

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 16

I, John Doe 16 hereby depose and say:

1. I was born on , 1952. I was a parishioner at St. Patrick's Church in Stoneham, Massachusetts.

2. I was a shy and withdrawn child and did not have many friends my own age. Father Paul Shanley, a priest at St. Patrick's, befriended me. He told me to come to the rectory if I ever wanted to talk. I often went to visit Father Shanley in the rectory.

3. When I was approximately 12 years old and in the 6th grade at St. Patrick's Elementary School, I had surgery to have my testicles taken down.

There was a lot of discomfort around the surgery and I was very embarrassed by it.

4. I went to St. Patrick's rectory to talk with Father Shanley. We sat in the conference room of the rectory. Father Shanley was sitting at his desk and he told me that he wanted to see the outcome of the surgery. He told me to pull down my pants. Believing that Father Shanley had only my best interest in mind, I reluctantly complied with his request.

5. Father Shanley proceeded to touch and fondle my testicles, pretending to examine them. I felt some discomfort but no pain. Afterwards, we talked for another hour or so. For a couple of weeks after this incident, Father Shanley asked me if he could examine me again. I said no.

6. Throughout my pre-teen and early teenage years, Father Shanley continued to foster our relationship, acting as a spiritual and personal advisor, around my feelings of loneliness and despair. We had clandestine meetings throughout the years. He often met me on the street or at a restaurant in Boston or at his house in Milton after I hitch-hiked there. He refused to come to my house or any place where he may be recognized. On occasion, he took me to his house in Milton. I believe that Father Shanley shared this house with two other men. Father Shanley took me to this house several times. While he was living on his farm in Vermont, he often invited me to come up to visit. I never did so.

7. On another occasion, in or about 1966-1967, while Father Shanley lived at Warwick House in Boston, with another priest previously from St. Patrick's, Father John White, Father Shanley took me there. While there, Father Shanley took me to his room and asked me about my sexual identity and if he could help me "figure it out." I felt panicked and did not know what to do. He showed me a pile of pictures of naked men and then asked me to tell him what feelings it evoked in me.

8. Father Shanley left the room and came back, naked, and told me that he could not drop me back off at home and that I had to stay the night with him. That night, Father Shanley anally raped me by putting his penis into my anus. Father Shanley also fondled my genitals on the ride back to Milton.

9. After this incident at Warwick House, my contact with Father Shanley was minimal. However, one night, in or about 1974, after breaking up with my girlfriend, I was depressed and took some sleeping pills and called Father Shanley for support. Father Shanley had me turn on music and guided me through masturbation as Father Shanley put it, "as a mechanism to relax."

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

John Doe 16