

ECKERT SEAMANS CHERIN & MELLOTT

~~FEDERAL RESERVE BANK~~

March 27, 1995

PERSONAL AND CONFIDENTIAL

GT REDACTION

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Boston, MA 02110
Telephone 617 342-6500
Facsimile 617 342-6899

Wilson D. Rogers, Jr., Esquire
Dunn and Rogers, P.C.
One Union Street
Boston, Massachusetts 02108

Re: Father Paul Shanley's
Sexual Molestation of [REDACTED]

Dear Mr. Rogers:

This firm represents [REDACTED]. Mr. [REDACTED] informs us that Father Paul Shanley ("Fr. Shanley") of the Archdiocese of Boston ("Archdiocese") sexually molested Mr. [REDACTED] when he was 13 years old. Fr. Shanley's brutal victimization of Mr. [REDACTED] has permanently scarred his life and has left him ashamed, anguished, angered and depressed. As demonstrated below, Mr. [REDACTED] has continued to suffer great emotional and psychological distress in the years subsequent to Fr. Shanley's sexual molestation of him, which forms the basis of his legal claims against Fr. Shanley and the Archdiocese.

Mr. [REDACTED] was raised in a strict Catholic household in [REDACTED], Massachusetts where sex was never discussed. In 1972, while attending [REDACTED] High School in [REDACTED], Mr. [REDACTED] noticed an advertisement in a newspaper placed by a priest who advertised himself as open minded and willing to listen. The advertisement was directed towards boys who were confused about their feelings and needed help. Then a young teenager, Mr. [REDACTED] had confused feelings concerning sex and as a result called the priest listed in the advertisement. That priest was Fr. Shanley. As you are undoubtedly aware, Fr. Shanley was a popular priest operating a novel "street ministry" which was sponsored by the Archdiocese. Father Shanley's "counselling" was conducted out of one-bedroom apartment and office located at One Warwick Street in Boston, MA.

Fr. Shanley was very nice on the phone and suggested that he drive to [REDACTED] to pick up Mr. [REDACTED]. Mr. [REDACTED] agreed and Fr. Shanley picked him up at a corner store in [REDACTED]. Fr. Shanley was dressed in his priest garb and suggested that they go to his apartment in Boston. Believing that he was interested in helping him sort out his feelings, Mr. [REDACTED] went with Fr. Shanley. Upon arriving at Fr. Shanley's apartment in Boston, Fr. Shanley stated that he needed a shower and left Mr. [REDACTED] in the living room which had a bed in the middle of it. Shortly thereafter, Fr. Shanley began calling Mr. [REDACTED] to come into the bathroom to talk to him. Mr. [REDACTED] obeyed and upon entering the bathroom he immediately noticed that Fr. Shanley had an erection. Mr. [REDACTED] quickly walked back into the living room. Wearing only a towel, Father Shanley followed Mr. [REDACTED] back into the living room. Fr. Shanley pulled Mr. [REDACTED] from his chair onto the bed telling him that he needed to see if Mr. [REDACTED] could function properly and if "everything worked." Mr. [REDACTED] protested vehemently telling him that he did not want to do anything but Father Shanley ignored his pleas a

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forcibly pulled Mr. [REDACTED]'s pants off. Father Shanley became irritable because Mr. [REDACTED] did not have an erection. He then stated that "it would only take a minute" and then forcibly rolled Mr. [REDACTED] onto his stomach. Father Shanley then reached for a jar of vaseline as Mr. [REDACTED] desperately tried to free himself from Father Shanley's grip. However, Fr. Shanley was too heavy and strong and he brutally sodomized Mr. [REDACTED]. When Fr. Shanley rolled off of Mr. [REDACTED], Mr. [REDACTED] begged to leave. Father Shanley then sent him on his way by giving him directions to [REDACTED] via the train and a bus.

The next week Father Shanley called Mr. [REDACTED] at home. Mr. [REDACTED] became absolutely terrified that Father Shanley might say something to his parents so he quickly got on the phone. Father Shanley told Mr. [REDACTED] that he had met someone just like him and that they would make great friends. Father Shanley asked Mr. [REDACTED] to come over just one more time to meet this friend. Mr. [REDACTED] stated that he would try but actually had no intention of going. However, Father Shanley called him again at his home and out of fear that his parents might find out about what had previously happened with Father Shanley, he agreed to visit Father Shanley one more time.

A short time later, Father Shanley picked up Mr. [REDACTED] in front of the same convenience store in [REDACTED] and drove him back to his Boston apartment. Upon arriving at his apartment, Father Shanley made a telephone call to a man he called [REDACTED] requesting him to come over. Rusty came over a little later and Father Shanley then stated that [REDACTED] had the same problem as Mr. [REDACTED], as he could not get an erection either. Father Shanley told Mr. [REDACTED] that he could help [REDACTED] with his problem. Mr. [REDACTED] next remembers Father Shanley rubbing Mr. [REDACTED]'s penis with [REDACTED] standing over him. Father Shanley continued to manipulate Mr. [REDACTED] until Mr. [REDACTED] ejaculated. Father Shanley then stated "good everything works." Father Shanley reiterated to Mr. [REDACTED] that he had wanted [REDACTED] to watch because he was also unable to achieve an erection. Mr. [REDACTED] does not recall how he got home that day and believes that he may have been drugged by Father Shanley.

Following Father Shanley's brutal sexual abuse, Mr. [REDACTED] refused to attend church with his family. Mr. [REDACTED] was unable to discuss what had happened and became very distrustful, violent, angry and completely lost his self respect. He quickly sunk into a deep depression and became confused about his sexual identity. Mr. [REDACTED]'s personality completely changed and the people around him and, in particular, his family and other people who loved him, became extremely fearful of him and his sudden frequent unprovoked violent outbursts. Mr. [REDACTED]'s parents were confused about the drastic changes in his personality and could not understand what brought them about. Mr. [REDACTED] continued to self destruct while also destroying the lives of those around him. These problems plague him to this day.

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There is ample evidence to support the claim that the Archdiocese knew, or should have known, of Father Shanley pedophilic proclivities, while taking no meaningful action to protect his potential victims. Rather than take action against Father Shanley, the Archdiocese continued to allow Father Shanley to use his collar as a means of obtaining innocent victims to satisfy his own perverted sexual desires.

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Mr. [redacted] first began to make the connection between Father Shanley's sexual molestation and his [redacted]

[redacted] Although the [redacted] he was insignificant, he felt so betrayed that he became physically violent. His distrust had become such an obsession that Mr. [redacted] became terrified that he could have killed a person. That night he called his sister to discuss the fight and he revealed to her Father Shanley's brutal sexual molestation of him. After a discussion with his sister that evening, he began to realize that substantially all of his problems came as a result of Father Shanley's molestation.

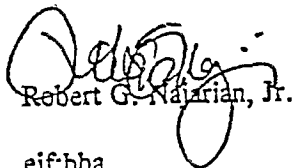
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Mr. [redacted] hereby makes demand on the Archdiocese of Boston, and Father Shanley in the amount of [redacted]. Should this matter not be resolved through mediation, we feel that if it were presented to a jury such an award would be the minimum amount obtainable. Further, on behalf of Mr. [redacted] we demand that the Archdiocese perform a complete investigation into the current status of Father Shanley and that the Archdiocese - as his incardinating authority under Canon Law - immediately sever him from any and all unsupervised conduct with youth.

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I have enclosed tolling agreements which I request you execute as soon as possible. I look forward to your prompt response to this letter.

Very truly yours,


Robert G. Najarian, Jr.

ejf:bba

Enclosures

cc: [redacted]

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