

JAN 2

Brody, Hardoon, Perkins & Kesten Attorneys at Law

Richard E. Brody
Laurence E. Hardoon
Samuel Perkins
Leonard H. Kesten

Of Counsel:
Cheryl A. Jacques
Wendy J. Murphy

One Exeter Plaza
Boston, Massachusetts 02116

Telephone 617-880-7100
Facsimile 617-880-7171

Jocelyn
Drew
Sherri Gilme
Steven
Pamela J.
Kurt
Robert J. M
Caro
Deidre

January 20, 1998

Wilson D. Rogers, Jr., Esquire
Dunn & Rogers
One Union Street
Boston, MA 02108

RE: [REDACTED]

Dear Mr. Rogers:

As you are aware, this office represents [REDACTED] with regard to injuries suffered as a result of having been sexually abused by Father Paul Shanley in approximately 1970. It is my hope that by bringing this matter to your attention, it may be resolved without litigation.

[REDACTED] He met Father Paul Shanley when he was approximately 15 years of age when his mother took him to see Father Shanley because he was depressed and experiencing confusion concerning his sexual identity. [REDACTED] began meeting with Father Shanley on a regular basis in the rectory at St. Patrick's Church in Stoneham, Massachusetts. Father Shanley questioned [REDACTED] extensively about the details of [REDACTED] sexual fantasies about his potential male partners, asking details about their physical appearance, weight and build, size of the genitalia and the sexual acts involved. After several of these discussions with [REDACTED], Father Shanley told him that he could help him with his sexual identity issues but that [REDACTED] would have to agree to go away with him for a couple of days. Father Shanley told [REDACTED] mother that [REDACTED] required a great deal of counseling and that he needed to take [REDACTED] away for a weekend. [REDACTED] mother agreed and delivered [REDACTED] to Father Shanley on a Friday for a weekend counselling trip. Father Shanley subsequently utilized this opportunity to sexually abuse [REDACTED]

GT Refers to 15

Father Shanley took [REDACTED] to a location in Roxbury, Massachusetts where Shanley was living at the time. [REDACTED] believes this location was known as "Warwick House". Father Shanley offered [REDACTED] either a very modestly appointed room in which to sleep or the opportunity to share a large room with Father Shanley that was set up like a "sultan's palace", with a four-poster bed, silk sheets

GT
Redaction

on the bed and a leopard or bear skin rug. [REDACTED] chose to sleep in the vacant room alone instead of in Father Shanley's room.

GT
Redaction

[REDACTED] recalls going into his room, immediately locking the door behind him and getting into bed. Father Shanley almost immediately unlocked the door and leapt onto [REDACTED] bed, tearing off the covers. Father Shanley flipped [REDACTED] over onto his stomach and anally raped this young boy. [REDACTED] was extremely frightened and confused by what had happened and recalls that afterward, he pulled the covers over his head and went to sleep. The rape was extremely painful and [REDACTED] has carried this memory of excruciating physical pain with him throughout his life. The next day, [REDACTED] went downstairs where he encountered a woman who appeared to be a maid and a Father White who had previously been assigned to St. Patrick's Church in Stoneham. Father Shanley took [REDACTED] back home on that day and he has had no contact with Father Shanley since that time.

GT
Redaction

[REDACTED] also recalls other altar boys who had accompanied Father Shanley to a cabin in Milton telling him that before bedtime, Father Shanley would tell the altar boys that he had to take some kind of medication and was not responsible for anything he did while asleep.

GT
Redaction

[REDACTED] has suffered greatly as a result of this sexual abuse. It offends the conscience to even imagine that this powerful, religious and authority figure convinced this young boy's mother to permit her son to accompany him on an overnight trip under the pretense of providing him counselling and then raping. . . him. [REDACTED] truly believed that Father Shanley was going to help him with the issues that were weighing heavily on his mind at the time. Following the incident, [REDACTED] experienced fear and humiliation about what had occurred. In retrospect, [REDACTED] believes that the rape by Father Shanley resulted in greater confusion about his sexuality and the morality issues involved having been the victim of a rape by a priest. Additionally, [REDACTED] recalls that Father Shanley had relatively small genitalia and believes that he associates this with pain. The result has been that throughout his adult life, he had been predisposed to engage in relationships with large brutal men with very large genitalia. [REDACTED] has difficulty trusting people and continues to be reclusive at times, having great difficulty functioning when he is forced to deal with the issues surrounding the sexual abuse by Father Shanley.

[REDACTED]

Wilson D. Rogers, Jr., Esquire
January 20, 1998
Page 3

GT Redaction

At this time, my client is prepared to resolve the legal aspects of his claim and the attendant distress that this has caused to him for the sum of \$[REDACTED]. As you are undoubtedly aware, this demand is extremely realistic based upon the facts and circumstances of this case.

Please contact me as soon as you have an opportunity to review this matter.

Very truly yours,


Laurence E. Hardoon

RCAB 00224