

ECKERT SEAMANS CHERIN & MELLOTT

ATTORNEYS AT LAW

September 27, 1993

GT REDACTIONS

██████████ claims that he was sexually molested by Fr. Paul Shanley in the Fall of 1970, when Mr. ██████████ was fifteen years old. Mr. ██████████ was referred to Fr. Shanley for counselling after running away from home. At the time, Fr. Shanley was a popular priest operating a novel "street ministry" which was sponsored and supported, in whole or in part, by the Archdiocese of Boston. Fr. Shanley did counseling and pastoral work out of a one-bedroom apartment and office located at 1 Warwick Street in Roxbury. According to our client, Fr. Shanley held himself out as a friend to alienated and troubled youth living on the streets, "a long-haired, radical priest" who gained the trust of runaway youths by living a non-traditional lifestyle and eschewing many of the formal trappings of a priest. Mr. ██████████ was invited by Fr. Shanley to come to the priest's office/apartment. Once there, the priest began fondling the fifteen-year old Mr. ██████████, and then quickly proceeded to perform oral sodomy on Mr. ██████████. Fr. Shanley attempted to anally sodomize Mr. ██████████, but Mr. ██████████ resisted and left the office. Though Mr. ██████████ refused to have anything whatsoever to do with Fr. Shanley after that point, Fr. Shanley, through his friendship with Mr. ██████████'s family, tried to invite Mr. ██████████ to visit Fr. Shanley after the priest had suddenly been moved out of the Archdiocese, to Weston, Vermont.

As recently as one and a half years ago, Mr. ██████████ learned that Fr. Shanley was "on medical leave," which, as you know, is a common designation for priests who have been accused of sexual improprieties. Yet he has also learned that Fr. Shanley was still serving Masses at St. Anne's Church in San Bernardino, California fairly recently, a most disturbing piece of information for Mr. Shanley. I do not think it requires much to impress upon you the profound anguish our client is experiencing at the prospect that Fr. Shanley is presently in a distant assignment with easy access to youths. Mr. Shanley demands a full accounting from the Church about Fr. Shanley's present situation with regard to his contact with youth, especially considering his sexual abuse of our client and his sudden transfers in the years thereafter. We especially request to understand the reasons behind his transfer out of the Archdiocese of Boston (where he is officially incardinated) to an assignment as distant as California, and the specific reasons why he is still listed as being on medical leave.