

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT DEPARTMENT
Suffolk County Civil Action No.
02-04551-T1 (Consolidated with C.A.
02-1296)
(Originally entered in Middlesex County
as C.A. No. 02-626)

GREGORY FORD, et al.,

Plaintiffs,

v.

BERNARD CARDINAL LAW, et al.,

Defendants.

AFFIDAVIT OF JOHN DOE

I, John Doe, having been duly sworn under oath, depose and state as to the following facts:

1. I was born in 1956 and have been a lifelong resident of Stoneham, Massachusetts.
2. I attended St. Patrick's Catholic School and was a parishioner and choir boy at St. Patrick's Church when Father Paul Shanley was a priest there during the 1960's.
3. I first met Father Shanley when I was approximately five (5) years old when he visited my mother at our home.
4. I also knew Father Shanley as one of our priests at St. Patrick's School and St. Patrick's Church.
5. During approximately 1963 or 1964 when I was in second grade, twice a month Father Shanley had a group of us taken out of class to meet with him, individually, in his room at the rectory to prepare us for First Communion. For this purpose, I met

with Father Paul Shanley, alone, approximately sixteen (16) times in his room at the rectory.

6. During those initial individual meetings, as he explained the events of First Communion, Father Paul Shanley had me sit on his lap and he would tuck in my shirt, putting his hand deep into my pants and touching my genitals and buttocks.

7. With each individual meeting, Father Paul Shanley would increase his contact with my genitals and eventually he would hold on to my penis.

8. During approximately 1964 or 1965 when I was in third grade, on Fridays after Mass Father Shanley would have a couple of children at a time taken out of class and sent to the lower Church for penance. Approximately once a month, I was sent and went into the confessional where Father Shanley was. I recall that Father Shanley always asked me if I was scared, and when I said that I was, he invited me to sit on his lap on the Priest's side of the confessional booth. While he asked me what my sins were and commented on how big I was growing, he put his hand down into my pants and massaged and rubbed my genitals. He also took my hand and put it into his pants onto his penis and commented that we both had one of those. Then Father Shanley had me masturbate him. Father Shanley called this 'exchanging.' During that same time period, Father Shanley also often stopped me on the playground at school and tucked in my shirt, passing his hand over my genitals.

9. During approximately 1965 or 1966 when I was in fourth grade, each day one boy was selected to go to the rectory to fill a container with milk for the class. On the approximately seven or eight times that I was chosen to get the milk, Father Shanley would invite me in to the basement of the rectory, make some small talk, and then he would let his pants fall to the floor and ask me to grab his penis and masturbate him. Father Shanley would explain to me what was happening and he told me that because I didn't have a father at home, I needed to learn about the birds and the bees from him. Father Shanley would always ask me if I was going to be late, and he would write a note to the nun explaining that I was late because he was teaching me something or showing me what altar boys wear. I recall that on one occasion, someone came down the stairs and startled Father Shanley, who quickly pulled up his pants. I recall that on another occasion, the organist, Edson Kimball, also walked in and saw Father Shanley pull his pants up.

10. During three (3) summers in the mid 1960's, I attended Catholic summer camps Fatima and Cedarcrest. I recall that several different churches sent low income and deprived children to these camps. Father Shanley was at the camps that I attended. Father Shanley was always around the showers and he would hold a towel and dry a boy who was selected for apparently misbehaving according to the counselor's checklist. Father Shanley would then escort the boy back to his building or bunk. On approximately three (3) occasions each summer when I was selected, Father Shanley would dry my body with the towel and rub my genitals. Then he took me to his building where he told me that we touched in third and fourth grade but now in fifth, I had to do it

oral and put my mouth on his penis. He offered me money, approximately \$1.00 to \$5.00 to do this, which he did pay me. Father Shanley also had me masturbate him with my hand and he masturbated me. He told me that if I told my mother, she would not believe me. He said that what happened was between me and God.

11. I have never met or talked with Mr. Greg Ford, Mr. John Doe 7 or Mr. John Doe 8, or anyone else who has been abused by Father Shanley. I do not know any details about anyone else's abuse by Father Shanley.

Signed this 19 day of July, 2003 under the pains and penalties of perjury.



John Doe