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 DAVID COLEMAN

I, David Coleman, hereby depose and say:

- 1. I was born on August 3, 1947 and grew up Malden, Massachusetts.
- 2. When I was about six years old, in 1953, I moved to Stoneham, MA and I lived there with my family until approximately August, 1961.
- 3. I lived with my parents and my three brothers, and we were parishioners at St. Patrick's Parish, Stoneham, MA.
- 4. In September, 1953, I started the first grade at the St. Patrick's parochial school in Stoneham, MA and I attended school there through the eighth grade.
- 5. Father Richard T. Coughlin was a priest at St. Patrick's Parish during the years I was first sexually molested by him, from approximately 1957-1960.

- I was also sexually molested by Fr. Coughlin after he was transferred to St.
 Mary's in Lynn, MA from approximately 1960-1963.
- I was molested regularly by Fr. Coughlin when he would drive me home after
 CYO basketball games on Friday nights at St. Patrick's from about 1957-1960.
- 8. I remember that Fr. Coughlin started an evening basketball program. He arranged to have the parking lot of the church lined like a basketball court, and it was set up with portable baskets on wheels. On Friday nights, I played basketball there with other boys from the Parish and Fr. Coughlin until about 9:30 p.m. I remember that after basketball, Fr. Coughlin would sometimes take boys out to get a pizza and then drop us off one by one. When Fr. Coughlin gave some of the boys a ride home after basketball or basketball followed by pizza, I was frequently, but not always, the last boy to be dropped off, or the 'lucky' one, that is, the one who was sexually molested. During the period from about 1957-1960, I was frequently the last boy to be dropped off, and I was sexually molested by Fr. Coughlin by his fondling my genitals in his car. I recall that I also played basketball games with Fr. Coughlin and other boys in school gymnasiums in Stoneham during the late fall, winter and early spring from about 1957-1960.
- 9. I remember that Fr. Coughlin had a 1955 Pontiac station wagon with a red and black plaid interior. I also recall that Fr. Coughlin had a Ford Edsel. I was sexually molested by Fr. Coughlin in his automobiles.
- 10. I was also sexually molested by Fr. Coughlin during the period from 1957-1960 when he took either several boys, or sometimes a larger group of boys, from St. Patrick's Parish on trips to Alton Bay, NH, where his brother owned a vacation

cottage. I often went on these trips and I shared a room and a bed with Fr. Coughlin. I was sexually molested by Fr. Coughlin fondling my genitals during these trips from about 1957-1960. I remember that during the period from 1957-1960, I also was sexually molested during at least one ski trip to a family ski area near Laconia, NH, when I stayed in a motel room with Fr. Coughlin. I was known as Fr. Coughlin's favorite boy in the group, and I remember that was why I was chosen to share his room, either in a motel or in his brother's vacation cottage.

- During the period from 1957 -1963, I was also sexually molested by genital fondling by Fr. Coughlin during trips to Lake George, New York, and to Manhattan, New York City.
- During the period from about 1961 -1963, I also accompanied Fr. Coughlin on golfing excursions to New Hampshire and Cape Cod, when I was sexually molested by genital fondling by Fr. Coughlin during overnight stays in motel rooms, at his brother's cottage in New Hampshire.
- 13. I remember that Fr. Coughlin was suddenly transferred from St. Patrick's in Stoneham, Ma to St. Mary's in Lynn in approximately 1960. I never learned why he was transferred. Years later, I was told by Fr. Paul Shanley, who took Fr. Coughlin's place at St. Patrick's Parish, that he "resented the hell out of Coughlin; the kids blamed me for his (Coughlin's) transfer, but I couldn't tell them why he'd been moved."

- 14. I moved to Wellesley, MA with my family in about 1961. For a period of time, I did not see Fr. Coughlin, but then I remember that he contacted me. I remember that I began to go on trips or excursions with him again, and that I was sexually molested by genital fondling by Fr. Coughlin from about 1961-1963 while he was at St. Mary's in Lynn.
- From about 1961-1963, I remember that we went on golfing excursions to Cape Cod, MA at played golf at golf courses at Wianno Country Club, Oyster Harbor Country Club and at Falmouth, MA.
- 16. When I was in the sixth and seventh grades in school, my grades plummeted from the 90's to the 70s and lower.
- 17. During the sixth and seventh grades, I missed many days of school due to undiagnosed illnesses, about 35 days in the first quarter of sixth grade alone.
- 18. During all the times that I was sexually molested by Fr. Coughlin, we were alone.
- 19. I spoke with other victims of Fr. Coughlin, who all live in California, after January, 1993.
- 20. I have been in therapy for approximately 10 years, since 1993. Prior that time, I was in and out of psychological counseling from about the age of twenty.
- 21. I have suffered from alcoholism and I attended AA meetings during the 1980s.
- 22. In approximately 1984, I was participating in group therapy in Wellesley Hills,

 MA when a woman in our group reported that her mother was having an affair

 with a priest in West Newton, MA and that the woman in our group had been

 raped by the same priest. The leader of our group asked if anyone else in the

 group had experienced sexual abuse by a priest or member or a religious group,

- and at that time, I realized the nature of Fr. Coughlin's actions with me as a child from about 1957 -1963.
- 23. I met with Fr. McCormack, the Secretary for Ministerial Personnel for the Archdiocese of Boston, in November, 1985 to tell him about my sexual molestation by Fr. Coughlin during the period from 1957-1963. Fr.

 McCormack told me that he would look into this but that I would not be told what was done about my allegations regarding Fr. Coughlin.
- 24. In May, 1990, I was hospitalized for about six days in the psychiatric unit of Newton-Wellesley Hospital for an emotional breakdown.
- 25. In November of 1992, I decided to contact the Archdiocese of Boston again to tell them about my sexual molestation by Fr. Coughlin in order to protect others from him and to make him accountable for his actions toward me. At that time, I had learned that Fr. Coughlin was in California, teaching at a boys' school and the leader of a boys' choir.
- 26. In the early months of 1993, I contacted Fr. Coughlin by telephone about a half dozen times to discuss our relationship and I continued to ask Fr. Coughlin if he would admit that he had sexually molested me. Fr. Coughlin would not admit during any of our conversations that he had harmed or sexually molested me in any way.
- 27. I was told by Fr. McCormack that the Archdiocese had no record of my meeting with Fr. McCormack in November, 1985.

- 28. I remember that in April, 1993, I was told by Fr. McCormack that the records of my meeting with him in November, 1985, had recently been found at the offices of the Archdiocese.
- 29. I continue to suffer from the effects of the sexual molestation by Fr.

 Coughlin. The diagnosis of my therapists is that the consequences of the sexual assault have become part of my personality. I have been told by psychiatrists and therapists that most of my psychological problems are due to my sexual molestation by Fr. Coughlin from about 1957-1963.

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

David Coleman