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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 *GT Redaction* [Redacted] with regard to injuries suffered as a result of having been physically and sexually abused by Father Paul Shanley from approximately 1963 through 1970. It is my hope that by bringing this matter to your attention, it may be resolved without litigation.

GT Redaction [Redacted] He was sexually abused by Father Paul Shanley on many occasions from approximately 1963 until 1970. [Redacted] originally met Father Shanley at St. Patrick's Church in Stoneham, Massachusetts. [Redacted] was an altar boy and Father Shanley was in charge of the altar boys. Prior to the time when the abuse began, Father Shanley had counselled [Redacted] mother for issues relating to marital problems she was experiencing. Father Shanley had knowledge of the problems in [Redacted] home and utilized this knowledge to take advantage of [Redacted] vulnerabilities.

GT Redaction

The first incidence of abuse occurred when [Redacted] was in the fifth grade in approximately 1963. [Redacted] recalls going on a trip with Father Shanley and other boys to a cabin in Milton, Massachusetts where Father Shanley fondled his genitals. Father Shanley did not abuse [Redacted] again until he was approximately 15 years old. At that time, Father Shanley resided at the "Warwick House" in Roxbury, Massachusetts. [Redacted] was sexually abused approximately 15 times from approximately 1967 until 1970.

GT Redaction

Wilson D. Rogers, Jr., Esquire
January 20, 1998
Page 2

GT Redactions

Beginning when [REDACTED] was approximately 15 years old, Father Shanley would invite [REDACTED] to help him at the "Warwick House" where Father Shanley counselled runaways. [REDACTED] would take the train from Stoneham to Roxbury where Father Shanley would meet him and take him to the "Warwick House" where he would abuse him. [REDACTED] also recalls being sexually molested by Father Shanley in a mobile home that Father Shanley used in his ministry.

GT Redactions

On some of the occasions, Father Shanley would permit [REDACTED] to accompany him to speaking engagements and then abuse him afterwards. Father Shanley would fondle [REDACTED] genitals and masturbate himself as well as [REDACTED] and would also request that [REDACTED] masturbate him. Father Shanley performed oral sex on [REDACTED] and asked [REDACTED] to perform oral sex on him which he did. Father Shanley digitally penetrated [REDACTED] anus and engaged in anal sex with him as well. On many of these occasions, Father Shanley would orchestrate a situation where he would bring up [REDACTED] problems at home and counsel him with those problems. He would take advantage of [REDACTED] vulnerabilities and after the counselling, sexually abuse [REDACTED]. [REDACTED] felt compelled to engage in the sexual activity and felt as though it was a "payback" for the counselling. [REDACTED] recalls, in particular, one event where Father Shanley shamelessly exploited [REDACTED] and sexually abused him on the evening of [REDACTED] father's funeral after approaching [REDACTED] to express his condolences.

[REDACTED]

GT Redactions [REDACTED] continues to experience episodes of severe depression as a result of the sexual abuse. [REDACTED]

GT Redactions

[REDACTED] a result of this horrendous breach of trust by Father Shanley, [REDACTED] adult relationships have been impacted. He has been unable to maintain meaningful long-lasting relationships and has been unable to merge feelings of love and emotion with physical sexual feelings. [REDACTED] believes that the sexual abuse by Father Shanley led him to be promiscuous. GT Redaction

GT Redactions

[REDACTED] has experienced a great deal of anger about the sexual abuse by Father Shanley and still harbors a great deal of unresolved rage which he tends to internalize. This has resulted in low-self esteem, severe bouts of depression and isolation. He tends to withdraw when people try to get close to him and often minimizes his accomplishments.

Wilson D. Rogers, Jr., Esquire

January 20, 1998

Page 3

GT Redactions

[REDACTED] has felt resentment towards his mother for bringing Father Shanley into their home when he was a boy. This is further complicated by the fact that [REDACTED] has been unable to disclose the abuse to his mother and other family members. He continues to feel the need to protect his mother from this knowledge because of her advanced age and maintaining this secret creates conflict within himself. He is distrustful of people in general and [REDACTED]

[REDACTED] his [REDACTED] He attributes this inability to trust to his memories of Father Shanley sexually abusing him after counselling him with his problems.

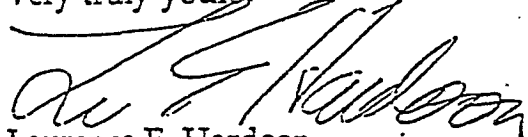
At this time, my client is prepared to resolve the legal aspects of his claim and the attendant distress that this has caused to him for the sum of \$[REDACTED]. Although my client is seeking monetary damages as a result of the abuse, it is important to him that the Archdiocese of Boston recognize that the acts of sexual abuse perpetrated upon him by Father Shanley represents a serious problem which has irreparably harmed [REDACTED] and other victims.

GT Redaction

GT Redaction

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

Very truly yours,


Laurence E. Hardoon

Enclosure

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