

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 [REDACTED]

I, [REDACTED], hereby depose and say:

1. I was born on [REDACTED], 1977 and grew up in Newton, Massachusetts.
2. Up until approximately the fifth grade, I was a parishioner at St. Jean's Parish in Newton, Massachusetts.
3. Approximately during the years 1983 – 1987, from the ages of about six to ten, I attended Sunday CCD (catholic education) classes regularly at St. Jean's School while my parents attended Mass.
4. My classmates in this CCD class included Gregory Ford, [John Doe 7] and [John Doe 8].
5. Father Paul Shanley was a priest at St. Jean's Parish during all times I was a parishioner.
6. On several occasions, Father Paul Shanley came to my CCD class and asked my teachers that I be excused to go with him. Generally, he would




take me to his office in the rectory, where we were alone together. I believe I was about seven or eight the first time this happened.

7. During many of these times alone together while I was supposed to be in my CCD class, Father Paul Shanley would sexually abuse me by having me perform oral sex on him between half a dozen and a dozen times in total. Generally, Father Shanley would perpetrate these acts of oral sex by inviting me into a game where I would have to "taste" him.
8. I remember one specific time when Father Shanley penetrated my anus with his finger. I was lying face down on the floor of Father Shanley's office, while his hands ran over my body I believe my pants were down and he went under my underwear. His hands stopped at my anus and he used his fingers to digitally penetrate my anus.
9. Father Shanley would usually tell me that I was "special" and "chosen" for these acts of sexual abuse. I remember feeling as though it would be the worst thing in the world to tell anyone what Father Shanley was doing to me. I was afraid for my safety and the safety of my family.
10. I recall one specific instance in which Father Shanley excused me from CCD class to take me to his office in the rectory of St. Jean's alone. While I was in or about the second grade, Father Paul Shanley came to my Sunday CCD class. He noticed a drawing I had made of the Grand Canyon and excused me from CCD class in order to "congratulate me". He took me to his office in the rectory of St. Jean's.



11. In or about the second or third grade, I began having problems with what I now know as depression and anxiety. I used to cry myself to sleep at night as a young child, without knowing or understanding why. Some time after being pulled from my CCD classes by Father Paul Shanley, I began engaging in "magical thinking". I believed that if I didn't perform certain acts in a ritualistic manner (such as folding my socks the exact same way), something horrible would happen to me or my family.
12. At or about the ages of seven or eight, I recall feeling as though I had to kill myself, or something bad would happen to me. Before Thanksgiving one year, I once held a knife to my wrist while standing in my kitchen thinking about killing myself.
13. In or about the third or fourth grade, I developed problems with anxiety and anger problem. I would stand in the middle of the street screaming at the top of my lungs and not know why.
14. In approximately the fifth grade, I began having academic problems for the first time, as well as conflicts with authority figures such as teachers. Also at or about this time, I was complaining so much about having to attend CCD classes that my parents decided our family would no longer belong to the parish of St. Jean's. In order to avoid CCD class and Father Shanley I would reset my parents' alarm clock so we would be too late to go, I would try to stay at a friend's house the night before class and I would argue all the time with my parents about that class. I believe I stopped all activities relating to St. Jean's when we switched parishes.

15. Throughout the rest of my childhood and adolescence, I continued to have significant mental health and substance abuse problems which I am beginning to understand were caused by being sexually abused by Father Paul Shanley. These problems necessitated the intervention of countless therapists and other mental health professionals. With the support of my parents (my mother is a licensed psychologist and my father is an environmental attorney) and my sister I was able to graduate from Wesleyan University in Connecticut. I have been free of drugs and alcohol for the past two and a half years and presently work in Rhode Island, where I teach creative writing to adolescents receiving treatment in a private psychiatric hospital.
16. I have never met or spoken with 
17. I have never spoken with Gregory Ford, or about any of the events set forth in this Affidavit. I have not seen or spoken to them since leaving St. Jean's. While I have heard from my parents and media reports that Gregory, and have alleged they were abused by Paul Shanley, I am not familiar with the details.

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

