

COMMONWEALTH OF MASSACHUSETTS SUFFOLK, ss
SUPERIOR COURT DEPARTMENT
SUCV 2002-04551 T1

(originally filed in MICV-2002-0626)
(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 12

I, John Doe 12, do hereby depose and state:

1. I was born on , 1963. When I was a child, my family and I attended Our Lady Help of Christian's Parish in Newton, Massachusetts.
2. During late December of 1980, I became very ill for about three months, being bedridden for at least a month of that time, culminating in invasive surgery. I had to make up that entire school year. During the time of bed and house confinement, I began avidly reading and studying the Bible.
3. As I was well enough, I started visiting priests to clarify and discuss what I had read and to generally seek spiritual direction. I would travel by public transportation to Boston to speak with priests/brothers, some of whom were members of religious orders, and also spoke with the pastor and a priest at Our Lady's. One of the priests at Our Lady's recommended speaking with the priest at St. Jean's, which was located just up the road from my parents' residence on Watertown Street, because he worked with young people.
4. So, one afternoon in late winter / early spring of 1981, when I was 17 years old, and still particularly thin and relatively weakened from the effects of the illness / surgery I called St. Jeans to make an appointment to speak with the priest there. He said we could meet later that very day. So, in the evening I went to visit St. Jean L' Evangeliste Church (Saint John the Evangelist Church). My particular interest that night was to discuss some questions I had regarding the "Holy Spirit".
5. When I arrived at the rectory, I was greeted by Father Paul Shanley. We went to and then sat down in his study. I told him I had come to ask him about the Holy Spirit, and he said, "He is the Third Person of the Blessed Trinity". I thought that this was a rather perfunctory answer for what I had

intended as a thorough discussion, particularly since this was his full offering on the subject. He resisted discussing the matter further, but instead began asking me what I was really there for and why specifically I wanted to see *him*. He asked whether I was lonely, &c.

6. Because we were not discussing the issues I had gone there to have elucidated, I was disappointed. Yet, he wanted to keep talking anyway, so I was polite and initially basically listened and tried to participate as I could.

7. Father Shanley quickly began a private colloquy of his views of the Pope and the Pontiff's teachings. To my astonishment, he criticized him, claiming that John Paul II was out of touch with current theologians, and was morosely conservative, particularly with respect to sexual ethics.

8. Father Shanley showed enthusiasm for expressing his opinions with me at length, which was unusual for clergy, as my experiences with priests/brothers were always formal and swift. Yet, having had no experience with or sympathy for conversing about liberal theology generally and moreover outright denigration and contempt of standard teachings, I could not give approbation or encouragement to Father Shanley's opinions. Yet, I was courteous to and respectful of Father Shanley.

9. Father Shanley eventually began asking me personal questions. After some discussion, he learned that I was experimenting with yoga exercises and asked me to demonstrate them. I agreed to do so, and after awhile we went into the living room, where there would be appropriate space. After I finished my brief demonstration, Father Shanley removed his clothing down to his underwear and mimicked what I had shown him. I was dismayed at his trying the exercise, and taking off his outer clothes to do it. Yet, I remained respectful, if not somewhat bewildered.

10. Afterwards Father Shanley and I went to the kitchen for a beverage, where he provided me something. As gas makes me light headed and generally uncomfortable, when Father Shanley turned on the gas pilot to heat the kettle for himself, I explained to him that it was time for me to leave. Father Shanley told me to stay. He explained it was late, and besides the housekeeper who usually slept there was not going to be there that night. I understood this to mean that I could spend the night in the housekeeper's bedroom. I explained that I would have to receive my parents' permission, and I assumed they would refuse. He was disappointed in my having to make the call, but I insisted it was necessary, as in any event they would be concerned. So I made the call there in his presence and unexpectedly my parents gave permission. Without drinking anything, Father Shanley turned off the pilot, and said it was time to go upstairs.

11. Once on the second floor, Father Shanley began to explain that there were Catholic theologians, copies of whose books he had there, that were teaching that homosexual activity was not a sin. I thought that these must be a minority of liberals whose views could not be regarded as authoritative. When we had gotten to the bedrooms, he showed me the room on the left where the housekeeper normally stayed, and I told Father Shanley that I was tired and wanted to go to bed, assuming I would just immediately retire into that latter room. But Father Shanley insisted that I take a shower first. Though I really did not want to, he insisted. The shower was in a bathroom that was directly connected with his bedroom which was across the hall. I thought the reason for the shower was that since I would be spending the night in the housekeeper's bed, Father Shanley wanted to be sure I was clean before using the sheets.

12. When I came out of the shower with just the towel around me, Father Shanley told me that I would be sleeping in his bedroom, on his water bed, and with him! I was extremely surprised, but I thought that perhaps the housekeeper's bed was inappropriate for me to use, and that there was no other bed. I asked if there would be enough room and he assured me there would be. At this point, I was becoming concerned about his intentions, however, and I said to him, "you're not going to touch me." Father Shanley emphatically assured me that he would not touch me. With this assurance and at Father Shanley's insistence, I then lay down to go to sleep in his bed naked.

13. I quickly and soundly fell asleep but awoke in the middle of the night in excruciating pain. Father Shanley was inserting his penis into my rectum.

14. I was not fully awake, but I tried to shake Father Shanley off of me and kept telling him "no, no". Father Shanley was aggressive and said, "It is okay. Let me finish."

15. I was able to break free and ran from Father Shanley's bedroom into the housekeeper's room and locked the door. Father Shanley knocked on the door asking me to let him in. I refused each request.

16. But in the early morning, once it was light, I did allow Father Shanley to come in, so I could get my clothes back and leave, after he assured me that there would be no further physical contact. Yet, before giving me my clothes back, Father Shanley insisted on giving me a backrub.

17. I felt very ashamed, confused, violated and dirty. I got dressed immediately and prepared to leave right away.

18. As I was leaving, Father Shanley told me that I would probably like going with him to a camp in New Hampshire, where we could become better acquainted. Once off the property, I went straight to St. Patrick's church in

Watertown. I waited for the morning mass, seeing the priest come in and set up the altar. I participated in the mass, and remained as a group afterwards recited the rosary together. Afterwards I went home and immediately took a shower.

Signed this 17th day of July, 2003 under the pains and penalties of perjury.

John Doe 12