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 18
John Doe 18

- I, John Doe 18 hereby depose and say:
- 1. I was born on ________, 1956. I am currently incarcerated at Souza-Baranowski Correctional Center in Shirley, Massachusetts. When I was a child, I was a parishioner at St. Mary's of the Annunciation Church of 135 Norfolk Street in Cambridge, Massachusetts. See EXHIBIT "A", attached hereto.
- 2. In the summer of 1970, when I was about $13\frac{1}{2}$ years old, I got into a fight with some other boys across the street from St. Mary's Gymnasium. Father Thomas Curran, (hereinafter Father Curran), broke up the fight, and brought me into St. Mary's Gymnasium. Father Curran

took me to the upper balcony and into one of the rooms. While Father Curran cleaned up my cuts on my face, he groped my genitals on the outside of my pants.

- 3. Father Curran sexually abused me on numerous occasions after this. The sexual abuse consisted of mutual masturbation, mutual oral and anal rapes.
- 4. In September of 1970, the weekend prior to my fourteenth birthday, Father Curran took me to Twin Donut Shop which had an entrance on North Beacon Street in Allston, MA. There, Father Curran introducted me to Father Paul Shanley, (hereinafter Father Shanley).

 Neither of them were wearing their clerical garb, and they both asked me to address them by their first names.
- 5. Father Shanley, and Curran took me to a large playground located on North Beacon Street, in Brighton,
 MA which was located directly across the street from the Faneuil Street Housing Project and the Boston Housing Authority facility. Father Shanley, and Curran and I walked around the property borders of the playground.
- 6. Once I met with Father Shanley's approval we all got back into a vehicle driven by Father Shanley, and he drove further down North Beacon Street towards Soldiers Field Road. He turned onto Soldiers Field Road and pulled into the parking lot of the International

House of Pancakes restaurant.

- 7. We walked across Soldiers Field Road into a wooded area that Father Shanley seemed to know. Once we arrived at a clearing, I was forced to engage in mutual masturbation and performed oral sex on both priests. While being abused by one priest, the other would watch.
- 8. Father Shanley continued to sexually abuse me in similar ways until 1974. Each Saturday afternoon Father Shanley would meet me at the bottom of a set of steps in the back of the Fidelis Way Housing Project at the steps leading from Warren Street across the street from the Kennedy Memorial Hospital in Brighton, MA..
- 9. On a number of these Saturday afternoons Father Shanley would bring me back to the Warwick House and another apartment in a building on Massachusetts Avenue in Roxbury, Massachusetts. On many occasions Father Shanley had me perform oral sex on him and he penetrated my rectum with his penis.
- 10. On one Saturday afternoon Father Shanley showed up early, and found me and my counsin w playing behind a school which was located on Warren Street in Brighton, right next to the steps, and across the street from the Kennedy Memorial Hospital. Father Shanley convinced my cousin to join us that afternoon. Father

Shanley took us by MBTA Trolley into Kenmore Square, and over to water way which was across the street on Park Avenue in Boston, MA., called the Fenway area.

brought me to the St. Gabriel Monastery located on
Washington Street in Brighton, Massachusetts where he
would have me perform various sexual acts on men who
lived at the monastery. I recall Father Shanley
introducing me to a man at the monastery who was wearing
black pants and a white shirt. Father Shanely watched
as this man performed oral sex on me in the man's bedroom.
On another occasion, this man abused me in a large hall
style gathering room, which was in the building just to
the right front of the St. Gabriel Church.

12. On all three occasions at the St. Gabriel
Monastery, my cousin, $oldsymbol{W}$, who lived at $oldsymbol{\square}$
, in Brighton, Massachusetts attended, and
was forced to perform oral sex on the men, and the men
penetrated my cousin. Father Shanley and these men
would pass me and my cousin back and forth.

13. Father Shanley would also take my cousin, and me to the Fenway area of Kenmore Square. He would observe me and my cousin engaging in oral and anal sex acts with each other, and with other men, that Father Shanley prostituted my cousin and me out to.

- w and I began prostituting ourselves at the Greyhound bus station in Copley Square Boston, Massachusetts. Father Shanley allowed us to keep the money that we made but in return we had to give him detailed descriptions of our sexual encounters. He would masturbate while questioning us about the sex we had done with the men we met. Father Shanley also photographed me while I was performing sex acts with my cousin.
- 15. The last incident of abuse occurred when I went with Father Shanley to the Carnival Lounge, a gay strip club in the Combat Zone on Boylston Street, in Boston, Massachusetts. Father Shanley forced me to dress up in a G-string and perform a strip dance for the customers. I was always self conscious about my body and my weight and was completely humiliated by this experience. I went into the back room of the club to change and was sodomized by a man I had never met.
- 16. I was very angry at Father Shanley. I followed him out of the lounge and slapped him. I told him that I never wanted to have anything to do with him again. I then went to the rectory at St. Mary's in Cambridge, Massachusetts and confronted Father Curran. I told him that I was very angry at him for what had happened and at the fact that Father Curran had introducted me to Father Shanley.

- 17. In 1979 the Court sent me to the Metropolitan

 State Hospital for a competency assessment. There, I met

 Father Curran again. He threatened to tell my girlfriend
 that I was gay if I did not perform oral sex on him.

 Terrified of how my girlfriend would react, I did what
 he demaned.
- 18. On August 1, 2002, I met with Barbara Thorp, LICSW from the Officer of Healing and Assistance of the Archdiocese of Boston. I discussed at length the abuse I suffered at the hands of Father Curran, and Father Shanley. Ms. Thorp's notes of that meeting are attached hereto as EXHIBIT "B".

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

John Doe 18

Post Office Box 8000 One Harvard Road Shirley, MA 01464-8000