

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 17

I, John Doe 17, hereby depose and say:

1. I was born on , 1949 and grew up in Stoneham, Massachusetts.
2. I currently reside in Ohio.
3. During the time I lived in Stoneham with my parents, I was a parishioner at St. Patrick's Parish in Stoneham, Massachusetts.
4. During the approximate years of 1955 – 1963, I was a student at St. Patrick's School.
5. In or about 1961 to 1963, Father Paul Shanley was a priest in St. Patrick's Parish. I was in about the seventh and eighth grade and was between the ages of twelve and fourteen.
6. In or about the years 1961 and 1963, Father Paul Shanley had a general practice of delivering messages to students, including myself, through



other students. In these messages, he would request private meetings with certain students which were held in the rectory of St. Patrick's. These meetings would generally take place during class time or after school. For those meetings during class time, the teacher would excuse students based upon a representation by another student that Father Shanley had requested the meeting.

7. In or about 1961 and 1963, I would play basketball after school with other kids my age. We would play basketball in the playground behind the old school and near Dr. Z's house. From time to time, students would enter the playground with messages from Father Shanley that a certain student was requested for a meeting in the rectory. I thought of these meetings as "sessions".
8. I recall seeing the looks of my peers before and after these sessions. Before leaving, my peers looked frightened, anxious and extremely reluctant to see Father Shanley. After a session, my friends and peers would keep their eyes averted and appeared embarrassed.
9. I was summoned about a half dozen times for these "sessions" with Father Paul Shanley during the approximate years 1961 – 1963, usually by another student while I was on the playground after school playing basketball, or while I was in class at St. Patrick's. The sessions always took place in private, in the dining area of the rectory of St. Patrick's. In each session, Father Paul Shanley would generally begin the conversations by asking how I was doing and how school was going. Eventually, he

would direct the conversation toward topics of sex, masturbation, genital development, pubic hair, wet dreams and other sexual topics. In each session, Father Shanley would ask me to expose my genitals to him so he could "check my development." Following the exposure, Father Shanley would gesture me to come toward him. He would pull me in close with his left arm so he could hug me. From time to time, he would say things like, "go have a great game".

10. The sessions I participated in were always held in the dining area on the first floor of the rectory of St. Patrick's. I was always alone with Father Paul Shanley during the sessions. Every conversation I had with him in private was sexual and inappropriate.
11. One afternoon I was "summoned" by one student while I was on the playground. I walked into the rectory and saw an elderly housekeeper who answered the door. As I walked into the rectory on the first floor, I passed through a vestibule on the way to a dining area with an elegant table and chairs. Father Shanley came out from the far end of the room and took a chair from the side of the table, sat down, crossed his left leg over his right, placed his hands on his lap, and began the usual conversation. He was very regal in his presentation as he asked me how I was doing and how school was going. I felt extremely uncomfortable. As usual, he steered the conversation to masturbation, pubic hair and wet dreams. He reminded me of things I learned in religious education.

Eventually, he told me he needed to examine my body, as he always did, by stating, "Let's have a look".

12. I was extremely embarrassed. I felt as though I couldn't question Father Shanley because he was a priest and I was his parishioner. I vaguely remember him asking me to retract the foreskin on my penis so he could examine it.
13. I am an honorably discharged veteran of the Vietnam Conflict. I served seven months in 1969, from approximately April through November. I am also a former police officer, but retired from this service due to the stress it placed me under so soon from Vietnam. I am also a former Walpole State Prison guard and have been featured in a publication about
14. I have never met Gregory Ford, John Doe 7, John Doe 8, 

15. Although I have seen the headlines of some of the media stories about Father Paul Shanley, I have not read detailed accounts of his acts of abuse because it was too upsetting.
16. I have not filed a civil suit or pursued a claim against the Archdiocese of Boston.

Signed this 6TH day of July, 2003 under the pains and penalties of perjury.

John Doe 17