

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  
████████████████████




I, ██████████, hereby depose and say:

1. I was born on [REDACTED], 1952, and grew up in Stoneham, Massachusetts.
2. During the time I lived in Stoneham with my parents and my [REDACTED] brothers and sisters, we were parishioners of St. Patrick's parish, Stoneham, Massachusetts.
3. I first met Father Paul Shanley when he arrived at my home to counsel my mother for marital problems with my now deceased father. I was approximately eight (8) years old.
4. Father Shanley was a family friend, and especially close to my mother. My mother was employed by the church [REDACTED] at funeral masses, requiems and weddings. My mother also sang in the church choir.
5. Father Shanley counseled my mother regarding her marital problems.

6. I was first sexually abused by Father Shanley when I was in the fifth grade in approximately 1963. I went on a trip with Father Shanley and some other boys to a cabin in Milton, Massachusetts. We stayed overnight in a cabin, that had many beds in one big room. I shared a double bed with Father Shanley and he fondled my genitals during the night. Father Shanley became frustrated that I did not respond to him, and then pretended to be asleep.
7. Father Shanley sexually abused me that night by putting his hands down under my underpants, touched my genitals, and massaging my bare back and bare buttocks.
8. Father Shanley did not sexually abuse me again until I was about fifteen years old. At that time, Father Shanley resided at "Warwick House" in Roxbury, Massachusetts. He abused me about fifteen times from approximately 1967 to 1970.
9. When I was approximately 15 years old, Father Shanley approached me at a dance club for teenagers that he organized. My mother volunteered to help out with the dances, and she . After Father Shanley moved to Warwick House in Roxbury, he still came to the dances and he talked to me about counseling me at his Roxbury location.
10. Eventually, I was invited to see Father Shanley at Warwick House in Boston to help him and also to talk to him about some personal problems I was having as a result of emotional and physical abuse by some of my brothers; together with emotional problems stemming from my father's alcohol abuse and mental health problems, about which Father Shanley was well aware. Father Shanley

counseled runaway boys at Warwick House, and he was known as the “runaway street priest”.

11. During this time, I would take public transportation to Boston by bus and by train, and then Father Shanley would meet me at the train station and take me to Warwick House. At other times, Father Shanley would take me to a mobile home that he used in his ministry, which was located in South Boston at the Boston Edison plant parking lot. Father Shanley talked to me about my family problems, which he knew about from counseling my mother. After counseling me, Father Shanley sexually abused me by performing oral and anal sex, masturbating, asking me to masturbate him, massaging and fondling my bare genitals, buttocks and back.
12. During the period from 1967 to 1970, I was sometimes asked to accompany Father Shanley on speaking engagements and then he would sexually abuse me afterward.
13. I also remember that Father Shanley also sexually abused me on the evening of my father’s funeral after approaching me to express his condolences
14. During these occasions of sexual abuse by Father Shanley from 1967-1970, he would fondle my genitals inside my pants. Father Shanley also masturbated himself and me, and then also requested that I masturbate him. Father Shanley put his mouth on my genitals and asked me to put my mouth on his genitals. I did what he asked. Father Shanley put his finger in my anus by reaching his hand around behind me and under my buttocks. Father Shanley also put his penis in my rectum.

15. During the times when Father Shanley sexually abused me, he would ask me to touch his penis, and put my mouth on his genitals. A few times I did not respond, but usually I did what he asked. I felt obligated to him. I felt that the sexual activity was a "payback" for the counseling that I received. If I did not cooperate with him, Father Shanley would reject me by not speaking to me for a while, and mistreat me emotionally and verbally.
16. Father Shanley also discussed sexual acts with me. When I was older, he wanted to have phone sex, but I refused.
17. Once, Father Shanley showed me pornographic pictures of teenage boys. A teacher that had been arrested for taking these photographs had given them to Father Shanley and he showed them to me.
18. Father Shanley also asked me to perform sado-masochistic sex when I was older, but I refused.
19. When Father Shanley sexually abused me, we were always alone.
20. I have not met nor spoken with Gregory Ford, John Doe 7, John Doe 8  

21. I have not read detailed accounts of media reports about Father Paul Shanley abusing Gregory Ford, John Doe 7, John Doe 8,   


Signed on this 19 day of July under the pains and penalties of perjury,

