

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT DEPT.
OF THE TRIAL COURT
CIVIL ACTION NO.: 02-1296-H

JAMES M. HOGAN, STEPHEN
BLANCHETTE, JOHN MORRIS,
BERNARD MCDAID, ROBERT
ABRAHAM, EDWARD BERGERON,
GARY BERGERON, JAMES DAVIN,
THOMAS BLANCHETTE, LAURENT
BEDARD, ROBERT COURTNEY,
STEVAN GAUTHIER, RUSSELL
BERGERON, OLAN HORNE, DAVID
LYKO, MARK JANECZKO, ROGER
HAMILTON, LAWRENCE FINN,
JAMES MURPHY, LAWRENCE
SWEENEY, DONALD BLANCHETTE,
EDWARD DAVIN, MICHAEL
MCCABE, JOHN DOES 1-4, RICHARD
ROES 1-8, MICHAEL MOES 1-4, AND
JAMES JOE

Plaintiffs,

v.

ROMAN CATHOLIC ARCHBISHOP
OF BOSTON, a Corporation Sole, JOHN
B. MCCORMACK, JOHN J. JENNINGS
and BERNARD CARDINAL LAW,
a.k.a., CARDINAL BERNARD F. LAW,
Defendants.

AFFIDAVIT OF BEATRICE CIARAMITARO

1. I am a resident of Gloucester, Massachusetts. I have a son, Paul Ciaramitaro who suffers from tuberous sclerosis, a congenital disease characterized principally by the presence of hamartomas of the brain ("tubers"), retina ("phakomas")

and viscera, mental retardation, seizures, and adenoma sebaceum, and often associated with other skin lesions.

2. My family was a member of St. Ann's parish in Gloucester. Father Joseph Birmingham was the pastor in or about 1986.

3. In or about 1987 Paul informed me that he had been sexually abused by Father Joseph Birmingham.

4. I called the Archdiocese of Boston Chancery in Brighton and was told to call my bishop, who was Bishop John Mulcahy in Swampscott. On or about February 12, 1987, I called Bishop Mulcahy and told him that Father Birmingham had been abusing Paul. I asked that Paul receive counseling.

5. I remember that Father Birmingham left St. Ann's the very next day.

6. Bishop Mulcahy arranged for Paul to receive therapy. Over the course of the next several years Paul went to various counselors.

7. I received counseling for about one year from Bishop Mulcahy himself. I trusted Bishop Mulcahy and looked to him for guidance in dealing with among other things, the abuse suffered by Paul.

8. Between 1989 and 1991, Cardinal Law served Mass at St. Ann's. After Mass I approached Cardinal Law and told him that Paul had been abused by Father Birmingham and that he was "having a hard time." To which, Cardinal Law brushed me off and said "Yes, I know. I'm sorry."

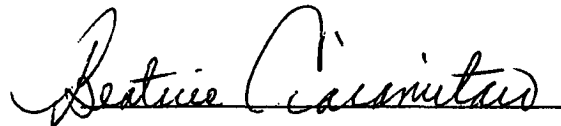
9. In or about 1991 I received a telephone call from Bishop Mulcahy. He was angry and shouting at me. He asked me, "why are you suing the church? You said all you wanted was counseling." I responded that I did not know what he was talking

about and that I was not suing the church. He said that Paul had gone to a lawyer and was suing the church for the sexual abuse by Father Birmingham.

10. Bishop Mulcahy continued to yell at me and threatened to withhold counseling from Paul if he continued to sue the church. Having Paul receive counseling was very important to me. Bishop Mulcahy was very angry and he made me very upset. I felt intimidated and coerced into convincing Paul to give up his lawsuit. I told Paul that if he continued to sue the church, he would be "kicked out of the family."

11. Shortly thereafter, Paul went to his attorney and told his attorney to settle the matter. Paul was only 19 years old at the time.

Signed under the pains and penalties of perjury this 20 day of June, 2002.

A handwritten signature in cursive script that reads "Beatrice Ciaramitaro". The signature is written in black ink and is positioned above the printed name.

Beatrice Ciaramitaro