

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 in 1954 and grew up in Braintree, Massachusetts. I am now married and a resident of Maine.
2. While living in Braintree my family and I attended Saint Francis of Assisi Parish. I was an altar boy there for several years.
3. In the Fall of 1970, at the age of fifteen, I ran away from home to New York City for a couple of days.
4. At this time, Father Shanley was a priest at Saint Francis of Assisi Parish in Braintree, Massachusetts.
5. At this time Father Shanley was also the leader of a program for wayward adolescents referred to as the "Ministry to Alienated Youth On the Streets of Boston" (herein "On the Streets") program, located in Roxbury, Massachusetts.

6. The "On the Streets" program was sponsored and supported by the Archdiocese of Boston.
7. My mother, [REDACTED] was a member of Saint Francis of Assisi Parish as well as a friend and supporter of Father Shanley and was familiar with the "On the Streets" program.
8. Father Shanley operated the "On the Streets" in a one-bedroom apartment and office located at One Warwick Street in Roxbury, Massachusetts.
9. When I returned from New York City, my mother had me go to Father Shanley for counseling due to her concerns about my running away.
10. My first counseling session with Father Shanley was at the Warwick House in the early 1970s. At this time we spoke about my feelings and why I had run away. In addition, Father Shanley asked me about sex. I remember him asking me if I "had any experience with sex." At the end of the afternoon visit, he stated that he felt I may have lied to him about some things and he suggested that I should return for future counseling with him in the evening so I could get a clear picture of what life on the street for runaway kids was like.
11. A few weeks later I went for a second visit with Father Shanley at the Warwick House. We took a ride around the streets in his car that evening and met some runaway kids.
12. After we returned to Father Shanley's one-bedroom apartment, I was seated on the office couch and Father Shanley walked into his office with a vibrator strapped to the back of his hand and began to rub it on my leg.

13. The next thing I can remember is being kissed on the lips by Father Shanley in his bed and the excruciating pain of him penetrating my anus with his penis.
14. I begged Father Shanley to stop. He told me to pretend that I had a large bowel movement. The pain didn't lessen until he finally stopped.
15. Father Shanley then performed oral sex on me. He put his mouth on my penis.
16. Father Shanley told me that anal and oral sex between men and boys was "perfectly normal."
17. During the time that I was abused by Father Shanley, we were alone.
18. After the incident described above I refused to have anything to do with Father Shanley.
19. I did not tell anyone about the incident, including my mother, due to the fact that she trusted and loved Father Shanley greatly and I did not want to hurt her. After the incident my mother was so thankful that Father Shanley took an interest in me, that she donated money to the "On the Streets" program and would volunteer her time to help serve holiday dinners to kids living on the streets of Boston.
20. Soon after this incident, Father Shanley moved to Weston, Vermont, and requested that I come to visit him. He wrote letters to my mother describing to her available modes of transportation and possible vacation dates.
21. I never saw Father Shanley again.

22. Shortly after Father Shanley abused me, when I was fifteen, I began drinking alcohol and using drugs.
23. I struggled with alcohol and substance abuse until I had surgery for an ulcer at the age of twenty-five.
24. For many years following the molestation, I wondered if I was homosexual.
25. I still cannot attend church of any denomination without being reminded about the sexual abuse by Father Shanley.
26. I have never met Gregory Ford, John Doe 7, John Doe 8, [REDACTED]
[REDACTED]
27. I have not read detailed accounts of media reports about Father Paul Shanley abusing other individuals.

Signed this 18th day of July, 2003 under the pains and penalties of perjury.