"I Will Surely Have You Deported:" Undocumenting Clergy Sexual Abuse in an Immigrant Community

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On November 6, 1984, a typewritten memorandum marked "Very Confidential" arrived on the desk of Washington, DC, Archbishop James Hickey. The memo, written by Monsignor Tom Kane, detailed a disturbing report he had received from a Catholic religious sister named Sister Manuela, who worked with Washington's Hispanic community. Sr. Manuela reported that a woman had recently come to see her about an urgent situation involving her nineteen-year-old nephew.¹ The young man had immigrated to Los Angeles from Mexico four years earlier, along with his mother (the woman's sister) and ten siblings. The family was undocumented, and their father was still in Mexico. Upon arriving in Los Angeles, the family found St. Marcellinus Catholic Church in the city of Commerce, where they met Monsignor Peter E. Garcia, director of the Spanish-Speaking Apostolate for the Archdiocese. The priest went out of his way to help the family, reported the aunt. He enrolled the children in Catholic school and even rented the poor family a home. Garcia then invited the oldest boy, sixteen years old at the time, to come live with him. The boy refused, but his parents insisted that he take the priest up on the offer. They likely viewed it as a charitable proposal, a way of helping to relieve their burden of providing for a large family.² By all accounts, Garcia was charismatic, popular, charming, and well-connected³—a powerful and trustworthy ally in a new country.

For the next three years, Garcia sexually and psychologically tortured the boy and also targeted two of his younger brothers. According to documents made public as part of a 2007 legal settlement against the Archdiocese of Los Angeles, Garcia coerced the oldest into silence by using his family's undocumented status as blackmail. After abusing for the first time, Garcia brought the boy to the local jail and, according to Sr. Manuela's complaint, "instructed

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him to either behave or else he would end up either in jail or back in Mexico." Underscoring the power Garcia wielded in the local community, he reportedly threatened the boy, "If you talk, I have lawyer friends and I will surely have you deported." By the time his aunt discovered and reported the abuse to Sr. Manuela, the young man had fled Los Angeles and had come to live with her in Washington, DC. He was suffering from severe mental illness and apparent drug addiction, and had covered the walls of his room in images of Our Lady of Guadalupe. At that point, the boy's entire family felt that they had no choice but to move away from Los Angeles. "They fear the priest is powerful," Sr. Manuela reported. "He could send the whole family back [to Mexico], and they do not rule out even physical violence, of which they are also afraid."

Garcia had twelve different parish assignments between 1966 and 1987.6 Two of these lasted just two months; another lasted five months, another eight. Reports contained in his unsealed personnel file reveal that beginning in 1966, the year he was ordained, Garcia abused at least twenty young boys and adolescents, the youngest of whom was around seven years old. Most of his victims were parochial school students and altar servers at the parishes where he served. Many were brothers or cousins. In a number of the documented allegations, victims and their family members mention that other boys they knew-brothers, cousins, friends, classmateshad also been abused by Garcia, making the true number of victims likely much higher than reported. By the time Sr. Manuela contacted church authorities in 1984, records show that bishops had been aware of Garcia's behavior for nearly a decade, having received the first allegation against him in 1975.8 Yet despite his unremitting pattern of sexual violence and the cascade of reports against him, Garcia was kept in active ministry, shuffled from parish to parish. It was 1980 before superiors first referred him to psychiatric treatment —a referral paired not with removal from ministry but instead with yet another new parish assignment and promotion from secretary to director of the archdiocesan Spanish-Speaking Apostolate.9

After Sr. Manuela's report, Garcia was finally sent to Jemez Springs, New Mexico, for a lengthy stay (1984–1986) at the Foundation House rehabilitation center run by the Servants of the Paraclete. There, despite being officially "On Sick Leave" from the Archdiocese of Los Angeles, authorities permitted him to hold two successive parish ministry assignments in the Archdiocese of Santa Fe. Of course, explaining the sudden appearance of this LA diocesan priest in New Mexico could prove "awkward," suggested Foundation House director Rev. William D. Perri, SP, especially if Garcia were to be actively supervised in ministry by treatment

program staff. Thus, in a letter to Archbishop Roger Mahony, Perri explained that he and Santa Fe Archbishop Robert Sanchez had resolved that Garcia should be placed into ministry without supervision and that the communities should be told nothing whatsoever about his history. Instead, Garcia would simply be very responsible:

Garcia needs to be very careful about any ministry involvement with young people and that he should simply inform the pastor that his gifts do not lie in this area.... Resolution: Msgr. Garcia's pastor will not be told about his problem. ¹⁰

It is unclear whether Garcia committed abuse in these New Mexico parishes. In 2020, the Archdiocese of Santa Fe included Garcia on an updated list of priests who have ministered in the archdiocese who have been accused of sexual abuse of children elsewhere but not in Santa Fe. 11 By 1987, frustrated with Mahony's unwillingness to allow him to return to parish ministry in Los Angeles, Garcia grew increasingly uncompliant with the Servants of the Paraclete aftercare (outpatient) treatment program in which he was enrolled. The letters he sent to the chancery took on increasingly evasive, sometimes aggressive tones. Foundation House staff, previously affirming of his participation, began to describe him as "slippery," "sneaky," and "untrustworthy." 12 As Garcia's relationships with superiors deteriorated, Mahony appears to lose patience with him. 13 In late summer 1987, Mahony referred him to the Daughters of Charity-run Saint Luke Institute in Suitland, Maryland, for further evaluation. Once there, a lengthy report to Mahony explicitly described Garcia's pattern of sexually abusing undocumented minors. According to the report,

Although Father Garcia does not perceive himself as coercive in these behaviors it is our understanding that many, if not most, of the minors with whom he was involved were undocumented aliens. They may well have felt threatened by the consequences of their making formal allegations, to one archdiocese or legal complaints against Monsignor Garcia. 14

Despite renewed attention to clergy sexual abuse after the 2018 release of the Pennsylvania grand jury report, stories like this one highlight a critically under-examined dimension of the crisis. Critiquing inattention to race and coloniality in studies of clergy abuse, researchers have begun to examine patterns of abuse on

indigenous lands and in residential schools. 15 Other studies have shown how bishops and religious superiors used missions in and beyond the United States as dumping grounds for predatory priests. 16 In part because of the complications undocumented legal status poses to disclosure, however, clergy sexual abuse in immigrant communities has received almost no scholarly attention and only marginal media notice. 17 Elements of the Garcia case gained moderate media attention after a massive 2007 legal settlement against Archdiocese of Los Angeles forced the public release of clergy personnel files of accused priests. Yet such accounts are laced through the record. In dioceses across the United States, unsealed clergy files, media reports, and survivor testimonies document patterns in which bishops knowingly transferred abusers to parishes and communities with significant immigrant populations. There, priests leveraged families' precarious legal status, poverty, social marginality, cultural and religious norms, and lack of English fluency to create relationships of dependency and to sexually exploit children and youth from those communities. When a priest's abuse would come to light, he would be transferred to another parish or position within the archdiocese, sent away to missions in Latin America or remote U.S. dioceses, or referred for treatment in Jemez Springs, where he would typically own up to his abuse, often with alarming directness and lack of contrition, and, once released (and, in some cases, even while in treatment), would receive another ministry assignment where his pattern of targeted exploitation would begin anew.

This article interrogates the complex politics of documentation with which Garcia's victims were forced to contend. Employing a decolonial lens, it attends to the relationship between three interwoven forms of (un)documentation at stake in the Garcia case and, by extension, in situations of clergy sexual abuse in migrant communities more broadly: first, the precarious legal and social status of victims; second, the silences, redactions, and euphemisms that characterize the archival records containing these accounts; and third, the spatial undocumentation at work in the regular use of migrant parishes as dumping grounds for problem priests. I demonstrate how a post-Vatican II theological and pastoral imagination of intimacy with the poor, refracted through prisms of state, ecclesial, and clerical dominance, helped to create the conditions for the production of undocumented victims. offloading abusive clergy onto immigrant communities, bishops participated in the production of the very margins that they both lamented and spiritualized. The erasure accomplished through these overlapping forms of undocumentation can help to contextualize the

absence of such stories from the broader narrative of Catholic clergy sexual abuse in the United States.

I construct this analysis by placing scholarly literatures on Catholic clergy sexual abuse, undocumented immigration, and U.S. Catholic parish life into conversation with an in-depth case study analysis of Peter Garcia and his victims, drawing primarily on documentary evidence contained in clergy personnel files made public in 2013 as part of the 2007 legal settlement against the Archdiocese of Los Angeles. 18 The version of the Garcia file released by the Archdiocese contains a heavily redacted 261 pages. However, a much more complete, 451-page version of the file is available through the abuse crisis archive Bishop-Accountability.org. 19 The latter contains, among other important details, significant internal communication demonstrating that bishops kept Garcia in New Mexico in order to shield him from prosecution. It should be emphasized that, while the Garcia case is egregious, it is not unique. Rather, it is emblematic of a pattern in and beyond the Archdiocese of Los Angeles in which predatory priests intentionally targeted victims from undocumented and otherwise vulnerable families. 20 By closely examining a particular case, this article seeks to interrogate the complex politics of documentation in situations of clergy sexual violence against the backdrop of postconciliar American Catholicism. Even more fundamentally, it makes a case that the study of sexual abuse across many religious and cultural contexts would be sharpened by an approach that includes analysis of legal, rhetorical, and spatial undocumentation in a decolonial framing that includes class, gender, race, and ethnicity.

Finally, I offer two notes on the terminology I employ in this article. First, I use the term Hispanic rather than Latinx in reference to Garcia's pastoral work because this is the term employed at the time Garcia was in ministry. Second, the use of the terms victim and survivor has been much debated within scholarly and practical discourse on clergy sexual abuse. Referring to individuals who have endured clergy violence as victims, some argue, centers the actions of perpetrators over the resilience of survivors, implicitly reducing their subjectivity to the fact of their violation. Others address the dilemma by combining the two terms into one, referring to the abused as victim/survivors. While I affirm such critiques, it is my judgment that victim often remains the more appropriate term, especially when the fate of the individual cannot be clearly ascertained through available documentary evidence. My hesitancy to assign survivorhood to those whose stories we encounter in Garcia's files is echoed in trauma psychology, where survivor is primarily a self-label associated with the healing process.²¹ Indeed,

as Brian Clites has powerfully documented, within clergy abuse survivor organizations, the reclamation of one's voice was "the foundation for transforming oneself from 'victim' to 'survivor.'"²² It is not within my power to make such claims on behalf of others. Moreover, I resist the dichotomous association of survivorhood as positive and victimhood as negative, which implicitly casts those who do not self-identify as survivors as deficient and lacking in agency and, moreover, fails to appreciate the cultural, racial, and gendered complexity behind such labels.²³ In this article, I use both *victim* and *survivor* where I judge each to be most appropriate.

The Garcia Case (1966–1987) and the Politics of (Un)documentation

To examine clergy sexual abuse in U.S. immigrant communities is to confront a complex politics of documentation. Documentation in the legal sense—whether a migrant is living in the United States legally or beneath the radar, sin papeles—is only part of the picture. Legal undocumentation presses itself upon bodies, voices, records, and lands. As Amy Reed-Sandoval argues, undocumented migrants in the United States endure "social undocumentation," a racialized and class-based state of profound bodily precarity and social invisibility.²⁴ Being undocumented, she writes, "entails far more than . . . an ongoing lack of legal status. It is also often about physical embodiment, commonplace ways of speaking and seeing, and much more."25 At the center of this undocumented existence is the body, upon which the consequences of living a life hidden from authorities are written in a host of violent ways. Documentation also refers to archives: court depositions; victim testimonies; local histories; and, especially, the photocopied, methodically redacted contents of unsealed clergy personnel files. Within these files, we encounter internal communications, handwritten memos, psychological evaluations teeming with optimistic, of-the-moment verbiage of sexual integration and the results of novel personality assessments, abusers' correspondences to superiors plinked out in typewritten lines on parish letterhead, scribbled with the marginalia of recipients at the chancery. These primary documents form the raw materials of two distinct but closely related stories: that of sexual and psychological violence carried out by priests, and-even more vividly-the story of institutional clericalism manifested in a culture of near-limitless second chances for offenders, near-total disregard for victims, and bishops' considerable knowledge of situations about which they would later publicly claim ignorance. In a third sense, within the

Catholic church, documentation is a spatial and geographical category. Dioceses, more than institutional subdivisions, are territorial categories, cartographic transpositions of ecclesiastical authority onto land. Parishes, too, are boundaried spaces governed by localized imaginations of racial, ethnic, and religious belonging. As we will see, the undocumenting effect of racialized territorial dwelling is evinced most clearly in the ecclesiastical production of clergy dumping grounds in migrant and indigenous communities. In this section, I sift through the multiple ways that dynamics of documentation and undocumentation—legal, social, archival, ecclesial, spatial—coincide to produce the erasure of immigrant victims from the narrative of clergy sexual abuse.

"A Very Low Profile": Undocumented Subjects

In the Garcia case, victims' undocumented legal and social status shaped the dynamics of abuse and its aftermath. It is clear psychological evaluations and from internal archdiocesan communications that Garcia targeted his victims precisely because they came from undocumented or otherwise vulnerable families. The priest would leverage his clerical power and Spanish-Speaking Apostolate leadership to access, assist, and engender trust from newly arrived immigrant families, sometimes women traveling with multiple children whose husbands were still in Mexico. In providing necessities like housing and schooling for these families, Garcia created a relationship of multifaceted dependence in which he assumed traditional masculine roles of both economic provider and father figure.²⁶ Garcia's cultural familiarity as Mexican American and his English-Spanish bilingualism granted him further access to and power over the families he targeted. Positioning himself as a translator and thus as a kind of cultural and economic gatekeeper between a family and their new country, he made himself indispensable to them, gaining further control over their lives. Such trust and dependence gave Garcia access to the families' boys. In the case of the primary victim described in the introduction, such access was solidified when he and the boy's parents forced the boy to come live with him. Other survivors similarly recalled how Garcia ingratiated himself to their families, building trust that eventually gave him opportunities to be alone with them, often for days at a time.²⁷ An attorney summarized one survivor's testimony in this way:

> His parents, devout and practicing Catholics, were proud that this prominent priest took an interest in their son. Thus,

[redacted] thought nothing of it when he was asked to accompany Fr. Garcia for a couple of days' vacation.²⁸

Toward victims, records suggest that Garcia would isolate boys from their families, inviting them to empty rectories or on overnight trips to Palm Springs and Lake Isabella and the Anaheim Charismatic Conference, where they would share a hotel room. There, he would disorient them with wine and pills, unleash violent physical aggression, and molest or rape them. Afterward, he would silence them using psychological manipulation—threatening deportation, calling their homes, and continuing to ingratiate himself to their mothers to such an extent that, once revelations arose, several of the women appeared as concerned for Garcia's welfare as for that of their sons. ²⁹ Garcia's abuse thus enacted corporeally and psychologically the social violence of legal undocumentation.

The practice of victim-silencing is a common through-line in accounts of clergy sex abuse across contexts. The Garcia case demonstrates how abusers and their religious superiors often extracted silence in contextually situated ways, uniting threats of reprisal with vulnerabilities and taboos specific to a victim's cultural and familial situation. Here, for example, living under the threat of deportation exacted victims' silence in a particularly violent and effective manner. For undocumented victims of sexual assault and other crimes, the legal and social precarity of undocumented life in the United States functions as a significant barrier to reporting abuse.³⁰ While U.S. citizens can, in theory, access the police, lawyers, healthcare, and media, 31 undocumented victims have few places to turn for protection and advocacy. Fear of police interaction and warranted mistrust of healthcare, legal, and criminal justice systems deter victims from reporting crimes to authorities, constraining possibilities for redress and justice.³² For minors, concerns over the problems that disclosing abuse could cause for undocumented family members adds additional psychological and practical barriers to reporting.³³ Thus undocumented victims of clergy sexual abuse face a double bind: either they remain silent and continue to be harmed, or they report their abuse and risk deportation.³⁴

Given the magnitude of these barriers, what makes the Garcia case extraordinary is that the family described in the introduction *did* secure legal representation. The Los Angeles Center for Law and Justice (LACLJ), an organization founded in the 1970s to provide legal advocacy to low-income immigrant and Latinx populations in the city, took the family's case in 1985. At this point, church officials

weaponized their undocumented status in an additional way. While Garcia used threats, archdiocesan authorities took the opposite approach, diffusing the family's demands with a mix of damage control and feigned ignorance. When lawyers from LACLI contacted archdiocese in September 1985 on the family's behalf, Archbishop Mahony replied by claiming to "know nothing of the origins of this entire matter." While Mahony had only recently succeeded Cardinal Timothy Manning as head of the Archdiocese of Los Angeles, his claims of ignorance are dubious. Even a cursory glance at Garcia's personnel file would have revealed extensive documentation of the case. Behind the scenes, records show, archdiocesan leaders were scrambling to coordinate a response with their lawyers and the head of Catholic Charities, attempting to preempt a lawsuit by offering counseling services to the family's children.³⁶ Archdiocesan damage control, combined with the complications of pursuing legal justice while undocumented, meant that charges were never filed. Garcia, for his part, seemed confident that the archdiocese would shield him from prosecution. As Mary Gail Frawley-O'Dea notes, in a surprisingly high number of cases, priests confronted with allegations against them confess on the spot, admitting the incidents occurred and promising not to do it again.³⁷ Such was the case with Garcia, whose shameless admissions of abuse suggest a well-founded awareness that he would face few legal or ecclesiastical consequences.38

It is important to note that immigration status does not operate in a vacuum but intersects with ethnicity, gender, class, culture, and church hierarchies and structures to yield complex power relationships.³⁹ As we have already seen in Garcia's words, Mexican Catholic moral and theological norms around priestly authority, redemptive suffering, and maternal assent; taboos related to homosexuality and sexual abuse; and values of familial and community primacy are just some of the relevant themes at issue.⁴⁰ Additionally, for newly arrived immigrant families, parishes functioned as spiritual, social, civic, and cultural centers of gravity. Thus to report abuse was not only to risk deportation; it was also to risk profound religious and social alienation—to risk, in other words, separation from God and God's people.

Garcia, of course, knew these obstacles well. As I discuss below, Garcia maintained a public profile as a vocal advocate for Hispanic Catholics. Leveraging cultural and religious insiderhood, Garcia repeatedly sought to reassure superiors that victims' families would never press charges. In a 1985 letter to Manning begging to return to Los Angeles, Garcia underscored that his victims' Catholicism meant that they would never pursue legal action. "They

do love their Church and even when hurt do try to protect their priests and religious," he wrote. "This is a very strong Hispanic characteristic." Two years later, in yet another plea, this one to Archbishop Sanchez of Santa Fe, Garcia assured the prelate that "the persons who would generally be looking for me are undocumented, so necessarily maintain a very low profile." He continued:

The mother of the boys involved made a solemn promise to a *comadre*... that they would never hurt my family or me in any way after all this happened. Generally, as you well know, Mexican people keep this type of promise very well.⁴²

Here, Garcia framed legal action not only in terms of the harm it would bring to victims' families but also to *his own* family. Manipulating traditional Mexican cultural values of familism and religious *promesas*, Garcia ensured his impunity.

"Meeting with [Redacted]": Undocumented Testimonies

A second, consequential form of documentation involves the ways that truths are concealed, revealed, coded, and translated within existing documentary evidence. This lexical concealment, I argue, has the effect of decentering, and often erasing entirely, victims' subjectivities, violently enfolding them into a narrative in which their abuser plays the role of protagonist. Three ways in which this undocumenting manifests in clergy personnel files and other diocesan records are euphemism, misrepresentation, and redaction.

Euphemism

One of the most durable patterns evident in internal records of clergy sexual abuse is the rampant use of euphemism to describe sex crimes. Where one would expect to see straightforward terms like *rape, assault,* and *molestation,* one instead encounters sexual violence described in spiritualized language ("sinning against chastity," "giving in to temptation," attraction to minors as the offender's "cross to bear"), benign euphemisms ("problems with boys," "relationships with minors," "inappropriate conduct," "friendship"), or highly abstract terms ("situation," "scandal," placing a priest on "sick leave"). Garcia's official evaluation report from the Saint Luke Institute summarized his history of sexual assault glibly as "relationships with youngsters." Elsewhere, psychological reports repeatedly describe "sexual interaction" and "sexual involvement," implying mutualistic relationships or illicit affairs rather than child rape.

Misrepresentation

In the case reported by Sr. Manuela, nearly everything we learn about the nature of Garcia's abuse is at least four degrees removed from the primary victim's own words. The clearest description of what happened to the boy during the four years he was being abused is contained in the initial memo written by Msgr. Tom Kane to Archbishop Hickey, who is recounting the report from Sr. Manuela, who is narrating what she learned from the victim's aunt, who learned it from the victim himself. Throughout this chain of reporting, the account is translated from Spanish into English (probably by Sr. Manuela), from oral testimony to business memo, from the lexicon of personal trauma to advocacy to institutional base-covering, from the site of haunted memory to the banal materiality of office paper and manilla folders. The closest thing to firsthand testimony in this case, in other words, is an interpretation of a translation of an interpretation, each layer of which is compounded by unique biases, interests, and understandings. The hermeneutical challenge involved in peeling back these layers is profound.

Once this chain of reporting crosses the boundary between laity and chancery, however, interpretation and translation become willful distortion. The chancery official in Washington, DC, who took Sr. Manuela's report warned her not to refer the young man to a psychologist until he had a chance to speak with the archbishop. 45 After church authorities in Washington received the report, records show that they deployed patriarchal and clerical power to cast suspicion on its veracity by questioning the credibility of the victim's aunt and mother. A follow-up memorandum attached to the initial report from Hickey to Manning conceded that Sr. Manuela was "credible" but concluded with the suggestion that church officials should "not eliminate the possibility of an 'attempted rip off,' the family's attempt to get to [the] Washington area."46 In other words, despite the family's stated lack of desire for publicity or court action,⁴⁷ and despite the magnitude and consistency of the allegations against Garcia, Hickey hinted to Manning that perhaps the entire story was a fabrication. The aunt's suggestion that her sister's family needed to leave Los Angeles for their own safety was, they insinuated, merely a desperate undocumented woman's ploy to trick church leaders into helping her family move across the country to join relatives. It is hard to imagine that church leaders genuinely believed the accusations they leveled against the women. Rather, allegations like these are consistent with the broader strategy of victim intimidation and discreditation employed by church leaders in such cases.48

Redaction

In public disclosures, victim names and identifiers are redacted to protect their subjects, a practice vital to ensuring confidentiality for victims and their families. Yet there is a way in which redaction also recapitulates the violence of erasure and identity loss that undocumented victims endure. It places the subjectivity of the abuser at the center of the victims' stories, relegating them to the status of unnamed victim, anonymous number, or even less: unaccounted for completely, present in absence alone. Even when invoked in notoriety, centering abusers reinforces the narcissism demonstrably operative in the actions of many offenders, Garcia included.⁴⁹ What's more, because unsealed clergy files are the primary source of documentary evidence in such cases, attending to these cases means wading through abusers' psychological evaluations, their letters to superiors and the often jarringly sympathetic responses they received in reply, and their self-centered apologias. Here, again, the subjectivity of the abuser is the centerpiece of such a file; he is its protagonist. Meanwhile, survivor voices are reduced to court depositions, legal transcripts, and the occasional public statement (rare for undocumented victims). In most cases, victims are partial subjects at best, known and heard only insofar as their stories are subsumed into that of their abuser, in whose protagonal tale they play the part of accusers.

As a researcher, I wrestled with an unsettling sense of participation in this dynamic as I pieced together accounts of name-redacted victims, looked up cases by the names of perpetrators, and relied on documents that prioritized the protection and rehabilitation of abusers to reconstruct these histories. Such reconstruction is, at best, partial. The final report against Garcia, dated August 31, 1988, exemplifies this fragmentary reconstruction. A page and a half of handwritten notes taken down by an archdiocesan official, likely Msgr. Thomas Curry, documents a meeting with the parents of two teenaged male victims. According to the complaint, Garcia—back in the Los Angeles area after his rehabilitation sojourns at Jemez Springs and the Saint Luke Institute —had recently telephoned the teens' home to invite the younger one to come work at his family's store. The phone call triggered so much anxiety in the boys that they eventually revealed that Garcia had previously "laid his hands on [them]." The brief report contains twenty-three name redactions. The resulting fragmented document muddles the identities of the two victims and exacerbates ambiguities about statements from their mother, whose primary concern appears to lie with protecting Garcia from punishment.⁵¹ While follow-up communications among church leaders and clinical

personnel lend limited clarity to the nature of the incident, it remains the case that, in this report as in the others, the only person with a consistent through-line is Garcia himself. Here, too, the hegemony of clerical masculinity is particularly clear. Except for Sr. Manuela, whose name does not appear in the Archdiocesan release, the only people in Garcia's entire 451-page file with clear identities are male clergy and lawyers. Women, children, and youth are nameless. Such files ultimately frame victims as incomplete subjects, anonymous complainants; laundried through chancery files, their stories of horror become inconvenient ordeals.

Were diocesan records merely one source of information among many, such absences would be less consequential than they are. Yet because these files constitute the most comprehensive documentary source of data on clergy sexual violence and institutional complicity, the lack of subjectivity such records afford to victims effects their thoroughgoing erasure from both scholarly and public understandings of clergy sexual abuse. We are left to fill in these blanks with media-shaped portraits of "typical" victims or, in the case of those harmed by Garcia, with the scant, stereotype-infused descriptions found in the documents.

As Amy Reed-Sandoval argues, working-class Mexicans in the United States "represent the paradigmatic 'illegal subject." Indeed, within the pages of chancery communications, Garcia's victims grew into precisely such "illegal subjects": angry, disaffected Mexican teens who dropped out of high school, joined gangs, turned to theft, became sexually confused, suffered drug and alcohol addictions, or had mental breakdowns. In the 1990s, after more victims started to come forward, lawyers described these young men much more sympathetically (and, one can assume, accurately), but even these descriptions reiterate such stereotypes. In one letter, an attorney spent two astonished paragraphs describing the trim haircut, "light olive complexion," "freshly laundered" clothing, handsome smile, and firm handshake of one of Garcia's survivors. "For some reason I had expected someone with down-cast eyes, head bent forward and barely communicative." ⁵⁴

As Brian Clites has argued, forms of subject-centered research, such as oral history and ethnography, are vital in centering the voices of survivors in abuse research.⁵⁵ Yet such work requires a highly developed set of skills and dispositions on the part of the researcher, and those who have endured abuse while undocumented face increased risks and barriers in disclosing their trauma. For these reasons, ethnography cannot, on its own, be understood as a solution to the problem of victim-erasure.

To be clear, this analysis does not intend to question the necessary legal practice of name redaction. Rather, my intention is to provoke reflection about the ways in which the nature of such records participates in the undocumenting of clergy abuse victims, particularly those living under conditions of legal precarity and social invisibility.

Undocumented Spaces: Dumping Grounds as Geographies of Second Chances

It is impossible to understand the multiple forms of undocumentation at work in the Garcia case without recognizing how church officials treated the predominately Mexican American communities where Garcia served as dumping grounds for abusive priests. What has often been called the "geographic solution" to the problem of predatory priests—that is, the strategy of offloading clergy geographically problem to poor, remote, marginalized, or racially minoritized communities, sometimes overseas—has been widely documented in dioceses and religious orders throughout the United States and beyond.⁵⁶ Whether located on geographical or social peripheries, dumping grounds rely on a socioreligious imaginary of Catholic colonial dominance, profound power asymmetries between priest and local community, and the presumption of victims' social invisibility.

The dumping ground strategy is often associated with geographic remoteness from centers of ecclesiastical and social power. Notorious dumping grounds include Jesuit missions in western Alaska, where sexually violent clergy were sent during the 1960s through the 1980s, and dioceses with significant indigenous populations, including Gallup, Santa Fe, Great Falls-Billings, and Honolulu, where bishops in need of clergy took in abusive priests from across the country. 57 In such cases, known or suspected abusers were placed into active ministry with indigenous and other minoritized children, with catastrophic results. In these remote locales, clerical sexual predation intersected with a colonial frontier mentality bound up with ideas of masculinity, missionary ruggedness, and the conquering of "uncivilized" peoples. This missionary imagination privileged rhetorics of innovation, which gave priests license to transgress and manipulate interpersonal boundaries in the name of pastoral experimentation.⁵⁸

Less recognized, however, is that the "geographic solution" was also an urban phenomenon. Whereas cities—and the immigrant Catholics who settled there—had once been the focus of

parish-building and, by extension, of diocesan presence and power, by the mid-twentieth century, many urban parishes had become sites of ecclesial disinvestment and neglect. White flight transformed national parishes into "inner-city parishes" as churches built to serve urban-dwelling European immigrant communities gradually became home to Black, Brown, and new immigrant parishioners from Mexico and Latin America, the Caribbean, Asia, and Africa.⁵⁹ Meanwhile, diocesan attention and resources followed white Catholics to the suburbs. As I have documented elsewhere, bishops assigned priests that no one else would take to staff inner-city parishes, where parishioner complaints could be ignored. 60 Depleted by the dumping ground effect, today Black, Brown, and immigrant-serving parishes are often the first to be targeted for shutdown and consolidation in diocesan restructuring plans.61 Thus, whether through attention or neglect, immigrants and their urban parishes have long been sites where diocesan power is enacted and manifested spatially.

Garcia's case reflects both urban and rural dimensions of the geographical solution. As we have seen, Garcia was assigned to a succession of Mexican American parishes in working-class Los Angeles neighborhoods.⁶² He was placed in charge of Spanish Affairs—a position that made him a church-sanctioned point person for newly arrived immigrant families throughout the diocese—long bishops became aware of his pattern of targeting undocumented boys. 63 After two years of treatment in Jemez Springs —a length of time indicative of the fact that it was not going well— Garcia was assigned to even more parish work with Mexican American and Native American laity, this time at remote Our Lady of Belen in Belen, New Mexico, and San Miguel in Socorro, New Mexico. While the Archdiocese of Santa Fe maintains no record of Garcia committing abuse there, at least three other Santa Fe priests credibly accused of child sexual abuse served at Our Lady of Belen between 1983 and 1990, and nine were assigned to San Miguel between 1963 and 1982.⁶⁴ Given that other priests who cycled through Jemez Springs also served off the record in churches throughout the region, it is not unlikely that these and other parishes hosted an even greater number of abusers from dioceses far and wide.⁶⁵

While employed in the name of discretion, internally chancery officials were blunt about the purpose of the dumping ground strategy: shielding abusers from prosecution. Responding to Garcia's ongoing persuasion campaign to return to Los Angeles, Manning declared that Garcia was not to come to California—"under any circumstances!" Presumably addressing Foundation House staff, a chancery staff member reporting for Manning explained,

If Peter is seen by certain parents he could get 10 years in prison. The statute of limitations will not expire until the young man is 21 years of age. The parents can continue to pursue Peter until that time. [Manning] also stated that the parents are just waiting for such a legal suit. 66

Two years later, as Garcia continued to beg to return to Los Angeles, Foundation House program director Perri wrote to Archbishop Mahony that the program was "merely trying to prevent Msgr. Garcia from further trouble and a possible prison sentence. In addition, [name-redacted Servants of the Paraclete psychiatrist] wishes to protect the Church at large, as we all do."67 Two months later, after a visit to Jemez Springs, Msgr. Curry wrote to Mahony confirming that doctors there believed "the liability of [Garcia] returning [to Los Angeles] is too great," as "there are numerous—maybe twenty—adolescents or young adults that Peter was involved with in a first degree felony manner."68 Such admissions directly contradict the Archdiocese of Los Angeles's present claim that "there were no instances in which prosecution was delayed or prevented by the offending priests being sent out of state for treatment."69 As Kathleen Holscher has documented in the Diocese of Gallup, it was these remote New Mexican lands and their nuevomexicano and native peoples that bore in dramatic and disproportionate fashion the geographic consequences of bishops' strategic determination to shield abusive priests and their dioceses from liability. 70

As Holscher has also persuasively argued, however, viewing dumping grounds only as geographical garbage heaps for bad priests offers an incomplete picture of their spatial power to attract, shield, and, in certain respects, create abusers. Rather, as Holscher describes, the dumping ground strategy traded on a Catholic colonial and theological imagination that exalted the purgative powers of the wild.⁷¹ In a clericalist ecclesial structure in which priests alone occupied the role of protagonists, sending a problem priest to geographical or social margins was, in multiple respects, a salvific act. In a Catholic moral universe that regarded scandal as a sin equal in gravity to sexual abuse itself, reassigning a priest before his transgressions could come to light not only spared him and the institutional church from repercussions; it also spared the innocent faithful from the soul-endangering power of sexual scandal. 72 Sent to the frontiers, he could take up the purgative role of missionary to the poor, native, immigrant, or unbaptized, saving a legion of souls that included his own. Combined with the absolutionary power of the Sacrament of Confession, no amount of second chances was too many for a priest with a soul to save. Rather than garbage heaps, dumping grounds were recycling centers, geographies of second chances.

Privileging and Producing Margins

In the post-Vatican II cultural turn, an additional theological-spatial imagination took root in the preferential option for the poor. The decades during which Garcia was in ministry witnessed the emergence of Latin American liberation theology, the coalescence of Catholic Social Teaching, and the enthusiastic embrace of liturgical and pastoral inculturation. 73 Within the U.S. church, the National Encuentro process energized Hispanic Catholics around issues of cultural recognition, evangelization, and social justice, resulting in the U.S. bishops' 1987 adoption of the National Pastoral Plan for Hispanic Ministry. 74 Though bishops resisted the radical calls of Chicano Movement-based Catholic organizations such as PADRES and Las Hermanas, the church nevertheless became a vital if complicated ally for Mexican and Latin American immigrants. Meanwhile, Mexican American theologians from the West and Southwest published agenda-setting works declaring borderlands, both geographical and symbolic, to be theologically revelatory spaces where divisions are transgressed and God reveals Godself in solidarity with the poor and migrant.⁷⁵ At the same time, the still-potent legacy of the War on Poverty spotlighted the plight of urban communities, imbuing "inner-city" apostolates with the same sort of missionary allure long associated with distant frontiers.⁷⁶ In their own ways, each of these religious and political currents remapped the urban landscape of U.S. Catholicism, transforming barrios and parishes in cities like Los Angeles into new missionary wilds.

On a moral level, the dissonance between the public advocacy and private actions of church leaders during this period can be interpreted as basic hypocrisy. During the same decades that U.S. bishops were publicly championing the dignity of migrants, privately, bishops in Los Angeles and beyond were knowingly transferring sexually violent priests into immigrant communities. There never appears to be any attempt, even circuitously, to place distance between Garcia and vulnerable people. On the contrary, over time, his transfers and promotions put him into contact with increasingly precarious communities. He was not removed from active ministry until 1989—not because of his crimes, but because he had become increasingly belligerent and unmanageable to superiors —and was forcibly laicized in 2006.⁷⁷ (Laicization is arguably the ultimate act of dumping, wiping an abuser off the ecclesiastical map and onto the secular one, disposing of him in the most distant possible land: the ontologically inferior world of lay existence.) Between 1966 and 1987, however, bishops exercised their power to

reassign Garcia again and again to communities where victims' legal and social invisibility meant that his pattern of sexual exploitation could continue unabated and, when accountability threatened, to deploy clerical power to protect Garcia while treating his migrant victims as disposable. The patterns of institutional violence on display in the Garcia case serve as a searing indictment of the church's rhetoric of solidarity during this period.

Yet, following Holscher's analysis, behind this obvious moral failure lies an even more complicated tension. The dumping ground strategy as it manifested in Los Angeles in the 1960s through the 1980s reveals a complicated spatial dialectic between the treatment of immigrant parishes as clerical wastelands and a theological imagination that imbued these margins with quasisoteriological status. Garcia practiced a kind of two-faced preferential option for the poor, advocating on behalf of Hispanic Catholics even as he intentionally targeted their children for sexual violence. Indeed, drawing from a different set of sources, it is possible to construct an entirely different portrait of Garcia—one of a bold pastoral leader and national advocate during a watershed decade for Hispanic Catholics. Throughout the 1970s, Garcia served as an inaugural member of the National Advisory Committee of the Secretariat for Hispanic Affairs under the National Catholic Conference of Bishops, helped to found the first national Spanish-language Catholic newspaper, 78 and, as Secretary to the Region XI Commission for the Spanish Speaking, served on the National Coordinating Committee for the Second National Encuentro for Hispanic Ministry in Washington, DC, in 1977. In 1976, Garcia co-founded the Pastoral Language Institute at Loyola Marymount University with the goal of offering those in ministry a primer in the "culture, family structure, history, sociology, psychology, economics, and politics of the Hispanic-American as well as an understanding of roles and the place of religion in barrio life."80 Garcia even testified before the United States Equal Employment Opportunity Commission on Religious Accommodation in his capacity as secretary to the Spanish-Speaking Apostolate, arguing that Hispanic Catholics deserved time off work to celebrate the church's holy days of obligation as well as the culturally significant Feast of the Three Kings, Good Friday, and the Feast of Our Lady of Guadalupe.⁸¹

Garcia's is not the only record fraught with contradiction. Many of the bishops later revealed to have played central roles in shielding abusive priests by transferring them into immigrant communities—Cardinal Manning, Archbishop (later Cardinal) Mahony, Bishop Juan Arzube of Los Angeles, and Archbishop Sanchez of Santa Fe, to name only those whose names figure

centrally into Garcia's file—were, during their tenures, also celebrated defenders of immigrant rights. How do we interpret these dissonances? Deeper than mere hypocrisy, such cases exemplify what we might term the missionary contradiction. Inseparable from colonial projects and their legacies, missionary histories are defined by discordant couplings: institutional priority and institutional neglect, evangelization and conquest, care and contempt, ethnic recognition and ethnic containment, familial concern and familial destruction, overtures of solidarity and the violence of rape.⁸² Garcia's abuse cannot be understood apart from his advocacy. Rather than treating these two forms of action as mutually incomprehensible, it is more accurate to contend that they functioned together to produce a distinctly Catholic form of clergy abuse.⁸³ The theology of nearness to the poor, corrupted by clergical privilege refracted through prisms of state and ecclesial dominance, helped to create the conditions for the production of undocumented victims.⁸⁴ By treating immigrant communities as dumping grounds for abusive clergy, bishops participated in the production of the very margins that they both lamented and spiritualized.

Conclusion

The above analysis demonstrates that the term undocumented should be understood less as a passive descriptor of legal status and more as a verb: "to undocument." Throughout the latter half of the twentieth century, legal, social, archival, and spatial undocumentation coalesced to produce invisible victims—survivors whose identities occupied subaltern ranks of the racialized hierarchy of clergy abuse visibility and, consequentially, whose stories were written out of the master narrative of clergy sexual abuse. This "hierarchy of visibility"85 reflects and is shaped by other social hierarchies of race, class, and gender that govern church and society, privileging white people over people of color, middle class and wealthy over poor, men over women, adults over children, suburban over rural and innercity, ordained over lay, citizen over immigrant, English speaker over Spanish speaker, and documented over undocumented. After the Boston Globe's 2002 "Spotlight" reports and again after the release of the Pennsylvania grand jury report, media attention focused largely on prepubescent male victims. The "typical" victim of clergy sex abuse was an altar boy from a white, urban or suburban, middle-class Catholic family. The stories of girls and women, migrants, and Black, Brown, and indigenous victims received little to no public attention.⁸⁶ While journalistic investigations shed light on

particular cases of abuse in minoritized communities, such accounts never found their way into the master narrative of clergy sex abuse in the United States.⁸⁷ For the most part, children and youth from undocumented families remained unaccounted for.

The broad invisibility of undocumented victims not only tells an unfinished story about who survivors are. It also paints a misleading picture of the role of power in such contexts. Power analyses of the crisis often attribute the Catholic church's culture of abuse to clericalism, the notion that ordination and sacramental authority confer upon clergy a superior status to that of laity.⁸⁸ Accordingly, addressing clericalism—that is, correcting what appears to be the primary power imbalance at stake in such cases by equalizing the roles of clergy and laity—would remedy the church's culture of abuse. As the Garcia case reveals, however, such proposals forget that clerical power does not operate in a vacuum. Rather, clericalism gains force by trading on other structures of domination based on race, ethnicity, class, legal status, gender, and age. Similarly, the Garcia case demonstrates that diocesan practices of covering up abuse would have been insufficient had they not intersected with other social hierarchies of (in)visibility. Garcia proceeded with a nearly bottomless well of second chances for two decades not only because he was a priest but because he was a priest in a nation with a carceral immigration system, in a church where the testimony of children was ignored, in an institution that treated immigrant-serving parishes as dumping grounds, in a justice system to which the poor and undocumented lacked access, and in a society where the vulnerable were systemically exploited. Understanding clerical abuse thus requires uncovering the larger matrices of domination that enabled and acted as cover for clerical violence.⁸⁹

Future studies of clergy sexual violence would benefit by critically evaluating the absence of undocumented voices from the historiographies, archival records, legal proceedings, and media reports on which they rely for data. Given the barriers to reporting discussed above, cases of clergy abuse in immigrant communities have been, without question, vastly underreported. Unearthing such cases is not as simple as sifting through clergy files with keyword searches. Like victims themselves, accounts of clergy abuse in immigrant communities often live below the radar. Attending to such testimony—that is, to the presences lingering behind these absences—requires that we avoid mistaking the voices of documents for the voices of victims themselves. The practice of reading between the lines becomes not merely an attempt to connect a diffuse set of dots but a means of witnessing to the undocumented subjects and testimonies hidden within and beyond the records.

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Notes

¹Initial reports refer to the young man as twenty years old, though a follow-up memo clarifies that he was to turn twenty the following week. Msgr. Kane, "Memoranda Re: Call from Sister Manuela," November 7, 1984, Garcia, Peter Edward Clergy Personnel File, BishopAccountability.org, https://www.bishop-accountability.org/news2013/01_02/Exhibit54Original.pdf (hereafter, Garcia Clergy File, BA).

Msgr. Tom Kane to Archbishop Hickey, Memorandum, November 6, 1984, Garcia Clergy File, BA.

³This description of Garcia appears throughout his file, including "Case: (Redacted) (victim) Fr. Peter Garcia (Perpetrator): Interview March 26, 2005 at 10:30 a.m. in the office of (Redacted)," Garcia Clergy File, Roman Catholic Archdiocese of Los Angeles (RCALA). The individual and his brothers were victimized by Garcia from 1975–1977 while students at St. Stephen Martyr School in Monterey Park, CA.

Kane to Hickey, 1.

Kane to Hickey, 2.

⁶The most complete assignment record for Garcia is included in the paperwork sent to Cardinal Joseph Ratzinger and the Congregation for the Doctrine of the Faith as part of the case for Garcia's laicization, November 15, 2004. This record includes assignments in both Los Angeles and New Mexico. Garcia Clergy File, RCALA.

Garcia's abuse likely started prior to his ordination. An initial psychiatric report from Foundation House in Jemez Springs, New Mexico, reports that Garcia also admitted to touching a sixth grader while teaching catechism class as a seminarian. Director (Servants of the Paraclete, Name Redacted) to Cardinal Timothy Manning, February 18, 1985, 3, Garcia Clergy File, BA. The twenty-victim estimate is found in Curry to Mahony, Memorandum Re: Visit to Jemez Springs, May 3, 1987, Fr. Peter Garcia File—Anthony Demarco Release, January 21, 2013, 325, https://www.bishop-accountability.org/docs/los_angeles_1/peter_garcia/LAARCH_018_318_to_319.pdf. See also Saint Luke Institute Medical Director (name redacted) to Most Reverend Roger Mahony, "Re: Monsignor Peter Garcia, SLI #11683," October 7, 1987, Garcia Clergy File, BA; and Memorandum by Msgr. Timothy Dyer for Peter Garcia Clergy File, November 1, 1993, Garcia Clergy File, RCALA.

⁸Saint Luke Institute Medical Director (name redacted) to Most Reverend Roger Mahony, "Re: Monsignor Peter Garcia, SLI #11683," October 7, 1987, Garcia Clergy File, BA.

Servants of the Paraclete, Foundation House, Jemez Springs, New Mexico 87025, "Monsignor Peter Garcia, Psychological Evaluation and Testing Report," November 27, 1984, Garcia Clergy File, BA. Comparing this report with Garcia's assignment record suggests that the case of abuse that prompted this referral took place at St. Anthony Catholic Church in San Gabriel, where he spent only two months (January 1, 1980–March 12, 1980). He was moved to St. Alphonsus Catholic Church in Los Angeles (March 13, 1980–August 21, 1980), and then to St. Marcellinus in Commerce, where he remained as pastor until he was forced to resign (August 22, 1980–November 25, 1984).

¹⁰William D. Perri, SP, cc: Most Rev Robert F. Sanchez, DD, Msgr. Peter Garcia, (Redacted), MD, to Most Rev. Roger Mahony, DD, March 24, 1987, 2–3, Garcia Clergy File, RCALA.

¹¹Archdiocese of Santa Fe, "List of Priests, Deacons, Religious, and Seminarians Accused of Sexual Abuse of Children in Other U.S. Dioceses Who Have Also Ministered/Worked in the Archdiocese of Santa Fe," revised September 4, 2020, https://files.ecatholic.com/17613/documents/2020/9/200904SecondListAccusedinOtherDioceses.pdf?t=1599548791000. Garcia's name had not previously been included in public disclosures by the Archdiocese of Santa Fe. See Tom Sharpe, "Letters Reveal Pedophile Priest Served at N.M. Parishes," *Santa Fe New Mexican*, February 7, 2013, https://www.bishop-accountability.org/news2013/01_02/2013_02_07_Sharpe_LettersReveal.htm.

¹²Curry to Mahony, Memorandum Re: Visit to Jemez Springs, May 3, 1987, Fr. Peter Garcia File—Anthony De Marco Release, January 21, 2013, 325–26, https://www.bishop-accountability.org/docs/los_angeles_1/peter_garcia/LAARCH_018_318_to_319.pdf.

¹³William D. Perri, SP, to Most Rev. Roger Mahony, DD, March 12, 1987, Garcia Clergy File, RCALA.

Saint Luke Institute to Mahony, October 7, 1987, 3.

¹⁵See Kathleen Holscher, "The Trouble of an Indian Diocese: Catholic Priests and Sexual Abuse in Colonized Places," in *Religion and US Empire*, ed. Tisa Wenger and Sylvester Johnson (New York: NYU Press, 2022), 231–52; Kathleen Holscher, "Colonialism and the Crisis Inside the Crisis of Catholic Sexual Abuse," *Religion Dispatches*, August 27, 2018, https://rewirenewsgroup.com/religion-dispatches/2018/08/27/from-pa-to-new-mexico-colonialism-and-the-crisis-inside-the-crisis-of-catholic-sexual-abuse/; and Jack Lee Downey, Colonialism Is Abuse: Reconsidering Triumphalist Narratives in Catholic Studies," *American Catholic Studies* 130, no. 2 (Summer 2019): 16–20. See also

Denise K. Lajimodiere, *Stringing Rosaries: The History, the Unforgivable, and the Healing of Northern Plains American Indian Boarding School Survivors* (Fargo: North Dakota State University Press, 2019). On abuse in Jesuit missions in Alaska, see Tom Curran and Mark Trahent, "The Silence," *Frontline* (April 19, 2011): https://www.pbs.org/wgbh/pages/frontline/the-silence/timeline/; and Lisa Derner, "Jesuit Abuse Settlement Aims to Heal," *Anchorage Daily News*, November 20, 2007, http://www.bishop-accountability.org/news2007/11_12/2007_11_20_Demer_JesuitAbuse.htm.

See, for example, Joseph Chinnici's account of the Franciscan Friars of Santa Barbara in *When Values Collide: The Catholic Church, Sexual Abuse, and the Challenges of Leadership* (Maryknoll, NY: Orbis, 2010); Kevin Lewis O'Neill, "The Unmaking of a Pedophilic Priest: Transnational Clerical Sexual Abuse in Guatemala," *Comparative Studies in Society and History* 64, no. 2 (2020): 745–69; and Tim Sullivan, "A US Priest, A Philippine Village, and Decades of Secrecy," *Associated Press*, September 9, 2019, https://apnews.com/article/philippines-us-news-ap-top-news-international-news-crime-e8c 2209aa8144b6c9bc637cb264dcf79.

See, for example, Aaron Schrank, "How A SoCal Priest Preyed on Two Brothers and Destroyed an Immigrant Family," LAist, 2018, https://laist.com/news/survivor-of-catholic-26, churchs-child-sex-abuse-scandal-calls-for-accountability-in-la; Aaron Schrank, "Immigrant Communities Were the 'Geographic Solution' Priests." Predator National Public Radio, November https://www.npr.org/2018/11/08/665251345/immigrant-2018, communities-were-the-geographic-solution-to-predator-priests; J. D. Long-García, "Is There a Sexual Abuse Reckoning Coming for the Latino Church?" America, August 3, 2018, https://www. americamagazine.org/faith/2018/08/03/there-sexual-abuse-reckoningcoming-latino-church.

In 2003, spurred by the *Boston Globe's* "Spotlight" exposés, California lawmakers created a one-year suspension of statue-of-limitations laws for victims of child sexual abuse, known as a "lookback window." In 2007, a \$660 million legal settlement against the Archdiocese of Los Angeles representing 508 victims mandated the public release of internal records on priests accused of sexually abusing minors. The archdiocese took six years to comply with the settlement, finally releasing the files in 2013.

This version of the file, drawn from legal evidence, redacts names of victims, their families, and medical personnel, but beyond these redactions, it includes full text of most documents. It also includes dozens of documents left out of the Archdiocesan disclosure, including many in which chancery authorities correspond

internally about potential legal culpability and the need to keep Garcia out of state. This file contains, in error, an unredacted mention of a victim's name. I will not use it here. I am indebted to Terence McKiernan for his ongoing work in maintaining this unparalleled archive of clergy files, news reports, legal documents, and other records related to the clergy sexual abuse crisis.

While such accounts are too numerous to name, certain cases serve to illustrate larger patterns. In addition to Garcia, priests in the Archdiocese of Los Angeles known to have targeted immigrant youth for abuse include Michael Baker (ordained 1974), Carlos Rodriguez (ordained 1986), and Fernando Lopez (ordained 2000). Similar accounts exist in dioceses throughout the United States. In the Archdiocese of Miami, Fr. Ernesto Garcia-Rubio (ordained 1963) abused Salvadoran and Nicaraguan refugee boys and other male teenage immigrants, and was sent for a time to Cuba, Colombia, and Honduras. In the Diocese of Dallas, Fr. Justin Joseph Lucio (ordained 1972) was assigned to unsupervised ministry at Casita Maria, an organization dedicated to assisting undocumented immigrants, after being accused in 1989 of abusing immigrant youths. In the Texas borderland diocese of Brownsville, nearly half of credibly accused priests were ordained elsewhere and were "dumped" on immigrant parishes in the poor, remote diocese. Crucially, the intentional targeting of vulnerable immigrant youth was not limited to the West and Southwest. In the Diocese of Brooklyn, New York, for example, Rev. Adam Prochaski (ordained 1968) abused hundreds of girls at Holy Cross parish and school in Queens, many of them Polish immigrants whose families Prochaski had helped bring to the United States.

²¹Inna Levy and Eyal Eckhaus, "Rape Narratives Analysis through Natural Language Processing: Survivor Self-Label, Narrative Time Span, Faith, and Rape Terminology," *Psychological Trauma: Theory, Research, Practice, and Policy* 12, no. 6 (2020): 635–42.

"Brian J. Clites, "A Theology of Voice: VOCAL and the Catholic Clergy Abuse Survivor Movement," *U.S. Catholic Historian* 40, no. 1 (Winter 2022): 81.

²⁵Kaitlin M. Boyle and Kimberly B. Rogers, "Beyond the Rape 'Victim'-'Survivor' Binary: How Race, Gender, and Identity Processes Interact to Shape Distress," *Sociological Forum* 35, no. 2 (February 18, 2020): 323–45; and Jan Jordan, "From Victim to Survivor—and from Survivor to Victim: Reconceptualising the Survivor Journey," *Sexual Abuse in Australia and New Zealand* 5, no. 2 (December 2013): 48–56.

²⁴Amy Reed-Sandoval, *Socially Undocumented: Identity and Immigration Justice* (New York: Oxford University Press, 2020), 81ff.

²⁵Reed-Sandoval, Socially Undocumented, 7.

²⁶The 2011 John Jay study on the causes of clergy sexual abuse noted that, because priests often function as father figures in families, certain similarities exist between clergy sexual abuse and intrafamiliar sexual abuse. See Karen J. Terry et al., "The Causes and Context of Sexual Abuse of Minors by Catholic Priests in the United States, 1950–2010: A Report Presented to the United States Conference of Catholic Bishops by the John Jay College Research Team" (Washington, DC: United States Conference of Catholic Bishops, 2011), 22. On how dependence in intimate relationships leaves undocumented immigrants "stuck," see Joanna Derby, *Everyday Illegal: When Policies Undermine Immigrant Families* (Oakland: University of California Press, 2015), 57–97.

This cultivation of familial trust is a through-line in the testimony of multiple victims and their families in Garcia's personnel file. See, for example, the interview transcript attached to "Archdiocese of Los Angeles Child Abuse and Neglect Non-Mandatory Reporting Form," March 26, 2005, documenting multiple incidents of abuse in 1975–1977; Memorandum, Msgr. Timothy Dyer, November 1, 1993, Garcia Clergy File, RCALA. The memo details a report of abuse of multiple sons from one family dating back to the early 1970s.

This victim, who was abused around age ten, came forward in 1992 at age twenty-two.

²⁹Garcia to (redacted, mother of victim), August 28, 1975, Garcia Clergy File, BA; Saint Luke Institute to Mahony, October 7, 1987, 3; and "Accusations against the Cleric," in documentation sent to Cardinal Joseph Ratzinger and the Congregation for the Doctrine of the Faith as part of the case for Garcia's laicization, November 15, 2004; Meeting with (illegible), (Redacted), Curry, Father, Mother, (Redacted), Uncle, (Redacted) child of Mr. and Mrs. (Redacted)," August 31, 1988, 10 a.m., Garcia Clergy File, BA.

See, for example, David Becerra, M. Alex Wagaman, David Androff, et al., "Policing Immigrants: Fear of Deportations and Perceptions of Law Enforcement and Criminal Justice," *Journal of Social Work* 17, no. 6 (2017): 715–31; Cecilia Menjívar, William Paul Simmons, Daniel Alvord, and Elizabeth Salerno Valdez, "Immigration Enforcement, The Racialization of Legal Status, and Perceptions of the Police: Latinos in Chicago, Los Angeles, Houston, and Phoenix in Comparative Perspective," *Du Bois Review* 15, no. 1 (2018): 107–28; and Nik Theodore and Robert Habans, "Policing Immigrant Communities: Latino Perceptions of Police Involvement in Immigration Enforcement, *Journal of Ethnic and Migration Studies* 42, no. 6 (2016): 970–88.

³¹It should be acknowledged that, among U.S. citizens, power disparities based on race and class also shape access to the justice system. Undocumented migrants are not alone in their lack of access to the legal system, but the profound level of risk involved in coming forward is unique in their situations. In addition, race, class, country of origin, and other factors also shape the treatment of undocumented migrants by law enforcement.

Devlin Barrett, "DHS: Immigration Agents May Arrest Crime Victims, Witnesses at Courthouses," Washington Post (April 4, 2017).

Micaela Crisma, Elisabetta Bascelli, Daniela Paci, and Patrizia

Micaela Crisma, Elisabetta Bascelli, Daniela Paci, and Patrizia Romito, "Adolescents Who Experienced Sexual Abuse: Fears, Needs and Impediments to Disclosure," *Child Abuse and Neglect* 28 (2004): 1035–48. See also Courtney E. Ahrens, Laura Carolina Rios-Mandel, Libier Isas, Maria del Carmen Lopez, "Talking about Interpersonal Violence: Cultural Influences on Latinas' Identification and Disclosure of Sexual Assault and Intimate Partner Violence," *Psychological Trauma: Theory, Research, Practice, and Policy* 2, no. 4 (2010): 284, 288–91.

³⁴Marilyn Frye, *The Politics of Reality: Essays in Feminist Theory* (Berkeley: Crossing Press, 1983), 4.

Most Rev. Roger Mahony to Mr. Antonio H. Rodriguez, October 7, 1985, Garcia Clergy File, BA.

³⁶J. J. Brandlin to Mr. Antonio H. Rodriguez, November 27, 1985, Garcia Clergy File, BA.

³⁷Mary Gail Frawley-O'Dea, "Preface: From the Bayou to Boston: History of a Scandal," in *Predatory Priests, Silenced Victims: The Sexual Abuse Crisis and the Catholic Church*, ed. Mary Gail Frawley-O'Dea and Virginia Goldner (London: Routledge, 2016), xii.

"Considered as a whole, documents in Garcia's file convey an overarching sense of what philosopher Kate Manne calls *himpathy*, "the excessive sympathy shown toward male perpetrators of sexual violence." See Kate Manne, *Down Girl: The Logic of Misogyny* (New York: Oxford University Press, 2018).

³⁹See Kimberlé W. Crenshaw, "Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory, and Antiracist Policies," *University of Chicago Legal Forum* 1989, no. 1 (1989).

⁴⁰For example, Mexican and Mexican American cultural attitudes toward the priesthood would have shaped power dynamics in this case. On one hand, Mexicano Catholicism is often associated with an elevated view of clerical superiority. Perhaps Garcia would have been acting not only out of his own clerical conditioning but also with a strategic awareness of the exalted status of clergy within Mexicano religiosity and thus in the eyes of his victims' mothers. At

the same time, as theologian Allan Figueroa Deck points out, many Latinas/os approach clericalism from a distinctive extrainstitutional vantage point. In Latinx Catholic communities, popular religion has historically functioned as a counterdynamic to the clerical monopoly over religious power in Latinx Catholic communities. In general, Deck argues, Latinx Catholics are less focused on the institutional church than Euro-American Catholics tend to be. Abuses of power by clergy, then, are viewed less as institutional failings or legal matters and more as family issues. See Allan Figueroa Deck, "Latino Migrations and the Transformation of Religion in the United States: Framing the Question," in Christianities in Migration: The Global Perspective, ed. Peter C. Phan and Elaine Padilla (New York: Palgrave MacMillan, 2016), 265; and Orlando Espín, The Faith of the People: Theological Reflections on Popular Catholicism (Maryknoll, NY: Orbis, 1997). See also Deck's explanation of this dynamic in Soli Salgado and Maria Benevento, "Culture Plays Role in US Hispanics' Muted Response to Abuse Crisis," National Catholic Reporter, November 13, 2018, https://www.ncronline.org/news/accountability/culture-playsrole-us-hispanics-muted-response-abuse-crisis.

⁴¹Garcia to Manning, cc. Arzube, May 9, 1985, 2, Garcia Personnel File, BA.

Garcia to Sanchez, April 1, 1987, Garcia Clergy File, BA.

⁴³Saint Luke Institute to Mahony, October 7, 1987, 3.

⁴⁴Saint Luke Institute to Mahony, October 7, 1987; Servants of the Paraclete, "Monsignor Peter Garcia, Psychological Evaluation and Testing Report," November 27, 1984.

Kane to Hickey, 2.

Memorandum, "Re: Archbishop Hickey's Memorandum to Card. Manning," November 16, 1984, Garcia Clergy File Supplement, BA.

⁴⁷Kane to Hickey, 2; "Memoranda Re: Call from Sister Manuela," November 7, 1984, Garcia Clergy File Supplement, BA.

⁴⁸See, for example, John Jay College of Criminal Justice, *The Nature and Scope of Sexual Abuse of Minors by Catholic Priests and Deacons in the United States*, 1950–2002 (Washington, DC: United States Conference of Catholic Bishops, 2004), 66, 74–75; and Douglas E. Noll and Linda Harvey, "Restorative Mediation: The Application of Restorative Justice Practice and Philosophy to Clergy Sexual Abuse Cases," *Journal of Child Sexual Abuse* 17, no. 3–4 (2008): 377–96.

**Redacted (Clinical Psychologist), "Confidential Client Information, Re: Monsignor Peter Garcia," February 4, 1989, 6, Garcia Clergy File, RCALA.

"Meeting with (illegible), (Redacted)."

⁵¹"Meeting with (illegible), (Redacted)," 2: Mrs. (Redacted): "We don't want them to take Fr. Garcia 'prisoner.' We see priests, even Fr. Garcia, as servants of God. We just don't want Fr. Garcia in the area because (Redacted) is very upset when he is aware of Fr. Garcia being around. We want (Redacted) to be helped."

Mrs. (Redacted): "If Fr. Garcia is reported, we will testify for mercy."

²Reed-Sandoval, *Socially Undocumented*, 8.

⁵³Kane, "Memorandum to Archbishop Hickey," November 6, 1984; Kane, "Memoranda Re: Call from Sister Manuela," November 7, 1984; "Meeting with (illegible), (Redacted)," August 31, 1988; Memorandum from Monsignor Timothy Dyer, November 1, 1993; "Case: (Redacted) (victim) Fr. Peter Garcia (Perpetrator), March 26, 2005."

⁵⁴John P. McNicholas to Alix Evans, Esq., June 3, 1992, 1, Garcia Clergy File, BA.

⁵⁵Brian J. Clites, "A Theology of Voice"; Clites, "Soul Murder: Sketches of Survivor Imaginaries," *Exchange* 48 (2019): 268–79; and Clites, "Our Accountability to Survivors," *American Catholic Studies* 130, no. 2 (Summer 2019): 4–7.

The earliest use of the term dumping ground to refer specifically to a place where sexually deviant clergy are transferred that I have encountered is in an 1898 essay in The Atlantic about the poor state of religiosity in Montana. The term's racialized associations are evident in this early account: "The denominations have made Montana their ministerial ash-heap dumping-ground. Upon it they have flung their outcast clergyvicious men, disgraced men, renegades of all shades and colors. In Sapphira, . . . Chinamen, Indians, and ministers rank about alike." Rollin Lynde Hartt, "The Montanians," The Atlantic 81 (1898): 739. The term geographic solution, now widely used, was coined by legal expert and clergy abuse victim advocate Patrick J. Wall in the early 2000s. See Patrick J. Wall (blog), November 7, 2019, https:// patrickjwall.wordpress.com/2019/11/07/geographic-solution/.

"Ton Alaska, see Tom Curran and Mark Trahent, "The Silence," Frontline, April 19, 2011, https://www.pbs.org/wgbh/pages/frontline/the-silence/timeline/; and Lisa Derner, "Jesuit Abuse Settlement Aims to Heal," Anchorage Daily News, November 20, 2007, http://www.bishop-accountability.org/news2007/11_12/2007_11_20_Demer_JesuitAbuse.htm. On Gallup, see Holscher, "The Trouble of an Indian Diocese: Catholic Priests and Sexual Abuse in Colonized Places," and "The Catholic Anatomy of a Dumping Ground: Thinking Across the Catholic-ness and the Coloniality of Sexual Abuse in Indian Country," public address, Gonzaga University, April 1, 2022. On Santa Fe, see Holscher, "Colonialism and the Crisis

Inside the Crisis of Catholic Sexual Abuse." On Great Falls-Billings, see Seaborn Larson, "Montana Reservations Reportedly 'Dumping Grounds' for Predatory Priests," *Great Falls Tribune*, August 16, 2017, https://www.greatfallstribune.com/story/news/2017/08/16/montanas-reservations-were-dumping-grounds-predatory-priests-suit-alleges/50457 6001/. On Honolulu, see James Dearie, "Honolulu Diocese Was a 'Dumping Ground for Troubled Clerics,' Abuse Report Says," *National Catholic Reporter*, July 13, 2018, https://www.ncronline.org/news/accountability/honolulu-diocese-was-dumping-ground-troubled-clerics-abuse-report-says.

[™]Jack Downey, "The Heretic Jim Poole, Asceticism and Abuse in the Alaskan Missions" (Gender, Sex, and Power: Towards a History of Clergy Sex Abuse in the U.S. Catholic Church, University of Notre Dame, March 28, 2022).

See, for example, Deborah Kanter, "Making Mexican Parishes: Ethnic Succession in Chicago Churches, 1947–1977," U.S. Catholic Historian 30, no. 1 (Winter 2012): 35–58.

⁶⁰Susan Bigelow Reynolds, *People Get Ready: Ritual, Solidarity, and Lived Ecclesiology in Catholic Roxbury* (New York: Fordham University Press, 2023), 92–96, 104–107, 242 fn. 58.

Tia Noelle Pratt, "Liturgy as Identity Work in Predominately African American Parishes," in *American Parishes: Remaking Local Catholicism*, ed. Gary Adler Jr., Tricia C. Bruce, and Brian Starks (New York: Fordham University Press, 2019), 144–45; Susan Bigelow Reynolds, "'This is Not Nostalgia': Contesting the Politics of Sentimentality in Boston's 2004 Parish Closure Protests," *U.S. Catholic Historian* 41, no. 1 (Winter 2023): 71–92.

⁶²Garcia's file is at times explicit about the rationale for his transfers. In 1976, for example, the pastor of St. Polycarp in Stanton, California, where Garcia had been serving since the previous year, contacted the chancery with concerns about Garcia's conduct. Bishop Juan Arzube—also later accused of committing and covering up abuse—recommended Garcia be transferred to St. Francis X. Cabrini, another predominately Mexican American parish and school in South Los Angeles "because of the distance." Instead, he was transferred even farther away to Holy Family in Glendale, forty miles north. Msgr. Rawden, Summary of St. Polycarp pastor report to Manning, March 9, 1976, Garcia Clergy File, RCALA.

It is important to note that, while archdiocesan records suggest that they first received an official report of Garcia's abuse in 1984, multiple victims testified to reporting Garcia to various church officials throughout the 1970s and 1980s, prompting his many assignment shifts.

⁶⁴Archdiocese of Santa Fe, List of Priests, Deacons, Religious, and Seminarians Accused of Sexual Abuse of Children, Rev. January 4, 2022, https://archdiosf.org/documents/2022/1/220104List%20of%20Priests%20Accused%20of%20Sexual%20Abuse-2.pdf.

⁶⁵Rebecca Moss, "Ex-treatment Center for Priests in Jemez Springs Sued," *Associated Press*, May 17, 2019, https://apnews.com/article/0edfaa057d104b949038daf4554ab864.

⁶⁶Redacted (report from Msgr. Rawden, reporting for Manning) to Garcia, May 7, 1985, Garcia Clergy File, BA.

Perri to Mahony, March 12, 1987, 2, Garcia Clergy File, BA.

⁶⁸Curry to Mahony, Re: Visit to Jemez Springs, May 3, 1987, Garcia Clergy File, BA. Emphasis mine.

"See "General Questions about Handling the Cases," in "Clergy Files Produced by Archdiocese of Los Angeles," *Archdiocese of Los Angeles*, accessed May 25, 2022, https://clergyfiles.la-archdiocese.org/listing.html.

"Holscher, "Colonialism and the Crisis Inside the Crisis of Catholic Sexual Abuse," and Holscher, "The Catholic Anatomy of a Dumping Ground."

"Holscher, "The Catholic Anatomy of a Dumping Ground," and Holscher, "The Trouble of an Indian Diocese."

Dyan Elliott, *The Corrupter of Boys: Sodomy, Scandal, and the Medieval Clergy* (Philadelphia: University of Pennsylvania Press, 2020). In a 2004 petition to the Vatican Congregation for the Doctrine of the Faith, Mahony cited scandal as a reason that Garcia should be laicized. See Mahony to Ratzinger, November 15, 2004, Bishops' *Votum*.

⁷³While these represent distinct theological trajectories, their confluence in the post-Vatican II cultural turn is significant. For touchstone representations of these currents, see, on Latin American liberation theology, Gustavo Gutierrez, A Theology of Liberation (Maryknoll, NY: Orbis, 1973); on the influence of the Latin American church on the development of Catholic Social Teaching, CELAM, The Documents of Medellín, 1968, and CELAM, the Documents of Puebla, 1979; and on inculturation, Pedro Arrupe, SJ, "On Inculturation, to the Whole Society," Boston College Institute for Advanced Jesuit Studies, May 14, 1978, https://jesuitportal.bc.edu/ research/documents/1978_arrupeinculturationsociety/; and Anscar J. Chupungco, OSB, Cultural Adaptation of the Liturgy (Mahwah, NJ: Paulist Press, 1982). On Catholic commitments to the Sanctuary Movement, see Carlos Ruiz Martinez, "The Question of Sanctuary: The Adorers of the Blood of Christ and the U.S. Sanctuary Movement, 1983–1996," U.S. Catholic Historian 38, no. 4 (Fall 2020): 53-70. On the commitments of the U.S. Bishops during this period,

see NCCB, The Bishops Speak with the Virgin: A Pastoral Letter of the Hispanic Bishops of the United States (1982), and NCCB, The Hispanic Presence: Challenge and Commitment (1983).

⁷⁴Mario J. Paredes, The History of the National Encuentros: Hispanic Americans in the One Catholic Church (Mahwah, NJ: Paulist Press, 2014).

See, for example, Virgilio Elizondo, Galilean Journey: The Mexican-American Promise (Maryknoll, NY: Orbis, 1983).

"See, for example, the Roxbury Apostolate in the Archdiocese of Boston, which in 1964 called on priests to submit applications to serve "Negroes, Puerto Ricans, Cubans, and others" living in Boston's inner cities. Reynolds, *People Get Ready*, 96–107; and Susan Bigelow Reynolds, "Solidarity as Slow Conversion," *Missiology* 51, no. 1 (January 2023): 31–45.

"Clergy Assignment Record (Detailed), Mr. Peter E. Garcia, Clergy Personnel File, Rev. Peter Garcia, Roman Catholic Archdiocese of Los Angeles, http://www.bishop-accountability.org/news2013/01_02/GarciaPeter.pdf.

⁷⁸El Visitante Dominical, published by Our Sunday Visitor. Résumé, Reverend Peter E. Garcia, 1, Garcia Clergy File, BA.

Résumé, Reverend Peter E. Garcia; cf. Paredes, *The History of the National Encuentros*; Luis A. Tampe, Encuentro Nacional Hispano de Pastoral (1972–1985): An Historical and Ecclesiological Analysis (PhD diss., The Catholic University of America, Washington, DC, 2014), 208, 209, 219 fn88. Curiously, primary documents from the Encuentro process refer to him as Rev. Pedro Garcia, a name that does not appear anywhere else in his record. Triangulating his role as Secretary to the Region XI Commission for the Spanish Speaking during those years—a role that is stated in his clergy file résumé and in Encuentro histories—and mentions of his appearance at the forty-first International Eucharistic Congress in Philadelphia in 1976 allows us to be sure that "Rev. Pedro Garcia" refers to the same Peter E. Garcia. As far as I can tell, this is the first analysis to make this connection.

⁸⁰"The Program Exchange," Journal of Continuing Higher Education 28, no. 2 (1980): 25–27.

⁸¹United States Equal Employment Opportunity Commission, Hearings before the United States Equal Employment Opportunity Commission on Religious Accommodation (1978), 169. Garcia testified during the Los Angeles phase of the hearings held on April 18, 1978.

⁸²This analysis follows an overarching theme in borderland, postcolonial, and Latinx literatures, of irreconcilable contradictions stemming from histories of conquest and colonization. Gloria Anzaldúa describes these contradictions, symbolized by the border

itself, as una herida abierta, an open wound, but, drawing on José Vasconcelos, maintains the possibility for future transformation in mestizaje, the synthesis of these contradictions. Initial theological adoptions of mestizaje, as in the work of Elizondo, went further, claiming mestizaje as a symbol of reconciliation. Nestor Medina has critiqued this view, arguing that cultural, ethnic, and geographical legacies of conquest cannot be covered over by idealized, universalized synthesis. Contradictions remain. It should be noted that Elizondo himself arguably embodied the very contradiction his work helps to illuminate. A legendary pastoral leader and theologian, especially for the Hispanic Catholic community in San Antonio, in May 2015 Elizondo was named in a lawsuit by a man who reported that, as a boy, Elizondo kissed and fondled him when he went to Elizondo in 1983 to report abuse by another priest. Elizondo vigorously denied the accusation. He died by suicide the following year, leaving a painful and ambiguous legacy. See José Vasconcelos, La Raza Cosmica, bilingual edition (Los Angeles: State University, 1979 [1925]); Gloria Anzaldúa, California Borderlands/La Frontera (San Francisco: Aunt Lute Books, 1987); Virgilio P. Elizondo, The Future Is Mestizo: Life Where Cultures Meet, rev. ed. (Louisville: University Press of Colorado, 2000); and Nestor Medina, Mestizaje: Remapping Race, Culture, and Faith in Latina/o Catholicism (Maryknoll, NY: Orbis, 2009).

Bere I am referencing the question that Robert A. Orsi has posed to scholars studying clergy sexual abuse: "What is *Catholic* about clergy sexual abuse?" See Orsi, *History and Presence* (Cambridge, MA: Harvard University Press, 2016), 216; and Orsi, "The Study of Religion on the Other Side of Disgust," *Harvard Divinity Bulletin*, Spring/Summer 2019, https://bulletin.hds.harvard.edu/the-study-of-religion-on-the-other-side-of-disgust/.

⁸⁴I am grateful to Lucila Crena for this insight.

Kevin Haggerty, "Tear Down the Walls: On Demolishing the Panopticon," in *Theorizing Surveillance*, ed. David Lyon (London: Willan, 2006), 29; cited by Rebecca M. Schreiber, *The Undocumented Everyday: Migrant Lives and the Politics of Visibility* (Minneapolis: University of Minnesota Press, 2018), 235.

Tia Noelle Pratt, "Black Catholics, Racism, and the Sex Abuse Crisis: A Personal Reflection," *The Revealer*, March 2, 2020, https://therevealer.org/black-catholics-racism-and-the-sex-abuse-crisis-apersonal-reflection/; Holscher, "Colonialism and the Crisis Inside the Crisis of Catholic Sexual Abuse."

"Examples of media accounts include William Lobdell, "Missionary's Dark Legacy," Los Angeles Times, November 19, 2005, https://www.latimes.com/archives/la-xpm-2005-nov-19-me-

alaska19-story.html; Michael Biesecker, "Guam's Ex-archbishop Shielded Culture of Clergy Sex Abuse," *Associated Press*, August 9, 2019, https://apnews.com/b8442f05def44d1ea79b9e6805da4e0c; Michael Rezendes, "In Mississippi Delta, Catholic Abuse Cases Settled on Cheap," *Associated Press*, August 27, 2019, https://apnews.com/d766d24d79f74e2ba1012358b47cb640; and Gary Fields, Juliet Linderman, and Wong Maye-E, "Church Offers Little Outreach to Minority Victims of Priests," *Associated Press*, January 4, 2020, https://apnews.com/00a7a65248e88ccf3e9dcd2b6054bbdc.

See, for example, Thomas P. Doyle, "Clericalism and Catholic Clergy Sexual Abuse," in *Predatory Priests, Silenced Victims*, 16–24; and Katharine Westerhorstmann, "Contributions towards a Structural Analysis of the Catholic Abuse Crisis," *Church Life Journal*, November 7, 2018, https://churchlifejournal.nd.edu/articles/contributions-towards-a-structural-analysis-of-the-catholic-abuse-crisis/.

Patricia Hill Collins, Black Feminist Thought: Knowledge, Consciousness, and the Politics of Empowerment (Boston: Unwin Hyman, 1990): 221–38. See also Devon W. Carbado, Kimberlé Williams Crenshaw, Vicki M. Mays, and Barbara Tomlinson, "Intersectionality: Mapping the Movements of a Theory," Du Bois Review 10, no. 2 (2013), 304; and Kimberlé W. Crenshaw, "Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory, and Antiracist Policies," University of Chicago Legal Forum 139 (1989). See also Meredith Edelman, "An Unexpected Path: Bankruptcy, Justice and Intersecting Identities in the Catholic Sexual Abuse Scandals," Australian Feminist Law Journal 41, no. 2 (2015): 271–72.

⁹⁰See J. D. Long-García, "Is There a Sexual Abuse Reckoning Coming for the Latino Church?" *America*, August 3, 2018, https://www.americamagazine.org/faith/2018/08/03/there-sexual-abuse-reckoning-coming-latino-church.

ABSTRACT Clergy sexual violence in immigrant communities is an understudied dimension of the sexual abuse crisis in the Roman Catholic church. Yet records suggest that bishops regularly treated immigrant-serving parishes as dumping grounds for serially abusive clergy. There, evidence suggests, abusers targeted minors from poor, vulnerable, and undocumented families, silencing victims with threats of deportation and further violence. How did legal status intersect with structures of state and ecclesial power and with social hierarchies of visibility in situations of clergy abuse? Centering the case of Msgr. Peter E. Garcia, a priest in the

Archdiocese of Los Angeles who abused at least twenty boys between 1966 and 1987, this article examines archival evidence from unsealed clergy personnel files to interrogate the complex politics of documentation in the case. It attends to the relationship between three interwoven forms of (un)documentation: first, the precarious legal and social status of victims; second, the silences, redactions, and euphemisms that characterize church records containing these accounts; and third, the spatial undocumentation at work in the use of migrant parishes as clergy dumping grounds. It demonstrates how a post–Vatican II theological and pastoral imagination of intimacy with the poor, refracted through prisms of state, ecclesial, and clerical dominance, helped to create conditions for the production of invisible victims. The erasure accomplished through the overlapping forms of undocumentation in the Garcia case, it argues, can help to account for the absence of such stories from the broader narrative of Catholic clergy sexual abuse in the United States.