

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
JOHN DOE

I, John Doe, hereby depose and say:

1. I was born on 1957, and I grew up in Brockton, Massachusetts.
2. I grew up in a strict Catholic household and we were parishioners at Lady of Lourdes parish, Brockton, Massachusetts.
3. My mother died in the , and after that I lived with step parents in Brockton.
4. In 1972, while I was a student at West Junior High School in Brockton, I noticed an advertisement in a newspaper placed by a priest who advertised himself as open-minded and willing to listen. The advertisement was directed toward boys who were confused about their feelings and needed help. At that time, I had confused feelings about sex, and as a result, I called the number listed in the advertisement and the priest was Father Shanley.

5. When I spoke with Father Shanley, he was very nice to me and he suggested that he drive to Brockton to pick me up and that we could talk about my confused feelings. I agreed and Father Shanley picked me up in front of a convenience store in Brockton.
6. Father Shanley was dressed in priest clothing and he suggested that we go to his apartment in Boston where we could talk. I went with Father Shanley, because I believed that he was trying to help me.
7. When Father Shanley and I arrived at his apartment, he said that he needed a shower and he left me in his living room which had a bed in the middle of the room. Shortly thereafter, Father Shanley called to me from the bathroom, and said that he wanted me to come to the bathroom and talk to him. I did as he requested, and when I entered the bathroom, I noticed that he had an erection. I quickly walked back into the living room. Father Shanley followed me into the living room and then pulled me from the chair I was sitting in onto the bed. He told me that he needed to see if I could function properly and if "everything worked." I protested vehemently, and said that I did not want to do anything. Father Shanley ignored my pleas and forcibly pulled my pants off. He became irritable because I did not have an erection. Father Shanley then stated that "it would only take a minute" and then forcibly rolled me onto my stomach. Father Shanley then reached for a jar of vasoline while I tried to break free. He was too heavy and strong for me to escape and he brutally raped me. First he put his finger in my anus and then I screamed out in pain, and I said that it really hurt.

Father Shanley then put his penis in my anus and raped me, while holding me down on the bed, digging his knuckles into my back. He then rolled off me.

8. After Father Shanley raped me, I begged to leave his apartment. I was bleeding from my rectum. Father Shanley drove me to the Park Street subway station and told me how to get back to Brockton by the train and the bus.
9. During the next week after he raped me, Father Shanley called me at home. I was terrified that he might say something to my step parents and I quickly got on the phone with Father Shanley. He told me that he had met someone like me and that we would be great friends. Father Shanley asked me to come to Boston again so that I could meet this friend. I said that I would try to come, but I had no intention of going to see him. Father Shanley called again and again, and I was afraid that my step parents would find out what happened between Father Shanley and me, so I agreed to visit him one more time. Father Shanley also threatened me, saying that "you wouldn't want anyone to find out about this" and I was afraid and went along with his request to come and see him again.
10. Shortly thereafter, in about 1972, Father Shanley picked me up again in front of the same convenience store in Brockton and he drove me back to his apartment. When we arrived at this apartment, Father Shanley called a man named "Rusty" and asked him to come over. Rusty arrived a short time later and Father Shanley said that Rusty had the same problem as I did, in that he could not get an erection. Father Shanley told Rusty that he could help with his problem. The next thing I remember is that Father Shanley was rubbing my penis and Rusty was standing over me. Father Shanley continued to manipulate my penis until I ejaculated.

Father Shanley that said, "good, everything works." Father Shanley told me that he wanted Rusty to watch because Rusty could not achieve an erection.

11. I do not remember going home that day, and I believe that I might have been drugged by Father Shanley. I also believe that Rusty was a priest.
12. During one of the times that Father Shanley took me to his apartment, he tried to get me excited by showing me pornographic books and magazines. I kept telling him that I wanted to go home.
13. Father Shanley tried to make me feel as if he was helping me and giving me something I needed like a priest would do. When Father Shanley was with me, he was also dressed like a priest.
14. After Father Shanley sexually abused me the second time in 1972, he kept calling and calling me at home. I was still afraid that my step parents would find out, and I kept talking to Father Shanley on the telephone. When he called one day after the second time he abused me in 1972, I started to cry during our telephone conversation, and soon I began to cry hysterically. Father Shanley then hung up, and I never heard from him again.
15. During the times in about 1972 when Father Shanley abused me, I was depressed because my mother had recently died and my real father was an alcoholic, so I was living with step parents.
16. I have not met nor spoken with Gregory Ford, John Doe 7, John Doe 8,

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21. I have not read detailed accounts of media reports about Father Paul Shanley abusing Gregory Ford, John Doe 7, John Doe 8, [REDACTED]

Signed this 21st day of July under the pains and penalties of perjury,



John Doe