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VIA FAX & MAIL

Father Sean Connor
Boston Archdiocese
2121 Commonwealth Avenue
Brighton, MA 02135

Dear Father Connor:

Please be advised that I represent the interests of Father Edward McDonough concerning his recent administrative leave based upon an allegation of an isolated incident of sexual misconduct occurring approximately thirty-eight (38) years ago. As I understand it, the alleged victim, [REDACTED], passed away approximately seven (7) years ago and his sister made this allegation on his behalf, by way of a three page letter sent to the Church approximately one month ago. At the outset, let me assure you that Father McDonough absolutely denies this allegations and is offended and outraged by it.

It is as a result of this isolated, unspecific allegation, recounted by Mr. [REDACTED] unidentified sister that resulted in the Church's unprecedented action of placing Father McDonough on administrative leave. Although one can endlessly debate whether such an action was warranted, even in light of the Church's new zero tolerance policy, my main purpose for writing this letter is to insure that the allegation is investigated fairly and expeditiously. It will only be then that the Church will be able to step forth and publicly declare that this allegation is unfounded and thereafter reinstate Father McDonough to St. Anne's Parish. To date, however, I have not seen any sign which indicates that the Church is moving forward in an expeditious manner. Quite to the contrary. It has been eighteen (18) days since Father McDonough has been placed on administrative leave, and only yesterday was he interviewed by the Church concerning this meritless accusation. Furthermore, based upon my inquiries, it appears that the Church has not yet even spoken directly with the accuser. It begs the question: What has been done in the last eighteen days to bring this matter to a resolution?

As I see it, the allegation is what it is - an unsupported, unreliable, hearsay statement made by the sister of a dead man twenty-five (25) years after it was allegedly reported to her, which was nearly fifteen (15) years after it was alleged to have occurred. How can such a statement be worthy of belief? Furthermore, pursuant to my limited investigation thus far, the allegation was allegedly made by a man with a tainted past and a past which ultimately led to his death. In short, this allegation is not only suspect, it borders on the frivolous. It is truly beyond

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belief that the Church, under these circumstances, has chosen to lend any credibility to this allegation given Father McDonough's unblemished record and a reputation beyond reproach.

Even in the best of circumstances, a 38 year old allegation is virtually impossible to investigate and support. I am convinced that with your background in law enforcement, you are aware of this. This investigation should not continue to linger. There is no credible evidence to support this allegation. The longer this investigation continues, the more damage will be done to an innocent man's reputation. I believe we have a small window of opportunity, which is rapidly closing, to address this matter directly with the public. After that time, it is doubtful that anything the Church does will repair my client's reputation and standing in the community.

I, of course, realize that the Church now has an obligation to conduct an investigation of virtually every sexual misconduct allegation made against a member of the clergy in this delicate climate. I question, of course, whether, in these circumstances, the allegation should have been made public before the investigation was shown to have supported it. Regardless, my main concern is singular at this time, and that is to make sure that the investigation is concluded immediately, and that the Church publicly vindicates a good man who has given his life to the Church. It is not only the just thing to do, but it is the moral thing to do, as well.

Father Connor, if the investigation does not conclude within the week, I am formally requesting that the Church provide me with the following information. This information will be necessary to allow me to defend my client and begin to prepare a vigorous defense to this allegation. Namely, I request:

1. A copy of the three page statement authored by the sister of [REDACTED]
2. The full name, address and dates of birth of [REDACTED] his mother, his sister, and any other of Father McDonough's accuser(s).
3. A copy of the transcript prepared in connection with the statement given by Father McDonough on June 10, 2002.
4. A copy of the transcribed statement(s) prepared in connection with the interview of Father McDonough's accuser(s), including but not limited to, any report drafted in connection with these interviews.
5. A copy of the entire file kept by the Archdiocese on all the priests assigned to the Church of the Incarnation in Melrose between 1962-1967, including all allegations of sexual misconduct made against:

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- a. Lenny Coppenrath
 - b. Phillip Harrigan
 - c. Paul Clougherty
6. A copy of any and all information which in any way supports the belief that the allegations made against Father McDonough are false.
 7. A copy of the Church's policy, protocol or statement which identifies the rights of the accused, the standard of proof/review, and the rules governing any and all hearings that one is entitled to in such investigations or inquiries.
 8. A copy of the Church's zero tolerance policy in connection with sexual abuse allegations.

I believe that production of the above-listed information will allow me to continue our investigation in such a manner that the truth will be exposed and ultimately lead to Father McDonough's vindication.

I would appreciate the courtesy of a prompt response to this letter.

Thank you for your prompt attention to this matter.

Very truly yours,



David P. Sorrenti

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