

ECKERT SEAMANS CHEI

ATTORNEYS AT LAW

March 27, 19

PERSONAL AND CONFIDENTIAL

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Wilson D. Rogers, Jr., Esquire
Dunn and Rogers, P.C.
One Union Street
Boston, MA 02108

Father,
My dictated letters are
coming but the tapes are
backed up in my office -
So here are copies of the
claim letters
Wid

Re: Sexual Molestation of by Fr. Joseph Fusoni

Dear Mr. Rogers:

This firm represents , a former altar boy at St. Joseph's
Church ("St. Joseph's") in Wakefield, Massachusetts. informs us that he was
sexually abused by Fr. Joseph Fusoni ("Fr. Fusoni"), a priest of the Archdiocese of
Boston ("Archdiocese"). has suffered extraordinary emotional, psychological
and physical anguish in the years since the commencement of the abuse, which form the
basis for his legal claims against Fr. Fusoni, Father Joseph O'Sullivan ("Fr. O'Sullivan")
and the Archdiocese as the facts below will demonstrate.

Fr. Fusoni sexually abused in or about the summer of 1984, when Mr.
was approximately 15 years old. In 1981, when was 11 years old,
became an altar boy at St. Joseph's where and his family were
parishioners. served Mass at St. Joseph's three to five times per week,
serving under the leadership of Fr. Fusoni, who was in charge of the altar boys at St.
Joseph's parish. During tenure as an altar boy, Fr. Fusoni befriended Mr.
A reverence for priests had been instilled in from a young age and
Fr. Fusoni was no exception. Over time, came to not only exalt Fr. Fusoni
but to trust him implicitly. Eventually, Fr. Fusoni would destroy this trust by using his
status as a priest and honored servant of the Catholic church and community to sexually exploit

During the summer of 1985, Fr. Fusoni invited to vacation with Fr. Fusoni
on Cape Cod. When it came time to organize the sleeping arrangements, Fr. Fusoni told
that it would be less expensive to rent a hotel room with one bed. Fr.
Fusoni also told that they would share that bed. recalls going
to bed the first evening and awakening early in the morning only to discover Fr. Fusoni
fondling genitals under the covers. On the second night of the vacation,
Fr. Fusoni again tried to fondle but,
warded off Fr. Fusoni's
assault by staying awake all night.

- Boston
Pittsburgh
Harrisburg
Allentown
Philadelphia
Buffalo
Fort Lauderdale
Boca Raton
Miami
Tallahassee
Washington, D.C.

REDACTED

ROBERT G. NAJARIAN, JR.
617/ 342-6852

AOB 00902

ECKERT SEAMANS CHERIN & MELLOTT

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After the abuse, [redacted] suffered from extreme anguish and shame. Prior to the sexual assault by Fr. Fusoni, [redacted] was an outgoing, self-confident and happy-go-lucky child with many friends. However, after the abuse, [redacted] became withdrawn and isolated. For months, [redacted] was plagued by horrible nightmares. Additionally, Fr. Fusoni's abuse of [redacted] caused him to drop out of Catholic school, St. John's Preparatory School in Danvers, Massachusetts. To this day, Mr. [redacted] has been unable to continue his education. Further, Fr. Fusoni's sexual abuse of [redacted] has resulted in [redacted] inability to make close and lasting relationships. Finally, and most importantly, Fr. Fusoni's abuse destroyed [redacted] faith in the Catholic church. Once a proud altar boy [redacted] has never been able to return to the church.

Functioning in his capacity as a priest, Fr. Fusoni had unquestionable moral stature that gave virtue and credence to his words and actions. Fr. Fusoni mercilessly exploited this sacred trust in order to satisfy his own bodily desires. In doing so, he destroyed Mr. [redacted] self-esteem as well as his faith in the church.

There are considerable grounds to establish that the Archdiocese knew or should have known of Fr. Fusoni's propensity toward sexual abuse of minors, but failed to take any significant actions to protect victims from these habits. [redacted] informs us that he spoke with Fr. O'Sullivan, the head pastor at St. Joseph's. Fr. O'Sullivan told Mr. [redacted] that Fr. Fusoni had spoken with Fr. O'Sullivan about Fr. Fusoni's sexuality. Fr. Fusoni informed Fr. Sullivan that Fr. Fusoni thought he might be gay and that he definitely had a liking for young boys. Additionally, Fr. O'Sullivan reported to Mr. [redacted] that before [redacted] was sexually abused, the parents of another young boy in the parish contacted Fr. O'Sullivan and told him that their son had also been abused by Fr. Fusoni. Despite this knowledge, the Archdiocese failed to take reasonable steps to train and supervise Fr. Fusoni.

[redacted] made the connection between the abuse and his damages shortly after the Fr. Porter story broke in May, 1992. After Father Porter's criminal trial ended, [redacted] informs us that he spent many hours contemplating Fr. Fusoni's sexual abuse of him. It was during these reflective hours that [redacted] began to make a connection between Fr. Fusoni's sexual abuse and his damages.

[redacted] hereby makes demand upon the Archdiocese of Boston, Father Joseph Fusoni and Fr. Joseph O'Sullivan in the amount of \$200,000.00 as compensation for his injuries which are causally related to the abuse of him by Fr. Fusoni.

REDACTED

AOB 00903

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I have enclosed Tolling Agreements which I request that you execute. I look forward to your prompt response to this letter.

Very truly yours,


Robert G. Najarian, Jr.

RGN/bba
Enclosures

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REDACTED