

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT DEPARTMENT
SUCV 2002-04551 T1
(originally filed in MICV-2002-0626)
(consolidated with SUCV-2002-1296)

GREGORY FORD, ET AL.,
Plaintiffs,

v.

BERNARD CARDINAL LAW,
a.k.a., CARDINAL BERNARD F.
LAW, ET AL.,
Defendants.

AFFIDAVIT OF
BRYAN SCHULTZ

I, Bryan Schultz, hereby depose and say:

1. I am 50 years old. When I was a child, my family attended St. Patrick's Church in Stoneham, Massachusetts.
2. Father Shanley was a priest at St. Patrick's. Father Shanley sexually molested me when I was between the ages of 12 and 14.
3. In addition, between the ages of 12 and 14 years, I volunteered at Camp Fatima in New Hampshire. Father Shanley suggested that I volunteer as a waiter during the Exceptional Children's week, a week of camp devoted to mentally and physically handicapped children.

4. There, I was introduced to Father Robert Gale, Father Daniel Graham, Father Robert Beale, Father Edward Kelley, Father Carl Dowd and others who have since been accused of sexual molestation.

5. After meeting Father Graham and Father Gale at Camp Fatima, I continued to have contact with both of them. Both Father Graham and Father Gale sexually abused me while I was a minor. I knew that Father Shanley, Father Gale and Father Graham were acquaintances. In fact, the Archdiocese asked Father Graham to speak with Father Shanley in 1988 after I wrote to Father Graham about the sexual abuse he perpetrated on me. See Exhibit "1"

6. I have worked for the Department of Social Services since 1980.

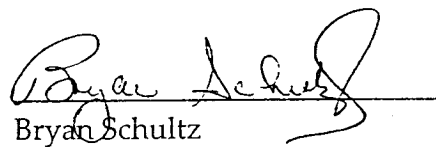
7. On July 10, 1986, I wrote a letter to Cardinal Law, on official Department of Social Services letterhead, and told him that I had seen a television program which caused me great concern about how the Roman Catholic Church was handling sexual abuse of minor children by parish priests. See Exhibit "2." I told him that I was a "former victim of sexual misuse by a number of Diocesan priests." See id. I stated: "If you are interested in hearing more about the circumstances of my past experiences as a victim, and it's continuing emotional effects; perhaps we can schedule a meeting." See id.

8. Cardinal Law did not respond to my letter personally. He had his secretary, Monsignor William Helmick, respond. See Exhibit "3." I was not

pleased with the response. I found it to be hollow and meaningless. In turn, I wrote a second letter to Cardinal Law on August 25, 1986 expressing my frustration, disappointment and concern regarding the response to my letter. See Exhibit "4."

9. If Cardinal Law had requested the meeting in 1986, I would have told him that I was abused by Fathers Paul Shanley, Robert Gale and Daniel Graham.

Signed this 15th day of July, 2003 under the pains and penalties of perjury.


Bryan Schultz