

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

I, John Doe, hereby depose and say

1. I was born on  1954. I never had a close relationship with my parents. I came from a family where there was violence and alcohol abuse.
2. My parents ultimately divorced in or about 1967 and I ran away from home. I lived on the streets of Boston off and on for two years.
3. When I was 14 years old, in 1969, I met Father Paul Shanley while I was living on the streets. Father Shanley was very well known to all the runaway kids on the street.
4. On the day I met him, Shanley picked me up in a 1968 green Chevy station wagon from Project Place, 33 1/3 Dwight Street, Boston, Massachusetts. I had not had a good meal in a very long time. Father Shanley brought me to

Warwick House. There, Father Shanley introduced me to an older lady who took care of Warwick House. Father Shanley had this lady feed me and clean my clothes.

5. After I got something to eat, Father Shanley brought me to his bedroom. He started asking me about sex. He seemed obsessed with the topic. At that age, I had not had any experience with sex and I became uncomfortable with the topic. However, I was living on the streets and did not know where my next meal was coming from so I was polite and let Father Shanley continue to talk.

6. The older lady knocked on Father Shanley's door and brought in my clean clothes.

7. After the older lady left the room, Father Shanley continued to talk about sex. He tried to convince me that it was okay for men and boys to sleep together. He told me that he studied psychology and I could trust him. I thought to myself, "here was this long haired priest dressed like I was." I trusted Father Shanley.

8. Father Shanley convinced me to spend the night. I was happy to have a warm and dry place to stay. I soon realized that there was only one bed and that Father Shanley and I had to share the bed. That night, Father Shanley raped me by inserting his penis in my rectum.

9. Not knowing where to turn, and considering the alternative of being on the street, I stayed for three nights with Father Shanley at Warwick House. Each night, Father Shanley raped me.

10. After the three nights with Father Shanley, he dropped me off on Boylston Street.

11. In April or May of that year, Father Shanley entered my life again. Father Shanley made arrangements for someone to drive me to visit him at his farm in Vermont. The first night, Father Shanley made advances toward me which led to him performing oral sex on me. The second night, I told Father Shanley that I did not want him to do this anymore. I left the next day. I had to take the bus back to Boston.

12. Shortly thereafter, I began using intravenous drugs and drinking heavily. When I was 15 years old I got off the streets. I got a job, an apartment and a girlfriend. I have been married a couple times and have two children. I have battled with alcohol my entire life but I have been sober since 1997.

Signed under the pains and penalties of perjury this 17 day of July, 2003.



John Doe