



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

I, John Doe, having been duly sworn under oath, depose and state as to the following facts:

1. I was born in 1960 in Columbia, S.A. In 1974, my mother and my 8 brothers and sisters and I moved to the United States and joined my father. We all lived in Lowell, Massachusetts.

2. Our family was extremely religious, and we attended church several times a week, but our home parish was Immaculate Conception Church.

3. I first met Father Paul Shanley in 1974 when I was 14 years old. I was introduced to him by Julio [redacted], an adult whom I had met through our church.

4. Mr. [redacted] asked me to accompany him to Boston to perform an errand. I was reluctant to do so, but he said I would earn some money and make my family proud. Both of my parents worked very hard in a textile mill to support our large family, so I thought it would be a good thing to do.

5. Mr. [redacted] gave me a manila envelope and had me tape it under my shirt. He then drove me to Boston and had me go into a church where I met Paul Shanley.

6. I did not speak English very well at that time so I did not understand him completely, but he invited me into an office. I took off my jacket and was pulling out my shirt when Shanley put his hand inside the front of my pants while grabbing my buttocks.

[REDACTED]

7. I thought at first that he was trying to undo the tape holding the envelope, but when he put his hand on my sex organ I became petrified. I had absolutely no sexual experience of any kind and I didn't understand what was happening.

8. I gave him the manila envelope and he gave me a regular sized envelope, and as I was about to leave, he grabbed me and kissed me on the mouth.

9. When I got back to Mr. [REDACTED]'s car, he opened the envelope and started counting money. I remember that it seemed like a lot of money to me.

10. I was in such a state of shock, I did not say anything to Mr. [REDACTED], or anyone else, about what had happened to me.

11. When we got back to Lowell, Mr. [REDACTED] gave me \$50. That was a fortune to me.

12. These deliveries went on for many months. Each time I made a delivery, Mr. [REDACTED] gave me another \$50.

13. Every time I delivered an envelope to him, Paul Shanley would grab my buttocks, and then fondle my sex organ.

14. My encounters with Shanley continued for several years. As my English got better, he told me that I was gay, I came from a totally backward culture which did not understand these things, and "Why did God give us these (touching his sex organ) if not to enjoy them with beautiful boys like you?"

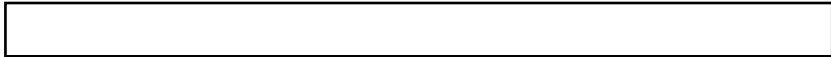
15. When I was 17, Shanley started taking me to a gay bar, which I think was called DiRocco's, where he would get me drunk and have sex with me in the parking lot outside the bar. He also started having me engage in sex acts with others, mostly older men.

16. Shanley would have six or seven of us together, usually including one other person my age, but mostly older men. Then he would take a bottle and spin it on the floor. Whoever the bottle pointed to would have to take off an article of clothing. This would continue until everyone was naked. Then we would pair off and have sexual relations.

17. Most of the men Shanley introduced me to were over 40. I did not want to have anything to do with them, but if I didn't show up for the meetings which he arranged for me, he would become totally enraged and threatened me with physical harm.

18. During sexual relations with Shanley, he would always attempt to penetrate my anus with his fingers. I would tell him I did not like this because it hurt, and he would keep urging me to let him do it, and then he would continue.

19. During the four to five years in which I was in contact with Shanley, he anally raped me on more occasions than I can remember.



Signed this 20 day of July, 2003 under the pains and penalties of perjury

JOHN DOE
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