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January 20, 1998

Wilson D. Rogers, Jr., Esquire
Dunn & Rogers
One Union Street
Boston, MA 02108

RE: [REDACTED] *GT Redaction*

Dear Mr. Rogers:

As you are aware, this office represents [REDACTED] *GT Redaction* with regard to injuries suffered as a result of having been physically and sexually abused by Father Paul Shanley from approximately 1960 through 1966. During this time, Father Shanley was serving as a priest at St. Patrick's Church in Stoneham, Massachusetts. It is my hope that by bringing this matter to your attention, it may be resolved without litigation.

[REDACTED] *GT Redaction*
[REDACTED] He was an altar boy at St. Patrick's Parish in Stoneham, Massachusetts when Father Paul Shanley arrived at St. Patrick's in 1960.

When [REDACTED] *GT Redaction* was approximately 12 years old, Father Shanley sent [REDACTED] *GT Redaction* " [REDACTED]". Shortly thereafter, in the context of a pastoral meeting, Father Shanley began discussing erections with [REDACTED]. He told [REDACTED] that if he did not get an erection it was not a sin and that if he did get an erection, it might or might not be sinful but [REDACTED] needed to discuss it with Father Shanley. Shortly thereafter, Father Shanley would take [REDACTED] into the baptism room at the rectory with him and Shanley would instruct [REDACTED] to masturbate. Father Shanley would leave the baptism room, telling [REDACTED] that he would return to check to see if [REDACTED] had an erection. After short period of time had passed, Father Shanley would return to the room and visually examine [REDACTED] genitals. This occurred on several occasions over the course of several weeks to months.

GT Redaction

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GT Redaction

The sexual molestation continued in Shanley's room in the rectory at St. Patrick's. Father Shanley would fondle [REDACTED] penis and cause [REDACTED] to fondle his penis. At times, Father Shanley would summon [REDACTED] to his room where [REDACTED] would find him in bed naked. Father Shanley would kiss [REDACTED] on the lips and would ask [REDACTED] to remove his pants or unzip his fly. [REDACTED] recalls observing that on these occasions, Shanley had an erection.

GT Redaction

On several occasions, Father Shanley took [REDACTED] and other altar boys to a cabin in the Blue Hills in Milton, Massachusetts. On these trips, the sleeping arrangements were orchestrated by Father Shanley such that [REDACTED] would share a sofa bed with Father Shanley. Before bedtime, Father Shanley told [REDACTED] that he had allergies, had to take medication and could not be responsible for what happened after he took his medication. During the night, Father Shanley would cause [REDACTED] to go under the covers and perform oral sex on him. These trips to the cabin began when [REDACTED] was 12 or 13 years old and continued for several years.

GT Redaction

After some of the occurrences of sexual abuse, Father Shanley would take [REDACTED] to confession at the Arch Street Shrine in Boston so that [REDACTED] could be absolved of his sins. Father Shanley told [REDACTED] he could not absolve [REDACTED] of his sins because he (Father Shanley) was directly involved. [REDACTED] told the priests at the Arch Street Shrine on several occasions that he had sexual contact with a priest. Father Shanley also went to confession at the Arch Street Shrine as well and presumably disclosed his sexual conduct with [REDACTED]. The fact that the priests to whom young [REDACTED] confessed knew of the sexual abuse and failed to take action to prevent further abuse is incredible. The failure of these priests to act on this knowledge is unquestionably outrageous and morally reprehensible.

As a result of these incidents of abuse, [REDACTED] has suffered greatly. Father Shanley utilized his position as a respected religious figure to take advantage of [REDACTED] at a time in his life when he was beginning to discover his sexuality.

[REDACTED]

[REDACTED] or
[REDACTED] He has great difficulty
with relationships and has been essentially unable to successfully maintain them.
He suffers from poor self-esteem, has experienced various sleep disturbances,
including nightmares, and has experienced problems with his memory and
concentration. [REDACTED] also experiences some sexual dysfunction as well. In recent
years, [REDACTED] depression has been so severe that it has interfered with his ability
to continue to work and this has had a devastating impact upon his life and
financial situation. Additionally, [REDACTED] believes that the abuse by Father Shanley
has disrupted his future plans in that [REDACTED] desired to go into the priesthood
before he met Father Shanley.

GT
Redaction

[REDACTED]

[REDACTED]

At this time, my client is prepared to resolve the legal aspects of his claim and
the attendant distress that this has caused to him for the sum of [REDACTED] GT Redaction
As I am sure you are aware, this demand is realistic and consistent with other
similar cases.

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Please contact me as soon as you have had the opportunity to review this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Laurence E. Hardoon".

Laurence E. Hardoon

Enclosures