assistant director in worship, and periodically
14 another -- maybe another director who might have
15 some specific interest or kind of expertise on
16 maybe a certain theme or something that we had --
17 the way that liturgy would be stylized.

18 Q. And who led those meetings?

19 A. It was kind of -- it's hard to say. We
20 would just gather and start talking about liturgy.
21 I -- I would say I did, but I -- I don't know if
22 that would be completely accurate.

23 Q. And so at that time you would review the
24 weekend's liturgy plan?

1 A. Mm-hmm.

2 Q. Is that correct?

3 A. Mm-hmm.

4 Q. And that -- the weekend's liturgy plan
5 was memorialized in a document that was written by
6 either Colin or Jill Piccolino; is that correct?

7 A. Correct.

8 Q. And when would be the first time that you
9 would see what they had generated from that
10 liturgy planning committee?

11 A. It would depend on what was going on.
12 Sometimes we had many things that were taking
13 place on a weekend. Others were more routine, if
14 you will.

15 Q. When would you typically --

16 A. But usually I would see them when they
17 were generated either Thursday -- Friday perhaps.

18 Q. Thursday in advance of Saturday's and
19 Sunday's Masses?

20 A. Correct.

21 Q. So you would see -- wouldn't see them at
22 the Tuesday meeting?

23 A. They were generated at the Tuesday
24 meeting. We talked about them, but then the

1 document itself, so like all the details --

2 So, for example, we're talking about
3 a liturgy and things that we would maybe be doing
4 to stylize a liturgy or what would be special
5 about this weekend's liturgy. Then the document
6 would be created that would have literally the
7 opening prayer, all the details about the
8 announcements that would happen before Mass, the
9 readings, if there was a special blessing. So
10 that document would be what we would take then
11 into -- as presiders and then all the other kind
12 of related ministers so everybody knew what was
13 going on for the liturgies.

14 Q. Okay.

15 A. So it had a lot of detail that we really
16 didn't have to discuss at those -- we didn't have
17 to get into that level of detail at those Tuesday
18 meetings.

19 Q. Right. But wasn't the -- wasn't there a
20 meeting at 1:30?

21 A. Correct. That was the directors. That
22 was all the rest of the directors.

23 Q. And wasn't that where the directors would
24 review on Tuesday that -- that weekend's liturgy

1 plan?

2 A. Not to -- not always to great detail, but
3 so say -- let me just give you an example. So,
4 say, it's Mother's Day and we are having some kind
5 of special blessing and maybe one of the other
6 directors would have certain input on that. So we
7 would talk further about that at the directors
8 meeting.

9 Q. Just to clarify, are we talking about the
10 time when Colin was working there or are we
11 talking about right now?

12 A. Both.

13 Q. Okay. I --

14 A. The time that he was there --

15 Q. We can omit the discussions about you now
16 and --

17 A. Yeah. No, no, this is --

18 Q. -- I want to focus on --

19 A. I'm focusing on when he --

20 Q. Okay. Great.

21 A. Yeah. Yeah.

22 Q. So you're testifying that you would not
23 have a copy of the weekend's liturgy plan until
24 Thursday?

1 A. Wednesday or -- whenever -- I can't
2 actually tell you if it was -- sometimes it was
3 Wednesday, sometimes it was Thursday.

4 Q. And Ms. Piccolino wouldn't send it to you
5 in advance of the noon meeting on Tuesday?

6 A. No.

7 Q. You're saying that you didn't have it
8 before that meeting?

9 A. No.

10 Q. So you didn't have an opportunity to
11 review it?

12 A. No.

13 Q. So the document would come to you -- or
14 the plan itself undocumented would come to you
15 from Ms. Piccolino and Mr. Collette?

16 A. Mm-hmm.

17 Q. You would discuss it with them at that
18 meeting --

19 A. No, we would --

20 Q. And then after the fact they would
21 generate --

22 A. Yes.

23 Q. -- a document?

24 A. Yes. Yes. Now, with --

1 MR. MARKS: There is no question pending.
2 Unless you were adding something more, but let her
3 ask the questions.

4 THE WITNESS: Okay.

5 BY MS. REGAL:

6 Q. Did you ever have a copy of the liturgy
7 plan prior to the Tuesday meeting?

8 A. I don't recall ever.

9 Q. And so when you met at 1:30 with the
10 other directors, they would not have a copy of
11 that plan either?

12 MR. MARKS: Objection. Asked and answered
13 several times now.

14 You can answer it again.

15 BY THE WITNESS:

16 A. No. They wouldn't.

17 Q. The document that you received on
18 Thursday then in advance of the Saturday and
19 Sunday Masses, did you ever have any changes to
20 make to those documents? Or those liturgy plans?

21 A. Very rarely.

22 Q. And were Mr. Collette and Ms. Piccolino
23 able to create the liturgy plans without your
24 approval?

1 A. Yes.

2 Q. And I just want to clarify. It's
3 undoubtedly going to solicit an objection, but I
4 have to ask anyway. I -- there was no
5 documentation for the liturgy plan prior to
6 Wednesday or Thursday of the week in which it was
7 to be used for the weekend; is that correct?

8 MR. MARKS: Objection. Asked and answered
9 three or four times.

10 You can answer it again.

11 BY THE WITNESS:

12 A. We would discuss, then the document would
13 be generated.

14 Q. Okay. So but there was no paper prior to
15 that; it was a discussion up until Wednesday or
16 Thursday?

17 MR. MARKS: Objection. Asked and answered now
18 four or five times.

19 You can answer it again.

20 MS. REGAL: I'm not trying to be vexatious. I
21 just want to make sure that I understand.

22 MR. MARKS: I think he's made it clear on the
23 timeframe. Meeting, put it together afterwards,
24 get it. Tuesday, Wednesday, Thursday.

1 MS. REGAL: It's not my goal to ask a question
2 multiple times. I promise.

3 I'm going to show you something I'm
4 going to mark as Exhibit No. 2.

5 (Keehan Deposition Exhibit No. 2
6 marked as requested.)

7 BY MS. REGAL:

8 Q. This is an e-mail we discussed in
9 Ms. Geisler's deposition earlier today. It's not
10 clear from the e-mail itself which ministry or
11 committee Mr. Collette and Ms. Geisler are
12 referring to, but you're one of the recipients of
13 this e-mail. Can you tell me what this is
14 referring to?

15 A. I believe it's the Marian ministry.

16 Q. And what is the Marian ministry?

17 A. So it's a group of people in the parish
18 who are particularly devoted to Mary. So much of
19 their prayer and their spirituality comes from
20 devotions to Mary.

21 Q. And so did you agree with Ms. Geisler at
22 the time that the e-mail should come from you and
23 not Mr. Collette?

24 A. I really don't remember.

1 Q. Okay. Is it your understanding that the
2 Marian ministry wants to hear from you directly
3 regarding any changes that are made?

4 A. I would say yes, that would be true.

5 Q. And do you know the reason for that?

6 A. I would say they tend to be a more
7 traditional group that defers to Father.

8 Q. Okay. Any other groups in the parish
9 that wanted to hear from you directly because
10 they're more traditional or for any other reason?

11 A. Many of them.

12 Q. And which ones?

13 A. I think it would be more people. There
14 are certain people in a lot of groups that -- I
15 would say it's a certain theology or it's a way
16 that they -- they would look to -- or they want to
17 hear from the priest.

18 Q. Okay. How about the Eucharistic
19 Adoration ministry, did they prefer to hear -- did
20 that ministry prefer to hear from you directly?

21 A. I would say some of them, yes. Yes.

22 Q. I mean the group as a whole? That's
23 doing my best to -- I know groups are made of
24 people, but to the extent that we're dealing with

1 a group?

2 A. Yeah.

3 Q. Did you feel like it was your
4 responsibility to e-mail or communicate with them
5 rather -- rather than Mr. Collette e-mailing or
6 communicating with them?

7 A. I try very hard to minimize my direct
8 communication with them.

9 Q. That may well be true, but I still need
10 to get you to answer the question I asked which is
11 do you -- were you -- did you feel at the time
12 that you needed to be the one to communicate with
13 the Eucharistic Adoration ministry rather than Mr.
14 Collette?

15 A. It's hard to specifically -- I can't
16 remember specifically with this particular group
17 more than maybe another. I can't -- I can't tell
18 you that for certain.

19 Q. But some members of that ministry
20 preferred it, is that what you're testifying?

21 A. I would -- yes. Yes.

22 Q. How about the Charismatic Prayer
23 ministry, did you feel as though that ministry was
24 better served with you being the person to whom

1 they communicated than Mr. Collette?

2 A. I definitely don't remember them more
3 than others.

4 Q. Well, when you say more than others, is
5 there an answer that applies to all the ministries
6 under the -- under the rubric of Worship and
7 Mr. Collette?

8 A. Can you repeat the question?

9 Q. What I'd like to find out is whether you
10 were the point person to which these individual
11 ministries communicated or if Mr. Collette was the
12 point person with which they communicated for the
13 parish, and it sounds to me that you've testified
14 that the Marian ministry preferred to hear from
15 you?

16 A. Yes.

17 Q. And so I'm asking does the Eucharistic
18 Adoration committee prefer to hear from you?
19 And then you said -- I don't want to
20 mischaracterize it -- that you don't remember one
21 specifically versus -- I take that to mean versus
22 generally?

23 A. Yeah. Right.

24 Q. And so I guess is it more appropriate to

1 ask if all of these ministries preferred to hear
2 from you directly rather than Mr. Collette?

3 MR. MARKS: Objection to the form of the
4 question. Compound. Mischaracterized the
5 witness's prior testimony. I believe asked and
6 answered.

7 You can answer the question.

8 MS. REGAL: Why am I so confused today? Asked
9 and answered it and -- I don't know.

10 BY THE WITNESS:

11 A. I would say Eucharistic ministers and
12 Marian ministry are -- they do stand out as
13 ministries that would want to hear more from me.
14 I have no recollection of Charismatic Prayer.

15 Q. How about the Centering Prayer ministry?

16 A. No recollection of communications in
17 which they would want to hear from me or Colin.

18 Q. How about the Ushers ministry?

19 A. I would say Colin.

20 Q. They preferred -- Colin directed that
21 group?

22 A. Yes.

23 Q. Is that what you're saying?

24 A. Yes.

1 Q. And the Table and Light ministers who,
2 directed that group, you or Colin?

3 A. Colin.

4 Q. Signing at Mass ministry, who directed
5 that group, you or Colin?

6 A. Colin.

7 Q. The Sacristans ministry, who directed
8 that group, you or Colin?

9 A. Colin.

10 Q. The Proclaimers, who directed that group,
11 you or Colin?

12 A. I'd say more both of us.

13 Q. The Music ministry, who directed that
14 group, you or Colin?

15 A. Definitely Colin.

16 Q. The Mass Coordinators, was that you or
17 Colin who directed that?

18 A. Colin.

19 Q. The Living Arts ministry, who directed
20 the Living Arts ministry, you or Colin?

21 A. Colin.

22 Q. The Liturgy Prep Committee, who directed
23 that group, you or Colin?

24 A. Colin and I together.

1 Q. The Lay Leader of Prayer ministry, who
2 directed that group, you or Colin?

3 A. I can't give you an answer. I -- I can't
4 really tell you.

5 Q. The Greeters ministry, who directed that
6 group, you or Colin?

7 A. Colin.

8 Q. The CLW, I think that's Children's --

9 A. Liturgy of the Word. Colin.

10 Q. Colin directed that group?

11 A. Mm-hmm.

12 Q. The A/V Loft ministry, who directed that
13 group, you or Colin?

14 A. I would say that would be -- have been
15 more collaborative between the two of us.

16 Q. And the Art and Environment ministry, who
17 directed that you or Colin?

18 A. Colin.

19 Q. Okay. Small Christian Communities?

20 A. Both of us.

21 Q. The Multicultural ministry, you or Colin
22 directed that group?

23 A. More both of us.

24 Q. And the Sewing ministry, who directed

1 that group, you or Colin?

2 A. Colin.

3 MS. REGAL: Mark this as Exhibit 3.

4 (Keehan Deposition Exhibit No. 3
5 marked as requested.)

6 BY MS. REGAL:

7 Q. Again, forgive the redundancy because we
8 discussed this in Ms. Geisler's deposition, but I
9 would like to draw your attention to the second
10 page, first full paragraph. It says, "Terry and I
11 were just sitting in the chapel and working on
12 getting him ready. The idea is very little, if
13 anything, has been approved by him. Nothing can be
14 done without his approval." And this is the --
15 is it true that this is regarding the adoration
16 chapel?

17 A. Yes.

18 Q. And the adoration chapel is under the
19 overview of which ministry -- which liturgical
20 ministry?

21 A. Worship.

22 Q. Worship. I don't -- forgive me, I don't
23 see one that says worship ministry.

24 MR. MARKS: Do you want to direct him to the

1 document that you're looking at because he doesn't
2 have what you're looking at.

3 MS. REGAL: Oh, I'm sorry. Yes, I can. I
4 mean is there -- we've gone through this whole
5 list of liturgical ministries and I can provide
6 with you a list. We can mark that.

7 (Keehan Deposition Exhibit No. 4
8 marked as requested.)

9 BY MS. REGAL:

10 Q. Forgive me, Father Keehan. I was looking
11 at this list as I've been referencing these
12 different liturgical ministries. Does adoration
13 chapel oversight fall under any the liturgical
14 ministries listed here?

15 A. So if you see under Personal Prayer and
16 Devotion, it says Eucharistic Adoration.

17 Q. Yes. Okay. And so this e-mail says
18 nothing can be done without his approval. I take
19 that to mean nothing can be done without the
20 approval of you, Father Terry; is that correct?

21 MR. MARKS: Objection to the form of the
22 question.

23 You can answer.

24 BY MS. REGAL:

1 Q. Is it -- do you understand that
2 Ms. Geisler meant by his approval, she meant your
3 approval?

4 MR. MARKS: Objection. Calls for speculation
5 as to what Ms. Geisler meant.

6 You can answer the question to the
7 extent you know.

8 BY THE WITNESS:

9 A. In terms of the structure of the
10 Eucharistic adoration chapel, yes, they would need
11 my approval.

12 Q. And did every discussion regarding the
13 Eucharistic Adoration ministry require your
14 approval?

15 A. Every?

16 Q. Yes.

17 A. No.

18 Q. Okay. Which ones did not?

19 A. I -- I'm recalling that this is in
20 reference to the group wanting to make some pretty
21 major changes in the chapel.

22 Q. Okay.

23 A. So then it came to my attention.

24 Q. What constituted a major change by your

1 definition?

2 A. They wanted to create new furniture and
3 lighting and for the presentation of the Blessed
4 Sacrament in the Eucharistic adoration chapel.

5 Q. Okay. We have -- this will be Exhibit 5.
6 (Keehan Deposition Exhibit No. 5
7 marked as requested.)

8 BY MS. REGAL:

9 Q. That e-mail there, the one that we
10 discussed, the one that I discussed with
11 Ms. Geisler, it said that you -- it says, "He also
12 mentioned he wants to see all the videos before
13 they go live tomorrow night."

14 MR. MARKS: I'm sorry. I don't think there is
15 a question pending, is there?

16 MS. REGAL: Oh.

17 MR. MARKS: I think that was just a statement.

18 BY MS. REGAL:

19 Q. Yes, you see the part where it says you'd
20 like to see all videos before they go live
21 tomorrow night. Do you know what videos to which
22 she was referring?

23 A. I believe, because this is Triduum and
24 Easter, although I'm not sure, but I believe that

1 this refers to three videos that we wanted to do
2 for Holy Thursday. As a part of the Holy Thursday
3 liturgy there is a blessing of three oils; the oil
4 of the sick, the sacred chrism, and the oil of the
5 catechumens.

6 Q. Okay.

7 A. The oil of the catechumens is used as
8 part of the ritual of people becoming Catholic so
9 we were going to get somebody who is in our
10 program that are becoming Catholic to give a
11 witness as we presented the oil. And somebody who
12 was anointed with the oil of the sick, as we
13 present the oil of the sick they would give a
14 little video testimony. And then for the sacred
15 chrism, I believe it was a couple of us as priests
16 who were going to give a little witness about when
17 we were anointed when we were ordained a priest.

18 Q. Okay.

19 A. I believe. That's -- but I --

20 Q. And whose -- whose work would it be to
21 propose videos for this purpose?

22 A. It could be anybody's to propose. Then
23 it was Liturgy's -- or Worship's responsibility to
24 pull the people together and actually get them to

1 sit down to be videotaped.

2 Q. Okay. And so Mr. Collette oversaw the
3 process of selecting and recording these videos?

4 A. It was collaborative. He had much to do
5 with it, but it was collaborative.

6 Q. Collaborative among whom?

7 A. So I may say, hey, here's a good person
8 who's becoming Catholic, let's talk to them.
9 Colin may say, oh, here's somebody who's been
10 anointed who is sick. Oh, okay.

11 Q. Okay.

12 A. So it was -- that's an example.

13 Q. And isn't it true that -- is it true that
14 every video that was used in services was subject
15 to your approval?

16 A. Not ever yone.

17 Q. So there was no policy that required
18 videos -- every video to be cleared by you?

19 A. There were times that I trusted that it
20 would be done well and I didn't necessarily
21 approve it.

22 Q. How many times?

23 A. I can't really tell you.

24 Q. I just want to clarify there was a policy

1 and sometimes you trusted people to follow to do
2 the right thing regardless of the policy? Was
3 there a policy that you must approve all videos or
4 was there not a policy that you must approve all
5 videos?

6 MR. MARKS: Objection. Compound question.
7 Vague and asked and answered.

8 You can answer it.

9 MS. REGAL: I'll reask the question.

10 BY MS. REGAL:

11 Q. Was there a policy that you must approve
12 all videos?

13 MR. MARKS: Objection. Asked and answered.

14 You can answer again.

15 BY THE WITNESS:

16 A. With the complexity of liturgy planning,
17 sometimes I was able to approve them, sometimes I
18 wasn't. So we didn't have a formal policy, but we
19 tried to say let's approve these. It didn't
20 always have to be me.

21 Q. Who else could it have been?

22 A. Colin.

23 Q. I want to ask you about some videos that
24 your attorney has provided to us that Mr. Collette

1 made that were posted on the Holy Family You Tube
2 channel. If necessary, I can bring this up on our
3 big screen here, but I think you might all know
4 what we're talking about. Those videos were
5 called reflections; is that correct?

6 A. Correct.

7 Q. And who else recorded them besides
8 Mr. Collette?

9 A. Myself, Friar John Paul Cafiero, some of
10 our visiting priests. Some of the other
11 directors.

12 Q. They were also recorded by parishioners;
13 isn't that correct?

14 A. Yes.

15 Q. Okay. Multiple parishioners; isn't that
16 correct?

17 A. Yes.

18 Q. And what was the purpose of those videos?

19 A. To give people some insights about the
20 scriptures and to stimulate their discussion of
21 the scriptures.

22 Q. And how did you select the people who
23 were to record those videos?

24 A. Colin and I would discuss that.

1 Q. Now, what would you discuss?

2 A. I'm trying to think of -- if there was
3 somebody else that I talked to about who should
4 record. Again, because Small Christian
5 Communities fell under Colin's leadership, it was
6 mostly he and I who would discuss who would give
7 the reflections.

8 Q. But isn't it true that you made the
9 assignments as to who recorded what?

10 A. I recall regularly Colin coming in with
11 the schedule and he and I would sit down and -- it
12 was a collaborative -- it was a collaborative
13 effort.

14 Q. Who made the assignments?

15 A. Both of us.

16 Q. So you're saying Colin sometimes made the
17 assignment and sometimes you made the assignment?

18 MR. MARKS: Objection. Asked and answered.

19 BY THE WITNESS:

20 A. Yes.

21 Q. How were the videos assigned to
22 parishioners to record?

23 A. Again, he and I would. Sometimes he
24 would say how about this person or that person

1 or -- because of schedules, sometimes some of
2 the -- some of the priests were not available.
3 You know, some of it was based on just simple
4 availability.

5 Q. And would those individual parishioners
6 volunteer to make such videos?

7 A. No. We would ask them.

8 Q. Were they compensated for providing those
9 videos?

10 MR. MARKS: I'm just going to object as beyond
11 the scope of limited discovery.

12 You can answer.

13 BY MS. REGAL:

14 Q. They weren't you said. Sorry.

15 And then were the -- the visiting
16 priests compensated for making those videos?

17 MR. MARKS: Same objection.

18 You can answer.

19 BY THE WITNESS:

20 A. Not to my knowledge.

21 Q. And do you know if Colin was compensated
22 for making those videos?

23 A. Not to my knowledge.

24 Q. Was it done on a voluntary -- volunteer

1 basis?

2 MR. MARKS: Objection. Vague as to who you're
3 referring to.

4 BY MS. REGAL:

5 Q. Was Mr. Collette's work making those
6 videos, was that done on a volunteer basis or was
7 that part of his job?

8 A. It's not listed in his job description.
9 But it was an expertise he had, so -- has.

10 Q. I'm sorry. What's the last part?

11 A. Has. An expertise that he has.

12 Q. Did the Archdiocese know about these
13 videos?

14 MR. MARKS: Objection. Calls for speculation

15 BY MS. REGAL:

16 Q. Did you communicate that you were making
17 these videos to the Archdiocese?

18 A. No.

19 Q. What parts of Colin's work required him
20 to provide spiritual guidance to parishioners?

21 A. His knowledge of spirituality and prayer.

22 Q. I'm sorry. Can you say that again?

23 A. His knowledge of spirituality and prayer.

24 Q. I'm sorry. I may have not asked the

1 question clear enough. What duties that Colin had
2 required him to provide spiritual guidance to
3 parishioners?

4 A. His role in leading the most important
5 public prayer that we have, the celebration of the
6 Eucharist on the weekend.

7 Q. So just his -- which role would that be
8 though?

9 MR. MARKS: Objection. Vague.

10 MS. REGAL: That's what I'm trying to do. I
11 agree it's vague. I'm repeating his word. I'm
12 trying to clarify. You said his role and I
13 wondered which role.

14 MR. MARKS: He said his role in leading
15 prayer.

16 BY THE WITNESS:

17 A. In leading, yeah. In leading the -- the
18 efforts to plan and execute our liturgies on the
19 weekend.

20 MR. MARKS: I think you -- if I may just help
21 just to speed things along. I think you guys are
22 talking -- I think what you're getting at is which
23 of these duties does he consider to be part?

24 BY MS. REGAL:

1 Q. Any of the duties. The ones listed
2 there, ones not listed there. Which duties that
3 Mr. Collette had required him to provide spiritual
4 guidance? And you're saying just assembling the
5 plans for the Mass --

6 A. Mm-hmm.

7 Q. -- required him to provide spiritual
8 guidance?

9 A. To help us in the quality of our -- of
10 our prayer. I think that's one of the major
11 things that leads people.

12 Q. Did he give spiritual guidance to any
13 individuals?

14 MR. MARKS: I guess I'm going to object.
15 Vague as to the term spiritual guidance.

16 To the extent you understand what
17 she's asking, you can answer.

18 BY THE WITNESS:

19 A. I think a lot of people see him as a
20 leader of the church and so they -- they seek his
21 knowledge and his wisdom about things.

22 Q. Right. And I -- I'm just asking which
23 tasks that he had, which duties that he had
24 resulted in him giving individuals spiritual

1 guidance?

2 MR. MARKS: Objection. Asked and answered.

3 Vague as to the term spiritual guidance.

4 You can answer.

5 BY THE WITNESS:

6 A. It was not -- no duty maybe in his job
7 description for that, but it -- it happens to all
8 of us as ministers. People come to us and they --
9 they seek our -- our guidance, our wisdom.

10 Q. By virtue of working at the church?

11 A. Yes.

12 (Keehan Deposition Exhibit No. 6
13 marked as requested.)

14 BY MS. REGAL:

15 Q. I'm going to show you what we're going to
16 mark as Exhibit 6. Ms. Geisler testified that
17 this is regarding a letter that was for your
18 signature. Am I correct that I recall that letter
19 was to be printed in the church bulletin or it was
20 to be mailed?

21 A. I believe it was a separate mailer for
22 Christmas -- either Christmas or Easter.
23 Christmas.

24 Q. Okay. And who wrote that letter that was

1 used in the mailer?

2 A. I don't know about this one specifically,
3 but usually what happens is I take a pass at it
4 and at this time I would probably say either Heidi
5 or somebody on the staff with really good writing
6 skills would kind of edit it.

7 Q. And so these things, these letters were
8 drafted for your final approval and signature; is
9 that right?

10 A. I would write them. They would be edited
11 and then I would -- they would always make sure
12 for these particular letters that I would have
13 final approval.

14 Q. Okay. Did Colin play any role in that
15 mailer?

16 A. It was all the mailers were pretty
17 collaborative in terms of --

18 Q. And who was doing the collaborating with
19 whom?

20 A. So partly it was a -- a kind of a
21 development venture. Ro would usually want --
22 would always want to see it. And then because it
23 was liturgical in nature, we would always ask for
24 Colin's input.

1 Q. You're familiar with the lay ecclesial --
2 you're familiar with the lay ecclesial ministry
3 program; is that right?

4 A. I am.

5 Q. And was it you who asked Mr. Collette to
6 participate in that lay ecclesial ministry
7 program?

8 A. I can't remember.

9 Q. Would Mr. Collette have needed your
10 approval to begin the process of participating in
11 the lay ecclesial ministry program?

12 A. Yes.

13 Q. And did you approve of it?

14 A. Yes.

15 Q. And why was that?

16 A. It was something he wanted to do.

17 Q. Did you want him to do it?

18 A. Yes.

19 Q. And was -- did you see any benefits --
20 well, scratch that.

21 What benefits did you see in
22 Mr. Collette completing the lay ecclesial ministry
23 program?

24 A. That it would broaden his background and

1 his interest in church, his ministry.

2 Q. Were there any benefits that you saw that
3 Holy Family could reap as a result of Mr. Collette
4 participating in the lay ecclesial ministry
5 program?

6 A. Yes.

7 Q. And what were they?

8 A. Ongoing education.

9 Q. Did you have the goal of him becoming a
10 pastoral associate?

11 A. I recall that he had the title pastoral
12 associate before I got there and then somehow that
13 was either taken away or changed partly because he
14 didn't have the qualification. So I remember
15 having some discussion with him about this, about
16 whether he wanted that title or needed that title
17 and I can't tell you if we decided something or
18 not. I -- in terms of a title, we weren't -- we
19 weren't -- the title didn't seem to be real
20 important to either one of us.

21 Q. What is a pastoral associate able to do
22 that an ordinary lay person cannot do within a
23 church?

24 A. So pastoral associate can focus on some

1 of the pastoral work of the church. For example,
2 either being a minister of care or coordinating
3 ministers of care, people who take Communion to
4 people who are sick. And then consequently, or in
5 addition, they often do wake services and cemetery
6 services that you really don't need to be a priest
7 to do. But a lot of people are used to priests
8 doing those things and that a pastoral associate
9 would have expertise in certain areas of the
10 church to help with just carrying out the
11 ministries of the church in areas that are -- you
12 don't need to be ordained to do.

13 Q. Okay.

14 A. So some pastoral associates, most of them
15 either focus on liturgy or some form of scripture
16 or some form of teaching and, where they can,
17 liturgical areas of the church.

18 Q. Can a pastoral associate deliver a
19 homily?

20 A. Technically the Church says no. Because
21 a hom -- a homily is reserved for the clergy.

22 Q. Why is that?

23 MR. MARKS: Objection to the extent it's
24 calling on him to interpret Cathological teaching.

1 MS. REGAL: I'm not questioning it. I just
2 want to know some more detail about this
3 distinction.

4 BY THE WITNESS:

5 A. So people who are not ordained, either a
6 deacon or a priest, should only do reflections.

7 Q. Okay. Can you -- what do you mean by
8 reflection?

9 MR. MARKS: I'm just going to object. Beyond
10 the scope of the limited discovery.

11 BY THE WITNESS:

12 A. Technically a homily is reserved for a
13 clergy, either an ordained deacon or ordained
14 priest. Lay people technically can give gospel
15 reflections or reflections at Mass. During Mass.

16 MS. REGAL: And I want to -- this is
17 Exhibit 7.

18 (Keehan Deposition Exhibit No. 7
19 marked as requested.)

20 BY MS. REGAL:

21 Q. If I can direct your attention to the
22 pages marked 181 and 182. It's the third and
23 fourth page in our packet. Have you seen this
24 document before?

1 A. It's my writing. Yes.

2 Q. It's two different writings. Which one
3 is yours, the top or the bottom?

4 A. The bottom.

5 Q. And so you did recommend Mr. Collette for
6 this -- for this lay ecclesial ministry program;
7 is that right?

8 A. Yes.

9 Q. Can you just read -- I'm having a hard
10 time reading your writing. Can you just tell us
11 what these things say?

12 A. On 182?

13 Q. On 181 and 182, if you wouldn't mind?

14 A. So there's checks for just -- I can't --

15 Q. I appreciate -- I can read the checks. I
16 need the handwriting part.

17 A. I am the pastor of Holy Family Parish
18 where Colin is currently Director of Worship.

19 Q. And then what did you write in regards to
20 the second question?

21 A. Colin is currently pursuing a D Min,
22 doctorate of ministry, and consistently shares his
23 knowledge of scripture and liturgy and church very
24 generously with our community and beyond.

1 Q. Okay. And the last?

2 A. Based on the above, Colin has a depth of
3 spirituality and ministry that are a real asset to
4 us at Holy Family. He continues to want to grow
5 and develop his own faith life and ministry
6 skills.

7 Q. So the second question where it says,
8 "How would you assess the student's character,
9 aims, and values? Are there special strengths or
10 problems which we should be aware", did you at any
11 time consider Mr. Collette's sexuality in making
12 your recommendation?

13 MR. MARKS: Objection. Beyond the scope of
14 limited discovery.

15 You can answer.

16 BY THE WITNESS:

17 A. No.

18 Q. Did you at any time discover his -- the
19 fact that he and Mr. Will Nifong resided together
20 in answering this question?

21 MR. MARKS: Objection --

22 THE WITNESS: No.

23 MR. MARKS: -- beyond the scope of limited
24 discovery.

1 BY MS. REGAL:

2 Q. To your knowledge, did Colin complete the
3 lay ecclesial ministry program?

4 A. I know he was working towards it. I
5 don't recall.

6 Q. Did you intend that after Mr. Collette
7 finished the lay ecclesial ministry program that
8 he would be able to lead any part of services?

9 A. I didn't feel like he needed the
10 certificate to do that.

11 MS. REGAL: I'd like to mark this as
12 Exhibit 8.

13 (Keehan Deposition Exhibit No. 8
14 marked as requested.)

15 BY MS. REGAL:

16 Q. This is another e-mail that we reviewed
17 with Ms. Geisler regarding having a lay presider
18 over prayer services. Was it common for lay
19 presiders to lead prayer services at Holy Family
20 at the time in 2014?

21 A. We had them. I wouldn't call it common.

22 Q. Okay.

23 A. But we would have lay leaders of prayer
24 periodically, yes.

1 Q. And who might those be?

2 A. Lisa Mercero (ph) who at the time was our
3 director of Family Faith. I believe Sue Geegan
4 led Ash Wednesday service. There were times when
5 we did not have a priest for morning Mass
6 periodically. So I think Jerry Stecker (ph), who
7 was our director of Pastoral Care at the time, and
8 I believe Colin did a couple of those.

9 Q. Is it preferable to have a priest lead
10 mass?

11 MR. MARKS: Objection.

12 THE WITNESS: Yes.

13 MR. MARKS: Beyond the scope -- beyond the
14 scope of limited discovery. Vague. The term
15 preferable.

16 You can answer.

17 BY MS. REGAL:

18 Q. Did the parishioners seem to prefer, from
19 what you've been told, when a priest is to lead a
20 Mass or a prayer service?

21 MR. MARKS: Objection. Calls for speculation.

22 MS. REGAL: I'm just strictly asking from what
23 you've been told by others.

24 MR. MARKS: Beyond the scope of limited

1 discovery.

2 BY THE WITNESS:

3 A. They prefer priests to -- to preside at
4 or lead Mass and the Masses are scheduled. Every
5 day we have Mass. Because I'm the only full-time
6 priest there, we have other priests that come in.
7 Sometimes with their schedules, they can't show,
8 they can't make the Mass, so a lay person then
9 will lead the word in communion service that is
10 not a Mass.

11 MS. REGAL: I have a document here I want to
12 mark as Exhibit 9.

13 (Keehan Deposition Exhibit No. 9
14 marked as requested.)

15 BY MS. REGAL:

16 Q. Do you recognize this document? Have you
17 ever seen it before?

18 A. I don't know if I have. Let me take a
19 second. I don't recall seeing this document
20 before today.

21 Q. I read this that -- this was provided to
22 me by your attorneys. I read this to be regarding
23 the decoration of a room. I think it's sort of a
24 multipurpose room. Do you know to which room this

1 is referring?

2 A. Yes, I do.

3 Q. Which room is that?

4 A. It's a room downstairs that has actually
5 been used for several different ministries, but
6 SPRED is a group that works with special --
7 children with special needs.

8 Q. And --

9 A. And the program of SPRED, Special
10 Religious Education for Developmentally disabled
11 children, requires some pretty specific furniture.

12 Q. Okay. And who's -- which ministry would
13 be responsible for overseeing the decor in a
14 multipurpose room like this?

15 A. I would assume whoever works with SPRED.

16 Q. Do you know who works with SPRED?

17 A. Well, I -- at the time, yes.

18 Q. Who was it?

19 A. Dolores Siyak (ph).

20 Q. Okay.

21 A. Maybe Wilma Grownie (ph).

22 Q. And was that under the worship rubric?

23 A. We've gone back and forth between Family
24 Faith and Worship. I can't tell you at the time

1 where it fell.

2 Q. In designing decor in this room, did they
3 require your approval?

4 A. I'm having difficulty remembering exactly
5 when this was because then the space also for a
6 period of time was used by the academy because
7 they were having difficulties with kids. So
8 there -- there were -- the space that I'm thinking
9 of was moved and -- or different groups used it so
10 their actual space moved from one room then back
11 to another. So I can't remember exactly in the
12 timeframe of when this is.

13 Q. For the decor in rooms of the church, who
14 oversees that? Or in 2014 who oversaw it?

15 A. That would definitely be Colin.

16 Q. And did he require your final approval on
17 his selections and decor?

18 A. It was pretty collaborative, but I don't
19 consider myself a decorator so I -- I relied on
20 his expertise.

21 Q. But in this e-mail they discussed --

22 A. Colors and drapes and -- yeah.

23 Q. In the e-mail they discussed taking their
24 selections to you?

1 A. Because of the fact that the room had
2 gone back and forth between different groups and
3 so there was a concern that it may still do that,
4 so to the extent that any of the decorations were
5 permanent or really hard to adapt to another
6 group, I wanted to have some input on that.

7 MS. REGAL: Okay. I have an exhibit here that
8 I'll mark as 10.

9 (Keehan Deposition Exhibit No. 10
10 marked as requested.)

11 BY MS. REGAL:

12 Q. Again this was an e-mail provided by your
13 attorneys. It says, "Good morning. A parishioner
14 is donating a piano to the church and I found out
15 late last night that the piano mover can move it
16 today. I know this is against policy, but could I
17 possibly get a check for the movers. I will fill
18 out the check request when I come in this morning.
19 I just want to get the ball rolling." Are you
20 familiar with a policy regarding -- a policy to
21 what he's referring? Do you know what that might
22 be?

23 A. Yes. Just a simple check request policy.
24 When different expenses need to be covered, people

1 request a check and finance processes the check.

2 Q. A piano being donated would be under
3 the -- under the review of a music director, I
4 assume; is that correct?

5 A. Yes.

6 Q. But Mr. Collette required your --
7 required your approval on those checks?

8 A. In this case it would either be Jim or Ro
9 or whoever it was -- this is 2014 so Ro would have
10 been -- or somebody in finance would have been
11 more -- I don't usually approve a check request.
12 It's more Ro or somebody in finance.

13 I take that back. Large checks I
14 do.

15 Q. Okay. Understood.

16 Were you involved in Mr. Collette's
17 immigration applications at any time while you
18 were at Holy Family?

19 A. I think early on -- I seem to recall
20 early on that there was a part of the process that
21 might not have been complete or he was working on
22 the final steps of it.

23 Q. You said the final steps?

24 A. I can't recall -- or one of the steps.

1 I -- but --

2 Q. When is the last time that you're
3 familiar that there was any kind of requirement
4 that Mr. Collette have any kind of immigration
5 documentation by your recollection?

6 A. Him mentioning to me fairly early on
7 that -- maybe the process wasn't complete. I -- I
8 can't remember.

9 Q. But --

10 A. I just remember something about his
11 immigration status.

12 Q. You don't recall having to fill out any
13 kind of documentation or anything?

14 A. I don't recall.

15 Q. Okay. Would you like to take a break?

16 A. Yeah.

17 Q. Okay.

18 (Whereupon a short break was taken.)

19 MS. REGAL: I'd like to introduce this as
20 Exhibit 11.

21 (Keehan Deposition Exhibit No. 11
22 marked as requested.)

23 BY MS. REGAL:

24 Q. Father Terry, I know we've talked about

1 this a little bit, but I want to ask you more
2 about the -- this document is the invitees to
3 attend liturgy prep meetings. And I just want to
4 ask you about that. The liturgy prep meetings,
5 they occurred at 1:30 on Tuesdays; is that right?

6 A. No. Liturgy prep meetings were meetings
7 that happened seasonally.

8 Q. Oh. Okay.

9 A. So to plan seasons. So they would have
10 to be kind of strategically placed throughout the
11 year.

12 Q. Okay. How many people attended those
13 meetings?

14 A. It varied, but I'd say we would average
15 around 10 to 15.

16 Q. Each year?

17 A. Each --

18 Q. Oh, people attend?

19 A. Yes, 10 to 15 people.

20 Q. Okay. And did all these ministry leaders
21 attend typically?

22 A. As they could. They tried, but it was --
23 it was pretty much a different group every time we
24 wanted to get representation from.

1 Q. Did you attend the liturgy prep meetings?

2 A. Almost all of them. Periodically I would
3 miss, but almost all of them.

4 Q. Did you lead the meetings?

5 A. Colin and I led them together.

6 Q. Did Colin attend all of the meetings?

7 A. Probably like I, he might have missed one
8 or two, but --

9 Q. In Mr. Collette's absence, who led the
10 meetings?

11 A. I would.

12 Q. And were decisions made at these meetings
13 about how -- about selections for the liturgy?

14 A. The meetings generated what color the
15 room should be painted. The rest of the ministry
16 did the painting of the room, if you know what I
17 mean.

18 Q. Are you talking about actual paint --

19 MR. MARKS: Yes, let's be -- I think that was
20 a figure of speech, not actually --

21 MS. REGAL: No, I was picking up what you were
22 laying down, but I still need to make sure that --

23 MR. MARKS: Let's get a clear record.

24 MS. REGAL: -- it's clear in the record.

1 MS. REGAL: Yes.

2 THE WITNESS: Sorry about that.

3 MR. MARKS: Not Sherwin Williams coming in --

4 THE WITNESS: Yeah. Yeah.

5 MS. REGAL: Okay. So let's take a step back.

6 I appreciate the literary style though.

7 MR. MARKS: Say the same thing but without the
8 analogy.

9 MS. REGAL: So let's just take that -- let's
10 just do that one more time.

11 Can you repeat the question for us?

12 (Requested record read.)

13 BY THE WITNESS:

14 A. So these meetings were more visionary,
15 thematic with some -- sometimes there would be a
16 specific, but the specifics were more Worship's
17 responsibility.

18 Q. Okay.

19 A. In collaboration with me.

20 Q. So did the group meeting for the liturgy
21 prep meetings, did they select a vision or theme
22 at those meetings?

23 A. Not always. But often.

24 Q. And the rest of the time who selected the

1 vision and theme when the selections weren't made
2 by the -- during the liturgy prep meeting?

3 A. If it wasn't clear, we'd say we need
4 another meeting. If it wasn't -- if like a theme
5 of Advent and Christmas wasn't clear, we'd say we
6 need another meeting.

7 Q. And so the meeting would reconvene to
8 make the selection?

9 A. Yes.

10 Q. Okay.

11 A. Sometimes we would come out of one
12 meeting and say, yeah, Advent and Christmas is
13 pretty clear.

14 Q. So the vision and themes -- the visions
15 and the themes were always selected via a meeting?

16 A. Yes.

17 Q. As you got down to the more specific
18 details after selecting the vision and theme, who
19 made those selections?

20 A. Colin and I together.

21 Q. And how did -- at what time did you do
22 that? Did you have a system in place for how to
23 make those selections?

24 A. Sometimes if we felt we needed a -- a

1 separate meeting, we would have like a dinner
2 meeting. And other times we could -- we would
3 take some -- a little extra time to get together
4 and try to carry it out, put the specifics to the
5 theme.

6 Q. How many members are there from the
7 parish in the liturgy prep -- I know these are the
8 ministry leaders, but how many different members
9 are there to the ministry prep committee or
10 ministry as it were?

11 A. There was never a set number. We just
12 tried to get representation from as many different
13 groups as we could.

14 Q. Okay. And so those meetings were the
15 time that people voiced their opinions?

16 A. (No audible response.)

17 MR. MARKS: You've got -- she -- you were
18 nodding, but she needs to -- you have to have a
19 yes or a no answer for her to record it.

20 THE WITNESS: Yes. Sorry.

21 MS. REGAL: I have an exhibit here that we'll
22 use as number Exhibit 12.

23 (Keehan Deposition Exhibit No. 12
24 marked as requested.)

1 BY MS. REGAL:

2 Q. Father Terry, I assume that you've seen
3 this document before?

4 A. Yes.

5 Q. Did you have any discussions with the
6 Archbishop prior -- prior to this e-mail about
7 Mr. Collette's termination?

8 A. Not specifically about his termination,
9 but the fact that it was brought to his attention
10 that he had a partner.

11 Q. And when was that conversation?

12 A. I can't tell you exactly, but I would say
13 eight months prior to the termination.

14 Q. And did the Archbishop approach you about
15 that topic or did you approach him about that
16 topic?

17 A. He approached me.

18 Q. And what did he say when he approached
19 you?

20 A. He said that he was getting letters from
21 parishioners that were upset by the fact that it
22 was public that he had a partner.

23 Q. How did you respond?

24 A. I said I knew that. I'm trying to

1 recall. He said this is causing tension or -- I
2 can't remember exactly the words that he used.

3 Q. Was his position at the time that
4 Mr. Collette should remain employed by Holy
5 Family?

6 A. He didn't indicate one way or another.

7 Q. Was your position at the time that
8 Mr. Collette should remain employed by Holy
9 Family?

10 A. Yes.

11 Q. In that discussion eight months prior to
12 the termination, was the matter settled?

13 A. Not in my mind. I'm sorry.

14 MR. MARKS: Let her finish the question.

15 MS. REGAL: That's fine.

16 BY MS. REGAL:

17 Q. In what way was it not settled?

18 A. I, in fact, was confused by what he
19 wanted me to do about it.

20 Q. Did you feel as though his instructions
21 were ambiguous, is that what you're saying by
22 being confused?

23 A. He said this is not right and people are
24 upset about this.

1 Q. How did you respond to that?

2 MR. MARKS: Objection. Asked and answered.

3 He can answer.

4 MS. REGAL: I don't see how. I just don't
5 recall Father Keehan saying this is not right so
6 that -- and people are upset by this, so I don't
7 know how it's asked and answered that what his
8 response would be.

9 MR. MARKS: Okay. I made my objection.

10 You can answer it again.

11 BY THE WITNESS:

12 A. At some point he -- in time he said that
13 I should talk to Bishop Rassas who is the Vicar of
14 our area.

15 Q. And did you speak to Bishop Rassas?

16 A. I did.

17 Q. And what did you say to Bishop Rassas?

18 A. He said it -- the Cardinal's very
19 concerned about this. And I said if the Cardinal
20 or you are going to scrutinize the sexual identity
21 of all of your music directors, you're going to
22 have a lot of work to do.

23 Q. How did Bishop Rassas respond?

24 A. He said --

1 MR. MARKS: I'm sorry. Just for the record
2 I'm going to object to this whole line of
3 questioning as outside the scope of limited
4 discovery.

5 But you can answer.

6 BY THE WITNESS:

7 A. Bishop Rassas' concern seemed only to be
8 that the Cardinal -- he said that he -- he
9 concurred with what the Cardinal said that a lot
10 of people are upset about this. But even from
11 that conversation, I didn't feel a clear direction
12 from them about what I should do.

13 Q. Okay. And what did you think the
14 potential directions they were asking you to go
15 were?

16 A. I feared that it -- I guess I just -- you
17 know, I think about the people in the parish and I
18 just thought that was my biggest concern, maybe
19 that people -- more people would be upset by this.
20 So, quite frankly, I didn't really know what to
21 do.

22 Q. When you received this e-mail, was this
23 the first time that you had seen this Facebook
24 page with this information on it?

1 A. Yes.

2 Q. Do you know who sent it?

3 A. No.

4 Q. And that discussion that you had eight
5 months prior to Mr. Collette's termination, was
6 that the last discussion you had about
7 Mr. Collette's employment with the Archbishop
8 until July of 2014?

9 A. I believe so, yes.

10 Q. But even though the issue had not been
11 brought up again in eight months, you still didn't
12 feel as though the issue had been closed and
13 settled?

14 A. No.

15 Q. As you read it, what did the phrase
16 "especially at this time clarity is needed" mean
17 to you?

18 MR. MARKS: Objection to the extent it's -- it
19 calls for speculation as to what Cardinal George
20 intended to mean.

21 You can answer your opinion as to
22 how you took it.

23 BY THE WITNESS:

24 A. I interpreted that as a reference to the

1 previous conversation that we had.

2 Q. The e-mail goes on to say, "Let me know,"
3 italics, "this week," in italics, "when you plan
4 to resolve this." I don't see from this e-mail
5 where it instructs you to terminate Mr. Collette.
6 Was termination the only option that you
7 understood that you had?

8 MR. MARKS: Objection to the extent it's
9 calling for speculation as to what was intended by
10 Cardinal George. Also -- Strike that.

11 You can answer.

12 MS. REGAL: Are you striking the whole
13 objection?

14 MR. MARKS: No, but to the extent you're
15 asking him to interpret what was meant. If you're
16 just also asking him how he --

17 MS. REGAL: I'm merely asking you, Father,
18 what --

19 THE WITNESS: That's how I felt.

20 BY MS. REGAL:

21 Q. What's how you felt?

22 A. That resolve this meant termination.

23 Q. Did you call him after receiving this
24 e-mail?

1 A. I did not.

2 Q. Did you call anyone at the Archdiocese
3 after receiving this e-mail?

4 A. I did not.

5 Q. And did you E-mail the Archbishop back
6 after receiving this e-mail?

7 A. I don't recall, but I don't think so, no.

8 MS. REGAL: I'd like to mark this as
9 Exhibit 13.

10 (Keehan Deposition Exhibit No. 13
11 marked as requested.)

12 BY MS. REGAL:

13 Q. Do you recognize this document?

14 A. I don't.

15 Q. Did you generate this document?

16 A. I don't -- I don't recall.

17 Q. And then the second page where it says
18 dismissal, that's not something you've seen
19 before?

20 A. No.

21 Q. So you didn't follow these options or
22 this schedule or agenda regarding Mr. Collette's
23 termination?

24 A. I don't recall.

1 Q. Who is Ann -- there are a lot of
2 consonants in a row without vowels there. I can't
3 pronounce --

4 A. Bzdwka.

5 Q. Who is Ann Bzdwka?

6 A. Ann was a volunteer in the liturgy
7 office, in the worship office.

8 Q. Did you call her after Mr. Collette's
9 termination?

10 A. I don't recall.

11 Q. Did you call Jill Piccolino after
12 Mr. Collette's termination?

13 A. Jill was present that evening that I had
14 the conversation with Colin. Colin left the room
15 and Jill came in because Colin had told her and
16 she was very upset. I didn't really feel the need
17 to call her.

18 Q. Did you e-mail the staff after
19 Mr. Collette's dismissal?

20 A. I'm pretty sure I did, yes.

21 Q. Do you still have a copy of that e-mail?

22 A. I don't know.

23 Q. Did you provide e-mails to your attorneys
24 regarding discovery in this matter?

1 A. Everything we provided was really through
2 Ro.

3 Q. You yourself didn't provide any e-mails?

4 A. I don't recall.

5 MR. MARKS: Can we go off the record just for
6 a minute?

7 MS. REGAL: Certainly.

8 (Discussion held off the record.)

9 BY MS. REGAL:

10 Q. Did you e-mail the pastoral council
11 regarding Mr. Collette's termination?

12 A. I know we had some type of a plan. I
13 don't recall the details. We must -- I must have.
14 I can't --

15 Q. Did you meet with the directors at 8:30
16 in the morning regarding Mr. Collette's
17 termination?

18 A. I don't recall a special meeting.

19 Q. Did you have a meeting with your staff
20 for a half an hour after Mr. Collette's
21 termination?

22 A. No.

23 Q. Did you meet with your staff regarding
24 Mr. Collette's termination for any amount of time?

1 A. I am sure we must have had some meeting
2 early on. I don't -- remember, our conversation
3 was a Sunday night. I had just gotten -- I was
4 still on retreat actually. I came back early from
5 retreat. So I can't -- I can't recall
6 specifically, but I know that was something that
7 I'm sure I would have done. So I -- whether we
8 waited until the regular Tuesday time, I can't
9 tell you.

10 Q. Did you call, I guess, the Lynch family,
11 the Lynches, regarding Mr. Collette's termination?

12 MR. MARKS: I'm -- hold on. I allowed some
13 leeway on this line of questioning, but at this
14 point I'm getting -- I'm going to object to the
15 entire line of questioning is beyond the scope of
16 limited discovery. I don't see what anything that
17 happened after the termination or who he talked to
18 has any relevance as to whether Mr. Collette held
19 a ministerial position during his employment.

20 MS. REGAL: Actually, this time I'm just
21 trying to determine if he actually turned over all
22 of the required documents pursuant to my discovery
23 request. That's what I'm really trying to
24 find out right now.

1 MR. MARKS: Well, if you're trying to find
2 out -- first of all, I did not withhold any -- any
3 documents. It was all turned over.

4 MS. REGAL: I'm not suggesting that you did.

5 MR. MARKS: So but what I'm going to say is if
6 you're somehow saying that there is an e-mail or a
7 call to the Lynch family, whoever the Lynch family
8 is, post termination, if you want to articulate
9 how that could in any way be relevant to whether
10 or not Mr. Collette's position was ministerial,
11 I'd love to know.

12 MS. REGAL: No, I'm just -- I'm almost done
13 with this line of questioning. My only -- my last
14 question is --

15 MR. MARKS: Well, no, but you're asking
16 somehow or implying that there is being a document
17 withheld and I'm saying -- what I'm asking is I
18 don't know that a document even exists, but what
19 I'm asking you is why would a conversation or an
20 e-mail or a phone call with the Lynch family,
21 whoever that is, why would that have any relevance
22 to duties Mr. Collette performed during his
23 employment and whether or not his position was
24 ministerial which is the only thing this Court has

1 instructed us to take limited discovery on.

2 MS. REGAL: The Court has also instructed the
3 defendants to provide e-mails related to the
4 termination of Mr. Collette. The e-mails are
5 within the court order, as you and I know and have
6 discussed, regarding what can be tendered in
7 discovery. Father Keehan doesn't recognize these
8 documents and I'm curious as to whose they are and
9 to whom they belong.

10 MR. MARKS: The e-mails the court order was
11 referring to was your allegation in the complaint
12 that he was shown an e-mail from Cardinal George
13 which was produced. We provided that e-mail. So
14 I think you're reading that court order much too
15 broadly.

16 MS. REGAL: Well, I'm reading it --

17 MR. MARKS: We had this discussion.

18 MS. REGAL: There was one e-mail and it said
19 e-mails. So insofar as we have a limited amount
20 of information from the Court, I'm just trying to
21 drill down on the last remaining points. We have
22 very few questions that remain. And I'm strictly
23 curious as to whose plans these were. There is a
24 Plan A and a Plan B. Whose were they?

1 MR. MARKS: The question of Plan A and Plan B,
2 you -- you've asked and he said he doesn't
3 recognize the document. That's an entirely
4 different -- first of all, this has no -- Plan A
5 and Plan B -- Plan B would have no relevance to
6 whether his position was ministerial. But, that
7 question itself is much different than did you
8 have a call with the Lynches about this
9 termination, which I can't -- and you have failed
10 to articulate how that in any way relates to
11 whether his position was ministerial.

12 MS. REGAL: Mr. Marks, you can keep on saying
13 that the question regarding that phone call to the
14 Lynches is irrelevant and you can succeed in
15 making it seem trivial. However, I'm trying to
16 find out if Father Keehan had a plan as to how to
17 terminate Mr. Collette and if he followed that
18 plan and that's why it's relevant. Not because a
19 phone call to the Lynches is particularly relevant
20 to whether or not Mr. Collette was a minister, but
21 because I'm trying to determine if Father Keehan
22 had a plan for his termination or resignation and
23 whether or not it was followed.

24 MR. MARKS: Well, let's take your --

1 MS. REGAL: That is what I want to know.

2 MR. MARKS: -- objective. Whether he had a
3 plan and it was followed, whether he had a plan
4 and it wasn't followed, whether he didn't have a
5 plan. How does that in any way relate to his
6 position and whether or not it was ministerial?

7 MS. REGAL: I think it can tend to lead to
8 more discoverable information and that is why I
9 think it's relevant.

10 MR. MARKS: That's what I'm asking. What
11 would possibly be relevant --

12 MS. REGAL: Well, I wouldn't know because I
13 don't know the answers. And we can -- we can
14 continue to waste time this way --

15 MR. MARKS: The fact you can't even
16 articulate --

17 MS. REGAL: -- and waste the Court's time and
18 everyone else's time.

19 MR. MARKS: The fact you can't articulate even
20 a plausible --

21 MS. REGAL: I don't --

22 MR. MARKS: -- basis why this might be
23 relevant, I -- tells, you know, tends to indicate
24 to me it couldn't lead to relevant --

1 MS. REGAL: So you're saying you would like me
2 to withdraw my question as to whether or not he
3 telephoned someone named the Lynches because I
4 will do that. Will that satisfy you?

5 MR. MARKS: If you want to ask him did you --
6 first of all, he said I don't -- he's already
7 asked and answered your line of questioning. He
8 said as to Exhibit 13, he didn't -- he's not
9 familiar with these documents. He didn't prepare
10 the documents and I believe he testified that he
11 didn't follow these documents.

12 MS. REGAL: I don't think he testified to
13 that.

14 MR. MARKS: Then you asked him a series of
15 questions, did you call people or did you talk to
16 your staff. He answered those questions to the
17 best of his ability.

18 MS. REGAL: Yes. And --

19 MR. MARKS: You're now --

20 MS. REGAL: -- to a line of questioning where
21 you're saying --

22 MR. MARKS: You're now --

23 MS. REGAL: -- it is not relevant, but to what
24 I find actually indicates that there may be an

1 e-mail that's not produced that's pertinent to my
2 discovery requests. So I think it is leading to
3 discoverable information and I would like to
4 continue.

5 MR. MARKS: Would you calm down, please?

6 MS. REGAL: Well, I am calm.

7 MR. MARKS: We're trying to be civil here.

8 MS. REGAL: But, you know, I mean you want to
9 keep on impugning my questions. I think we're
10 spending way more time that he can ask --

11 MR. MARKS: We're six hours into two
12 depositions and, frankly, we haven't covered much
13 relevant ground today.

14 MS. REGAL: Well, I appreciate the compliment,
15 but I'd like to finish.

16 MR. MARKS: If you'd like to ask him did he
17 follow this, fine. If you're asking about a
18 specific conversation, you can say did you call
19 the Lynches, but what did you talk about, those
20 things. We're so far beyond the bounds of, you
21 know, what the point of discovery was.

22 MS. REGAL: And yet still finding discoverable
23 information that may not have been tendered in
24 discovery.

1 MR. MARKS: If you think an e-mail about his
2 termination somehow -- you know, which is not what
3 even the Court ordered, but if you somehow think
4 it can be discoverable, I certainly will go and
5 look through the documents. We're not withholding
6 anything because this is such a clear cut open and
7 case shut -- open and shut case.

8 MS. REGAL: I think the court order made clear
9 that I was entitled to e-mails regarding the
10 termination.

11 MR. MARKS: And we --

12 MS. REGAL: And I think -- and it's clear that
13 there may be an e-mail that's not been produced.

14 MR. MARKS: We'll certainly go back and look
15 for it. But as I've said, you've failed to even
16 articulate even if there was some sort of e-mail
17 that didn't get pulled into our -- our collection,
18 how it could possibly be relevant to the issue of
19 what this man, Mr. Collette, did during his
20 employment.

21 MS. REGAL: And your objection is noted in the
22 record multiple times.

23 MR. MARKS: Okay.

24 MS. REGAL: So are you asking me if I'd like

1 to withdraw my question regarding the telephone to
2 the Lynches?

3 MR. MARKS: If he wants to answer if he had a
4 telephone call with the Lynches, go ahead. We'll
5 simply waste more time.

6 BY MS. REGAL:

7 Q. Did you call someone named the Lynches
8 regarding Mr. Collette's termination?

9 A. I don't recall.

10 Q. Did you have a plan as to how to ask
11 Mr. Collette for his termination -- or my
12 apologies.

13 Did you have a plan for how to ask
14 Mr. Collette for his resignation?

15 MR. MARKS: Same objections. Well beyond the
16 scope of discovery.

17 You can answer.

18 BY THE WITNESS:

19 A. The plan was simply a conversation with
20 him.

21 Q. With whom did you create that plan?

22 A. Ro and I.

23 Q. Did you have a plan as to what you would
24 do if Mr. Collette declined to resign?

1 A. Yes.

2 Q. And with whom did you develop that plan?

3 A. Ro.

4 Q. Was anyone else privy to those
5 discussions?

6 A. No.

7 Q. Did you speak with anyone at the
8 Archdiocese following Mr. Collette's
9 termination --

10 A. Yes.

11 Q. -- about Mr. Collette's termination?

12 A. Yes.

13 Q. With who did you speak?

14 MR. MARKS: To the extent there were any
15 conversations with any legal counsel such as
16 Maureen Murphy, you shouldn't share any of those
17 conversations even if she was present. If you had
18 conversations outside of legal counsel, you can
19 answer the question, although I'm going to object.
20 I think it's well beyond the scope of limited
21 discovery.

22 BY MS. REGAL:

23 Q. Father Keehan, I want to be clear that
24 I'm not asking about any conversations between you

1 and an attorney or any conversations that where an
2 attorney was present. But can you answer to
3 whom --

4 A. Yes.

5 Q. -- did you speak about Mr. Collette's
6 termination after his termination?

7 A. Chris Connova.

8 Q. And what was the nature of that
9 discussion?

10 A. Details about his termination and
11 benefits.

12 Q. What details about the termination?

13 A. He's the HR guy. So there were -- there
14 were several and Ro and I talked about those. She
15 seems to have much more experience with this so
16 she kind of took the lead on that and the
17 conversations with Chris.

18 Q. Was anyone else on the call besides you
19 and Ro, Ro Geisler?

20 A. No.

21 Q. Did you discuss the termination at any
22 other time with the Cardinal?

23 A. Yes. I can't tell you how soon, but
24 Bishop Rassas and the Cardinal, yes

1 Q. And what did the Cardinal say?

2 A. He said I'm going to want to convey my
3 feelings to your community about this.

4 Q. And how did you reply to that?

5 A. I said that's fine. We then had -- we
6 had a town hall meeting that the Archdiocese said
7 do not have. So --

8 Q. Did they give you any more detail as to
9 why the Archdiocese did not want you to have such
10 a town hall meeting?

11 A. Because they --

12 MR. MARKS: Objection. Beyond the scope of
13 limited discovery.

14 You can answer the question.

15 BY THE WITNESS:

16 A. They said you're opening yourself up to a
17 lot of -- let's just say, for lack of a better
18 term, drama. I -- I believe Chris said that it
19 wasn't necessary, Bishop Rassas definitely said it
20 was not necessary. As the pastor of the
21 community, I felt it was necessary.

22 MS. REGAL: I want to show you a document I'm
23 marking as number -- Exhibit 14.

24 (Keehan Deposition Exhibit No. 14

1 marked as requested.)

2 BY MS. REGAL:

3 Q. Do you recognize this document?

4 A. I do recognize it.

5 Q. Did you -- this appeared in your church
6 bulletin; is that correct?

7 A. Correct.

8 Q. Did you have any input with the
9 Archbishop about the text of this letter?

10 A. Yes. He showed me a version of it and
11 I -- I -- he asked for my input and I made some
12 changes. I can't really remember what they were,
13 but I just remember -- and then it was one of the
14 most frank conversations I had with him. I said,
15 "Your Eminence, it's now October. This occurred
16 in July. I said people are beginning to kind of
17 settle down a little bit." He said, "I'm your
18 Archbishop. I want this in your bulletin." I
19 said, "Okay."

20 Q. So you -- by your comments you meant to
21 perhaps dissuade him from reigniting the
22 discussion?

23 A. I remember that being something that I
24 was concerned about, yes.

1 MR. MARKS: Kristina, can we take a short
2 break?

3 MS. REGAL: Absolutely. Yes.

4 (Whereupon a short break was taken.)

5 MS. REGAL: I'd like to show you Exhibit 15.

6 (Keehan Deposition Exhibit No. 15
7 marked as requested.)

8 BY MS. REGAL:

9 Q. Do you recognize this document?

10 A. I do.

11 Q. Okay. Did the Archbishop ask you for
12 your input in the drafting of this letter?

13 A. No.

14 MS. REGAL: Okay. This is the last that I
15 have for you. It's Exhibit 16.

16 (Keehan Deposition Exhibit No. 16
17 marked as requested.)

18 BY MS. REGAL:

19 Q. You sent this e-mail; is that correct?

20 A. Yes.

21 Q. And you write, "You can be of great
22 assistance by emphasizing to anyone who asks that
23 Colin made a decision to announce his engagement
24 to a same-sex partner on social media and thus is

1 now public. His statement is not within the
2 teachings of the Church on marriage and therefore
3 he cannot be employed by the Archdiocese." My
4 only question for you on this is was it that he
5 made the announcement or was it that he was
6 married that you understood to be the reason that
7 he must be terminated?

8 MR. MARKS: Objection to the extent it calls
9 for speculation as to why Cardinal George gave the
10 instruction.

11 To the extent you can answer the
12 question, answer.

13 BY THE WITNESS:

14 A. That he made the announcement.

15 Q. Okay. And in the time that you've worked
16 as a priest, is there -- have you ever had to look
17 into someone's marital status before as an
18 employee?

19 MR. MARKS: Objection. Objection beyond the
20 scope of limited discovery.

21 And to the extent you don't want to
22 answer that question, you don't need to.

23 BY THE WITNESS:

24 A. Had to, no. Didn't have to.

1 Q. But is there -- you did, but you didn't
2 have to, is that what you're saying?

3 MR. MARKS: Same objection.

4 To the extent you don't want to
5 answer that question --

6 MS. REGAL: I'm just trying to clarify.
7 That's all.

8 BY THE WITNESS:

9 A. I'm just trying to think of a situation.
10 I can't -- can you repeat the question?

11 Q. You just said that you -- this is the
12 first time that you had to and I didn't know if
13 there was a time where you did but you didn't have
14 to. I just wanted to understand the distinction
15 you were --

16 MR. MARKS: Just objection. Mischaracterizes
17 the witness's testimony. He didn't say this was
18 the first situation where he had to. You asked
19 him if he had ever looked into -- or ever had to
20 look into someone else's marriage and he said no,
21 not have to.

22 MS. REGAL: Maybe you just --

23 BY THE WITNESS:

24 A. There had never been a need before.

1 That's it.

2 MS. REGAL: Okay. I have no further
3 questions. That's it.

4 EXAMINATION

5 BY MR. MARKS:

6 Q. Father Keehan, as you know, my name is
7 Alex Marks. I represent the defendants in this
8 lawsuit. I just have -- I have two questions for
9 you.

10 Earlier you were asked a series of
11 questions about job descriptions and you said part
12 of the reason the job descriptions you had asked
13 for them was to clarify people's job
14 responsibilities. Do you recall that testimony?

15 A. I do.

16 Q. Do you agree that is it fair to say part
17 of it was to memorialize what -- the existing
18 duties people were doing?

19 A. Yes.

20 Q. It wasn't a situation where nobody knew
21 what was going on and you were trying to instruct
22 people what they should be doing?

23 A. No.

24 Q. You were also asked a series of questions

1 about the videos Mr. Collette recorded for Holy
2 Family's You Tube channel. Do you recall that?

3 A. Yes.

4 Q. Do you recall Mr. Collette's counsel
5 asked you a question if it was listed as part of
6 his job responsibilities or something along those
7 lines?

8 A. Yes.

9 Q. Your testimony as to these videos was
10 that Mr. Collette would collaborate with you and
11 you would enter into discussions with Mr. Collette
12 as to discussions who to select to record the
13 videos?

14 A. Correct.

15 Q. And then Mr. Collette would also record
16 the videos?

17 A. Correct.

18 Q. Some of his own videos?

19 A. Correct.

20 Q. Would he have done either of those on the
21 Holy Family You Tube channel but for his positions
22 as Director of Worship and Director of Music?

23 A. No.

24 MR. MARKS: I don't have any further

1 questions.

2 FURTHER EXAMINATION

3 BY MS. REGAL:

4 Q. Just to be clear, Father Keehan, it
5 wasn't a requirement to be a Director of Music or
6 Director of Worship to record reflection videos
7 for the You Tube station or the You Tube channel;
8 is that correct?

9 A. Correct.

10 MS. REGAL: Okay.

11 MR. MARKS: I don't have any questions. We'll
12 reserve.

13 (WITNESS EXCUSED.)

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JOHN COLIN COLLETTE,)
)
Plaintiff,)
)
vs.) No. 1:16-cv-2912
)
THE ARCHDIOCESE OF CHICAGO)
and HOLY FAMILY CATHOLIC)
PARISH,)
)
Defendants.)

I, FATHER TERENCE KEEHAN, state that I
have read the foregoing transcript of the
testimony given by me at my deposition on the 17th
day of October, 2016, and that said transcript
constitutes a true and correct record of the
testimony given by me at the said deposition
except as I have so indicated on the errata sheets
provided herein.

FATHER TERENCE KEEHAN

No corrections (Please initial) _____
Number of errata sheets submitted _____(pgs.)

SUBSCRIBED AND SWORN to
before me this _____ day
of _____ 2016.

NOTARY PUBLIC

1 UNITED STATES OF AMERICA)
NORTHERN DISTRICT ILLINOIS)
2 EASTERN DIVISION) SS.
STATE OF ILLINOIS)
3 COUNTY OF COOK)

4

5

6 I, Joan M. Burke, Certified Shorthand
7 Reporter, Registered Professional reporter, do
8 hereby certify that FATHER TERENCE KEEHAN was
9 first duly sworn by me to testify to the whole
10 truth and that the above deposition was reported
11 stenographically by me and reduced to typewriting
12 under my personal direction.

13 I further certify that the said
14 deposition was taken at the time and place
15 specified and that the taking of said deposition
16 commenced on the 17th day of October, A.D. 2016,
17 at 1:50 p.m.

18 I further certify that I am not a
19 relative or employee or attorney or counsel of any
20 of the parties, nor a relative or employee of such
21 attorney or counsel, nor financially interested
22 directly or indirectly in this action.

23 In witness whereof, I have hereunto set
24 my hand and affixed my seal of office at Chicago,

1 Illinois, this 27th day of October, A.D. 2016.

2

3



4

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CSR NO. 084-002259

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1 Errata Sheet

2

3 NAME OF CASE: Collette vs The Archdiocese of Chicago and Holy Family Catholic Parish

4 DATE OF DEPOSITION: 10/17/2016

5 NAME OF WITNESS: Father Terence Keehan

6 Reason Codes:

7 1. To clarify the record.

8 2. To conform to the facts.

9 3. To correct transcription errors.

10 Page ____ Line ____ Reason ____

11 From _____ to _____

12 Page ____ Line ____ Reason ____

13 From _____ to _____

14 Page ____ Line ____ Reason ____

15 From _____ to _____

16 Page ____ Line ____ Reason ____

17 From _____ to _____

18 Page ____ Line ____ Reason ____

19 From _____ to _____

20 Page ____ Line ____ Reason ____

21 From _____ to _____

22 Page ____ Line ____ Reason ____

23 From _____ to _____

24

(Signature)

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Archbishop Archbishop - Holy Family Parish

From: Archbishop Archbishop
To: Keehan, Terence
Date: 7/23/2014 2:54 PM
Subject: Holy Family Parish
CC: Rassas, George
Attachments: Collette7-2014.pdf

Father Keehan:

The need to resolve this issue is evident. Keeping an objectively immoral situation sponsored by the parish will continue to divide the Church. Especially at this time, clarity is needed. The clarity comes from the Church's moral teaching. Let me know *this week* when you plan to resolve this.

Thanks,

Francis Cardinal George, O.M.I.

cc: Bishop George Rassas

EXHIBIT 6

https://www.facebook.com/colin.collette

Colin Collette

Colin Collette

Colin Collette

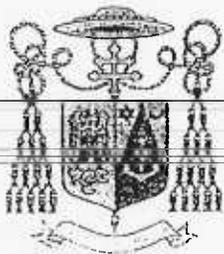
As if being in Roma is not enough!! Now I am engaged to the most wonderful and patient man on earth!!!! Ponte Sant Angelo will forever be in my heart.

Recent

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PHOTOS

1:24 PM 7/17/2014



OFFICE OF THE ARCHBISHOP

ARCHDIOCESE OF CHICAGO

October 22, 2014

Dear Parishioners of Holy Family Parish,

You have been in my thoughts and prayers these past few weeks. The press of events prevented me from writing this letter earlier, but please allow me to begin by thanking your pastor, Father Terry Keehan, for his constant concern and ongoing ministry as your pastor and as a priest of the Church. These have been difficult days, and I am grateful to those of you who have shown him your love and support. He is a man of great personal integrity.

With many of you, I am also grateful to Colin Colette for his many years as music minister at Holy Family Parish. I have enjoyed the music and the choir on the occasions when I have celebrated Mass at the parish. I have also appreciated the time I had to speak with Colin and gain a deeper appreciation of his own sense of vocation.

The issue that has marked your parish's life has been the dismissal of Colin as music minister. The issue is not directly Colin's sexual orientation. Most have known that Colin is gay. Our parishes welcome many Catholics who are homosexually oriented, because the Church is catholic, universal in her outreach. Everyone is welcome, however, on Christ's terms, not ours.

The issue is Colin's participation in a form of union that cannot be recognized as a sacrament by the Church. A minister is not just a functionary, someone with a certain expertise. Personal lifestyle enters into the consideration of suitability for ministry. This is clear in the case of ordained priesthood, for example. In the case of married people, ministers in an official position represent to the world the Church's understanding of marriage. At issue here is the integrity of the Church's public ministries.

All this being said, the hurt that many now feel is real, and I hope that, with the help of Father Keehan, you will be able to work your way through what could be a moment of conversion to the peace that our faith brings. God is with you during these days. You remain in my prayers. Please keep me in yours.

Sincerely yours in Christ,

A handwritten signature in cursive script, appearing to read "Francis Cardinal George".

Francis Cardinal George, O.M.I.
Archbishop of Chicago

Job Description - Worship and Music Director

Job Summary -

Promote, embrace, and execute all responsibilities and interactions with the parish mission as the foundation. Create and implement weekly and seasonal liturgical experience from sight and sound to prayerful moments. Foster the development of ensemble groups, youth choir, children's choir, and youth and/or adult instrumental groups. Work collaboratively as a member of the Pastoral Leadership Team to develop, support and implement the Pastor's Vision and the Vision and Mission of the Parish.

Tasks and Responsibilities -

- Identify and recruit potential liturgical ministers and volunteer workers. Train and supervise worship staff and liturgical ministers
- In collaboration with the music selection committee, music manager, Pastor, and liturgical ministering teams design and arrange the music program for Sundays and Feast Days.
- Rehearse and conduct all volunteer and paid liturgical musicians
- Develop tools necessary in a timely fashion to implement the theme and provide a liturgical plan to all involved to facilitate the maximum experience for the assembly.
- Analyze member participation or changes in congregational emphasis to determine needs for liturgical celebrations.
- Collaborate with other ministries to establish goals and objectives for worship and to develop ways to encourage participation.
- Present to the community to engage all in full, conscious active participation at Sunday and Feast Day liturgical celebrations.
- In collaboration with Pastor, Pastoral Leadership Team, and liturgical ministering communities develop annual liturgical theme as well as seasonal themes.
- Develop and implement formation and education opportunities for both new and experienced liturgical ministers, as well as for the seven ministering communities as requested.
- Design and implement the Worship environment for Sundays and Feast Days. Direct the acquisition of materials and supplies for all liturgical celebrations.

Work Styles -

Initiative	Job requires a willingness to personally take on responsibilities and challenges.
Cooperation	Job requires working or acting together as a member of a team for a common purpose or benefit.
Concern for Others	Job requires being sensitive to others' needs and feelings and being understanding and helpful on the job.
Dependability	Job requires having excellent attendance, being reliable, responsible, and fulfilling obligations.
Self Control	Job requires maintaining composure, keeping emotions in check, controlling anger, and avoiding aggressive behavior, even in very difficult situations.
Integrity	Job requires consistency of actions, methods, principles, expectations, and outcomes.
Social Orientation	Job requires preferring to work with others rather than alone, and being personally connected with others on the job.

Leadership Job requires a willingness to lead, take charge, and offer opinions and direction.

Colin Collette

May 13, 1999

Worship Position Responsibilities:

1. Responsible for Art & Environment
2. Living Arts
3. Liturgy Planning
4. Liturgical Art
5. Resource Ministry With Pat Lynch and Linda Kabarec

Music Position Responsibilities:

1. Saturday Night Liturgy and Rehearsals
2. Children and Youth Choir
3. Develop Teen Choir
4. Coordinate Music for Funerals (Additional \$50/Funeral to be paid by Holy Family if you personally provide the music.)

Worship and Music Positions to be accomplished in 26 hours per week at an annual salary of \$24,866.07.

*Goals and objectives for Leadership
community.
6/15/99*

TO: Mike Enger
CC. Pat Brennan
FROM: Colin Collette

Mike,

I would be happy to sign with attached agreement with the following changes, which I feel more closely reflect our conversation of 6/11/99, and previous discussions.

Worship Position Responsibilities:

Accepted with the following inclusion:

- ✓ 6. To combine existing Personal Devotional Prayer Ministries and form one new ministry for Personal Devotional Prayer.

Music Position Responsibilities

I do not recall our discussion including % of actual weddings and funerals that I would do. Also while the conversation did focus on my agreed guaranteed salary; the guaranteed portion of the salary was to cover the co-ordination of wedding and funeral programs. There would still be a stipend provided, not by the parish, by the parishioners for the actual music when I was the musician involved.

In terms of my performance review concerns:

1 and # 4 appear to be in direct conflict. It was my understanding that when I was doing #4, that is exactly when #1 became a problem.

Also #5, I do not recall this being an issue and find that the wording implies that I engage regularly in "confrontational conflicts" with other staff members. This is not the case. There was one person mentioned and at a previous meeting we, i.e. Pat and I, agreed that there was to be a three party meeting to discuss the problem and seek reconciliation.

If these additions are acceptable to you, please consider this signed letter and attachment as my acceptance of the proposed agreement.

Colin Collette
6.11.99

TO: Colin Collette
CC: Pat Brennan
From: Mike Enger

6/16/99

The following outlines the discussion held last Friday (6/11/99) with Father Pat, yourself and me:

Worship Position Responsibilities:

1. Responsible for Art and Environment
2. Living Arts
3. Liturgy Planning
4. Liturgical Art
5. Resource Ministry with Pat Lynch

Music Position Responsibilities:

1. Saturday Night Liturgy and Rehearsals
2. Children and Youth Choir
3. Develop Teen Choir
4. Coordinate music for all funerals and provide music for most.
5. Provide the music for most funerals or 90% of them. Based on history over the past two years we can estimate approximately 50 funerals per year. On that basis we would expect you to provide the music for 45 funerals.
6. Coordinate music for all weddings.
7. Provide the music for most weddings or 90% of them. Based on history over the past few years we can estimate approximately 70 weddings per year. On that basis we would expect you to provide the music for 63 weddings.

Called Program:

Teach one called class (6 sessions).

Worship, Music and Called responsibilities as listed above are all to be considered part of your full time duties. We are offering you a salary of \$38,251.20 which is last year's salary adjusted upwards by 3.8%. There are no additional stipends being considered at this time. Naturally all full time Holy Family and Archdiocese benefits are included in this offer.

At our meeting on 6/11/99 we also discussed several issues and concerns that had to do with your performance, your interaction with other staff members and your relationship with Father Pat. The following are the areas that will be reviewed on a quarterly basis:

1. Learn to understand the boundaries of your job responsibilities and stay with them. Also respect the boundaries of your fellow staff members job responsibilities.
2. Accomplish all of your agreed upon job responsibilities in a timely manner.
3. Refrain from all negative energy conversations with both staff members and parishioners.
4. Exhibit a collaborative team spirit.
5. Avoid confrontational conflicts with other staff members.

Dee Selesky will be available to you on a part time basis as your Administrative Assistant. As we said please prepare a listing of Dee's responsibilities to determine the number of hours per week she will need to be available to you.

Please contact me if there are any small issues that still need to be discussed. We would like to resolve this by the close of day Friday, June 18, 1999.

Mike Enger

P.S. IF YOU AGREE PLEASE
SIGN AND RETURN TO ME

HFP0013

J. Colin Collette
~~Co~~-Director of Worship
Director of Music

Goals and Objectives 2001/2002

Goals

The ongoing support and resourcing of all Liturgical Ministering Communities.

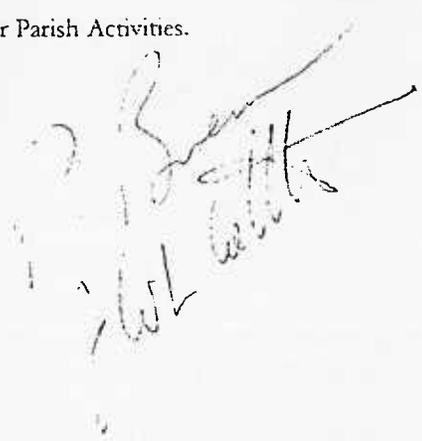
Working in collaboration with the Co-Director of Worship, to maintain the current level of liturgical excellence and continue to develop and evaluate new ways of helping the people of Holy Family pray the liturgical year in creative and engaging ways.

The revivification and ongoing development of the Music Ministering Community, and the parish Liturgical Music program, with particular attention to the participation of the community, and new ways to engage youth and teens and children in the community worship life.

Work, in collaboration with the Co-Director of Worship, to revision the Living Arts Ministry and re-establish this community as a viable and integral Liturgical presence.

Continue to resource other Parish Ministering communities as needed in the areas of Liturgy and Theology. (Called, Footsteps, Adult and Family Faith.)

Support the Pastor and Pastoral Council in various other Parish Activities.

A handwritten signature in dark ink, appearing to read "J. Colin Collette", is written diagonally across the lower right portion of the page. The signature is somewhat stylized and overlaps with the text of the final goal.



*1-1-16
May
2016*

Colin Collette

Goals and Objectives 2/08

J. Collette

Goals:

Full, active, conscious participation of the assembly at Liturgy

Holy Days (30-40x per yr)
Expand preaching and teaching opportunities at Holy Family

Recruit and hire part time Musician specializing in Children's Music Ministry

Implement ongoing system for evaluation and feedback for weekend liturgies and festival days

Re-invigorate Liturgy Planning and Preparation

Expand and increase presence of Living Arts as a regular part of Worship

Recruit and hire part time A/V Technician to be present to volunteers and assembly during the weekend liturgies

Centering Prayer and Meditation retreat: September 11, 12, 13 with Dr. James Finlay, Entering the Mind of Christ

Objectives:

- Get a new Computer in place in A/V
- Add the Cantor words on the screens
- Radio Communication between A/V loft, Mass Co-ordinators and Director
- Continue to improve on education and training in AV Sound
- Reestablish a process for Liturgy Prep which would include Fr. Pat
- Expanded Catechesis on Major Feast Days especially Triduum
- Bring more Spirit and Positive energy to the liturgies
- Bring back positive aspect of ministry, i.e. Fall and Spring Evening of Reflection. Name what negative things block us in ministry.
- Bring back praying before masses with Presider, T & L, proclaimers, etc.
- Presence of Living Arts, more dancing and drama during all masses
- Grow our minsteries, make a reasonable measureable percentage goal to grow
- Support of Centering Prayer regional Retreat
- CLW needs a musician and more presiders
- Deepen our understanding of Holy Days of Obligations include Marion Devotions on Major Marion Feasts
- Table & Light needs more kids. Encourage a progression into other areas of ministry as children grow older such as Crossbearer, projection, ushers, etc.
- Hospitality with the 25th Anniversary will have extra occasions to serve
- Develop and expand Children's Music Ministry
- District 211 Honors Choir Concert
- Holy Family Music Ministry CD
- 25th Anniversary Liturgical Celebrations including one large off site Liturgy
- 25th Anniversary Windows (Glass windows similar to the Day chapel for the main Worship Space doors to include engraved statements from our Mission Statement and Heart Values)
- Play to celebrate the opening of the Multitorium

Fundraising Efforts:

Holiday Flower Show

Teen Valentie's Day Flower and Cookie Sale

CD Release Concert

Wine Tasting and Appetizers Party (x2)

Mother's Day Plant Sale

J. Colin Collette
Goals and Objectives 2002/2003

Director of Worship

- ❖ Ongoing training and formation of all Liturgical Ministers
- ❖ Continue to work the liturgy planning process (monthly preparation and weekly review) while continueing to develop mew models of communication between the Ministry Staff and other ministering communities.
- ❖ Revivification of the Arts in Liturgy and in the Life
- ❖ Renewal the of the evangelical tone of Liturgy
 - Combining the best of Vatican II Theology and Evangelical Praise
- ❖ Develop and Resource a Lay Preaching Team to preach monthly and community Liturgy
- ❖ Resource/Teach as part of the Called, and various other departmental training programs as requested by the Pastor and other Directors
- ❖ Holy Family Fest consultant/advisor
- ❖ Work with the Pastor and Director of Communications to develop a comprehensive strategic plan for ongoing and seasonal marketing of community programs and events
- ❖ Participate in newly formed Core Staff and continue to explore and expand Co-directorship of Word and Worship

Director of Teen Liturgy and Music

- ❖ Work collaboratively with Family Faith and Youth Ministry to prepare for and execute our new biweekly Teen Liturgy
- ❖ Teen Band and Choir

Co-Director of Music

- ❖ Wedding Music,
Quarterly Wedding Music Fair, and Seasonal Engaged Orientation

Work with Carol Romer to set up and finalize all wedding consults and music programs

Serve as resource to outside musicians when selected by the couple
- ❖ Funeral Music/ Resurrection Choir
- ❖ Ongoing collaboration with the Director of Music in regard to preparation and execution of Weekend/Feast Day Music program

Director of Teen Liturgy and Music

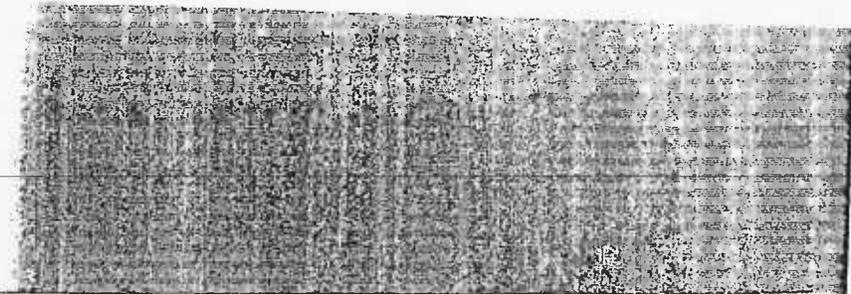
- ❖ Work collaboratively with Family Faith and Youth Ministry to prepare for and execute our new biweekly Teen Liturgy
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Work with Carol Romer to set up and finalize all wedding consults and music programs

Serve as resource to outside musicians when selected by the couple
- ❖ Funeral Music/ Resurrection Choir
- ❖ Ongoing collaboration with the Director of Music in regard to preparation and execution of Weekend/Feast Day Music program



CODE OF CONDUCT ACKNOWLEDGEMENT FORM
Employees and Volunteers

Parish/School/Agency Holy Family
DATE 12-12-04

I have received a copy of the CODE OF CONDUCT FOR CHURCH PERSONNEL. I have read and understand the Code of Conduct, and I agree to abide by it. I have also read and understand the "Measures to Aid Observance of the Code of Conduct" and the "Practical Suggestions" and will employ them to help me observe the code of conduct. A violation of this code can result in disciplinary action, up to and including termination and/or removal from ministry.

J. Colem Collette
Signature

J. Colem Collette
Print Name

Director of worship
Position

The signed Code of Conduct Acknowledgement Form shall be kept in employee personnel files at the agency/parish/school. Volunteers' forms will be kept in a general volunteer file on site.



JUN-06-95 TUE 01:33

OFFICE DIVINE WORSHIP

FAX NO. 3124865158

P. 02

Coordinator of Liturgy

A Vision of this Ministry

The Coordinator of Liturgy is an integral member of the parish staff with professional preparation in, and sensitivity to, the celebration of Catholic liturgy and human ritual. This ministry provides leadership in the planning, execution, and celebration of all parish liturgies, and develops and coordinates all liturgical ministries.

In the faith life of the local community, the role of liturgy is to celebrate and challenge one's relationship with God, one another, and the world. Therefore, liturgy necessitates a qualified person to coordinate this important aspect of parish life.

Responsibilities and Tasks

Ministry of Administration

The Coordinator of Liturgy:

- 1) Collaborates with the Pastor, under his supervision, and with other members of the parish staff, integrating his or her own area of responsibility with the overall parish endeavor.
- 2) Directs the parish worship program, including the planning of liturgical seasons, sacramental celebrations, and the yearly calendar in collaboration with the Director of Music Ministry.
- 3) Coordinates the work of the liturgy teams and committee, as well as the work of the various liturgical ministers: presiders, lectors, communion ministers, servers, musicians, sacristans, writers, artists, ushers, etc.
- 4) Prepares and manages the worship budget in collaboration with the Pastor.
- 5) Provides for periodic evaluation of the quality of worship programs and ministries.
- 6) Oversees the provision of needed materials for worship such as aesthetic decor and cleanliness of the worship space, ample supply of sacred vessels and vestments, and maintenance of an effective sound system, etc.
- 7) Collaborates with the Principal, DRE, Youth Minister, Coordinator of Evangelization, and other staff members in order to provide any needed assistance or consultation for their worship responsibilities.

Ministry of Worship

The Coordinator of Liturgy:

- 1) Discerns parish worship and prayer needs, and oversees the provision of quality liturgical celebrations and sacramental services, in collaboration particularly with the Director of Music Ministry.
- 2) Serves as the local parish resource to all staff members and liturgical ministers to promote an understanding and development of needed skills for the planning and execution of all parish liturgies.
- 3) Joins with others to develop the liturgical spirit of the parish, and fosters an atmosphere of hospitality and harmony.
- 4) Serves as leader of prayer in group formation sessions, when appropriate.

Ministry of Education

The Coordinator of Liturgy:

- 1) Invites, motivates, and trains volunteer ministers.
- 2) Provides for the initial and ongoing formation of all liturgical ministers, as well as liturgy teams and committees.
- 3) Educates members of the assembly and provides input for parish organizations in matters of liturgical understanding, sensitivity, and planning.

JUN-06-95 TUE 01:34

OFFICE DIVINE WORSHIP

FAX NO. 3124865158

P. 03

Coordinator of Liturgy

- 4) Makes information available about opportunities for growth, including Archdiocesan and Deanery workshops, programs, etc.
- 5) Keeps abreast of developments in sacramental theology, the requirements of Canon Law, liturgical practice nationally, and Archdiocesan policies and guidelines, and updates the parish on these matters.

Ministry of Pastoral Services

The Coordinator of Liturgy:

- 1) Is visibly present to main parish groups, at principal parish events, and is attuned to the living faith and real concerns of parishioners.
- 2) Recruits persons for various liturgical roles, attempts to involve new members, parishioners of all ages, and diverse parish subgroups.
- 3) Is involved in ecumenical, cluster, Deanery, and Archdiocesan networks of professional peers, and fosters good public relations both within and outside of the parish.

Qualities

The Coordinator of Liturgy possesses the qualities common to all pastoral ministers, described in Section I, under "Qualities Needed By All Pastoral Ministers," beginning on page 25.

In addition, this minister must also possess a sense of the sacred and of ritual. He or she should have a good sense of personal presence to the parish community, and the ability to articulate the parish's spirituality into appropriate expressions of Roman Catholic worship.

Competencies and Skills

In addition to the competencies and skills needed by all pastoral ministers, described in Section I, under "Competencies and Skills," beginning on page 27, the Coordinator of Liturgy:

- 1) Has an in-depth understanding of the theology and history of sacramental and liturgical practices.
- 2) Is knowledgeable of the historical and pastoral development of the liturgical year.
- 3) Is knowledgeable of the relationship between religion and culture and of the relationship between ecclesial spirituality and liturgy/devotional expressions of popular piety.
- 4) Has basic knowledge of the Church's liturgical norms and regulations.
- 5) Has a basic understanding of the Church's liturgical ministries and arts.

Formation, Training, and Criteria for Readiness

In addition to the formation and training for all pastoral ministers, described in Section I, under "Competencies and Skills," beginning on page 27, preparation for this ministry also requires professional development in the liturgical arts.

Even though it is possible for an individual to have a well-developed and in-depth liturgical sense developed by exposure to substantive literature, exemplary pastoral experience of liturgy, and educational workshops, ordinarily, liturgical competence is acquired through a professional course of liturgical studies. A certificate or degree, together with one or more supervised internships in a pastoral setting, is recommended for this ministry.

Referral

In the Archdiocese of Chicago, inquiries about this ministry should be addressed to: Director, Office for Divine Worship, 1800 North Hermitage, Chicago, Illinois 60622, (312)486-5153.

JOB DESCRIPTION DIRECTOR OF WORSHIP

I. POSITION SUMMARY

The Director of Worship provides leadership in the planning, execution, and celebration of all parish liturgies, and develops and coordinates all liturgical information. The Director of Worship is an integral member of the parish staff with professional preparation in , and sensitivity to, the celebration of Catholic liturgy and human ritual. This is a full-time exempt position that reports directly to the Pastor.

The person must work in a collaborative style and be committed to the practice of Catholic Christian values in fulfilling the parish community's mission and goals as they apply to this position.

II. RESPONSIBILITIES

MINISTRY OF ADMINISTRATION

- Collaborates with the Pastor, under his supervision, and with other members of the parish staff integrating his or her own area of responsibility with the overall parish planning.
- Directs the parish worship program, including the planning of liturgical seasons, sacramental celebrations, and the yearly calendar in collaboration with the Coordinator of Music Ministry.
- Coordinates the work of the worship ministering communities and leader community, as well as, the work of the various liturgical ministers: presiders, lectors, communion ministers, servers, musicians, sacristans, writers, artists, guests, etc.
- Prepares and manages the worship budget in collaboration with the Pastor and Financial Manager.
- Provides for periodic evaluation of the quality of worship programs and ministries.
- Oversees the provision of needed materials for worship such as aesthetic & liturgical seasonal decor and cleanliness of the worship space, ample supply of sacred vessels and vestments, and maintenance of an effective system for their storage & use, etc.
- Collaborates with the Catechesis Staff and the Director of Evangelization and other staff members in order to provide any needed assistance or consultation for their worship responsibilities.

MINISTRY OF WORSHIP

- Discerns parish worship and prayer needs, and oversees the provision of quality liturgical celebrations and sacramental services, in collaboration particularly with the Coordinator of Music Ministry.
- Serves as the local parish resource to all staff members and liturgical ministers to promote an understanding and development of needed skills for the planning and execution of all parish liturgies.
- Joins with others to develop the liturgical spirit of the parish, and fosters an atmosphere of hospitality and harmony.
- Serves as leader of prayer in group formation sessions, when appropriate.

MINISTRY OF EDUCATION

- Invites, motivates, and trains ministering community leaders.
- Provides for the initial and ongoing formation of all liturgical ministers, as well as worship ministering communities and the leadership community.
- Educates members of the assembly and provides input for parish organizations in matters of liturgical understanding, sensitivity and planning.
- Makes information available about opportunities for growth, including Archdiocesan and Deanery workshops, programs, etc.
- Keeps abreast of developments in sacramental theology, the requirements of Canon Law, liturgical practice nationally, and Archdiocesan policies and guidelines. Update the parish on these matters.

MINISTRY OF PASTORAL SERVICE

- Avails himself/herself to main parish groups, at principal parish events, and is attuned to the living faith and real concerns of parishioners.
- Recruits persons for various liturgical roles, attempts to involve new members, parishioners of all ages, and diverse parish subgroups.
- Involves himself/herself in ecumenical, cluster, Deanery, and Archdiocesan networks of professional peers, and fosters good public relations both within and outside of the parish.

III. POSITION EXPECTATIONS

- Has an in-depth understanding of the theology and history of sacramental and liturgical practices.
- Is knowledgeable of the historical and pastoral development of the liturgical year.
- Is knowledgeable of the relationship between religion and culture, and of the relationship between ecclesial spirituality and liturgy/devotional expressions of popular piety.

III. POSITION EXPECTATIONS (con't)

- Has basic knowledge of the Church's liturgical norms and regulations.
- Has a basic understanding of the Church's liturgical ministries and arts.
- Need for flexible schedule including weekends
- Catholic and active in the practice of his/her faith
- Committed to Holy Family's heart values and practices of ministry, stewardship, evangelization, community and collaboration.

IV. REQUIREMENTS

- Graduate Study in Liturgy/Theology, Masters preferred
- Five years liturgical/ministerial experience
- Strong pastoral and liturgical skills
- Strong written and oral communication skills
- Strong interpersonal and group facilitation skills

Job description along with yearly performance goals, will be reviewed and updated annually.

**Holy Family Catholic Community
Inverness, IL
Director of Music**

Holy Family is a welcoming, passionate community inviting all to new life in Christ through our vibrant worship. We are known for our engaging contemporary liturgy and creative, diverse contemporary music.

Vision

The Director of the Music Ministry is a professional who holds highly specialized credentials in music and is a person of faith. This person is responsible for effective planning, coordination, and execution of music within the liturgical celebrations of the parish. This person in collaboration with the Pastor presents a vision of how the parish can develop its musical and liturgical potential.

Summary

Directs all aspects of a contemporary catholic music program, selects and plans music for all regularly scheduled liturgies, holidays, feast days and other events for the parish. This is done in collaboration with the Pastor and the Director of Liturgy and, when appropriate, the liturgy team. The director is responsible for the recruiting and development of musicians, cantors, choir members, teen and youth choirs. Work collaboratively as a member of the Pastor's Leadership Team to develop, support and implement the Pastor's Vision and the Vision and Mission of the Parish.

Tasks and Responsibilities

1. Conduct and accompany Saturday 5:00 mass and Sunday 7:30, 9:00 and 11:00 masses including, 4:00 non-teen mass.
2. Supervises the accompanist and conductor for teen masses.
3. Directs and coordinates weekly rehearsals for choir and band with the support of the Music Coordinator
4. Provides leadership in areas related to liturgical music, e.g. trains the congregation on new selections.
5. Collaborates with Pastor and Director of Liturgy for the selection of music for all liturgies.
6. Close working relationship with Director of Liturgy in developing, planning and implementing liturgical music
7. Develops a music style that is eclectic, evangelical and contemporary and incorporates secular music while considering both classical and traditional music venues.
8. Works with Music Coordinator to select music, schedule musicians, assure copyright permission.
9. In collaboration with Director of Liturgy analyze membership participation to determine needs, changes or enhancements in music program.
10. Builds repertoire and encourages participation of parish community in singing at liturgy.
11. Serves as a resource consultant for all parish, through the education of staff, ministers of music and the congregation to develop their potential and to understand the role of music in worship and to celebrate the liturgy through music.
12. Invites, motivates, and trains all parish ministers of music and fosters unity to create a spirit of harmony with the presider and other liturgical ministers.
13. A member of the Pastor's Leadership Team with participation in weekly meetings.

14. Develop a youth choir in collaboration with the Academy and family faith
15. Attend approved music conferences, workshops, institutes and/or other forms of continuing education sessions.
16. Provide piano and choral music for additional celebrations as designated by the pastor.
17. Responsible for the oversight of music for weddings.
18. Coordinate music for funeral services in collaboration with the Pastoral Care Ministry. Responsible for the music and performance of the Resurrection Choir.
19. Prepares and manages the budget for the music department in conjunction with the Parish Controller to ascertain accurate financial expenditures to fulfill vision
- 20.

Educational and Professional Requirements

1. Education: Bachelor's or Master's Degree in Music
2. Professional Experience:
 - a. Five years experience as a musician in parish ministry or equivalent
 - b. Three years experience as a Music Director or equivalent
3. Skills:
 - a. Proficient in the following: piano, guitar, voice, conducting. Arranging skills a plus
 - b. Expected to direct, practice and lead all parish choir groups
 - c. Excellent organizational skills with follow through and follow up on commitments
 - d. Open and forthright with an ability to work as a team member, collaborate with others, and lead as necessary. Also skilled in consensus building
 - e. Excellent people skills to engage parishioners and volunteers with skills in conflict resolution
 - f. Open to discussing and implementing new ideas

Compensation

1. Salary will be commensurate with skills and experience
2. Additional fees for other music services, i.e. weddings, funerals, etc.

References Required

09/11/14

JOB DESCRIPTION DIRECTOR OF WORSHIP

I. POSITION SUMMARY

The Director of Worship provides leadership in the planning, execution, and celebration of all parish liturgies, and develops and coordinates all liturgical information. The Director of Worship is an integral member of the parish staff with professional preparation in , and sensitivity to, the celebration of Catholic liturgy and human ritual. This is a full-time exempt position that reports directly to the Pastor.

The person must work in a collaborative style and be committed to the practice of Catholic Christian values in fulfilling the parish community's mission and goals as they apply to this position.

II. RESPONSIBILITIES

MINISTRY OF ADMINISTRATION

- Collaborates with the Pastor, under his supervision, and with other members of the parish staff integrating his or her own area of responsibility with the overall parish planning.
- Directs the parish worship program, including the planning of liturgical seasons, sacramental celebrations, and the yearly calendar in collaboration with the Coordinator of Music Ministry.
- Coordinates the work of the worship ministering communities and leader community, as well as, the work of the various liturgical ministers: presiders, lectors, communion ministers, servers, musicians, sacristans, writers, artists, guests, etc.
- Prepares and manages the worship budget in collaboration with the Pastor and Financial Manager.
- Provides for periodic evaluation of the quality of worship programs and ministries.
- Oversees the provision of needed materials for worship such as aesthetic & liturgical seasonal decor and cleanliness of the worship space, ample supply of sacred vessels and vestments, and maintenance of an effective system for their storage & use, etc.
- Collaborates with the Catechesis Staff and the Director of Evangelization and other staff members in order to provide any needed assistance or consultation for their worship responsibilities.

MINISTRY OF WORSHIP

- Discerns parish worship and prayer needs, and oversees the provision of quality liturgical celebrations and sacramental services, in collaboration particularly with the Coordinator of Music Ministry.
- Serves as the local parish resource to all staff members and liturgical ministers to promote an understanding and development of needed skills for the planning and execution of all parish liturgies.
- Joins with others to develop the liturgical spirit of the parish, and fosters an atmosphere of hospitality and harmony.
- Serves as leader of prayer in group formation sessions, when appropriate.

MINISTRY OF EDUCATION

- Invites, motivates, and trains ministering community leaders.
- Provides for the initial and ongoing formation of all liturgical ministers, as well as worship ministering communities and the leadership community.
- Educates members of the assembly and provides input for parish organizations in matters of liturgical understanding, sensitivity and planning.
- Makes information available about opportunities for growth, including Archdiocesan and Deanery workshops, programs, etc.
- Keeps abreast of developments in sacramental theology, the requirements of Canon Law, liturgical practice nationally, and Archdiocesan policies and guidelines. Update the parish on these matters.

MINISTRY OF PASTORAL SERVICE

- Avails himself/herself to main parish groups, at principal parish events, and is attuned to the living faith and real concerns of parishioners.
- Recruits persons for various liturgical roles, attempts to involve new members, parishioners of all ages, and diverse parish subgroups.
- Involves himself/herself in ecumenical, cluster, Deanery, and Archdiocesan networks of professional peers, and fosters good public relations both within and outside of the parish.

III. POSITION EXPECTATIONS

- Has an in-depth understanding of the theology and history of sacramental and liturgical practices.
- Is knowledgeable of the historical and pastoral development of the liturgical year.
- Is knowledgeable of the relationship between religion and culture, and of the relationship between ecclesial spirituality and liturgy/devotional expressions of popular piety.

III. POSITION EXPECTATIONS (con't.)

- Has basic knowledge of the Church's liturgical norms and regulations.
- Has a basic understanding of the Church's liturgical ministries and arts.
- Need for flexible schedule including weekends
- Catholic and active in the practice of his/her faith
- Committed to Holy Family's heart values and practices of ministry, stewardship, evangelization, community and collaboration.

IV. REQUIREMENTS

- Graduate Study in Liturgy/Theology, Masters preferred
- Five years liturgical/ministerial experience
- Strong pastoral and liturgical skills
- Strong written and oral communication skills
- Strong interpersonal and group facilitation skills

Job description along with yearly performance goals, will be reviewed and updated annually.

Holy Family Parish
Job Description
Director of Worship & Music Ministries

I. POSITION SUMMARY

A Director is responsible for all the ministries in a specific Leadership Community. The Director collaborates with the ministry leaders to develop ministry goals that support the mission and vision of Holy Family Parish.

II. DIRECTOR RESPONSIBILITIES

- a. Collaborates with the Pastor and Ministry Leaders to develop goals, monitor progress, and evaluate outcomes for each ministry.
- b. Discerns with the Pastor opportunities for Director's personal and professional growth. Develops and implements objectives to meet specified outcomes
- c. Uses the Gifted Discernment Process to recruit members for ministry.
- d. Implements an education/training program for ministers.
- e. Orients new staff and ministers to Holy Family Parish policies and procedures.
- f. Develops and monitors budget for all ministries, programs, and events within the Leadership Community.
- g. Collaborates with other Directors and staff personnel to maximize cross division goals, and parish-wide events.
- h. Facilitates the implementation of parish goals
- i. Serves as a mentor and consultant to other staff members.

III. LEADERSHIP COMMUNITY SPECIFIC RESPONSIBILITIES

- a. Directs the parish worship and music ministries programs, including the planning of liturgical seasons, sacramental celebrations, and the yearly calendar in collaboration with Word & Worship staff.
- b. Collaborates with the Associate Director of Music to assure that all music ministries are prepared and supported for all liturgical events.
- c. Develops a parish music style that is eclectic, evangelistic, and contemporary, while considering both classical and traditional music venues.
- d. Discerns & plans the parish worship & prayer needs; plans for liturgical celebrations and sacramental services.
- e. Oversees the provision of materials for worship including the aesthetic & seasonal environment.
- f. Coordinates the work of all ministries within the Worship Leadership Community.
- g. Serves as a resource and consultant to staff and lay leaders in planning liturgical events.

- h. Educates members of the assembly and provides input for parish organizations in understanding and planning liturgical matters.
- i. Serves as a leader of prayer.
- j. Discerns with Pastor for other specific areas of collaboration

IV. POSITION EXPECTATIONS

- a. Ability to work flexible hours, including evenings, holidays, and weekends.
- b. Catholic active in the practice of his/her faith.
- c. Committed to Holy Family Parish's heart values and practices of ministry, stewardship, evangelization, community, and collaboration.
- d. Reports to the Pastor

V. POSITION REQUIREMENTS

- a. Graduate study in Liturgy/Theology/Music, Masters preferred
- b. Three-five years of liturgical/ministerial experience
- c. Demonstrated Leadership skills.
- d. Strong written and oral communication skills
- e. Strong interpersonal and group facilitation skills

**Holy Family Catholic Community
Inverness, IL
Director of Liturgy**

Holy Family is a welcoming, passionate community inviting all to new life in Christ through our vibrant worship. We are known for our engaging contemporary liturgy and music.

Vision

The Director of Liturgy is a professional with excellent pastoral and liturgical skills. This person is responsible for developing and planning all liturgies in collaboration with the Pastor and the liturgical team. In collaboration with the Pastor this individual presents a vision of how the parish can develop its worship and liturgical potential.

Summary

The Director of Liturgy, with the pastor, develops a contemporary liturgical vision consistent with the vision and mission of Holy Family of inviting all to new life through vibrant worship, passionate community and lifelong learning. The Director of Liturgy is responsible for the pastoral, practical and church sanctioned oversight of liturgical celebrations in a contemporary Catholic community while maintaining and enhancing the worship experience which engages all in active and conscious participation. As a member of the Pastor's Leadership Team this individual works collaboratively with the team members to develop, support and implement the Pastor's Vision and the Vision and Mission of the Parish.

Tasks and Responsibilities

1. Directs the parish worship program including the planning of liturgical seasons, all sacramental celebrations, and the yearly calendar in collaboration with the liturgical ministry and the Pastor
2. Ensures the liturgies embody the contemporary and evangelical vision of Holy Family Catholic Community as well as the realities facing church members.
3. Creates a liturgical experience that embodies the realities facing church members.
4. Collaborates with the Director of Music and the Pastor in the selection of music for all liturgical sacramental events.
5. Discerns and plans eclectic worship and prayer for liturgical celebrations, Sundays, daily, holiday and sacramental services.
6. Oversees the development of liturgies including: Eucharist, rituals, special prayer services and devotions. Approves final execution
7. Serves as team leader in the planning of all ordinary and extraordinary liturgical celebrations. Approves the details and is responsible for the final execution
8. Oversees efforts to install the liturgical environment and to recruit and consult artists, florists and designers to enhance the liturgical environment and develop design schemes.
9. Collaborates with the Pastor and Liturgical Ministry in liturgical planning.
10. Identify, recruit, and retain liturgical ministers and volunteer workers. Train and supervise worship staff and liturgical ministers. This includes Eucharistics Ministers, Proclaimers, Sacristans, etc.
11. Analyze member participation or changes in congregational emphasis to determine needs for liturgical celebrations.

12. Develop and implement formation and education opportunities for both new and experienced liturgical ministers, as well as the seven other ministering communities as requested.
13. Collaborate with other ministries to establish goals and objectives for worship and to develop ways to encourage participation.
14. Keep current of and study changes in liturgical practices as determined by the Vatican, the USCCB and the Archdiocese of Chicago.
15. Manages and supports the work of the Associate Director of Liturgy
16. Attends weekly meetings with the Pastor's Leadership Team
17. Attends weekly review and planning meeting with Pastor and Parish Manager and Director of Music
18. Studies new opportunities for worship through keeping aware of trends in liturgical celebrations.
19. Maintains relationships with the Archdioceses, local parishes, and other communities of faith and with the local community and beyond.

Education and Professional Requirements

1. Education: Graduate degree in Liturgy/Theology or equivalent
2. Professional Experience:
 - a. Experienced background in liturgical ministry. Background in music needed.
 - b. Strong understanding of the liturgical norms and traditions of the church.
 - c. Commitment to the principles of Vatican II
3. Skills:
 - a. Excellent written and oral communication skills
 - b. Strong administrative and computer skills
 - c. Strong interpersonal and group facilitation skills
 - d. Ability to take direction, work as a team member and provide leadership
 - e. Strategic planning and goal setting experience
 - f. Creativity, initiative and follow through are required skills
 - g. Highly organized
 - h. Visionary

Consistent with Archdiocesan Guidelines and commensurate with experience

Director of Liturgy
Holy Family Catholic Community
2515 Palatine Road
Palatine, IL 60067
Phone: 847-907-3424
Email: rgeisler@holyfamilyparish.org
Website: www.holyfamilyparish.org

Holy Family is a welcoming, passionate community inviting all to new life in Christ through our vibrant worship. We are known for our engaging contemporary liturgy and music.

Vision

The Director of Liturgy is a professional with excellent pastoral and liturgical skills. This person is responsible for developing and planning all liturgies in collaboration with the Pastor and the liturgical team. In collaboration with the Pastor this individual presents a vision of how the parish can develop its worship and liturgical potential.

Summary

The Director of Liturgy, with the pastor, develops a contemporary liturgical vision consistent with the vision and mission of Holy Family of inviting all to new life through vibrant worship, passionate community and lifelong learning. The Director of Liturgy is responsible for the pastoral, practical and church sanctioned oversight of liturgical celebrations in a contemporary Catholic community while maintaining and enhancing the worship experience which engages all in active and conscious participation. As a member of the Pastor's Leadership Team this individual works collaboratively with the team members to develop, support and implement the Pastor's Vision and the Vision and Mission of the Parish.

Tasks and Responsibilities

1. Directs the parish worship program including the planning of liturgical seasons, all sacramental celebrations, and the yearly calendar in collaboration with the liturgical ministry and the Pastor
2. Ensures the liturgies embody the contemporary and evangelical vision of Holy Family Catholic Community as well as the realities facing church members.
3. Creates a liturgical experience that embodies the realities facing church members.
4. Collaborates with the Director of Music and the Pastor in the selection of music for all liturgical sacramental events.
5. Discerns and plans eclectic worship and prayer for liturgical celebrations, Sundays, daily, holiday and sacramental services.
6. Oversees the development of liturgies including: Eucharist, rituals, special prayer services and devotions. Approves final execution
7. Serves as team leader in the planning of all ordinary and extraordinary liturgical celebrations. Approves the details and is responsible for the final execution
8. Oversees efforts to install the liturgical environment and to recruit and consult artists, florists and designers to enhance the liturgical environment and develop design schemes.
9. Collaborates with the Pastor and Liturgical Ministry in liturgical planning.

10. Identify, recruit, and retain liturgical ministers and volunteer workers. Train and supervise worship staff and liturgical ministers. This includes Eucharistics Ministers, Proclaimers, Sacristans, etc.
11. Analyze member participation or changes in congregational emphasis to determine needs for liturgical celebrations.
12. Develop and implement formation and education opportunities for both new and experienced liturgical ministers, as well as the seven other ministering communities as requested.
13. Collaborate with other ministries to establish goals and objectives for worship and to develop ways to encourage participation.
14. Keep current of and study changes in liturgical practices as determined by the Vatican, the USCCB and the Archdiocese of Chicago.
15. Manages and supports the work of the Associate Director of Liturgy
16. Attends weekly meetings with the Pastor's Leadership Team
17. Attends weekly review and planning meeting with Pastor and Parish Manager and Director of Music
18. Studies new opportunities for worship through keeping aware of trends in liturgical celebrations.
19. Maintains relationships with the Archdioceses, local parishes, and other communities of faith and with the local community and beyond.

Education and Professional Requirements

1. Education: Graduate degree in Liturgy/Theology or equivalent
2. Professional Experience:
 - a. Experienced background in liturgical ministry. Background in music needed.
 - b. Strong understanding of the liturgical norms and traditions of the church.
 - c. Commitment to the principles of Vatican II
3. Skills:
 - a. Excellent written and oral communication skills
 - b. Strong administrative and computer skills
 - c. Strong interpersonal and group facilitation skills
 - d. Ability to take direction, work as a team member and provide leadership
 - e. Strategic planning and goal setting experience
 - f. Creativity, initiative and follow through are required skills
 - g. Highly organized
 - h. Visionary

Consistent with Archdiocesan Guidelines and commensurate with experience

Coordinating Parish Ministries

Gerard T. Broccolo
Susan C. Rosenbach, S.S.S.F.
Lucien T. Roy
Lea L. Woll, S.L.W.

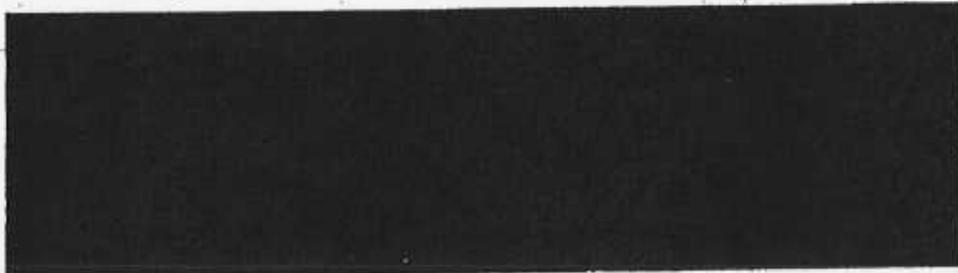
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Coordinating Parish Ministries

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Director of Music Ministry

A Vision of this Ministry

The Director of Music Ministry is a professional who holds specialized credentials in music and who has a thorough understanding of Roman Catholic liturgy. This person of faith is responsible for the effective planning, coordination, and execution of music within the liturgical celebrations of the parish. He or she is gifted with a vision of how a local Church can develop its potential.

“...Every liturgical celebration... is a sacred action surpassing all others” (*Constitution on the Sacred Liturgy, #7*). “Among the many signs and symbols used by the Church to celebrate its faith, music is of preeminent importance... Music should assist the assembled believers to express and share the gift of faith that is within them, and strengthen their interior commitment of faith” (*Music in Catholic Worship, #23*).

Responsibilities and Tasks

Ministry of Administration

The Director of Music Ministry:

- 1) Collaborates with the Pastor, under his supervision, and with other members of the parish staff, integrating his or her own area of responsibility with the overall parish endeavor.
- 2) Directs the parish music program, selects and plans music in cooperation with the Coordinator of Liturgy and the liturgy teams/committee for use in parish liturgies.
- 3) Provides leadership in areas related to liturgical music, e.g., selects and develops participation aids for the congregation, selects and maintains musical instruments, coordinates services and schedules of parish musicians, assures copyright permission, etc.
- 4) Prepares and manages the budget for the parish music program in collaboration with the Coordinator of Liturgy and the Pastor.
- 5) Collaborates with the Coordinator of Liturgy, and with other staff members, e.g., Principal, DRE, Youth Minister, etc., to coordinate and ensure appropriate music for all parish sacramental celebrations, and provides them with consultation and needed assistance.

Ministry of Worship

The Director of Music Ministry:

- 1) Provides music and musicians for all Sunday and other major celebrations, including weddings, funerals, etc.
- 2) Builds repertoire and encourages participation of parish community in singing at various liturgies.
- 3) Acts as consultant to parishioners for planning sacramental liturgies, e.g, weddings, funerals, baptisms, etc.

Director of Music Ministry

Ministry of Education

The Director of Music Ministry:

- 1) Invites, motivates, and trains all parish ministers of music (whether volunteer, stipended, or salaried).
- 2) Provides liturgical formation, music education, and practical preparation for liturgical celebration for cantors/leaders of song, choral, and instrumental groups.
- 3) Serves as a resource consultant for parish concerns regarding music, helping to educate staff, ministers of music, and congregation in developing their potentials to understand the role of music in worship and to celebrate liturgies of musical quality.
- 4) Keeps abreast of current developments in liturgy and in music, and directs music ministers to available training workshops, and formational opportunities.

Ministry of Pastoral Services

The Director of Music Ministry:

- 1) Is visibly present at principal parish events, keeping attuned to the living faith and real concerns of parishioners.
- 2) Cooperates with the Coordinator of Liturgy in recruiting needed musicians, and attempts to involve newcomers and a broad spectrum of parishioners.
- 3) Works to foster unity among all parish musicians, and to create a spirit of harmony with the presider and other liturgical ministers.
- 4) Promotes good public relations both within and beyond the parish, and is involved in ecumenical, cluster, Deanery, and Archdiocesan networks of professional peers.

Qualities

The Director of Music Ministry possesses the qualities common to all pastoral ministers, described in Section I, under "Qualities Needed By All Pastoral Ministers," beginning on page 25. Effective functioning of this ministry requires, in particular, that the Director of Music Ministry is a person of prayer, is sensitive to the cultural experience of parishioners, and understands their spirituality and worship life.

Competencies and Skills

In addition to the competencies and skills needed by all pastoral ministers, described in Section I, under "Competencies and Skills," beginning on page 27, there are several which the Director of Music needs in particular:

- 1) Is knowledgeable of and comfortable with Church music literature in all forms and styles for the congregation, choirs (adult, teen, and children), vocalists, and instrumentalists.
- 2) Is proficient in liturgical principles.
- 3) Has a thorough understanding of the musical, liturgical, and pastoral judgments which must be made in selecting music for liturgy.
- 4) Is proficient in at least one performance area (e.g., keyboard, choral, voice).

Formation, Training, and Criteria for Readiness

In addition to the training for all pastoral ministers, described in Section I, under "Competencies and Skills," beginning on page 27, preparation for this ministry demands professional training in music and liturgy. Minimally, a Bachelor's Degree or equivalent is required for a Director of Music Ministry, even though a more professional qualification, such as the equivalent of a Master's Degree in music and liturgy, is preferred.

Referral

In the Archdiocese of Chicago, inquiries about this ministry should be addressed to: Associate Director for Music, Office for Divine Worship, 1800 North Hermitage, Chicago, Illinois 60622, (312)486-5153.

Job Description - Worship and Music Director

Job Summary -

Promote, embrace, and execute all responsibilities and interactions with the parish mission as the foundation. Create and implement weekly and seasonal liturgical experience from sight and sound to prayerful moments. Foster the development of ensemble groups, youth choir, children's choir, and youth and/or adult instrumental groups. Work collaboratively as a member of the Pastoral Leadership Team to develop, support and implement the Pastor's Vision and the Vision and Mission of the Parish.

Tasks and Responsibilities -

- Identify and recruit potential liturgical ministers and volunteer workers. Train and supervise worship staff and liturgical ministers
- In collaboration with the music selection committee, music manager, Pastor, and liturgical ministering teams design and arrange the music program for Sundays and Feast Days.
- Rehearse and conduct all volunteer and paid liturgical musicians
- Develop tools necessary in a timely fashion to implement the theme and provide a liturgical plan to all involved to facilitate the maximum experience for the assembly.
- Analyze member participation or changes in congregational emphasis to determine needs for liturgical celebrations.
- Collaborate with other ministries to establish goals and objectives for worship and to develop ways to encourage participation.
- Present to the community to engage all in full, conscious active participation at Sunday and Feast Day liturgical celebrations.
- In collaboration with Pastor, Pastoral Leadership Team, and liturgical ministering communities develop annual liturgical theme as well as seasonal themes.
- Develop and implement formation and education opportunities for both new and experienced liturgical ministers, as well as for the seven ministering communities as requested.
- Design and implement the Worship environment for Sundays and Feast Days. Direct the acquisition of materials and supplies for all liturgical celebrations.

Work Styles -

Initiative	Job requires a willingness to personally take on responsibilities and challenges.
Cooperation	Job requires working or acting together as a member of a team for a common purpose or benefit.
Concern for Others	Job requires being sensitive to others' needs and feelings and being understanding and helpful on the job.
Dependability	Job requires having excellent attendance, being reliable, responsible, and fulfilling obligations.
Self Control	Job requires maintaining composure, keeping emotions in check, controlling anger, and avoiding aggressive behavior, even in very difficult situations
Integrity	Job requires consistency of actions, methods, principles, expectations, and outcomes.
Social Orientation	Job requires preferring to work with others rather than alone, and being personally connected with others on the job.

Leadership Job requires a willingness to lead, take charge, and offer opinions and direction.

Fr. Terry Keehan



When you think of the quote from the Gospel of John "I have come that you may have life, and have it more abundantly" (John 10:10), or after connecting his love with God's love and encouraging us to remain in his love, Jesus says, "I have told you this so that my joy

might be in you and your joy might be complete" (John 15:11), there are a few people in this world that you immediately think of and one is Ernie Banks who passed away this past week. Ernie is a Hall of Fame baseball player who starred for the Cubs from 1953 until 1971. As a baseball enthusiast I could rattle off all kinds of statistics that are tributes to his athletic talent, but those are secondary, to me and many others, to his character. Ernie Banks stayed loyal to one team and he became one of Chicago's greatest ambassadors. He was the recipient of the Medal of Freedom from President Obama, and he inspired millions of people.

Ernie excelled as a player, but even more as a human being. He seemed to bring brightness, life and joy from the depth of his soul on such a consistent basis. He brought home many individual honors, but he consistently extolled his team and his teammates, the organization that he represented, and the city he loved in everything he did. I think we can all learn a lesson from him and be inspired to work harder in forming a team, which to me is one of the most powerful images of community. Let's be inspired by people like Ernie Banks who live out Gospel values and support each other as members of this community which is very vibrant, but can always be stronger. He was always grateful for what he had, and frequently cited his parents, who had very little financial wealth but instilled in him the importance of being grateful for what he had. Let's seek to collaborate more, to be more respectful, to be more considerate of each other's differences, to work more sensitively and diligently to bring about God's kingdom here at Holy Family. Let's be more grateful for the many blessings we have and continue to build on them together. From those efforts I am sure that we can experience "...life more abundantly" and that our joy "...might be complete."

Our One in Love Ministry, for anyone interested in support, advocacy, study, prayer and reflection connected with homosexuality, continues to grow. Several other ventures associated with these efforts are moving forward here at Holy Family, including focus groups studying family issues connected with the Catholic Church's teachings on homosexuality. Phase One of these efforts was completed in December and provided key findings in four areas including:

- A review of the procedures and processes underway for the world wide synod on family issues
- A history of the Catholic doctrines and teachings on homosexuality along with reviewing how change happens in the church
- Support and advocacy groups that focus on these topics today
- Other institutions and resources that support related issues and concerns

Phase Two will include crafting an informed position paper in each of these areas which will include input from you as parishioners. Look for further details here and on our website.

Phase Three will include presentation of our parish input to church leaders for the next phase of the family synod in Rome this coming October.

Please join me in congratulating two outstanding women from Holy Family who have received significant recognition recently.

• Sue Geegan, Our Director of Outreach and Justice, who will receive this year's Steven O'Brien-Combs Heart of Charity award from Catholic Charities. The Heart of Charity honor recognizes someone who demonstrates outstanding compassion for those in need. Sue certainly exemplifies that, and so many of you join her in those efforts here at Holy Family.

• Allison Cochran is a peer minister, Kairos leader, catechist and mission trip participant here at Holy Family among other activities and ministries. Ally is a senior at Fremd High School and recently was named one of only 10 teens in the northwest suburbs to the Daily Herald's 2014-15 Leadership Team. Congratulations, Ally and Sue!!

Our annual Gala is a less than one month away on Saturday, February 21 at the Meadows Club in Rolling Meadows. Many people at Holy Family have been working really hard to create a fun and enjoyable evening with a Mardi Gras theme that promises to excite and engage all who attend. Archbishop Cupich will be joining us, so this will be a great opportunity to meet him if you haven't already. Please plan on attending and include family and friends to catch our vibrant spirit. Please also consider syndicated bidding with others. If family members or friends or co-workers are interested in some of the very exciting live auction items but can't attend the event, ask them to offer a certain amount of money towards your bidding price at the Gala. Community or group bidding is always stronger than individual.

Finally, we welcome Amanda Asque to our 9 and 11 am liturgies this weekend to reflect on her experience with addictions. Amanda will share a longer version of her story in the chapel following masses from 12:15-1:15. I know that you will find Amanda's story rich and inspiring. Please invite anyone who may be interested to listen to her.

Holy Family Ministry Leadership Structure

Outreach & Justice

Sue Geegan, Director: 847-907-3443

Pastoral Council Rep - Andrew McGovern: 847-907-3443

Assistance Programs

Assist-A-Family - Patty Brannan: 847-732-2352

Clothing Drive - Mary-Frances Conway: 847-934-6132

Emergency Assistance - Sue Geegan: 847-907-3443

Food Pantry - Sue B.: 847-359-0042

Holiday Sharing - Pam Kulpins: 847-925-9501

Peace & Justice

Parish Sharing (St. Matthias) - Open

Peace & Justice Cluster - Open

Respect Life

Habitat - Larry Buertner: 847-438-1468

PADS - Sue Geegan: 847-907-3443

Respect Life (WINGS, St. Joseph's Home, PHD, MSJD)

Pat Hynek: 847-359-2473

Welcome Ministries

Hospitality - Open

Landings - Bill Hoskins: 847-358-0236

Welcoming Sessions - Susan Cabay: 847-274-4423

Home Mass - Linda Arthur: 847-934-3719

Welcome Desk - Linda Nordlund: 847-359-7369

Teen Faith (Grades 7 through 12)

Denise Logan, Director 847-907-3431

Pastoral Council Reps - Alan Bosslet: 630-346-1136;

Samantha Gundling & Tyler Miles (Teen Reps)

Education and Formation

Ignite (Jr. High Catechesis): Amy Hodson: 847-907-3446

FLAME (High School Catechesis) & Celebrating the Spirit (Confirmation): Amy Hodson, Bernie Rupe, Diane Igielski

Faith on Fire (Post-Confirmation Formation) - Alan & Anne Bosslet: 630-346-1136

Peer Ministry - Leslee Dirnberger: 224-587-4590

Kairos Retreat: Denise Logan: 847-907-3431

National Catholic Youth Conference - Owen Walsh: 847-907-3439

Service and Social

Teen Service and Justice - Janeen Feldman: 630-894-1053

Interfaith House - Gary Tomal: 847-842-0852; Sandy Pazerunas: 847-705-0715

St. Leonard's House - Al & Dolly Lindeman: 847-421-1066

Peacebuilders - Owen Walsh: 847-907-3439

CHWC Summer Mission Trip - Denise Logan: 847-907-3431

Awaken Retreat - Bernie Rupe: 847-636-0422

Social Events - Open

Administration

Teen Faith Office - Gina Petit

Teen Mass Coordinator - Shawna Brauer: 847-652-7649

Social Media - Johnny Pineda: Johnny.pineda@gmail.com

Holy Family Catholic Academy

Leaders. Thinkers. Grounded in Faith

Kate O'Brien, Principal: 847-907-3452

Pastoral Council Rep - Judy Petric

Inquiries? Call Deb Atkins at 847-907-3461

Serving 450 children
from 2 year-old pre-school through 8th grade
with a faculty and staff of 53 and growing!

Worship

Colin Collette, Director: 847-907-3425

Pastoral Council Rep - Sandy Stewart: 847-289-8932

Liturgical Ministries

Art / Environment - Worship Office: 847-907-3440

A/V Loft - Frank Biank: 847-705-1016

Rich Surma: 630-830-1279

CLW - Peter Cunningham: 847-590-1910

Eucharistic Ministers - Kathy Ahlgrim: 847-359-5346

Bob Keller: 847-534-6173

Greeters - Carrie Crall: 847-639-0972

Lay Leader of Prayer - Worship Office: 847-907-3440

Liturgy Prep - Colin Collette: 847-907-3425

Living Arts - Worship Office: 847-907-3440

Mass Coordinators - Peter Wickman: 847-358-0054

Music Ministry: Contact Music Office at 847-907-3430

Proclaimers - Sherry DeLuca: 847-359-2831

Sacristans - Sue Kinzig: 847-359-3626

Signing at Mass - Mary Mazzaroli: 815-262-3059

Table & Light Ministers - Natalie Clark: 847-381-2810

Ushers - Bob Boccaccio: 847-358-8879

Personal Prayer & Devotion

Centering Prayer - Diane Kelly: 847-934-4672

Charismatic Prayer - Mary Jane Kirkwood: 847-382-2140

Eucharistic Adoration - Linda Yamamoto: 847-359-7533

Marian Ministry - Bob & Marie Fallon: 847-304-4846

Other

Small Christian Communities - Pat & Charlie Lynch:
847-651-7099

Multicultural Ministry - Glenn Yamamoto: 847-359-7533

Sewing Ministry - Carol Chess: 847-843-7131

Worship

CL/MB

Colin Collette
 Director
 847-907-3425
 CCollette
 @hol_family_park.org

The Worship Community... creates a vibrant prayer and worship experience so that all may participate in a fully conscious and active way in the Liturgy.

Mass Intentions ✠

Monday, May 5

9:00AM Stephanie Ognar (Sue Murphy)
 9:00AM Helen Masbaum (Family)

Tuesday, May 6

9:00AM The People of Holy Family Parish

Wednesday, May 7

9:00AM Mary Kate Barrio (Barrio Family)
 9:00AM John Orilla (Oliva Millan)
 9:00AM Kim Chamberlain-Carone (Wendy Simon)
 7:00PM Mary Kate Barrio (Barrio Family)

Thursday, May 8

9:00AM Philippe Paragas (Family)

Friday, May 9

9:00AM Ewa Kinser (Mama)
 9:00AM Bridget Prate (Mom & Dad)
 9:00AM Father Brennan (Nwankwo Family)

Saturday, May 10

Happy Mother's Day to All!

Sunday, May 11

Happy Mother's Day to All!

Mass Intentions are available by contacting the Parish Office

An essential part of our mission is vibrant worship. As part of this commitment, we have invited dynamic speakers who will address a variety of relevant, engaging topics during upcoming weekend liturgies. We believe these topics reflect the concerns people have in their everyday lives. May our shared faith experience help us as we journey together with greater awareness and compassion.

On May 31 and June 1 Deacon Tom Lambert, co-chair of the National Council on Mental Illness will be speaking about how mental illness can be very isolating for every person in the family.

Mental illness affects 6% of the population yet it is one of the least talked about and least supported medical issues.

The Barrington chapter of NAMI, National Alliance on Mental Illness, will have representatives in the narthex following each mass to answer questions and present the many programs they offer individuals and families affected by mental health illness.

For more information, contact Sue Geegan at 847-907-3443.

Thank You!

Our sincere appreciation to all of our Liturgical ministers for making Triduum and Easter so special for our community through all of your labors of love.

- Art & Environment
- Children's Liturgy of the Word
- Eucharistic Ministers
- Greeters
- Liturgy Prep
- Mass Coordinators
- Music Ministry
- Proclaimers
- Projection and Sound
- Sacristans

- Signing at Mass
- Table & Light
- Ushers
- Personal Prayer and Devotion (including Centering Prayer, Charismatic Prayer, Eucharistic Adoration, Marian Ministry)
- SCC (Small Christian Communities)
- Multicultural Ministry
- Sewing Ministry

*Peace be with all of you and your families during this season.
 Colin, Jill, Sue and Ann*

Family & Teen Faith

CL/MB

Fast Track Registration!

It's back. It's fast. It's easy.



(7th & 8th Grade)

Ignite is an energetic faith ministry designed especially for 7th and 8th graders. Relevant activities, discussions, and service projects help our younger teens to continue to grow in their faith as well as develop their own small Christian community of acceptance.



(High School)

Flame is designed for high school teens who want to further their understanding and knowledge of the Catholic faith. Our small groups are current, in touch with everyday life and flexible to meet the different needs of each group. FLAME sessions are one component of "Celebrating the Spirit", the Holy Family Confirmation preparation program. FLAME has two retreats, one for each year of the program. Groups also have opportunities for service and social activities throughout the year.

* Teen Mass*

Both **Ignite** and **FLAME** programs meet on Sunday evenings starting with the 4 pm Mass. Groups consist of 10-12 teens led by adult facilitators and peer ministers. We meet for large and small group activities and discussion from 5:15-7:00pm.



Sacrament Preparation

This program prepares high school teens for the sacrament of Confirmation. Enrollment in two years of our FLAME program is one component of Celebrating the Spirit. Teens are typically confirmed in the spring of sophomore year.



Faith on Fire (Juniors & Seniors)

A continuing faith program for high school juniors and seniors that meets once a month on Sunday nights from 6:30-8:00pm. This group will provide peer support, community, continuing faith formation, socialization and discussion on topics relevant to older teens.



Peer Ministry (Juniors & Seniors)

Peer Ministry involves high school Juniors & Seniors who have received the sacrament of Confirmation and choose to serve, lead and support their peers as they grow in their faith. Peer Ministers assist in small groups with Ignite and FLAME, assist with Family Faith classes, and facilitate the Teen Mass.

***Do not let cost be a prohibitive factor in the faith development of your child(ren). Contact Laura in the Faith Office at 847-907-3436 or lferlita@holyparish.org to discuss alternative payment options.**

April 2, 2017

Father Terry Keehan

CLIMB



"On the evening of that first day of the week..." With these words the Gospel passage this week from John begins. That first day is the first Easter and, in a sense, these words tell us that it is still Easter. The day of Easter continues. The joy, hope, power and new life

of Easter continues through the 50 days of this season of light, culminating with Pentecost. It is still Easter Day. Easter day goes on. The doors are locked where the disciples are because they are afraid, and Jesus came and stood in their midst to assuage their anxiety and much, much more. He appears to them, even though it is a physical impossibility for him to enter because of locked doors. So in a very basic physical way Jesus is different. That physical difference ushers us (the hearers) into the spiritual difference. Jesus is fully human and fully divine and we see this remarkable state illustrated in this passage. He transcends physical barriers, but is still in the flesh. He is divine, but somehow still human. He has suffered and died and yet he is alive.

In this appearance Jesus goes on to offer peace, show the disciples concrete evidence that it is in fact he whom they know so well. He sends them as God sends him, breathing on them and giving them the gift of the Holy Spirit with this breath. This gesture, this breathing, complements God the creator's actions in the second creation narrative in Genesis. God breathes life into the clay form of humanity and thus humanity is given life.

Immediately following this Johannine breath of spirit Jesus gives some specific instructions for the spirit/life to be present in a resurrected world. The action item is forgiveness and Jesus intimates that forgiveness is a choice. Thus forgiven sins are forgiven and un-forgiven sins remain. The spirit is alive when we forgive. The spirit struggles when we don't forgive. Christian people who bear the identity of Christ are called to forgive each other and that is a critical way that a world hungering for mercy and forgiveness will know the presence and message of a forgiving God. But this message, like almost everything in life, is not perfect. One of the disciples is not present for the reality of the risen Christ who bears a message of peace, breath, spirit and forgiveness. Thomas misses the encounter with Jesus the Christ. His absence overrides the critical entrusting that Jesus does with the other disciples and us. They, and we, are entrusted with not only the message but the reality of peace, breath, spirit and forgiveness extended in the name of a God who commissions us to share it with the world. Thomas doesn't believe because he can't simply take the others' word for it.

Our world is filled with such doubt. We often don't believe because things aren't so clear or convincing. The

need for forgiveness and second chances are not always compelling for us, so we may miss many opportunities to spread peace and extend forgiveness.

The next time you feel prone to violence, take a deep breath. Be reminded that the God who created you breathed life into you, and the spirit of that God gives you the gift of peace not violence. The next time you don't feel like forgiving, take a deep breath and be reminded that the God, who first breathed life into you, needs you to extend forgiveness.

Our attendance for Masses and services from Holy Thursday thru Easter Sunday was up this year from last. There are so many people to thank for making the Triduum last weekend so vibrant. Judy Klingner has directed the Passion Plays for our teens for the past eight years. She once again led our teens in not only quality acting but expressions of their faith that brought the passion of Christ so alive. Jill Piccolino and Sue Brach coordinate so many details of the many services. Ann Bzdawka is a constant source of support for our music and worship experience. Countless volunteers decorate our church. Our Footsteps (RCIA) leaders Robin Schreiner, Cathe Haran and Wendy Posy along with a dedicated team of adults walk with those preparing for full communion in our church. All of our liturgical ministers: proclaimers, ushers, greeters, Mass coordinators, table and light ministers, Eucharistic Ministers, sign language leaders, AV and loft folks, choir, musicians and visiting musicians work with our staff of Tom Meehan, Lorainne Soderlund, Marsha Adamczyk, Ro Geisler, Denise Logan and Colin Collette in providing an inspirational, creative and vibrant worship experience. Thanks to all of you!

Please look for men and women speakers who will be sharing their wisdom, creativity, prayerfulness and passion during weekend liturgies and immediately following weekend liturgies in addition to weeknights during the coming months. My vision and hope is to invite quality speakers to talk about real world, relevant and important topics and issues to further enhance the sacredness of the Eucharist. We believe in the real presence of Christ in the Eucharist, so to further immerse ourselves in and celebrate the sacredness of life, our already high quality adult speaker offerings will be more connected with the weekend worship experience. Our first speaker will be on the weekend of May 31 and June 1, Deacon Tom Lambert will be with us to talk about mental illness during all weekend Masses. Please look for additional presentations and spread the word about our unique approach. If you have suggestions for topics and speakers, please contact Marsha Adamczyk in our Adult Faith office at madamczyk@holymfamilyparish.org or at 847-907-3458.

This Sunday our Church celebrates the canonization of two great Popes, John Paul II and John XXIII. Please join us in the chapel immediately following 11 am Mass to watch a recorded version of the canonizations.

September 21, 2014

Father Terry Keehan

CL/MB



There is such hopeful beauty in the inspired word of God that we hear proclaimed this weekend. "Seek the Lord while he may be found, call to him while he is near," we hear from the 55th chapter of the prophet Isaiah. An important fundamental step in prayer is acknowledging how

close and attentive God is to us and what a profound spiritual act it is to simply seek the Lord in our midst. Paul is caught between life and death and eloquently states the struggle of this tension in our second reading from Philippians.

I so often use this week's Gospel passage from Matthew in discernment and vocation talks. The story paints a picture of a God who seeks us. God is the owner of the vineyard of the world and God actively and persistently calls us multiple times throughout the day and the length of our lives to work in that vineyard. We don't have just one singular moment of vocational call from God, we have multiple ones. A couple of classic examples of this are going off to college, starting a career and retirement.

At this time of year I always hear from young parishioners who have made the transition to college and they are meeting new people from all over the country and the world. They are being exposed to some of the brightest minds in some of the most fascinating fields, and these are important components to God's call for the future including discernment about career and relationships.

I so enjoy the enthusiasm of young people who transition then from the academic heavy environment of college into the work force. I love to listen to their excitement and the newness of their professional career in which they so often see their work as God's, or even realize that a first job is not the most meaningful one and God is in fact calling them to something else.

My brothers Bill and Jack have both recently retired, but neither is ready to fully retire. I think few people are. So retirement for them is the closing of one chapter and the ushering in of a new one. Their work is not done, but God is calling them to meaningful work in another way. It is 5:00 pm for them, but the vineyard still needs what they have to offer.

What is God calling you to do? Are you in a transition? Perhaps it is 9:00 am in the day of your life. Perhaps it is noon or 3:00 or even 5:00 pm. Sit in prayer with the persistent God who is calling you into the vineyard, and let God lead you again to meaningful work.

We welcome Dr. Tracey Cantarutti this weekend, a parishioner and management coach, to lead us in

reflecting about *Jesus as CEO: The Compassionate Model of Leadership*. She will share reflections during the 9:00 and 11:00 am Masses, and then offer a more in-depth presentation in the chapel following 11:00 am Mass. Two other coming presentations that I would like to invite you to are Sr. Rosemary Connelly and Lois Gates from Misericordia/Heart of Mercy Home on Tuesday, October 28. Sr. Rosemary and Lois lead a phenomenal ministry at the home for more than 600 children and adults with developmental disabilities, and they will be sharing things that they have learned in 40 years of ministry with the developmentally disabled. These are a part of our "Year of the Woman" Adult Faith series which highlights wisdom and faith that women in our community have to share. Also we will be hosting Make a Difference Day here at Holy Family on Saturday, October 25. This is a great opportunity for families and individuals to do a service project together off campus and then return to Holy Family for 5:00 pm Mass and a social afterwards. See this and subsequent bulletins for details.

We are following up on the Town Hall Meeting in regards to many issues associated with Colin's departure. We held a meeting this past Thursday for those who expressed interest in leading efforts to examine the Catholic Theology on Homosexuality. The goal of the evening was to define a structure that allows us to study all aspects of the issue and then define a road map to propose change. One effort that has already begun is the formation of a ministry to assist those of any age seeking clarification and support as they reflect on and perhaps struggle with their sexual identity.

We have a need for Ushers, Catechists and Wedding Coordinators here at Holy Family. I could issue a general invitation and ask any of you to consider helping with these needs, but I would like to suggest another way. Please personally invite someone in the community that you know who is outgoing, warm and welcoming to consider being an Usher. Please encourage women, moms and grandmas as well as men, dads and grandsons to be ushers. Please personally invite someone who has a passion for education to consider being a catechist, and please encourage someone who is organized and interested in celebrating weddings with brides, grooms and their families to consider being wedding ministers. Marsha Adamczyk or Mary Whiteside in the Adult Faith office are the contacts.

We are also in need of people to help with our Transportation Ministry. We have more needs now than ever to give people rides to church, the doctor or other destinations. If you initially signed up and haven't been contacted recently, please give us updated contact information. Al Clementi is the contact at 847-772-2646.

August 11, 2017

Father Terry Keehan

CL/MB



In our first reading this weekend from the First Book of Kings, Elijah is seeking the Lord, like almost all of us, if not all of us. Elijah was a prophet and wonder worker in the northern kingdom of Israel in the 9th century BC and he defended the Israelites worship of Yahweh over

the worship of the Canaanite god Baal. In the desire to hear God's (Yahweh's) voice, there is great drama for Elijah. That sounds like our journey doesn't it? Elijah's story tells us that God is not in the drama of the earthquake, or the drama of the fire or the drama of the strong wind. Rather God's voice is in the, "...tiny whispering sound."

We all know that God speaks to us in both drama and tiny sounds, however there is wisdom in the midst of storm, fire and quaking to listen and pray.

I have sent the following statement to staff, leadership, Advisory boards and Worship ministries. Many of you have seen it but for those who haven't, I wanted to share this information here:

As pastor of Holy Family Catholic Community, it is with deep sadness that I inform you that Colin Collette has been released of his staff duties at Holy Family.

Through the use of social media, the Archdiocese of Chicago has become aware that Colin has publicly endorsed a position in conflict with Church teachings. Employees who make such choices cannot remain employed by the Archdiocese. As ministers of the church, staff are expected to and agree to publicly uphold the teachings of the church.

We thank Colin for his tenure of dedication and service to Holy Family. We prayerfully wish him well as he pursues other endeavors.

In light of the many and varied emotions that so many of you have expressed surrounding the events of the past two weeks, we will hold a meeting this coming Wednesday, August 13 at 7:30 pm in church. We are calling it a Town Hall Meeting for Listening and Respect. It will be an opportunity to hear and to voice some emotions that surround Colin's departure, which is primarily a personnel issue instigated by a recent public statement that he made. There are so many other related emotions, feelings and issues that so many of you have voiced in relation to this situation, and my concern is how these effect our larger community. It is truly a very complicated and complex situation. I thank the scores of you who have shared your feelings and opinions with me and I believe that

we need more time to sift through and sort out so that we may continue with wisdom and do so in a manner that upholds who we are here at Holy Family. We have always been a community that encourages sharing and the spiritual movement that goes deep beneath issues and concerns.

~~Those things will continue and the core of who we are here as a community of faith will not change.~~

I would like to take this opportunity to thank all of our hospitality ministers who so regularly provide snacks and coffee after weekend masses in the narthex. We are blessed with a large narthex (gathering space near the entrance to church) that enables us to provide hospitality, and all of the hard working parishioners who prepare and warmly serve snacks after Masses play a vital role in the welcoming and information sharing aspects of our parish mission. So much of the spirit of Holy Family is both shared and celebrated as we visit in the narthex after Mass. Thanks to all of our hospitality ministers and we could use even more help in this vital ministry. If you can help with weekend hospitality please contact our Director of Outreach and Justice, Sue Geegan at 847-907-3443.

Fall Fest is approaching. Please mark September 26 and 27 on your calendars for our new and improved Fall Fest. Friday will be a night to celebrate the German idea of Fall with German music and food. Saturday will begin with a 5 K run and include lots of games for kids and family in the afternoon with more contemporary rock music in the evening headlined by one of Holy Family's favorites, *Second Time Around*. Please plan on attending and bring lots of family and friends to join us.

Each of you reading this now knows someone who is interested in becoming Catholic. Your invitation for them to find out more information about Catholicism and Holy Family is more important than you know. Please invite anyone who is interested in becoming Catholic to learn more. Please encourage them to see that by participating in the RCIA they will not be brainwashed or forced into making a choice about something against their will. They will not be asked to denounce anything that they have previously learned about God. Footsteps (RCIA) is the best of adult education because it is prayerful, informative, connected with the larger community in ritual and leads to someone making their own choice to be received into the Catholic Church. Please don't be concerned about not knowing how to answer follow up questions that they may have. Our staff or RCIA team can take care of that, rather, simply give us their contact information or ask them to contact Bonnie Rooney at 847-977-4715.

October 12, 2017

Father Terry Keehan

CLIMB



Have you noticed a stern tone to the messages of Jesus these past few weeks? The extended portion of the 20th, 21st and 22nd chapters of the Gospel of Matthew that we have been listening to have brought us parables that have been negative in tone and very challenging

to pray with.

The larger context of Matthew may help us in praying with these passages. In the end of chapter 20, Jesus predicts his passion and death for the third time. Chapter 21 begins with his entry into Jerusalem, where he will suffer and die soon. He then gets angry at those selling goods in the Temple, and even curses a fig tree. These actions are met with the question to him from the scribes and Pharisees, "On whose authority do you do (and say) these things?" Jesus then tells the vineyard parables of the two sons and the tenant workers that we heard the past two weeks, and the angry King's son's wedding feast that we hear proclaimed this week.

The moral of these tales seem to be similar. They evoke questions of how we are caring for what has been entrusted to us and how we are responding to God's invitations that involve the ultimate vineyard and feast-- the Kingdom of God that has been entrusted to us. That is the world and the deeper spiritual call from God that urges us to care for it and to bring its natural resources to fruitfulness, and to raise us up to a level of love and care that are essential to our Christian mission. It challenges us to see ourselves as Tenants of and Invitees to what God owns and has entrusted to all humanity, including us. When you think about it, this is a very important spiritual endeavor that goes beyond stewardship.

In this section of the Gospel there is urgency and defiance in Jesus' tone. He has entered Jerusalem for the final time. His mission is clear and his emotions are high. He is challenging the religious authorities to embrace a mission of compassion and mercy that he stands for, and ultimately he shows them, and us, in his suffering, death and Resurrection, that this mission would be fulfilled.

Bishops of the world over are gathering in Rome currently for an Extraordinary General Assembly Synod to examine "The Pastoral Challenges for the Family in the Context of Evangelization." This is in preparation for an "Ordinary General Assembly Synod" next October. A synod is called by the Pope himself and

goes through the Extraordinary and Ordinary phases to examine a particular aspect of church teaching that is pressing or important.

I think we would all agree that family dynamics are changing, particularly here in America. We see the family experience both challenged and expanded as issues from marriage, divorce, annulment, remarriage, same-sex marriage, adoption, single parenting, technology, stress and so many others are shaping how we function and who we are as family.

Many of you asked for a copy of the prayer that we prayed last week during Mass for the bishops gathered at the Synod. Here it is for you to pray at home:

**God of the vineyard of family,
you call us to bring about a fruitful harvest of love
through care, concern, support and respect
for our family members.
Help us to tend the gift of family
that you have given us.
Guide us with your wisdom, particularly
when family challenges arise.
Lead us to be the families that you call us to be.**

**Fill our bishops with your Holy Spirit as they gather
to examine the ever-changing dynamics
of families everywhere.
Urge them to prayerfully reflect
on pastoral challenges of the family
in the context of evangelization.
Help them to help us live the gospel of the family
in a more credible manner.
We ask this through Christ our Lord
Amen.**

We welcomed 18 new Eucharistic ministers, 12 of whom are teens, and 10 new table and light ministers recently. We are still in need of ushers for Mass. Please consider being an usher or encouraging someone else to serve as one. Remember we currently have 8 women ushers, so the ministry is not limited to men.

Ro Geisler, Sue Geegan and I traveled to two Indian Reservations last week, one in Red Lake, Minnesota (diocese of Crookston) and one in Belcourt, North Dakota (diocese of Fargo). We were once again guests of the Catholic Extension Society, a national organization that assists mission dioceses across the country that have a substantial number of people living below the poverty line. We are hoping that the trip will lead to a Lenten partnership similar to the one we had last year with St. Paul in McKee, Kentucky. You will be hearing more about the strong Catholic presence on these reservations in the coming months.

Worship

CLIMB

The Worship Community... creates a vibrant prayer and worship experience so that all may participate in a fully conscious and active way in the Liturgy.



Summary of the September 21st Weekend Relevant Speaker

At Holy Family we are dedicated to offering relevant and meaningful messages during Mass and encouraging all to be part of making the "beautiful mess" that comes from living out the Gospel.

Approximately every month we invite a speaker to share a unique perspective during Mass on a relevant social issue. Last weekend, at the 9:00 am and 11:00 am Masses, Tracey Cantarutti, President of TLC Leadership Options, Inc. spoke about "Jesus as CEO: The Compassionate Model of Leadership." Tracey inspired us to be servant leaders in our communities, families, and in the workplace. Compassion requires us to put aside "the tyranny of the urgent" and focus on the needs of others and to be "dealers in hope" and to stop the behavior of "micro-inequities". Tracey explains these concepts and also gives us tips on how to increase our "EQ, Emotional Intelligence" so to better practice compassion in our relationships.

Tracey's reflection can be viewed on our website www.holyfamilyparish.org along with reflections from other relevant speakers, including Matt Eyerman, who spoke in July about Hope Amidst Violence in inner city Chicago.



November 23, 2014

Worship

The Worship Community... creates a vibrant prayer and worship experience ~~so that all may~~ participate in a fully conscious and active way in the Liturgy.



Singers Needed for Our Christmas Eve Family Choir!

All who love to sing can join us on Christmas Eve for our 1:30 pm mass in Church. Rehearsal is on Saturday, December 20th beginning at 10:00 am. If you are interested, please contact Ann Bzdawka in the Music Office at (847) 907-3430 or ann@holymfamilymm.com to register.

Thanksgiving Eve Vespers

Wednesday, November 26 at 7PM

Join us for evening prayer on Thanksgiving Eve, Wednesday, November 26 at 7pm to spend some quiet time in quiet reflection and thanksgiving. We are extending a special invitation to the youth of our community and those returning from college. Please join us.

PLEASE NOTE: NO 7PM Mass this evening

Attention All Eucharistic Ministers & Ministers of Care to the Sick

The Office of Divine Worship at the Archdiocese of Chicago issues a certificate of mandation for Eucharistic Ministers and Ministers of Care to the Sick. We presently need to renew for this term of mandation.

All EM's and Ministers of Care to the Sick need to be remanded.

The following dates are made available to you to be remanded (you need to attend only one):

Sunday, November 23 at 8:30am
OR

Tuesday, November 25 at 10:00am

Please RSVP to Kathy Ahlgrim at kathy@ahlgrimfuneral.com or Bob Keller at Robert@frimarkkeller.com

Thanksgiving Day Mass at 10:00am

Christmas Flower Memorial Donations

During this holiday season remember your departed loved ones with flowers.



Christmas Flower Memorial Donation envelopes are available in the Narthex.

Please take a moment to fill out the envelope and return it to the Front Office.

The names will be published in our bulletin during the Christmas season.

Of Special Note

Meals for Fr. Terry



Calling all cooks! Do you love to spend time in the kitchen? Do you have a favorite family recipe you would like to make for Fr. Terry? If so, this is the ministry for you!

This ministry provides healthy, home-cooked dinners for Fr. Terry on Mondays, Tuesdays and Fridays. Through the generosity of so many parishioners, Fr. Terry has been able to enjoy countless delicious, home-cooked meals. If you are interested in making a meal, please go to www.takethemameal.com (last name: Keehan, password: homemade) or call Pam Kulpins at 847-925-9501. We thank you in advance for your generosity.

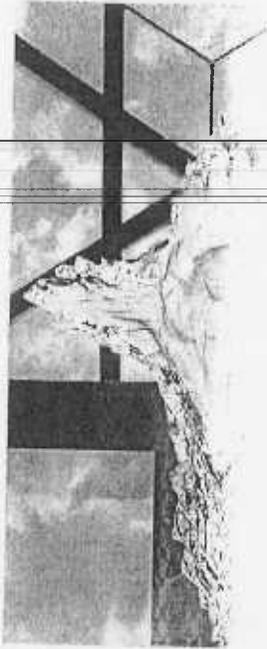
Holy Family Books & Gifts is owned by Holy Family Parish and solely managed and operated by volunteers.

HOLY FAMILY GIFTS & BOOKS - (847) 907-3413

Check the Gift Shop for Someone You Love
 WILLOW TREE FIGURINES, JEWELRY, PLAQUES, BOOKS & MORE!

Of Special

CLIMB



Few people can deny the breathtaking beauty of Holy Family's Cross of New Life.

Like all pieces of fine art, the Cross of New Life elicits powerful emotions. The cross captures the --

hope of a couple beginning their life together,
joy of baptizing a new member of our community,
sacredness of our sacraments, and the
solemn passage into eternal life.

Perhaps the Cross has moved you or someone you love. Only three, 33-inch, numbered, artist proofs of this magnificent piece of religious art remain. Each has been inspected by the artist and is wrapped in its original packaging.

A 33-inch version of the Cross is available for viewing in the bookstore.

Please contact Rosemary Geisler for more information on the artist proofs. (847-907-3424) or rgeisler@holymfamilyparish.org

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J. COLIN COLLETTE

HIGHLIGHT OF QUALIFICATIONS

Unique blend of wide ranging practical experience in program creation, development, implementation, administration and evaluation, coupled with high levels of academic achievement.
Progressive innovator with highly developed interpersonal abilities.
Solid achievements in public relations, fundraising, development and marketing.

- Past. report
10 yr - 12 yr.
(+) M. Div. M. A.

EDUCATION

- Gen. info
see. work
1/2

- 1995 **Master of Divinity, Word and Worship**
Catholic Theological Union At Chicago, Chicago Illinois
Master of Arts, Word and Worship (Candidate)
Expected Completion June 1997
Catholic Theological Union At Chicago, Chicago Illinois
Institute For Liturgical Consultants (Certification Candidate)
Expected Certification June 1997
Catholic Theological Union and The Archdiocese of Chicago
Chicago, Illinois
- 1984 **Diploma In Church Music**
St. Francis Xavier University, Antigonish, Nova Scotia
- 1983 **Bachelor of Arts - Psychology**
St. Francis Xavier University, Antigonish, Nova Scotia

EMPLOYMENT HISTORY

- October 1992 to present **Director of Music**
ST. JAMES CATHOLIC PARISH, Chicago, Illinois
- Formulate the direction and overall liturgical program for approximately 25 parish musicians and members of church choirs.
 - Teach the basic elements of liturgy and participation in the selection and adaptation of appropriate liturgical elements.
 - Integrate individual levels of progress and involvement.
 - Create and sustain musical and liturgical programs of the highest quality.
 - Assist in the overall coordination of all liturgical celebrations for this parish.
 - Member of the parish liturgy and spiritual life commissions.

Invitees to attend Liturgy Prep Meetings

Colin Collette, Director
Jill Piccolino – Associate Director

Staff

Sue Geegan, Director Outreach & Justice
Denise Logan, Director Teen and Family Faith
Marsha Adamczyk, Director Adult Faith
Ro Geisler, Director Operations and Parish Manager
Matthew Thibeau Pastoral Car & Support
Heidi Rooney, Director of Marketing

Ministry leaders All Volunteers except those in Bold type

Sandy Stewart, Parish Council Rep
Frank Biank, Rich Surma A/V Loft
Peter Cunningham, Children's liturgy of the word
Kathy Ahlgrim, Bob Keller, Eucharistic Ministers
Carrie Crall, Greeters
Colin Collette, Staff, Director, Liturgy Prep
Peter Wickman, Mass Coordinators
Sherry DeLuca, Proclaimers
Sue Kinzig, Sacristans
Mary Mazzaroli, Signing at Mass
Natalie Clark, Table and Light Ministers (Altar Servers)
Bob Boccaccio, Ushers
Diane Kelly, Centering Prayer
Mary Jane Kirkwood, Charismatic Prayer
Linda Yamamoto, Eucharistic Adoration
Bob and Marie Fallon, Marian Ministry
Pat & Charlie Lynch, Small Christian Communities

EXHIBIT 11

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN COLIN COLLETTE,)
)
Plaintiff,)
)
v.)
)
THE ARCHDIOCESE OF CHICAGO,)
And)
HOLY FAMILY CATHOLIC PARISH,)
)
Defendants.)

Case No. 1:16-cv-2912

Judge Charles P. Kocoras

AFFIDAVIT OF SUE BRACH

I, SUE BRACH, under oath, state the following are true and accurate statements to the best of my personal knowledge:

1. I was an employee of Holy Family Catholic Parish in Inverness, Illinois (“Holy Family”), for approximately five (5) years.
2. I began working at Holy Family in 2010
3. I resigned from my employment at Holy Family in January 2015.
4. I had various job duties at Holy Family, and I worked with Jill Piccolino.
5. When Jill Piccolino was not in the office or otherwise unavailable, I would draft the Liturgy Plans.
6. The Liturgy Plans would always be sent to the directors and Holy Family’s Pastor, Fr. Terence Keehan (“Fr. Terry”) on Tuesday before the directors met on Tuesday afternoons at 1 p.m.
7. The purpose of sending the Liturgy Plan before the meeting was to allow the directors to have the plan to discuss during the meeting.
8. At these meetings, anyone was entitled to suggest a change to the Liturgy Plan, such as substituting one prayer for another prayer, or adding a prayer into the Liturgy Plan.
9. John Colin Collette (“Colin Collette”) did not create the liturgy plans; they were created

by the Liturgy Planning and Preparation committee that included laity parishioners, and by the directors who attended these meetings.

10. The process of creating the Liturgy Plans was very collaborative, everyone at the meetings gave their input and it was incorporated into the plan.

11. The Liturgy Plans were always sent on Friday afternoon, and Fr. Terry always had to give final approval on the plans.

12. At no time during my employment at Holy Family did Colin Collette have the ability to give final approval to any element of the Liturgy Plan.

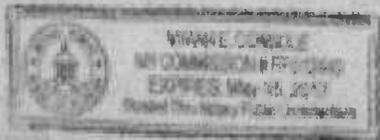
13. Fr. Terry, however, had the ability to say "yes" or "no" to any part of the Liturgy Plans.

14. Fr. Terry often changed the Liturgy Plan on Friday or even Saturday before weekend Masses began.

15. Colin Collette rarely made such changes, and to my knowledge, could only make them with Fr. Terry's approval.

16. If called upon as a witness, I would testify as aforesaid.

Sue Brach
SUE BRACH



SWORN TO AND SIGNED before me
this 5 day of December, 2016.

Suzanne G. Corbelle
NOTARY PUBLIC

LAVELLE LAW LTD.
Kerry M. Lavelle (E) Bar # 62015221
Matthew J. Shook (E) Bar # 62418721
Kristina B. Royal (E) Bar # 63086471
LAVELLE LAW LTD.

501 W. Colfax
Palatine, Illinois 60067
(847)705-7555
kmlavelle@lavellelaw.com
msheahin@lavellelaw.com
~~kregal@lavellelaw.com~~

ATTORNEYS FOR PLAINTIFF

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN COLIN COLLETTE,)
)
Plaintiff,)
)
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)
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And)
HOLY FAMILY CATHOLIC PARISH,)
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Defendants.)

Case No. 1:16-cv-2912

Judge Charles P. Kocoras

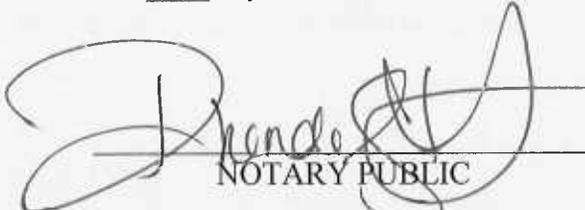
AFFIDAVIT OF DENISE LOGAN

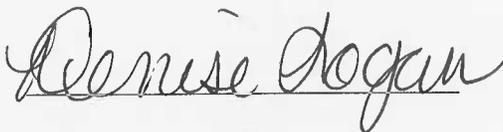
I, DENISE LOGAN, under oath, state the following are true and accurate statements to the best of my personal knowledge:

1. I was an employee of Holy Family Catholic Parish in Inverness, Illinois (“Holy Family”), for approximately five (5) years.
2. I began working at Holy Family in August 2010
3. I resigned from my employment at Holy Family in January 2015.
4. My job title was Director of Teen and Family Faith.
5. During my time working at Holy Family, there was a weekly meeting of directors on Tuesdays at 1 p.m., during which we as directors would discuss the Liturgy Plan for the week.
6. These meetings were a collaboration between the directors and Holy Family’s Pastor, Fr. Terence Keehan (“Fr. Terry”).
7. At these meetings we would discuss future special masses that would be held, future events coming up at Holy Family, and that week’s Liturgy Plan.

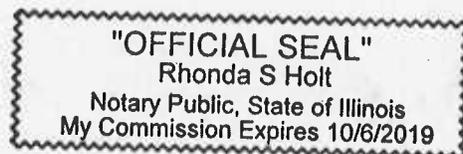
8. Each of the directors shared an equal role at these meetings.
9. At any given time there were seven (7) to eight (8) directors, and each of us gave input on various Liturgy Plans throughout the year.
10. The process of creating the Liturgy Plan was collaborative, to fulfill the Holy Family mission to include parishioners and laity in the creation of the liturgy and the operation of the parish.
11. Fr. Terry had the final say on Liturgy Plans and all aspects of the ceremonies, services and Masses.
12. John Colin Collette ("Colin Collette") did not create the liturgy plans; they were created by the Liturgy Planning and Preparation committee that included laity parishioners, and by the directors who attended these meetings.
13. Colin Collette did not have the final say on what elements were a part of the liturgy plan.
14. It was very consistent at Holy Family that the parishioners, the laity, had a large role and ownership in how the liturgy was created and presented.
15. Colin Collette, like the rest of the directors, facilitated the laity to give their input to create the liturgy.
16. If called upon as a witness, I would testify as aforesaid.

SWORN TO AND SIGNED before me
this 5th day of December, 2016.


NOTARY PUBLIC



DENISE LOGAN



LAVELLE LAW LTD.

~~Kerry M. Lavelle (Ill. Bar # 6201522)~~

Matthew J. Sheahin (Ill. Bar # 6243872)

Kristina B. Regal (Ill. Bar # 6300647)

LAVELLE LAW, LTD.

501 W. Colfax

Palatine, Illinois 60067

(847)705-7555

kmlavelle@lavellelaw.com

msheahin@lavellelaw.com

kregal@lavellelaw.com

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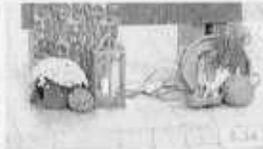
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Holy Family Catholic Community: Parish and Academy

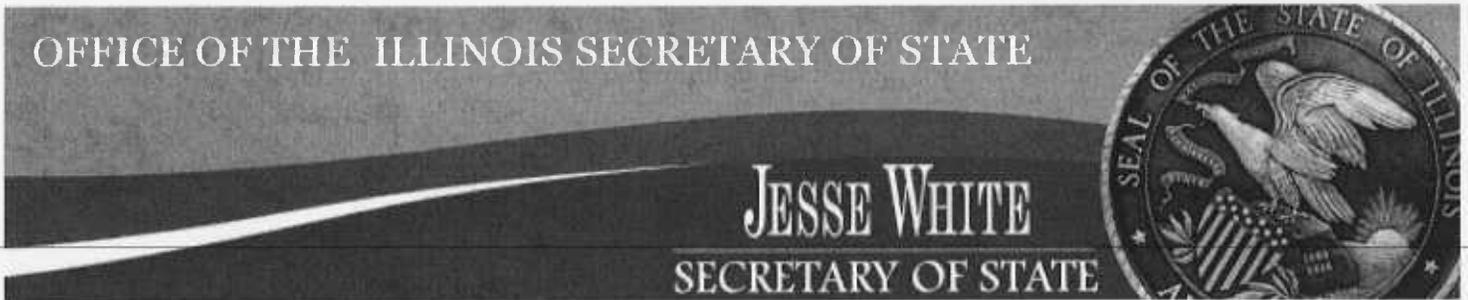
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CORPORATION FILE DETAIL REPORT

File Number	70759357		
Entity Name	SURROUNDINGS BY COLIN, INC.		
Status	ACTIVE		
Entity Type	CORPORATION	Type of Corp	DOMESTIC BCA
Incorporation Date (Domestic)	08/08/2016	State	ILLINOIS
Agent Name	PAUL D STREICHER	Agent Change Date	08/08/2016
Agent Street Address	321 N CLARK ST STE 2200	President Name & Address	
Agent City	CHICAGO	Secretary Name & Address	
Agent Zip	60657	Duration Date	PERPETUAL
Annual Report Filing Date	00/00/0000	For Year	
Assumed Name	ACTIVE - MANGEL FLORIST ACTIVE - MANGEL FLORIST AT THE DRAKE HOTEL		

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HOLY FAMILY
CATHOLIC COMMUNITY
inviting all to new life in Christ

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Mission and History

Our Mission

To engage all in the sacramental life through vibrant worship, life-long learning and passionate community.

Our Mission Statement guides everything we do at Holy Family. It packs a lot of meaning into a simple 16-word sentence. There is great depth and significance in our mission.

Sacramental life – Our communal celebration of the Eucharist that marks our deepest identity as the Body of Christ. It calls us to membership in the Church with the hope, belief and promise of everlasting life.

Vibrant Worship – Our commitment to a dynamic liturgy with a new, contemporary spirit. We are open to all, providing an environment for worshipers to deepen their faith by giving praise to God, reflecting on the Gospel message, and proclaiming the life, death, and resurrection of Jesus Christ.

Life-long learning – Our dedication to high quality, innovative education programs for children, teens, young adults, adults and seniors. We offer abundant opportunities for everyone to experience spiritual growth and a deeper understanding of our faith.

Passionate Community – Our promise of active involvement, energy and enthusiasm for our Catholic faith. We respond to God's call to share our gifts and talents in order to make our community stronger. We offer emotional, spiritual and charitable support to the sick, the bereaved, the poor and others experiencing some of life's most challenging moments.

Our History

Holy Family Catholic Community was started in the fall of 1984 as a new parish to serve the Northwest suburbs in a new contemporary spirit. Joseph Cardinal Bernardin appointed our first pastor, Rev. Medard Laz, to lead the development of Holy Family. The first Mass was celebrated on December 1, 1984, in the cafeteria at Fremd High School while work began on a permanent home for our community, which was dedicated on April 30, 1988.

The completion of the new church brought a dramatic increase in the size of the congregation and the responsibilities of the parish. Liturgies expanded, a parish council was formed and associate clergy were assigned to help meet the needs of the rapidly growing parish.

One of these associates, Rev. Patrick Brennan, began serving Holy Family part time in 1992 and was named pastor in 1994, Father Pat, who had extensive experience in guiding parish renewal programs and evangelization, continued to expand our campus as well as the community we served. During Father Pat's term as pastor, the number of registered families grew by more than 1,000; ministries expanded to over 100; and parish facilities increased from 40,000 square feet to nearly 128,000.

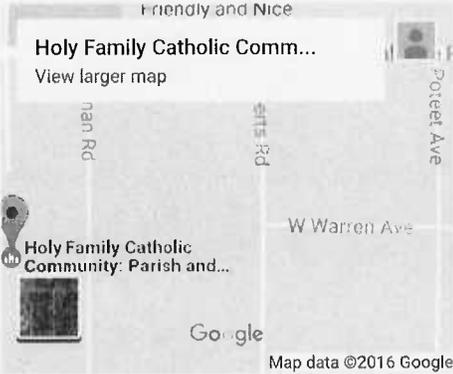
Rev. Terence M. Keehan was appointed in 2009 as the third pastor of Holy Family, leading the church in its next phase of growth and development. Prior to becoming a priest, Fr. Terry earned a Master's Degree in Organizational Development which he used during a successful career in pharmaceutical sales. Fr. Terry also worked in the Vocations Office of the Archdiocese of Chicago

and led several large and small, city and suburban parishes in associate pastor and pastor roles. Under his direction, the *Our Families, Our Faith, Our Future*, capital campaign raised over \$4 million dollars to maintain, complete, and enhance our campus. The completion of the lower level of the Brennan Center added additional classrooms and meeting space for expanding ministry programs. The campaign also funded campus maintenance projects and enhancements, including new interior and exterior signage and narthex improvements. Other initiatives, led by Fr. Terry, include garnering resources to strengthen existing ministries and build new programs, with an emphasis on empowering the laity to share their gifts in order to further the church's ambitious mission. Holy Family continues to welcome over 100 new families to our membership each year.

The *Cross of New Life*, installed in 1997, is a central element of our community, depicting our faith and spirit of our parish. Sculpted by Ernest Caballero in clear acrylic to take advantage of the light streaming through the large church window, the *Cross of New Life* is the largest acrylic art piece ever created. Measuring 2 feet by 16 feet, and weighing almost 2,000 pounds, the cross depicts a Christ breaking loose from a very free-formed cross, reaching out with compassion to everyone. The rays of His risen presence surround Him in the form of a cross. The Cross of New Life is an instrument of evangelization and is a tangible sign of Holy Family's mission to all who come here seeking understanding, acceptance, and love of the Lord and one another.

HOLY FAMILY

2515 Palatine Road
Inverness, IL 60067
847.359.0042



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Title: Parish Front Office Receptionist/Secretary

Department: Operations

Parish: Holy Family – Inverness

Reports to: Operations Office Manager

Status: Full Time

Description

This is an administrative position which requires an individual with strong interpersonal and communication skills. This position requires a professional who often will be the first voice and face of the Parish. This position will support the office manager as well as the Directors of Ministering Communities.

This individual must work in a Collaborative style and be committed to the practice of Christian values in fulfilling the parish community's mission and goals as they apply to this position.

Duties and Responsibilities

- Receive all incoming calls in a professional and courteous manner.
- Greet all visitors and guests in a courteous manner, answer all questions and guide individuals to the appropriate person or place.
- Knowledge of all activities occurring in the Building
- Knowledge of Building layout, worship space, chapel, and meeting room
- Available to give directions for security and safety in emergency situations
- Welcome Ministry representative to new parishioners visiting the parish during business hours.
- Management of Front Office for smooth transition to evening staff.
- Interaction with Academy Staff
- Key operator for Xerox copier and fax machine.
- Sort and distribute mail, maintain postage machine, sign for deliveries, and advise maintenance of proper distribution upon delivery.
- Prepare required documents for shipping and other assignments.
- Perform other clerical duties as required by Office Manager and Directors.
- Share responsibility for Bookstore Coverage as needed

Position Expectations

- Professional and pastoral interaction with parishioners, visitors, volunteers and staff.
- Knowledge of Parish Activities to support questions and inquiries
- Work collaboratively with colleagues
- Ability to anticipate and take initiative to problem solve
- Participation in Parish and staff activities
- Commit to supporting the heart values of ministry, stewardship, evangelization, community
Must demonstrate understanding, respect and support for Catholic Church teaching, mission and values.

Requirements

- 5+ years experience as receptionist and secretary
- Knowledge of Microsoft Suite
- Excellent communication skills.
- Detail-oriented, reliable, well-organized, team player.
- Forty hours per week

Immediate or reasonable start date

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ARCHDIOCESE OF CHICAGO



Office for Lay Ecclesial Ministry

Department of Personnel Services

Home Page	PASTORAL ASSOCIATE CERTIFICATION
What is Lay Ecclesial Ministry	A. CRITERIA FOR ELIGIBILITY
Functions/Overview	1. COMPETENCIES
Ministry of Pastoral Associate	a. Knowledge
Pastoral Associate Certification	Has a functional knowledge and understanding of:
On-Going Formation and Recertification	<ol style="list-style-type: none">1. Catholic church teaching2. Church history3. Moral theology4. Liturgy5. Scripture6. Stages of human and faith development7. Principles of organization, management and team building8. Communication and counseling skills9. Canon Law10. Pastoral theology
P.A.A.C	b. Administrative Skills
PACC	<ol style="list-style-type: none">1. Is able to initiate and implement programs appropriate to area of responsibility, including recruitment, training and supervision of volunteers.2. Is able to develop and maintain a budget for the above programs.3. Is able to make decisions and assume responsibility for delegated tasks.4. Can negotiate and manage conflict.5. Is able to communicate effectively and has good interpersonal skills.6. Possesses basic management, leadership, collaborative, and group process skills.
LEM Documents	c. Pastoral Skills
	<ol style="list-style-type: none">1. Spiritual:<ul style="list-style-type: none">• Is able to contribute to the spiritual growth of the people of the parish.• Is able to lead others in prayer.• Is able to share own faith journey and enable others to do the same.2. Community Building:<ul style="list-style-type: none">• Is able to assist in shaping the parish vision.• Is able to collaborate with others in ministry.• Is able to be objective in pastoral situations.3. Pastoral Counseling:<ul style="list-style-type: none">• Is able to apply basic skills of counseling and spiritual direction, and can appropriately refer persons.• Has the capacity to relate to the sick, dying, and bereaved.• Is sensitive to the social justice issues involved in a multi-cultural church and society.
	2. ACADEMIC QUALIFICATIONS
	A master's degree, from a Catholic institution, in divinity, pastoral or theological studies, or its equivalent, is required. Applicants should have the ability to articulate and demonstrate knowledge of Catholic theology appropriate to a master's level in divinity or theology.
	3. EXPERIENCE
	Two years experience as a salaried parish pastoral minister, e.g. minister of care, pastoral assistant, coordinator of ministries.
	4. FORMATION/SPIRITUALITY
	<ol style="list-style-type: none">a. Is aware of need and takes time for personal spiritual growth.b. Is an active Roman Catholic participating in a faith community/parish.c. Has an ability to integrate ministry with prayer and the sacramental life.d. Takes time for regular private prayer
	A. RESPONSIBILITIES AND TASKS
	1. GENERAL PASTORAL MINISTRY OF A PASTORAL ASSOCIATE
	<ol style="list-style-type: none">a. Collaborates with the pastor, under his supervision, and with other members of the parish staff in the overall pastoral ministry of the parishb. Collaborates in the overall process of the parish administration including: needs assessment, pastoral planning, decision-making, implementation, budget management, etc.c. Acts as director or coordinator of one or more of the parish ministries or programs as agreed upon by mutual negotiation. (Some of the possible ministries or programs are listed under the heading "Specific Pastoral Responsibilities.")d. Participates in the recruitment, training, formation, and enabling of others, including staff and parishioners.e. Leads communal prayer when needed and liturgically appropriate.f. Is a significant presence at primary parish gatherings, such as Sunday liturgies and social functions.g. Is available to parishioners for help with personal needs and parish projects.h. Assists or provides for ministry to persons in crisis.i. Cooperates with the parish pastoral council.j. Participates in regular staff meetings.k. Performs other tasks to be determined and agreed upon at staff meetings.

- i. Demonstrates an interest in the initiation of new members in the parish community and in the processes of evangelization and renewal.
- m. Relates to cluster, deanery, vicariate, archdiocesan and ecumenical structures as appropriate.
- n. Assists the pastor in developing social consciousness among staff and parishioners.

2. POSSIBLE SPECIFIC PASTORAL RESPONSIBILITIES

Since the role of the pastoral associate may vary according to the needs of the parish, she/he may be involved in one or more of the ministries listed below. However, in negotiating these roles with the pastor or administrator, care must be taken to be sure that appropriate archdiocesan agencies have approved and/or certified the pastoral associate's skills and competencies for the various ministries.

1. Ministry of spiritual life

- 1. Provides spiritual direction, pastoral counseling and retreats.
- 2. Develops and facilitates a parish liturgy committee for the purpose of planning Sunday and seasonal parish liturgies.
- 3. Works cooperatively with the parish music director in planning music for liturgy.
- 4. Coordinates and provides training for parish liturgical ministries, i.e. lectors, servers, eucharistic ministers.
- 5. Assists in preparation of individuals for sacraments.
- 6. Assists in planning parish sacramental services.
- 7. Preaches when pastorally and canonically appropriate.

2. Ministry of education/formation

- 1. Oversees the RCIA process, including the recruitment and formation of team members.
- 2. Develops or assists with parish retreats, such as CRHP, etc.
- 3. Coordinates family life ministry.
- 4. Provides for adult education program.
- 5. Coordinates the religious education program.
- 6. Coordinates the youth ministry program.
- 7. Coordinates the young adult program.
- 8. Coordinates the parish sacramental programs.
- 9. Collaborates with the ORE, principal, and youth minister in assisting with ministry to children, youth, and adults.
- 10. Assists in providing staff development, education and enrichment.

3. Ministry of human concerns

- 1. Acts a liaison with the Marriage Tribunal for couples regarding marriage or annulment procedures after Tribunal approval.
- 2. Develops support groups for the widowed, grieving, separated and divorced, or makes referrals to outside groups to provide these services.
- 3. Networks with local community resources.
- 4. Coordinates the ministry of care program.
- 5. Provides pastoral care to people in need in the parish.
- 6. Helps fulfill the companionship and sacramental needs of homebound, hospitalized and nursing home patients.

4. Ministry of administration/management/parish life

- 1. Supervises auxiliary personnel (i.e. office, maintenance, etc.)
- 2. Oversees maintenance of buildings and grounds.
- 3. Supervises maintenance of parish records.
- 4. Coordinates the parish census.

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Adult Faith CLIMB

Marsha Adamczyk
 Director
 847-907-3458
 MAdamczyk
 @holymfamilyparish.org

The Adult Faith
 Community...
 supports the mission
 of lifelong learning by
 providing educational,
 spiritual, and
 formational activities
 for the parish and the
 community.



Friar Ed Shea, OFM

**“Bless Me Father for I Have Sinned.
 It Has Been a Looooong Time Since
 My Last Confession.”**

Presented by Friar Ed Shea, OFM

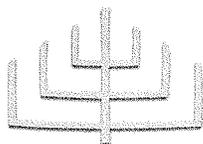
Wednesday, April 2, 2014
 7:00-9:00 pm

\$10 suggested donation

To register, contact Mary Whiteside at 847-907-3450
 or mwhiteside@holymfamilyparish.org

Upcoming events in Adult Faith
 (There have been some changes, so mark your calendar!)

Spirit Journey "A Lenten Journey with St. Ignatius of Loyola"	The Spiritual Direction Team	Mondays, March 10, 17, 24, 31, and April 7, 2014 7:00-8:30 pm Free will offering appreciated.	Mimi Ferlita, OFS 847-907-3412 mferlita@holymfamilyparish.org
Love in the Old Testament (With an Emphasis on Song of Songs)	Pauline Viviano, Ph.D.	Thursdays, March 13, 20, and 27, 2014 7:00-9:00 pm \$10 suggested donation per evening	Mary Whiteside 847-907-3450 mwhiteside@holymfamilyparish.org
Bless Me Father for I Have Sinned, It Has Been a Looooong Time Since My Last Confession	Friar Ed Shea, OFM	Wednesday, April 2, 2014 7:00-9:00 pm \$10 suggested donation	Mary Whiteside 847-907-3450 mwhiteside@holymfamilyparish.org
The Beauty of Worship and Liturgy	Colin Collette	Wednesday, April 9, 2014 7:00-9:00 pm Free	Mary Whiteside 847-907-3450 mwhiteside@holymfamilyparish.org
Jewish-Catholic Dialogue	Fr. Terry Keenan and Rabbi Taron Tachman	Wednesdays, May 7 (at Holy Family) and May 14 (at Beth Tikvah) 7:00-9:00 pm No charge	Mary Whiteside 847-907-3450 mwhiteside@holymfamilyparish.org
"Attitude of Beatitudes" Silent Overnight Retreat for Women at Bellarmine Retreat Center in Barrington, IL	Rev. Michael Sparough, SJ and Mary McKeon	May 16-17, 2014 Cost TBD	Mimi Ferlita, OFS 847-907-3412 mferlita@holymfamilyparish.org



Beth Tikvah Congregation
Our House of Hope

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300 Hillcrest Blvd, Hoffman Estates, IL 60169

847-885-4545

info@beth-tikvah.org



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Leadership

Clergy

- Rabbi Taron Tachman
- Cantorial Leader Ilana Axel
- Rabbi Emeritus Hillel Gamoran
- Cantor Emeritus Menahem Kohl

Staff

Lay Leadership

- Board of Directors
- Past Presidents

First Time Visitors

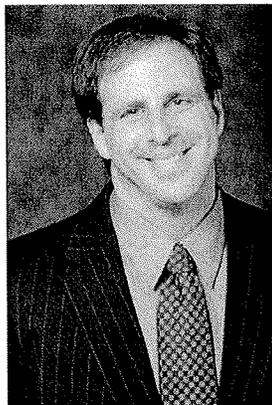
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Upcoming Events

- DEC 6 12.06.2016 Latke Pick-up
- DEC 6 12.06.2016 ECC Gift Card Sales
- DEC 6 12.06.2016 5:00 pm - 8:30 pm Religious School
- DEC 6 12.06.2016 5:00 pm - 7:00 pm Chanukah Bazaar
- DEC 7 12.07.2016 ECC Gift Card Sales
- DEC 6 12.06.2016 7:30 pm - 9:30 pm Kol Tikvah Rehearsal: Chanukah
- DEC 7 12.07.2016 9:15 am - 12:00 pm NO School: Conferences ECC - 2s
- DEC 7 12.07.2016 9:15 am - 12:00 pm NO School: Conferences ECC - 3s & 4s
- DEC 7 12.07.2016 12:00 pm - 1:30 pm ECC Lunch Bunch & Enrichment: Bookworms

Clergy

Clergy



Rabbi Taron Tachman



Cantorial Soloist Ilana Axel



Emeriti

Subcategories

- Rabbi Taron Tachman
- Cantorial Soloist Ilana Axel
- Emeritus

DEC 12.08.2016

8 ECC Gift Card Sales

Contact Info

office@beth-tikvah.org

Beth Tikvah Congregation
300 Hillcrest Blvd
Hoffman Estates, IL 60169

Phone: 847-885-4545

Fax: 847-885-1600

Email about website to
webmaster@beth-tikvah.org

Shabbat Times

Candle lighting: 4:02pm

12/9/2016, 4:02:00 PM

Friday, 09 December 2016

Parashat Vayetzei

12/10/2016, 12:00:01 AM

Saturday, 10 December 2016

Havdalah (60 min): 5:20pm

12/10/2016, 5:20:00 PM

Saturday, 10 December 2016

We Welcome
Interfaith Families



Find us on the
Interfaith Family
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Yom Shlishi, 6 Kislev 5777

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