

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 3

I, John Doe, being duly sworn, depose and state as follows:

1. I was born on February 6, 1966. As I child, I lived in Brighton, Massachusetts and my family and I attended St. Columbkille's Church.
2. I was baptized and confirmed at St. Columbkille's Church and I attended St. Columbkille's Elementary and High School from approximately 1978-1983.
3. I was sexually abused by Father Joseph Birmingham when I was approximately 12 or 13 years old. The first time was when Father Birmingham took me to a tennis/sports club. I could not swim, but Father Birmingham took me in the pool. As he was holding me in the pool, he put his hands down my swim trunks and fondled my genitals. Because I could not swim, I could not get away from him. We also went into the Jacuzzi and he put his hands down my swim trunks there too but someone came in and he stopped. We also went into the sauna and he told me that I had to take off my swim trunks to go into the sauna, inn the sauna he began to fondle me again until someone came in. I told him that I wanted to go home. He then made me take a shower with him naked.

4. The second and last time Father Birmingham abused me was in the rectory of the church. It was close to the end of the day and my teacher told me that Father Birmingham wanted me to come up to his room in the rectory. I asked if Father Birmingham could come down and he did. But then Father Birmingham took me upstairs to his room brought me in and locked the door.

5. There, Father Birmingham had managed to open my pants and start fondling me at first on his bed. I managed to pull away and was standing trying to close my pants and again, he came up behind me and he started pushing his hands back in my pants at which point I pushed him off of me and I ran from him. I ran out of his room, down the stairs, out the rectory door and into the street. I was so scared that I did not look before I crossed the street and I was hit by a car. I was taken to St. Elizabeth's Hospital, which is up the street from St. Columbkille's. I believe that Father Birmingham rode in the ambulance with me. When my mom came to the hospital, Father Birmingham was in the hospital with me. He also came by my parent's home at some point that evening after I was released from the hospital.

6. I never spoke to Father Birmingham again. I left St. Columbkille's High School in the 11th grade.

Signed this 16 day of July, 2003 under the pains and penalties of perjury.


John Doe 3