January 17, 1994

Wilson D. Rogers, Jr., Esq. Dunn & Rogers 20 Beacon Street Boston, MA 02108 GT REDACTIONS

Dear Mr. Rogers:

Re:

As you know, we represent ("Mr. ") of Mr. has informed us that when he was 15 years old he was sexually abused by Father Paul Shanley ("Father Shanley"), a priest of the Archdiocese of Boston ("Archdiocese") who is presently on assignment in San Bernadino, California. Mr. has claims against the Archdiocese for its failure to properly train and supervise Father Shanley which malfeasance resulted in Father Shanley sexually abusing Mr.

and Father Paul Shanley

Briefly, in the fall of 1970, Mr. was referred to Father Shanley after he had run away from home and had spent a brief period of time "on his own" in New York City. Mr. returned to Boston to be with his family, as he was emotionally distraught from his experience on the streets in New York City as a wayward adolescent.

As you are undoubtedly aware, Father Shanley was a popular priest operating a novel "street ministry" which was sponsored by the Archdiocese. Father Shanley's counseling was conducted out of a one-bedroom apartment and office located at One Warwick Street in Roxbury. Mr. "'s mother, " ("Mrs. "), was very familiar with Father Shanley's "ministry to alienated youth" and she cajoled her son into seeking guidance from Father Shanley. Mrs. "had been friends with Father Shanley for some time when he was a priest at St. " in "; she was, in fact, one of Father Shanley's strongest supporters.

Mr. 's first visit with Father Shanley went without incident and the young boy was immediately enamored with this charismatic priest. Indeed, Father Shanley held himself out to Mr. as a friend to alienated and troubled youth, a "long-haired, radical priest" who gained the trust of many run away youths by living a non-traditional lifestyle and eschewing many of the formal trappings of a priest. Mr. truly believed that Father Shanley could provide him the direction and friendship he desperately needed. During his first visit with Father Shanley, Mr. discussed his previous predicament as a troubled youth and his vulnerabilities. Father Shanley consoled Mr. talked to him about sex, and asked that he return for future counseling with him. Accordingly, within a couple of weeks, Mr. went to see Father Shanley for a second visit.

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However, the second occasion when Mr. visited Father Shanley "counseling" at his "office", took a different turn. While in this one-bedroom apartme alleges that Father Shanley, while counseling him, started kissing him began to fondle Mr. . Mr. . states that Father Shanley then quic 's pants and proceeded to perform anal sodomy upon h removed Mr. begged Father Shanley to stop the anal sex as the pain w excruciating, and Father Shanley then orally sodomized Mr. entire event, was overcome with fear. Given Mr. state, he was powerless to resist this assault by Father Shanley. Mr. remembers Father Shanley telling him that anal and oral sex between men was "perfec normal." Cognizant of his mother's trust and admiration of Father Shanley, Mr. explains that he was left with nowhere to turn; he could not tell anyone of this abuwas so grateful to Father Shanley for taking an interest in : son, she tendered to him a large donation for his street ministry. Alone and confus dealt with his feelings of betrayal by engaging in conduct which permit him, unconsciously, to cope with the abuse; that is, he began his long career of alco: and drug abuse.

Mr. has recently ascertained that Father Shanley had been transferred arrived the Archdiocese of Boston to a parish in Vermont. I have enclosed a copy c letter to Mr. 's mother dated May 11, 1971. In this letter, Father Shan gives his "best to all the wonderful people of who stood by me in the dwhen my predictions seemed so preposterous...". The letter asks Mrs. to: her son, "if he has a vacation and no wheels, there is a bus that leaves from Boston a comes to the next town of Ludlow."

It is unclear what happened to Father Shanley following his departure from Verme although, as recently as a year and one-half ago, Mr. learned that Fath Shanley was on "medical leave," a common designation for priests who have be accused of sexual impropriety. Father Shanley may also have served Masses at St. An Church in San Bernardino, California, fairly recently, which was a most disturbing pi of information for Mr. to digest. As expressed to you in my letter September 27, 1993, Mr. is deeply disturbed that Father Shanley had a dist assignment with easy access to youths. Moreover, he is suspicious as to the reasons we Father Shanley was transferred to California.

As a result of the sexual abuse which was inflicted upon him by Father Shanley,?

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had numerous sexuality issues and, in fact, wondered whether he wa

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homosexual. In addition, Mr.

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has authorized me to make demand upon the Archdiocese in the amount also demands a full accounting from the Archdiocese regarding Father Shanley's present situation as well as his past history. Mr. also requests that the Archdiocese provide him with appropriate assurances that Father Shanley will be supervised and that he will never receive an assignment from the Archdiocese of Boston which places him in contact with children.

Kindly advise me at your earliest convenience concerning your position on this matter.

As in the past, I enclose Tolling Agreements for Father Shanley's and the Archdiocese's signature.

Very trul

Enclosures

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