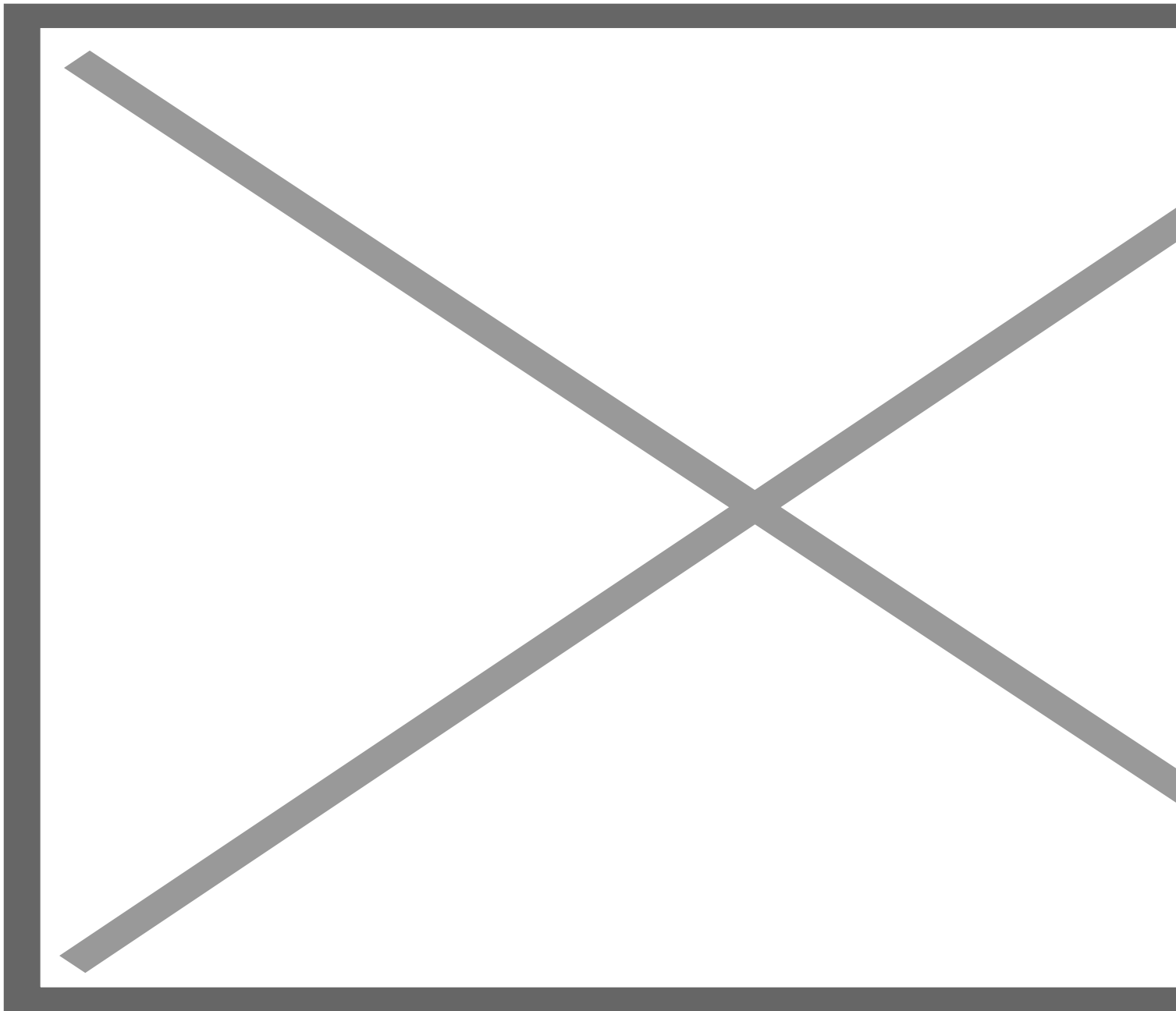


Church leaders not bound to report sexual abuse confessions, Arizona Supreme Court rules

by [Fiona André](#)
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The Arizona Supreme Court building in Phoenix. (Photo by David Pinter/Wikimedia/Creative Commons)

The Arizona State Supreme Court ruled that church leaders do not need to report cases of sexual abuse, disclosed during confessions, to authorities, in a lawsuit brought against a man who confessed to Church of Jesus Christ of Latter-day Saints bishops to sexually abusing his daughter.

Arizona justices unanimously ruled on July 30 that trial courts couldn't interfere in church leaders' decision to report sexual abuse cases disclosed in confession, according to their own interpretation of religious doctrine.

"We hold that the First Amendment generally prohibits fact finders from inquiring into a clergy member's application of his particular religious doctrine—absent fraud or collusion for secular purposes—in determining whether reporting should be withheld if 'reasonable and necessary,'" wrote Vice Chief Justice John Lopez in the court's [opinion](#).

The LDS Church praised the ruling, saying it affirmed the confidential nature of religious confession.

"Arizona law also recognizes the confidential nature of religious confession. The decision affirms that these religious protections are to be respected alongside society's shared commitment to protect the vulnerable," it wrote in a statement. "The abuse at the center of this case was reprehensible, and the Church has always condemned it."

Angela Walker, the executive director of the Survivors Network of those Abused by Priests advocacy group, expressed concern that predators would be able to use a "confessional loophole to escape justice."

"While we respect the court's decision, we believe that the safety of these children must be protected," Walker wrote in a statement. "Especially since this predator videoed these images and put them online."

The ruling sends the case back to lower courts and reverses a July 2025 decision of the state's Court of Appeals. Arizona's reporting statute compels anyone who reasonably believes a minor has been the victim of abuse to immediately report it. But the statute exempts clergy who deem it necessary to not report it for religious reasons. The Court of Appeals found the admissions of guilt in the case didn't invoke clergy-penitent privilege and that church leaders could have reported the abuse.

In 2020, three of Paul Adams's children sued the LDS Church for violating the state's reporting statute by not reporting Adams's sexual abuse after he admitted it in multiple meetings with church leaders.

In late 2011, Adams told Bishop John Herrod of Bisbee Ward Mormon Church in southern Arizona during a confession that he had sexually abused his 5-year-old daughter, who is one of the plaintiffs, according to the lawsuit. Herrod convened counseling meetings with Adams and his wife, Leizza, in 2012, during which Adams confirmed the abuse.

In 2013, Paul Adams was brought before a church council and admitted to the abuse and was excommunicated. Herrod and his successor, Bishop Robert Mauzy, both considered his admission to be made in the context of "confidential communications" or confessions.

In 2017, the couple was indicted following an Interpol investigation that traced a child pornography video downloaded by a New Zealand man back to Paul Adams. The US State Department found thousands of videos of child abuse on Paul Adams's devices, including of his daughters. He also admitted to abusing multiple of his children around that time.

Leizza Adams pleaded no contest to two felony counts of child abuse and was sentenced to 2 1/2 years in prison. Paul Adams admitted to abusing two of his daughters and posting about it online to law enforcement but died by suicide in jail before trial.

In November 2023, the Cochise County Superior Court ruled church leaders learned about the abuse in confidential communications and had no duty to report it because clergy-penitent privilege applied. The Superior

Court granted defendants a motion for summary judgment.

The trial court ruled that defendants learned about the abuse as church leaders and could determine whether it was “reasonable” and “necessary” within their religious doctrine not to report it. However, the appellate court held that a reasonable fact finder could conclude Herrod had, in some situations, “observed” Paul Adams speak about the abuse to another bishop, rather than during their one-on-one confession, which could lead a trial court to conclude clergy-penitent privilege didn’t apply.

In 2022, an [Associated Press investigation](#) reported LDS Church lawyers told bishops not to report the abuse to police or child welfare officials, complying with the church’s help line advice on such situations arising from confessions.

The church argued the AP investigation misrepresented the church’s efforts and denied covering up the abuse. It said clergy members advised Paul Adams to repent and seek professional help, asked him to report the abuse and encouraged his wife to report it. The church also [said](#) it only learned about the extent of the abuse in 2017.

The Church’s Handbook requires leaders to report abuse disclosed in confessions when they could cause serious injury. —Religion News Service