

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 John Doe 15

John Doe 15, hereby deposes and states as follows:

1. I was born on , 1952. I am currently incarcerated at Sousa-Baranowski Correctional Center in Shirley, Massachusetts.
2. I met the Reverend Paul Shanley in the summer of 1968. At that time my parents were living at Street, Quincy, Massachusetts. Most of the time I was living in the streets of Quincy Square.
3. Early one summer evening in 1968, I left my parents house and was walking on Palmer Street in Quincy. I walked by Snug Harbor School and then decided to hitchhike a ride to Quincy Square. A dark colored Chevrolet (Malibu 1966 or 1967) pulled over to give me a ride and I got in. The man driving the car was Father Shanley. He asked me where I was going and I told him Quincy Square. He asked me where I lived and I told him on the streets of Quincy. Father Shanley asked me if I knew a kid

named Lenny. I said yes I knew Lenny because he was a sharp dresser. Father Shanley told me that he gave Lenny the money to buy those clothes and that he was looking for Lenny that night but could not find him.

3. When we reached Quincy Square I told Father Shanley that he could let me out. Father Shanley asked me to go for a ride with him since I had no place else to be. I agreed. Father Shanley drove through Quincy and we reached the Blue Hills Reservation. At the Reservation he took a right onto a lumpy dirt road and parked the car. It was getting dark and I was scared.

4. Father Shanley told me that he gave Lenny money because Lenny did favors for Father Shanley. Father Shanley then slid over across the seat to me and reached for the button on the top of my pants. He opened the button, unzipped my pants and pulled them down to my knees. Father Shanley reached and masturbated me. I told him to stop because I did not like it. He then tried to perform oral sex on me. I pushed him away. Then Father Shanley undid his pants and tried to make me give him oral sex. I bit him. He pushed my face to the right and he stuck his penis in my anus. It hurt so bad I said please stop hurting me and he pushed harder. I was crying. He finally stopped. He took me back to Quincy Square and I never saw him again.

Signed this 16 day of July, 2003 under the pains and penalties of perjury.

John Doe 15