

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT DEPARTMENT  
Suffolk County Civil Action No.  
02-04551-T1 (Consolidated with C.A.  
02-1296) (Originally entered in  
Middlesex County as C.A. No. 02-626)

GREGORY FORD, et al.,

Plaintiffs,

v.

BERNARD CARDINAL LAW, et al.,

Defendants.

AFFIDAVIT OF [REDACTED]

I, [REDACTED] hereby depose and say:

1. I was born on [REDACTED] 1969 and grew up in Newton, Massachusetts.
  2. During the time I lived in Newton with my parents, brother and sister, I was a parishioner at St. Jean's Parish in Newton, Massachusetts.
  3. Approximately during the years 1980 – 1984, from the ages of about ten to fourteen, I attended Saturday CCD (catholic education) classes regularly at St. Jean's School.
  4. Also during the approximate years 1980 – 1984, I attended various parish events, including Christmas Bazaars. In or about 1984, when I was in or about the ninth grade, I attended the youth group at St. Jean's.
  5. Father Paul Shanley was a priest at St. Jean's Parish during the years I was sexually abused by him, approximately 1980 – 1984.
- [REDACTED]

6. I was sexually abused by Father Shanley on numerous occasions during the approximate years 1980 -- 1984. I would have been approximately ten or eleven when the abuse first started.
7. Generally, Father Shanley would have access to me during my CCD class time although there were two other instances of abuse outside of CCD class time described below. Father Shanley would usually either find me outside the classroom or would ask the teacher that I be excused because I was needed by him.
8. Father Shanley would usually abuse me in the bathroom of St. Jean's during my CCD class, although there were two occasions where he abused me in the rectory of St. Jean's, described in further detail below.
9. During all times I was abused by Father Shanley, we were alone.
10. Generally, the acts of abuse by Father Shanley included fondling, masturbation, oral and anal rape. The acts of abuse began with fondling and attempted oral rape, and later progressed to digital anal rape. Generally, Father Shanley would instruct me to perform oral sex on him. Also generally, he would penetrate my anus with his finger. I believe the first time Father Shanley digitally penetrated my anus was after he had taught me how to perform oral sex on him. I believe I was still about eleven years old at the time he had first digitally penetrated my anus. Most of the time, Father Shanley would explain to me that he was a "worker of God" and that the acts of abuse were sanctioned by God.



11. I clearly remember the first time I was abused by Father Shanley. When I was about ten or eleven, I asked my CCD teacher to use the bathroom. The CCD teacher sent me to the bathroom alone. Father Shanley met me in the hallway and took me to the bathroom. While we were in the bathroom, he asked me to expose my genitals and he fondled my genitals. He then exposed his genitals and asked me to perform oral sex on him. I attempted to do so, but did not complete the act. Father Shanley did not ejaculate at that time.
12. I clearly remember the last time I was abused by Father Shanley. During the summer of 1984, I planned to meet some friends from the youth group at St. Jean's at one of their houses. We agreed to meet in front of St. Jean's because I did not know where the house was. I arrived to St. Jean's early, and Father Shanley came outside to greet me. Father Shanley took me inside the rectory to his bedroom. He performed oral sex on me and digitally raped my anus. This was the first and only time Father Shanley performed oral sex on me.
13. I clearly remember Father Shanley bringing me to his bedroom in the rectory of St. Jean's on two occasions. One of those occasions is described in the previous paragraph above. The other occasion happened while I was attending a Christmas Bazaar with my family at St. Jean's. Father Paul Shanley approached me and asked if I would help him get some snacks from the Rectory. Father Paul Shanley brought me to his bedroom



in the rectory of St. Jean's and had me perform oral sex on him. He also put his fingers into my anus.

14. I recall that Father Paul Shanley threatened me to not report the abuse to anyone. I recall being terrified of him.
15. Father Paul Shanley told me that if I told anyone of the abuse, he would go to my grandfather and tell him it was my fault.
16. During the years Father Paul Shanley was sexually abusing me, I tried to avoid him by going to the bathroom during CCD classes by myself and by avoiding him at Communion during Mass at St. Jean's.
17. I recall that shortly after Father Shanley started abusing me, when I was either ten or eleven, I began drinking alcohol – vodka and gin.
18. I recall that by age twelve or so, I began using marijuana.
19. Sometime in junior high, I got in trouble for bringing a knife to school.
20. I recall that by about age fourteen, I was using cocaine, Valium and acid.
21. I recall that around age fourteen or fifteen, my parents were so frustrated in trying to find out what was wrong with me that they begged the Catholic Church for help.
22. I recall stopping most activities relating to the Catholic church at around age fourteen.
23. I recall Cardinal Bernard Law visiting Our Lady's in Newton and saying Mass there. I recall my mother bringing me up to Cardinal Law after Mass and telling him she needed help with me. Cardinal Law invited me to meet with him at the Chancery. At the time of this meeting, when I was




about fifteen or so, I was struggling with severe substance abuse and psychiatric problems.

24. I have struggled with substance abuse problems for more than twenty years of my young life. I have been told by psychiatrists and therapists that my substance abuse problems are a direct result of the abuse I suffered by Father Shanley.

25. I had recovered from my substance abuse problems for just over two years prior to the news of pedophile priests being made public in or about early 2002.

26. Currently, I am incarcerated in a county jail and have been since in or about March, 2003 for charges incurred while I was abusing substances. I expect to be released within the next year.

27. I have never met Gregory Ford, ,  or .

28. I have not read detailed accounts of media reports about Father Paul Shanley abusing Gregory Ford,  or .

Signed this 21<sup>st</sup> day of July, 2003 under the pains and penalties of perjury.

