

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT DEPARTMENT
SUCV 2002-04551 T1
(originally filed in MICV-2002-626)
(consolidated with SUCV-2002-1296)

GREGORY FORD, ET AL.,
Plaintiffs,

v.

BERNARD CARDINAL LAW, a.k.a.,
CARDINAL BERNARD F. LAW, ET
AL.,
Defendants.

AFFIDAVIT OF JOHN DOE
(Actual Name of Person Rendered
to Defendants' Counsel and The Court)

I, John Doe, depose and say as follows:

1. For the purposes of this Affidavit, I am known as John Doe. My real name is being provided to the Court and to the counsel for the Defendants.
2. My date of birth is 1950 and I grew up in Stoneham, Massachusetts.
3. I came to know Father Paul Shanley ("Fr. Shanley") when I attended St. Patrick's Elementary School in Stoneham, Massachusetts in the late 1950's and into the 1960's. I have an older brother and sister who also attended St. Patrick's. During the time I knew Fr. Shanley he was involved in the youth group at the parish. He portrayed himself as the Youth Minister.
4. During the summer of 1966, at his request, I met with Fr. Shanley privately in the rectory. He had private meetings with many of the kids and encouraged this.

5. At the meeting, Fr. Shanley spoke to me about a "theory of the lesser of two evils." He told me he had a cabin in the Blue Hills off Rte. 128 and said that he had been there with other boys from the parish. He said I should consider spending the night with him there and if I felt the need to seek out sexual relief from girls, I should contact him and that the lesser of two evils would be for him to masturbate me and for me to masturbate him. He said that he had put himself at risk and would take the responsibility for that, in order to "save my soul."

6. Fr. Shanley drove the two of us out to his cabin in the woods in the late summer of 1966. It was a one room cabin off of Rte. 128 in the woods and it had a bed. He told me that he was a sound sleeper and that if I got an erection to masturbate him and that he would reciprocate. That night, he performed oral sex on me.

7. After that incident, Fr. Shanley suggested that we "replay the scenario." I chose not to as I was profoundly embarrassed and mortified. I felt like I had the weight of the world on my shoulders.

8. About a week after the incident, I told my parents what had happened. They wanted me to talk to someone about it, but I pleaded with my mother not to humiliate me any further.

9. Shortly after talking to my parents about what Fr. Shanley had done to me, we went to visit my cousins who lived in Attleboro, Massachusetts. When we arrived at my cousins' house, my cousin indicated that she had some errands to do and she stopped by the Shrine of Our Lady of La Salette. The next thing I knew, I was sitting in a small meeting room. A man came in and introduced himself as Father Chabot and said that he was a priest at Our Lady of La Salette. He said that he knew my cousin and her family and said that she was a great lady. Fr. Chabot said that he was sensitive as to what had

happened with Fr. Shanley, that something needed to be done and that it was not my fault. It was obvious to me that my mother had spoken to my cousin and my cousin had spoken to him about what had happened.

10. Fr. Chabot asked me to tell him what had happened with Fr. Shanley and I did so. I told him everything I could remember. I told him about what Fr. Shanley had said about the lesser of two evils and about going to the cabin. I told Fr. Chabot that I got my parents' permission to go with Fr. Shanley to his cabin in the Blue Hills and I told him about what Fr. Shanley had done to me. I described the cabin to him and the sign which said "Owned By Fr. Shanley" and I told him that Fr. Shanley had brought other boys up to the cabin. I told Fr. Chabot that I did not know what happened with those boys.

11. When I was done, Fr. Chabot told me that he would follow up with the information and that he would contact people at the Chancery for the Boston Archdiocese. Fr. Chabot told me not to worry about things and that he had friends in the Chancery that would take care of the matter.

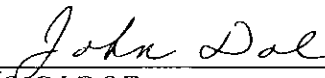
12. I have seen the letter which is attached to this Affidavit as Exhibit "1." On the top of the letter, it reads: "Shrine of Our Lady of La Salle." The information described in this letter was almost identical to the information which I gave to Fr. Chabot at the Shrine of Our Lady of La Salle.

13. There is a document which is numbered RCAB-00045 on the bottom. At the top of this document it says "Father Shanley's Answer to Attached Charge Accepted As True." This document appears to be signed on the top by Monsignor Sexton. I knew Monsignor Sexton. He was living at St. Patrick's from the time I was a little boy until the 1970's and he knew Fr. Shanley very well. This letter describes my family, including my

uncle, my father and my older brother and sister. However, there are significant inaccuracies and untruths in this letter. My mother never attempted suicide and my father was a man of exceptionally high morals, an extremely ethical man. The letter also says that the accusations which I made were unfounded. That is not true. Fr. Shanley sexually molested me.

14. There are also documents which are numbered RCAB-00046 through 00048. The documents say "I swear to you as my God as my judge that I did not masturbate this boy here or anywhere else at the date or any other date, so help me God. I feel unclean even writing such a demurrer." Fr. Shanley is lying when he says this.

**SUBSCRIBED AND SWORN UNDER THE PAINS AND PENALTIES OF
PERJURY THIS 15 DAY OF July, 2003.**



JOHN DOE

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