

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 17-cv-00210-RBJ

LiST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,  
LEONARD S. LABRIOLA,  
Plaintiffs,

v.

KNIGHTS OF COLUMBUS,  
Defendant.

KNIGHTS OF COLUMBUS,  
Counterclaim Plaintiff

v.

LiST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,  
LEONARD S. LABRIOLA, WEBSINC.COM, STEPHEN S. MICHLIK, JONATHAN  
S. MICHLIK, AND TERRY A. CLARK,  
Counterclaim Defendants.

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**AFFIDAVIT OF BRIAN CAULFIELD**

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Brian Caulfield, first being sworn, states:

1. My name is Brian Caulfield. I am over the age of 18 years. I have personal knowledge of the facts stated herein. The statements herein are true and correct and based on my personal knowledge.

2. I serve the Executive Staff for the Knights of Columbus (“Order”) and as the Vice Postulator of the Sainthood Cause of Father Michael McGivney, the Order’s founder. From that work, I know firsthand of the continuing religious influence of Father McGivney on the Order’s daily operations. As Vice Postulator, I have studied the life, writings, and reputation of this priest who ministered to Catholic immigrants in nineteenth-century Connecticut, a time when the faith

and ethnic origin of these people, most of whom were poor, were often attacked by American society. Michael McGivney was born in Connecticut to Irish immigrant parents, the eldest of thirteen siblings, some of whom died before reaching majority. His father, a factory worker, passed away when Michael was a young man in seminary. This experience of family hardship and early death instilled in Michael's heart a firm resolve to help the poor and marginalized. Five years after he was ordained a priest, while still an assistant pastor at St. Mary's Church in New Haven, he founded the Knights of Columbus in 1882 with a handful of men from the parish in the basement of the church. The work of providing for members and families was inextricably tied to religion in his mind and in the minds of the founding members. It still is today.

3. The Order's Catholic identity and religious character date to its founding by and the faith of Father Michael J. McGivney. Father McGivney's model was not business and profit but rather service and charity according to the Gospel. He wrote, at the time, that he wished to gather together men of his parish for charitable and religious works and to offer financial benefits (usually after the early death of a family's breadwinner) that equaled or exceeded those given by non-Catholic societies of his day, which were drawing men away from their Catholic faith. Early on, the fraternity started a "pass the hat" model by which members would contribute when a "brother" or his family was in need. The Catholic mission, from the beginning, was to form a society of Catholic men who would journey in faith together, support their Church, and care for widows and orphans.

4. The Knights of Columbus Charter states well the Order's Catholic purposes:

The purposes for which said corporation is formed, always consistent with Catholic values and doctrine, are the following: (a) through a system of subordinate councils, along with regional, national, and international convocations, to raise up, support and encourage a fraternity whose

members are practical Catholics united by their faith and by the principles of charity, unity, fraternity, and patriotism; (b) through common worship, charitable works, meetings, and rites of initiation, to form its members in Catholic faith and virtue; (c) to render pecuniary aid to its members, their families, and beneficiaries of members and their families; (d) to render mutual aid and assistance to its sick, disabled, and needy members and their families; (e) to promote social and intellectual interaction among its members and their families; (f) to promote and conduct educational, charitable, religious, social welfare, war relief, public relief, and other activities; and (g) to unite members in their Catholic identity and the practice of their Catholic faith. To more effectively carry out its purposes, said corporation may establish, accumulate, and maintain a reserve fund or other funds in such manner and in such amounts as it may determine.

5. The Charter also requires that a Catholic priest or bishop serve as the Order's Supreme Chaplain. The Supreme Chaplain has a broad and critical role of ensuring that the actions of the Order's Supreme Council and its Board of Directors are always consistent with Catholic values. He also guides the chaplains of the subordinate councils, and he is responsible for instructing members in the Catholic faith and leading them in prayer. Section 7 states:

The corporation shall have a chaplain who shall be designated the Supreme Chaplain. He shall be a Catholic priest or bishop who conducts his ministry to the Order in the spirit of Father Michael J. McGivney. He shall, by virtue of his office, serve as a member of the Supreme Board of Directors and its Executive and Finance Committee. He shall serve, ex officio, on the Supreme Council. The Supreme Chaplain shall be responsible for forming the members of the Supreme Council and the Board of Directors in Catholic values and doctrine. He shall advise those bodies as to whether their actions are consistent with Catholic values and doctrine and with the corporation's Catholic purposes. The Supreme Chaplain shall guide the chaplains of the subordinate councils, ensuring that they support the Catholic identity and evangelical mission of their councils and the corporation at all levels and in all activities. He shall be responsible for instructing the members in the Catholic faith and leading the Order in prayer, and he shall be consulted regarding any changes in the religious content of the Order's rites of initiation.

6. A man must be a "practical" or practicing Catholic, in union with the Holy See, to be eligible to join the Knights of Columbus. It is not enough that an applicant has been baptized Catholic, gone to Catholic school, or sent his children to religious

education classes. To become a Knight, he must himself practice the Catholic faith by attending weekly Mass, frequenting the sacraments, and accepting Catholic teachings.

7. The handbook for council officers provides guidelines defining a practical Catholic:

A practical Catholic accepts the teaching authority of the Catholic Church on matters of faith and morals, aspires to live in accordance with the precepts of the Catholic Church, and is in good standing with the Catholic Church.

A practical Catholic strives to have a greater knowledge of the teaching of Christ and his Church, and to accept, respect and defend the Church's authority (vested in the Supreme Pontiff, the hierarchy and clergy united with him) to teach, govern and sanctify the faithful.

A practical Catholic gives material and moral support to the Church and her works on all levels, promoting the programs of the parish and diocese and coming to the aid of the missions, the needy and the underprivileged; supports and advances the just causes of minority groups; endeavors to eliminate unjust discrimination, prejudice, etc.; and supports the Church in her defense of marriage and family life.<sup>1</sup>

The chaplain's guide counsels, "Whenever there is a question of a member's failure to remain a practical Catholic, the [council] officers should consult with the chaplain and the member's pastor so that no injustice will be done and no unjust or un-Christian gossip is permitted to be spread."<sup>2</sup>

8. The Knights of Columbus carries on the founding vision and legacy of Father McGivney in many ways. Our principles of Charity, Unity, Fraternity and Patriotism are built on the Gospel's values expressed in the saying, "Whatever you did for the least of my brothers, you did for me." Service to God and service to neighbor are inseparable in the heart of a Knight. The

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<sup>1</sup> The Knights of Columbus, LEADERSHIP RESOURCES: PRACTICAL INFORMATION FOR GRAND KNIGHTS, DISTRICT DEPUTIES AND FINANCIAL SECRETARIES 5 (Undated Current Edition), <http://www.kofc.org/en/resources/officers/officers.pdf>.

<sup>2</sup> The Knights of Columbus, CHAPLAIN'S HANDBOOK 15 (2013), <http://www.kofc.org/un/en/resources/officers/chaplain.pdf>.

principles of the Order are not just words, they are calls to action. The Good Samaritan, who helped a stranger in need because he was a fellow human being created by the same God, is the ideal model for a Knight of Columbus.

9. The good that the Knights do cannot be easily measured, for it reaches the heart, mind, and soul. But some indication of the scope and depth of the Order's charitable reach can be given by the numbers tabulated annually in the "Survey of Fraternal Activity." It is significant in itself that this yearly report is recorded as "fraternal" and not "business" activity. As with the parable of the Good Samaritan, both the one who gives and the one who receives charity are understood to be brothers under the same God.

10. In 2016 alone, the Order's combined charitable outlay totaled \$177,500,673. The following examples describe a small sampling of the Order's charitable giving.

a. The Order supports Catholic education. It gave funds to establish the Pontifical John Paul II Institute for Studies on Marriage and Family at Catholic University. The Order has given money generously to support the work of evangelization within the Church. Numerous scholarships for seminary students and other Catholic students have come from the Order. The Father McGivney Fund for Catholic Education was created by the Order.

b. The Order has given funds to create the Saint John Paul II National Shrine located just outside the Basilica of the National Shrine of the Immaculate Conception in Washington D.C.

c. The Order has given support to the Vatican for causes ranging from microfilming irreplaceable documents from the Vatican Library, paying for

worldwide transmission of telecasts from St. Peter's Basilica, and funding a major restoration to the façade of St. Peter's Basilica.

d. The Order has given charitably to the Pope's religious activities. In 1979, 2008 and 2015, the Order provided substantial support for the pastoral visits of Pope John Paul II, Pope Benedict XVI and Pope Francis, respectively, to the United States.

e. In 1981, the Order founded the *Vicarius Christi* Fund, now with a corpus of \$20,000,000 for the purpose of providing the Pope with the annual earnings to support his personal charities. From the fund, the Order has presented the Pope with over \$1.5 million annually.

f. The Order also supports causes not formally affiliated with the Catholic Church, including Special Olympics, the Wheelchair Foundation, Habitat for Humanity, and programs run by the councils called Food for Families and Coats for Kids.

11. But the charity of Knights is not measured in dollars alone. An equally important number, reported also in the annual "Survey of Fraternal Activity," are the volunteer hours logged by our members. In 2016, that number was 75,112,694. This represents the "sweat equity" that the Order values so greatly; it represents not only what the world usually considers as charity – monetary donations, valuable as they are – but a giving of the self through a person-to-person encounter.

12. These numbers are reported every year at the Supreme Convention, which gathers hundreds of Knights and their families from all across the international Order. The religious character of the proceedings is clear from the order of business: each of the three days begins with the celebration of Holy Mass, offered by cardinals, bishops and priests of the Catholic

Church. In addition, the sacrament of confession is available each day, and a prayer chapel is set up in a conference room for anyone to visit.

13. The Order has embarked on numerous education programs to help men and their families increase their understanding of the faith and live it out. A longstanding and successful program has been the Catholic Information Service, launched in 1948, which began by printing pamphlets and running magazine advertisements, and which today has a full range of multimedia faith educational materials and online courses.

14. The Order's signature initiative, Building the Domestic Church While Strengthening Our Parish, is encouraged for every council and Knights of Columbus family. *See* <http://www.kofc.org/en/domestic-church/index.html>. The idea, taken from the writings of recent Popes, is that the Catholic family makes up a "domestic church" – a church in the home – where the faith is first learned, taught, and handed on. The family should, in turn, serve the local parish to create a "family of families" for the worship of God and the support of one another, including the poor and abandoned.

15. Within this initiative are a host of religious works such as the Family Rosary, Consecration to the Holy Family, the Family Fully Alive, the Father's Day Affirmation of Wedding Vows, and Family Week Celebrations.

16. At the First Degree initiation ceremony, under the theme of Charity, a new Knight receives religious instruction and a rosary imprinted with the Order's emblem. He is told to pray it daily. Religious instruction continues as a man advances through the other degrees, learning about the religious significance of Unity, Fraternity, and Patriotism. The Third Degree offers lessons on the Eucharist as the source and summit of Catholic life.

17. A perusal of the Order's monthly magazine, *Columbia*, is another indication of the commitment to faith and religious education. The periodical has a column by the Order's Supreme Chaplain, which focuses on some aspect of the faith and religious formation, features stories on saints and holy men throughout history, and has a back-cover highlight on the vocation story of a young man or woman, under the theme "Keep the Faith Alive."

18. The Order also offers support for vocations to priesthood and religious life through its RSVP program, by which local councils "adopt" a seminarian or religious hopeful, offer prayers and friendship, and contribute up to \$500 a year toward his or her expenses.

19. I have detailed thus far some of the very public ways in which the religious vision of the founder still imprints a defining character on all the Order does. But I would like to take a few moments to outline a more subtle influence that Father McGivney has, which I see in my position as Vice-Postulator. Since Father McGivney needs a documented miracle attributed to his intercession in order to move forward in the Cause for Sainthood, one of my duties is to receive and investigate reports of "favors" that Knights, family members, or any others (Catholics or non-Catholics) receive through what they perceive as his heavenly help. In addition to a few truly extraordinary cases of healing that we would send to the Vatican for consideration as a medical miracle, I receive reports of numerous "everyday miracles" from people who have a devotion to Father McGivney. These reports are posted on the Father McGivney website and some are printed in the newsletter that is mailed five times a year to more than 160,000 members of what is called the Father McGivney Guild. Over the years, I have noticed a pattern in these reports, and realized that most of the favors people receive have to do with issues that Father McGivney worked on while he was a priest on earth. I wrote about this fact in the August 2017 issue of *Columbia*.




20. In short, I see four categories of reported favors: help with employment and finances, alcoholism and substance abuse, return to the Catholic faith, and family reconciliation. Week after week, month after month, we hear of these little miracles in which a concerned or even desperate person prayed to Father McGivney and received an inexplicable, unexpected healing or resolution to a problem. Those who send in these reports, from all parts of the world -- United States, Canada, Mexico, and as far away as the Philippines -- exhibit great trust, great faith and true gratitude for Father McGivney and the Order which he founded, the Knights of Columbus.

21. The fact that the Order would assign someone like me, with a graduate degree in religious studies, to work day in and day out studying these reports, is another indication of the true religious character of the Knights of Columbus.

22. I will conclude by recounting some of the religious symbols and reminders encountered by employees in their normal rounds at the Knights of Columbus headquarters, which send subtle but clear reminders about who we are as an organization and what we stand and strive for as an Order.

23. Many employees park at the Knights of Columbus Museum, where there are religious artifacts, a gallery devoted to the life and legacy of Father McGivney, a papal gallery showcasing the Order's close relations with the Holy See over the course of a century, and other religiously based exhibits. On the short walk to the Order's headquarters, one passes a heroic-size bronze statue of Father McGivney reaching out to a widow and her children. In the building's lobby are photographic portraits of the Pope and the Archbishop of Hartford. On the fourth floor, is the Holy Family Chapel seating 100, where Mass and the prayer of the rosary are offered on a regular basis, and the walls are covered with religious art created by the priest who has done similar work for the Vatican and Catholic shrines in Fatima and Lourdes. On the bulletin board

on the floor where I work are posters detailing the Order’s commitment to ethical practices and a quote: “Keeping the promise of Father McGivney through our commitment to corporate integrity is the highest priority with the Knights of Columbus, and one that we all share.”

  
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Brian Caulfield

STATE OF CONNECTICUT       )  
  ) ss.  
COUNTY OF NEW HAVEN       )

Subscribed and sworn to before me on October \_\_ 2017, by Brian Caulfield.

WITNESS MY HAND AND OFFICIAL SEAL.

  
\_\_\_\_\_  
Notary Public

My Commission expires: Sept. 30, 2022