

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 John Doe 13

I, John Doe 13, hereby depose and say:

1. I was born on 1961 and grew up in Melrose, Massachusetts.
2. My parents raised me with the beliefs of the Catholic religion, including being respectful and deferential to priests. As a child, I attended CCD classes on Main Street in Melrose for about a year. I believe I also received the sacrament of First Communion at St. Mary's in Melrose.
3. In or about the years 1974 – 1976, when I was between the ages of thirteen and fifteen, I attended Melrose Junior High. One of my guidance counselors at the time was a Ms. Driscoll.
4. In or about the seventh grade, I approached Ms. Driscoll with questions about sexual behavior and identity. She informed me she knew of a priest who specialized in this area, a Father Paul Shanley. Ms. Driscoll arranged

[Affiant's initials]

for me to meet Father Shanley in front of Melrose City Hall a short time later.

5. Father Paul Shanley picked me up in front of Melrose City Hall in a small car. He did not have on his clerical garb. We drove for a while and although I cannot remember the route we took I know it involved a large rotary.
6. During the ride, Father Shanley began providing answers to explicit sexual questions I had not asked. For example, he asked, "Will you ever run out of sperm Doe 13?" No, you can jerk off as much as you want without running out." He did this throughout the ride.
7. We eventually arrived at what appeared to be a studio apartment. He opened the door, which I think was half made of wood and half made of glass squares. I remember noticing something round hanging from the ceiling. Father Shanley told me it was a 'lens'. There was also a mattress on the floor.
8. Eventually, we ended up laying on the mattress together. I remember pretending to be asleep so Father Shanley would leave me alone. Father Shanley took my hand and placed it on his genitals. He fondled my genitals and attempted to make my penis erect. I continued to pretend to be asleep. Father Shanley attempted to put his penis in my mouth. I was non-responsive, and eventually Father Shanley stopped. He appeared to be bored with me.

[Affiant's initials]

9. Father Shanley took me back to Melrose City Hall where he dropped me off.
10. I told my guidance counselor, Ms. Driscoll, of what Father Shanley did to me. To my knowledge, nothing happened as a result.
11. A short time later, I was in front of Melrose City Hall with my friends. Father Shanley pulled up in his car and called me over. He asked me to get in his car and when I refused, he yelled at me, telling me not to call him again for help.
12. I have never spoken in detail with other victims of Father Shanley.

Signed this 18 day of July, 2003 under the pains and penalties of perjury.

John Doe 13