

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 11

I, John Doe 11, hereby depose and say:

1. I was born on , 1948. I am a resident of Stoneham, Massachusetts. As a child, my family and I attended St. Patrick's Parish in Stoneham, Massachusetts. I was a student at St. Patrick's Elementary School. My family was very active in the Church and my father was a well-known physician .

2. When I was approximately 13 years old Father Paul Shanley came to my classroom to hand out report cards. I remember thinking that this was unusual because the Assistant Pastor, Father Smith or a former Assistant Pastor, Father Burke normally gave out the report cards.

3. Later that day, I was told by the lay teacher, Ms. Mary Corcoran, that Father Shanley wanted me to go to the rectory to speak with him.

4. When I entered the rectory office, Father Shanley offered me a cigarette. I did not smoke but I was impressed that he thought a 12 year old was mature enough to be offered a cigarette.

5. Father Shanley told me he was a psychologist. He said he knew the answers to questions before I asked them. Father Shanley said that he had just been at my home looking for "pornographic material."

6. Father Shanley said that he knew I was the head of a sex ring and that I was a "known bisexual." At the time, I did not know what a bisexual was. He asked me how often I "played with myself." I asked him what he meant and he asked me if I wanted to learn.

7. Father Shanley told me that that I should pull down my pants to see if I was sexually aroused by being with him and talking about sex. I cried and said no. I was very frightened.

8. Father Shanley said my parents should have seen that I was bad boy and that they were not good parents for me. He said he wanted to help me by "working with me."

9. Father Shanley said that he wanted to see if I had an erection and asked whether I wanted to confess my sins. He had me kneel before him in order to give me absolution. He put his hands on my shoulders and sides and then stood behind me. His erect penis was sticking into my back. I turned around and faced him and he sat down. He asked me repeatedly whether I had an erection. He put his hands on me and rubbed the inner part of my knee. He moved his hands upward to my genitals and touched my genitals.

10. Father Shanley told me that if I ever told anyone about this he would make sure that my father's reputation and medical practice were ruined. At this point I was so scared that I

left without his permission. I recall Father Shanley saying that we would talk later. I ran home, approximately 200 yards.

11. When I got home, I was confronted by my parents. They asked me what Father Shanley wanted with me. It was then that I learned that while I was in school, and before Father Shanley asked me to come to the office, he had indeed been to my house "looking for pornographic material."

12. [redacted], my family's housekeeper, answered the door around 9:30 that morning. I had already gone to school and my parents were not at home. At the door was Father Shanley. Father Shanley asked to speak with my parents but they were not home. Father Shanley asked Mrs. [redacted] if he could look in my room for something. He said that my parents would not mind. Mrs. [redacted] allowed Father Shanley to go into my room because she recognized him as a priest at St. Patrick's.

13. Mrs. [redacted] left Father Shanley alone in my room. Approximately one hour later, my dad came home and found Father Shanley, who by this time had climbed into the attic and was looking through the eaves. Father Shanley told my dad that he was looking for pornographic material. Father Shanley told my dad that I had hidden pornography in my room and he wanted to confront me with it. Father Shanley told my dad that he had found a copy of "Animal Farm" by George Orwell and that he had seen a painting that was pornographic. My understanding is that Father Shanley was referring to a painting by Raphael of the Virgin Mary holding the Christ child.

14. My dad ordered Father Shanley out of the house and told him that if it were not for the fact that he was a priest, he would "knock his block off." Father Shanley smiled and said "I know."

15. By this time my mother had arrived home. Father Shanley and my dad went downstairs and Father Shanley told my parents that I was a sexual deviant and that they had been remiss as parents. Father Shanley told them that he would be talking with me at school.

16. After running home from school, I told my parents what had happened. Shortly after, my mother wrote a letter to the Chancery and Monsignor Sexton, who was the Pastor at St. Patrick's. I read the letter and it described the abuse and named Father Shanley as the perpetrator. I was asked by my mother to mail the letter and I put it in the mail. I clearly remember that it was addressed to the Chancery in Brighton, Massachusetts. I do not believe that there was any response to the letter and Father Shanley remained in the parish until around 1967.

17. Later, in approximately 1963, my father spoke to Monsignor Sexton about the fact that Father Shanley had molested me. I was certainly willing to explain what had occurred to any church official, but no one was interested from the church ever spoke to me.

18. I also know that my father reported Father Shanley to a family friend, the Chief of Police in Stoneham, Bernard Vacon.

19. I understand that my mother's letter to the Chancery regarding Paul Shanley has not been produced in this case.

20. I have not read or heard detailed accounts of the abuse suffered by Gregory Ford,

or

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