

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 9

I, John Doe 9 hereby depose and say:

1. I was born in 1954 and grew up in Braintree, Massachusetts.
2. Up until I was approximately 14 years old, I was a parishioner at St. Thomas More Church in Braintree, Massachusetts and attended Sunday Mass regularly. I attended Catholic schools through the 9<sup>th</sup> grade and served for over 6 years as an altar boy at St. Thomas More Church.
3. Father Paul Shanley was a close friend of my maternal grandmother,  . My grandmother provided significant financial support to Father Shanley and provided most of the funding for Father Shanley's Maine cabin, that was called "Terrible Mountain." Father Shanley used his Maine cabin as a shelter for runaways and others, including 1960's radicals who were fugitives from the law. My sister,     was at the cabin when the FBI raided it, looking for fugitives.

4. I first met Father Shanley when I was approximately 8 or 9 years old. Father Shanley would visit my grandmother and my mother at their respective homes for Christmas and Thanksgiving. Father Shanley often held Mass at my grandmother's house.

5. During the 1960's, both of my parents were heavy drinkers and were physically and emotionally abusive to me and my siblings. This was a very difficult time in my life. Whereas I had always been a very good student, in and around approximately 1968, I became depressed and my grades started to change.

6. Concerned about my grades, approximately in the summer of 1968 my parents suggested that I see Father Shanley for counseling. Shortly thereafter, Father Shanley drove to Braintree to pick me up for our first counseling session.

7. Father Shanley drove me to his apartment on Beacon Street in Boston for my first counseling session with him. During that drive, Father Shanley told me that he knew that I had it rough at home. Father Shanley immediately made me feel safe and understood. I believed that he was going to rescue me from my family.

8. Father Shanley's apartment was on one the upper floors of the building. The apartment had high ceilings and woodwork. Father Shanley's bed was a mattress on the floor.

9. Father Shanley told me that to make me less nervous and work out my tension, he had to massage my body. As he massaged me, he had me remove my clothes until I was naked.

10. At the first counseling session and repeatedly at other sessions, Father Shanley asked me to describe to him the worst thing that I had ever done in my life or

that had happened to me. Father Shanley told me that once I had gotten past that, he could help me cure any problem that I had. I could not come up with anything bad that I had done, but Father Shanley continued to ask me that question. Father Shanley specifically wanted to know if I had done anything sexually with anyone. I told Father Shanley that I did not have any experience with sex.

11. Father Shanley invited me to stay overnight and I did. I slept next to him in his bed on the floor. During the night, Father Shanley tried to touch my body, but I told him to stop and he did. The next morning, Father Shanley drove me home to Braintree.

12. My next counseling session with Father Shanley took place a couple of weeks later still in approximately the summer of 1968. This time I took the train into Boston to see him.

13. When I arrived at Father Shanley's apartment building, he buzzed me in downstairs. When I got up to his apartment, I found him in the bathroom, taking a bubble bath in the bathtub, with candles lit around the room and Gregorian chants playing in the background. When Father Shanley told me to join him in the bathtub, I was confused and did not know what to do, but I did what he said, and undressed and stepped into the bathtub with him.

14. I sat in the bathtub with my back to Father Shanley. Father Shanley rubbed my back and calmed me down.

15. After the bath, Father Shanley took me to his bed and continued to massage my body. Father Shanley then sexually abused me by performing manual masturbation and oral sex on me. Father Shanley made me perform oral sex on him, and

he ejaculated. Father Shanley asked me to sleep over at his apartment that night and I did.

16. A couple of weeks later, I had a third counseling session with Father Shanley. I met Father Shanley at his apartment and he similarly sexually abused me by manual masturbation, oral sex, and this time he put his finger in my anus. Afterward, we went for a walk up and down Boylston Street in the Back Bay, where Father Shanley "held court" and was treated like a celebrity by all the hippies he stopped to counsel. I felt lucky to have Father Shanley as a father figure.

17. I saw Father Shanley approximately five (5) times over that summer and fall of 1968. During each counseling session he sexually abused me by manual masturbation, oral sex and putting his finger in my anus. I have very powerful memories of the abuse.

18. I saw Father Shanley occasionally over the next several years and helped him move into a beautiful house on Brush Hill Road, in Milton.

19. After Father Shanley moved into the house in Milton, he invited me over on approximately five (5) occasions over the following six (6) months.

20. At those visits, Father Shanley smoked marijuana and drank wine or beer with me and others. Father Shanley also took me into his bedroom that had a mattress on the floor, and he manually masturbated me, performed oral sex on me, and put his finger in my anus.

21. Father Shanley performed my brother [ ]'s wedding service at St. Francis of Assisi Church in South Braintree in the late 1970's. I was at [ ]'s wedding with a date and in front of her Father Shanley put his arm around me and said, "I could

tell you stories about him.” I felt extremely threatened by what Father Shanley would say, but he did not say more. That was the last time that I saw Father Shanley.

22. I do not know Mr. Greg Ford, and I do not know details about Mr. Greg Ford’s abuse.

Signed this 16<sup>th</sup> day of July, 2003 under the pains and penalties of perjury.

John Doe 9