

**CLERGY SEXUAL ABUSE OF WOMEN:
SOME HISTORICAL PERSPECTIVES**

By Gary R. Schoener

12-year-old killed for having sex; her mother is charged read the small headline in a January 15, 2005 Associated Press story out of Birmingham, Alabama which was published in the Minneapolis Star Tribune (page A 12). The brief text told of “a woman angry with her 12-year-old daughter for having sex” who killed her daughter in a gruesome fashion. The story did not reveal with whom she had sex or give any clues as to why the anger was not directed at the boy or man who sexually exploited the little girl.

Bizarre and troubling, but sadly not a unique story or one without precedent. “Honor killings” of women for extra-marital or pre – marital sex occur in many cultures, and the blaming of even young girls for having sex is commonplace throughout the world. This not a question as to how human societies got to this point, but rather why we have not moved beyond it. This broader context is the backdrop for understanding our failure to properly respond to the problem of sexual exploitation of girls and women by clergy and other persons in a position of power.

**We shall not cease from exploration
And the end of all our exploring
Will be to arrive where we started
And know the place for the first time.**

T.S. Elliot, "Little Gidding"
(Gardner, 1987, p.897)

The dilemma of sexual exploitation of women by professionals pre-dates the history of the church itself. The earliest concerns about physician-patient sex in a written text are to be found in the **Corpus Hippocratum**, a body of about 70 medical texts compiled by the Library of Alexandria in Egypt during the 4th and 5th centuries B.C. (Lloyd, 1983).

It is not known how many of these works can actually be attributed to Hippocrates, who lived from 460 to 370 B.C., although it is quite likely that he did not write the most famous item in the Corpus, the Oath which is usually attributed to him (Lloyd, 1983). In both the "Oath" and "The Physician," doctor-patient sexual intimacy is discussed. The "Oath," usually referred to as the Hippocratic Oath, was states in part:

**. . . with purity and holiness I will practice my art Into whatever house I
enter I will go into them for the benefit of the sick and will abstain from every
voluntary act of Mischief and Corruption and further from the seduction of
females or males, of freemen and slaves. . . .** (Braceland, 1969, p. 236)

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but not widely reported. A review of child sexual abuse by Roman Catholic priests notes that during that period the Church took a traditional stance that clerics were the responsibility of the Church and, in theory, were not subject to secular law. The prosecutions that took place were tried in ecclesiastical courts under Cannon Law. (Stark, 1989, p. 793)

It is unclear what impact on such behavior the advent of the celibacy vows had as they evolved. A number of historians link this development to a concern about possible claims on the assets of the church by widows and offspring of priests as property rights of women and children were recognized in Europe (Sipe, 1990).

The issues of sexual exploitation of women by professionals again emerges in the literature near the end of the 18th Century. Concern about physicians taking sexual advantage of their patients through the misuse of mesmerism (hypnosis) was voiced in 1784 by a Commission of Inquiry headed by Benjamin Franklin, which, in a secret report to the French King, Louis XVI, stated:

. . . the danger exists. . . since the physician can, if he will, take advantage of his patient. . . . Even if we ascribe to him superhuman virtue, since he is exposed to emotions which awaken such desires, the imperious law of nature will affect his patient, and he is responsible, not merely for his own wrong-doing, but for that he may have excited in another. (Franklin, de Bory, Lavoisier, Bailly, Majault, Sallin, d'Arcet, Guillotin, & Le Roy, 1965, p. 6)

Perry (1979) notes that at ". . . the time the report was written. . . medical doctors enjoyed a bad reputation in the eyes of a significant segment of the lay public." (p. 188)

In 2003 Karin Gedge, an assistant history professor at West Chester University in Pennsylvania, published **Without Benefit of Clergy: Women and the Pastoral Relationship in Nineteenth-Century American Culture**. She examines the perceptions of experiences of women in relationship to their pastors during the most of the 19th century. As part of her discourse, she examines some trials which occurred during this period in American history. One such case was the trial of a Methodist pastor in Rhode Island who was accused of murdering an unmarried mill worker, Sarah Cornell, who had claimed that he was the father of her child. This case was not only a major focus of media attention, but led to songs, poems, and even a play. The defense successfully trashed the victim, impugning her morals, and the pastor was acquitted.

Gedge (2003) also reviewed another highly publicized trial – the ecclesiastical trial of the Right Reverend Benjamin Onderdonk, Episcopal Bishop of the State of New York. Four women accused him of fondling them and sexually groping their bodies. In the absence of a concept like “sexual harassment” this case ended in a middle of the road verdict in which the Bishop was allowed to keep his title and salary and residence, although he had to surrender his duties as bishop.

Two cases in the same era involved charges of adultery against pastors – the Kalloch case and the Beecher case. The 1857 criminal case brought against Isaac Kalloch, a Baptist Pastor in Boston, resulted in his acquitted of the charge committing adultery with a woman who was a parishioner. The victim was vilified, as usual.

By the way, in Minnesota, and in a number of states, adultery is still a crime. I was not aware of this until the sentencing phase of the trial of pastor Robert Eugene Dutton in Nicollet County when to the

shock and dismay of many Judge Noah Rosenbloom sentenced Dutton to only 90 days in jail instead of the 2 year sentence which was expected. The Judge noted in this downward departure that the victim was guilty of adultery.

After verifying the accuracy of the newspaper accounts both I and Ellen Luepker filed complaints against the judge with the Minnesota Board on Judicial Standards who declined to discipline him. Privately in a phone call the judge admitted that given his logic, it was a less serious crime to rape a married woman. (Schoener et. al, 1989, pp. 558-559, 565) Judith Janssen, the remarkable woman who was the victim in this case, nonetheless, was undaunted and wrote:

There have been countless times during the past few years when I have cried out to the Lord about our ever moving to St. Peter. I can now gratefully acknowledge that it was in Minnesota, after August 1985, that the abuse occurred. If this had occurred earlier, or in most other states, I might still be struggling to sort out what happened. (Schoener et. al., 1989, p. 837)

Henry Ward Beecher (1813-1887), brother of feminist and author of **Uncle Tom's Cabin**, Harriet Beecher Stowe, was "one of the premier preachers in the late nineteenth century," according to the **Dictionary of Christianity in America** (Reid, Linder, Shelley, Stout, 1990). At the height of his distinguished career and pastoral influence, Beecher counseled Elizabeth Tilton, the wife of a friend, who was grieving the death of her infant. Beecher sexually exploited Ms. Tilton and cautioned her not to tell anyone about it (Morey, 1988).

In 1872 journalist Victoria Woodhull published the story of the relationship and was sued for libel and jailed. A congregational investigating committee, ignoring "almost irrefutable evidence," not only exonerated Beecher but expressed towards him "sympathy more tender and trust more unbounded" than before (Morey, 1988, p.868). In a sad twist of fate the journalist Victoria Woodhull had a romantic involvement with Mr. Tilton. (Gabriel, 1998) Elizabeth Tilton was excommunicated in 1878 and died blind and alone. Beecher's career was not significantly affected (Waller,1982).

The issue of sexual contact between a pastor and his female parishioners was also the subject of a number of works of fiction. **The Scarlet Letter** by Nathaniel Hawthorne, published in 1850, described the shame of a young woman, Hester Prynne, who was forced to wear the scarlet letter "A" (for adulteress) after having been made pregnant by a clergyman, Arthur Dimmesdale. The pastor escaped public disgrace, but not negative emotional consequences. When Hester inquired as to whether the good works he had done in the church among those who revered him had brought him any comfort, Dimmesdale replied:

As concerns the good which I may appear to do, I have no faith in it. It must needs be a delusion. What can a ruined soul, like mine, effect towards the redemption of other souls?--or a polluted soul, towards their purification? And as for the people's reverence, would that it were turned to scorn and hatred! Canst thou deem it, Hester, a consolation, that I must stand up in my pulpit, and meet so many eyes turned upward to my face, as if the light of heaven were beaming from it!--and then look inward, and discern the black reality of what they idolize? I have laughed, in bitterness and agony of heart, at the contrast between what I seem and what I am! And Satan laughs at it! (Hawthorne, 1991, p.134)

Romance novels of the late 19th and 20th century typically portrayed pastors as boyish and innocent men, pursued by women who sought to seduce them and whose clutches they barely managed to escape (Morey, 1988). For example, Corra Harris' **A Circuit Rider's Wife**, published in 1910 (and serialized in the **Saturday Evening Post** the same year), includes the following narration by Mary, wife of a Methodist minister:

...when we hear of a minister who has disgraced himself with some female member of his flock, my sympathies are all with the preacher. I know exactly what has happened. Some sad-faced lady who has been "awakened" from a silent, cold, backslidden state by his sermons goes to see him in his church study. (They who build studies for their preachers in the back part of the church surround him with four walls of moral destruction and invite it for him. The place for a minister's study is in his own home, with his wife passing in and out, if he has female spiritual invalids calling on him.)

This lady is perfectly innocent in that she has not considered her moral responsibility to the preacher she is about to victimize. She is very modest, really and truly modest. He is a little on his guard until he discovers this. First, she tells him that she is unhappy at home....

...He sees her reduced to tears over her would-be transgressions, and before he considers what he is about he has kissed the "dear child." That is the way it happens nine times out of ten, a good man damned and lost by some frail angel of the church. (Harris, 1988, pp. 81-83)

Mary nipped one such potential relationship--that between a parishioner and her minister husband William--in the bud by privately confronting the woman, after having watched with chagrin that:

...William was always cheered and invigorated by her visits. He would come out of his study for tea after her departure, rubbing his hands and praising the beautiful, spiritual clearness of her mind, which he considered very remarkable in a woman. (Harris, 1988, pp. 83-84)

Mary proposes a solution to this problem:

Someone who understands real moral values ought to make a new set of civil laws that would apply to the worst class of criminals in society--not the poor, hungry, simple-minded rogues, the primitive murderers, but the real rotters of honor and destroyers of salvation. Then we should have a very different class of people in the penitentiaries, and not the least numerous among them would be the women who make a religion of sneaking up on the blind male side of good men without a thought of the consequences. (Harris, 1988, p. 85)

The problem according to Harris authors? Exploitive male clergy? No, the problem is seductive women. Although Harris' account was of the 1880's, and published in 1910, it should be noted that it was reissued as **The Circuit Rider's Wife** (Harris, 1988) in 1988 and had a second printing in 1990, so somebody still reads it. Furthermore, **The Bishop's Mantle**, written by Agnes Turnbull in 1948, contained similar sentiments, describing the struggles of Hilary Laurens, a young minister, who was barely able to escape the clever plotting of predatory women in his congregation:

In spite of himself he thought of the ministers, from Beecher down, who had had trouble with women. Every city clergyman had to recognize this menace. A few to his own knowledge through the years, in spite of their utter innocence, had yet escaped by a hair's breadth. A few here and there had not even escaped. There were always the neurotic women who flocked not only to the psychiatrists but also in almost equal numbers to ministers, pouring out their heart confessions and their fancied ills; there were those pitiable ones in whose minds religion and sex had become confused and intermingled; there were those who quite starkly fell in love with a clergyman and wanted love from him in return. Yes, a man of God had to be constantly on his guard in connection with this problem of women [emphasis mine](Turnbull, 1948, p.235).

In his classic Introductory Lectures in Psychoanalysis, published in 1917, Freud noted the romantic and erotic feelings his female patients exhibited toward him, labeling it transference. In writing on this topic, Freud (1958) clearly indicated that the therapist should not take advantage of the patient's "longing for love" and should abstain from sexual involvement. Freud also noted that the therapist had to struggle with his own countertransference love feelings.

In recent years it has come to light that psychoanalyst Carl Jung had a romantic affair with Sabina Spielrein, whom he treated from 1905 to 1909. She had been 19 years old when she began her analysis. Subsequently she became a physician and in 1912 joined the Vienna Psychoanalytic Society (Carotenuto, 1984; Kerr, 1993).

In a letter to Freud dated 4 June 1909, Jung mentions the relationship and indicates that Spielrein was "systematically planning [his] seduction" (McGuire, 1988, p.228). Freud's response, dated 7 June 1909, was supportive and noted that while Freud himself had "never been taken in quite so badly," he had "...come very close to it a number of times and had a narrow escape" (McGuire, 1988, p.230). Freud focused all blame on Spielrein:

The way these women manage to charm us with every conceivable psychic perfection until they have attained their purpose is one of nature's greatest spectacles (McGuire, 1988, p.231).

On 21 June 1909 Jung wrote to Freud that he had met with Spielrein and discovered that she had not been the source of the rumors about their relationship and indicates remorse about "the sins" he had committed:

When the situation had become so tense that the continued preservation of the relationship could be rounded out only by sexual acts, I defended myself in a manner that cannot be justified morally. Caught in my delusion that I was the victim of the sexual wiles of my patient, I wrote to her mother that I was not the gratifier of her daughter's sexual desires but merely her doctor, and that she should free me from her. In view of the fact that the patient had shortly before been my friend and enjoyed my full confidence, my action was a piece of knavery which I very reluctantly confess to you as my father (McGuire, 1988, p.236).

Jung had written to Sabina Spielrein's mother, indicating that he had moved from doctor to friend "the more easily" because he had not charged a fee, and then made a proposition that he would come to regret--that if she wished him "to adhere strictly to [his] role as doctor," she should pay him "a fee as suitable recompense for [his] trouble" (Donn, 1990, p.93).

In his letter of 30 June 1909 Freud reports that he has written to Sabina Spielrein's mother, as Jung asked him to, and that "the matter has ended in a manner satisfactory to all. He asks Jung to not fault himself for drawing Freud into the situation, asserting that "it was not your doing but hers" (McGuire, 1988, p.238). Again we can see what **the problem** is--it is **seductive women**.

Kerr, in *A Most Dangerous Method*, writes of this history:

Jung was scarcely the only person to become involved with a patient. Gross's exploits were legendary, Stekel had long enjoyed a reputation as a "seducer," Jones was paying blackmail money to a former patient, and even good Pastor Pfister was lately being entranced by one of his charges. Indeed, the most extraordinary entanglement was Ferenczi's, the amiable Hungarian having taken into analysis the daughter of the woman he was having an affair with and then fallen in love with the girl. (Kerr, 1993, p. 379)

The 1970's also saw the advent of the self-report survey of professional groups with the publication of Kardener, Fuller, & Mensh's (1973) study of a sample of 1,000 physicians in Los Angeles County. Their finding that 10% of psychiatrists and other physicians acknowledged erotic contact with clients, and that 5% acknowledged sexual intercourse, established the seriousness of the scope of the problem and presaged the ensuing professional debate not to mention a large number of self-report surveys (Schoener et. al., 1989, pp.25-45).

From March 10 to 19 the case of Roy v. Hartogs was tried in New York City. It was widely reported in newspapers around the U.S. and Canada. Julie Roy, the plaintiff, charged Dr. Renatus Hartogs, a psychiatrist with good credentials and the author of a column for **Cosmopolitan** magazine, had sexually exploited her. Ms. Roy won the suit and the next year co-authored a book, **Betrayal**, which was later made into a made-for-TV movie of the same title (Freeman & Roy, 1976). While not the first such case, its broad publicity led to many other clients coming forward and presaged the local and national coverage of other cases in by news media.

A major discussion of therapist-client sex occurred in May of 1976 at the annual convention of the American Psychiatric Association. The next year a national survey of psychologists was published whose findings mirrored those of Kardener, Fuller, & Mensh (Holroyd & Brodsky, 1977), and in 1978 a California Psychological Association Task Force undertook a large scale survey of psychologists concerning their knowledge of cases (Bouhoutsos et.al., 1983).

Such surveys were not done of pastors, for the most part, and when they were done it was mostly later in time. Richard Blackmon (1984), in an unpublished Ph.D. Thesis done at Fuller Theological Seminary, surveyed clergy in four denominations – Presbyterian, United Methodist, Episcopalian, and Assembly of God – and found that 39% acknowledged sexual contact with a congregant and 12.7% sexual intercourse with a congregant. These figures are far higher than self report data from physicians or mental health professionals. In addition, 76.5% indicated that they knew of a pastor who had sex with a congregant – again, a higher number than in secular professions studied.

23% of pastors who responded to a 1987 survey done in *Christianity Today* indicated that they had engaged in inappropriate sexual behavior after having entered into the work of ministry. Twelve percent admitted to sex with someone other than their spouse. A survey of Southern Baptist pastors found that more than 70% knew of pastors who had sex with a congregant, although only 6% admitted that they had done this. An additional 4% admitted sex with a former congregant.

Charles Rassieur (1977) did an early book **The Problem Clergymen Don't Talk About** but it was aimed at seminarians and clergy and known only to them. In 1984 **Beyond Forgiveness** by Rev. Don Baker was published by a small religious press in Oregon. It told the story of a pastor who had sexually exploited a number of women.

The issues about sexual exploitation of women were examined in a book which came from Minnesota: **Sexual Assault and Abuse: A Handbook for Clergy and Religious Professionals** edited by Mary Pellauer, Barbara Chester, and Jane Boyajian. Mary was a leader in working on these issues in the ELCA, Barbara headed the Rape Counseling Center in Minneapolis, and Jane was a theologian and ethicist.

Many other books followed, most dealing with sexual exploitation of women in Protestant or Catholic settings. Eventually there was a flurry of books about child sexual abuse in churches and church – run institutions. Many of the child abuse books focused on abuse of boys.

Lloyd Rediger (1990, 2003) contributed two works based on his counseling of both victims and clergy in various protestant faiths. The abuse of nuns by other nuns (Hill, 1995) and by priests (Maes & Slunder, 1999) have also been the subject of books. In addition, in 2001 the Pope issued a world-wide apology for the sexual exploitation of nuns and church women in Africa by priests who were seeking sex from women without a risk of AIDS. This was soon forgotten by the news media as the scandal around the sexual abuse of children in the Roman Catholic church took center stage.

Over time websites have evolved. Many can be found through [Advocateweb:](#)

www.advocateweb.org Advocateweb is focused on sexual exploitation and abuse by all types of helping professionals. Those who access its Forum are typically women who have been victimized by male or female professionals, including clergy.

There is a resource now about abuse in the Jewish community – The Awareness Center. It is at www.awarenesscenter.org Charlotte Schwab (2002) has published a book about rabbinic abuse which focuses on abuse of women entitled **Sex, Lies, and Rabbis: Breaking a Sacred Trust**.

Another way to view changing attitudes is through newspaper advice columns. In 1986 Ann Landers published a letter from “More Than I needed to Know in Panama City,” who learned on his honeymoon that his wife had slept with five men who were at their wedding including the minister who married them. Among other things, Ann advised: “And for heaven’s sake, tell Sally to keep her mouth shut. The minister doesn’t need the publicity.”

She withdrew this advice when she published a followup letter from “Disappointed in Detroit”:
“For 32 years I was married to a minister who was protected by people who also kept their mouths shut. In the meantime, my husband was taking advantage of young women to whom he should have been ministering. If people had not remained silent, he would have been removed from his job. The next result was that he caused irreparable harm to all of those who believed he was a servant of God....

In 1989 Landers published a letter from “A Crushed Christian in California” who said that an associate pastor began courting her as soon as he learned of a recent large insurance settlement she had received. As soon as they married, he began dominating her life, frequently citing “God’s Will” as a rationale. She wrote: “Using ‘God’ to control, manipulate, bully and extort is cruel and sadistic. My emotional scars will take years to heal and I may never fully trust a minister or church again.”

In more recent years advice columns have given far better advice and show a greatly changed set of values about sexual exploitation by pastors.

Frustrated consumers who had been sexually exploited and concerned professionals began seeking remedies through media attention and changes in public policy. In 1984 Wisconsin criminalized therapist-client sex, although the statute specifically did not include clergy. That same year the Minnesota legislature created a Task Force on Sexual Exploitation by Counselors and Psychotherapists which examined sexual exploitation by professionals including clergy.

In 1985 Minnesota criminalized therapist-client sex, making it a felony, and including sexual contact by clergy who were providing counseling for emotional problems. To date more than twenty states have criminalized, the majority of them including clergy among the counselors who are prohibited from having sex with clients. (Bisbing, Jorgenson, & Sutherland, 1996). Most of those who testified at hearings in Minnesota and elsewhere were women victimized as adults or adolescents.

In 1992, after a pastor successfully used the “spiritual counseling defense,” the Minnesota Legislature expanded the criminal statute to include clergy doing spiritual counseling. So for more than a decade pastoral sexual conduct with all counselees has been a crime in Minnesota. However, this requires that there have been one - on - one counseling – it cannot just be serving in the role of a pastor. The only other state which has such a law is Texas, and it was signed into law by our current president who was then governor of Texas.

In the 1980’s interdenominational task forces in several states examined sexual misconduct by clergy with both child and adult counselees/parishioners. The Washington Council of Churches issued a report on **Sexual Contact by Pastors and Pastoral Counselors in Professional Relationships** in 1984 and the Minnesota Interfaith Committee on Sexual Exploitation by Clergy published **Sexual Exploitation by Clergy: Reflections and Guidelines for Religious Leaders** in 1989.

That same year Rev. Marie Fortune's book **Is Nothing Sacred?** challenging the religious community to deal more effectively with sexual misconduct in the church, was published. Dr. Peter Rutter's **Sex in the Forbidden Zone**, also published in 1989, generated considerable discussion and media coverage in North America and brought about an incredible response from many victims/survivors of sexual misconduct by professionals. Hundreds of people, for example, have contacted our center about misconduct by therapists and clergy as a result of reading this book.

As a result of the Minnesota Task Force on Sexual Exploitation by Counselors and Therapists, a manual **It’s Never OK** was published by the State of Minnesota. More recently it has been updated by Nancy Biele and was re- titled **It’s *Still* Never O.K.**

Our own work and that of these task forces evolved to examine sexual exploitation by all sorts of counseling professions – secular ones and clergy. This is very different from what was to evolve in the 1990’s around the revelations of sexual abuse by catholic priests. LINK UP and SNAP originally were focused mostly on one denomination – Roman Catholicism – and heavily focused on abuse of minors. They were not connecting this with abuse of minors by other types of professionals.

Efforts were made in the 1990’s to establish better linkages. But originally the one movement focused largely on women victims and on all types of professionals as offenders, whereas the other was very focused on clergy and religious perpetrators, especially against male children.

On June 5 and 6, 1986, a national conference entitled “It’s Never OK” was held in Minneapolis and co-sponsored by the Continuing Education & Extension division of the University of Minnesota and the Minnesota Task Force on Sexual Exploitation by Counselors and Therapists. (The program can be found in Schoener et. al., 1989, pp. 787-792) The program examined sexual exploitation by psychotherapists and clergy for the most part. The conference drew 250 people from around the United States and it was decided to try to hold these every two years.

However, after a planned conference in Philadelphia was cancelled, the next conference was not

until 1992. It too was in Minneapolis, and was co-sponsored by the Walk-In Counseling Center and several other groups. It drew more than 650 people from around the world. The book **Breach of Trust** (Gonsiorek, 1995) was almost a proceedings for this conference in that its contributors were all presenters. In 1994 another such conference was held in Toronto, Ontario, and drew about 600 people. In 1998 another one was held in Chestnut Hill, Mass., near Boston. Unfortunately, at present there are no others I know of which are planned.

There have been regional conferences in Canada and in Houston, Texas, and workshops have been held in a number of places. There have been two very large Australia-New Zealand conferences on sexual exploitation by professionals – held in Sydney (1994) and Melbourne (1996). There have been two major conferences in Switzerland (2001 & 2002) sponsored by a group called AGAVA.

Rev. Marie Fortune and the Center for the Prevention of Sexual and Domestic Violence (now the Faith Trust Institute) in Seattle have sponsored victim retreats around the United States and Canada. Rev. Fortune has also presented on this topic around the world. A number of other advocates have done retreats on a less frequent basis, sometimes for clergy victims, and sometimes for victims of both clergy and therapists. BASTA run by Estelle Disch in the Boston area held such retreats for a number of years (Schoener et. al., 1989, pp203-213). Rev. Pat Liberty and others have done these sporadically in various parts of the United States.

Jeanette Milgrom of the Walk-In Counseling Center began the first support groups for women victims of sexual exploitation by counselors (secular and clerical) in 1976. By 1979 Ellen Luepker took over this function and began offering them through Minneapolis Family & Children's Service. Ellen went into private practice and continued this work for many years. (Schoener et. al., 1989, 177-202)

By the end of the 1980's and beginning of the 1990's a number of church denominations had developed or were working on policies and guidelines for handling complaints of sexual misconduct by clergy. A large percentage of cases were those of female parishioners or counselees who had come forward to complain of sexual exploitation by male clergy. A few books have resulted from some of these cases providing a glimpse at what women have experienced (Fairbanks, 2002; McBride, 1999).

It has been difficult to hold pastors accountable for sexual exploitation of adults. In the civil courts there is generally no such thing as "clergy malpractice" (Weitz, 2001) although pastors can in many instances be held accountable for break of fiduciary duty or have their counseling compared to that of secular counselors (Bisbing, Jorgenson & Sutherland, 1996).

In terms of accountability, another issue is the responsibility of the church for the pastor's misconduct. Minnesota passed a law in 1986 – Minnesota Statutes 148.A – which outlines the duties of an employer of someone who might do counseling. This radically impacted churches in Minnesota. It includes a requirement that they (1) check at least five years back for any information from past employers concerning sex with clients or attempts at it; (2) that when asked they pass the information on, and if they fail to do so they can be liable for future damages.

Case law has been spotty, but basically it has been established that there can be a failure to supervise as well as other employer-related failures. Under some circumstances a protestant Bishop can be accountable for action or inaction after the fact (e.g. **Mary E. Moses, a/k/a Mary Elaine Tenantry vs. the Diocese of Colorado, a Colorado Corporation, & Bishop William Frey, Supreme Court, State of Colorado, 863 P.2n 310 (Colorado 1993)**). Responsibility in cases involving the Roman Catholic faith where priests are assigned directly by a diocese has been easier to demonstrate. (Bisbing, Jorgenson, & Sutherland, 1996).

However, unlike cases involving abuse of children in the Roman Catholic faith, adult women have found a much more difficult time bringing actions for clergy sexual exploitation. It has been especially difficult to have a finding of liability by the district, conference, synod, or diocese as opposed to the individual clergy offender.

Conclusion

The sexual exploitation of adult women by clergy and other professionals dates back thousands of years and is mentioned as early as the 3rd century BC in medical writings. Clergy, like secular professionals from whom women seek help, are in a position to abuse the trust placed in them.

Although publicly discussed cases go back hundreds of years, for the most part women have been blamed for these events rather than seen as victims. Although feminism and the growth of broad concern about sexual exploitation of women by persons in a position of power and authority helped bring about a response to clergy sexual abuse, we have a long way to go.

The 1980's and 1990's saw an outburst of literature and public awareness, and some reforms in a variety of faith groups. It also saw some development of laws relating to this exploitation, and in addition a large number of lawsuits. The case law which has evolved is quite varied, in some instances providing for accountability, and in others offering protection to churches or the clergy.

There has been an evolving understanding of ways in which women victims can be helped and offenders can be evaluated. Much still remains to be developed in those areas. In terms of advocacy and the handling of complaints, while strides have been made there are still great difficulties in bringing such complaints in most churches.

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