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FRANCIS J. O'CONNOR  
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CHARLES J. DUNN (1901-1983)  
OF COUNSEL:  
JOHN F. DUNN

April 22, 2002

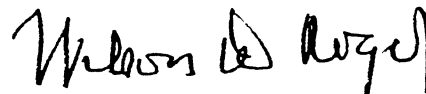
Kurt N. Schwartz, Esquire  
Assistant Attorney General  
Chief, Criminal Bureau  
Office of the Attorney General  
One Ashburton Place  
Boston, MA 02108-1698

Dear Mr. Schwartz:

In accordance with the Letter Agreement which this office signed on behalf of the Roman Catholic Archbishop of Boston, a Corporation Sole, with the Attorney General's Office dated March 1, 2002, enclosed please find a copy of the Complaint which has now been filed in Suffolk County setting forth allegations of sexual abuse of [REDACTED] by Rev. Ronald Paquin. I trust that you will forward this matter to the appropriate authorities in New Hampshire.

Thank you for your attention to this matter.

Very truly yours,



Wilson D. Rogers, Jr.

WDR/mc  
Enclosure

1904

COMMONWEALTH OF MASSACHUSETTS

██████████ SS

SUPERIOR COURT  
CA. NO. ██████████

██████████ and ██████████  
██████████  
Plaintiffs

v.

THE ROMAN CATHOLIC ARCHBISHOP )  
OF BOSTON, A CORPORATION SOLE )  
AND RONALD PAQUIN, )  
Defendants )

COMPLAINT  
AND JURY TRIAL DEMAND

INTRODUCTION

██████████ 16, died in November, 1981 as a direct result of the wilful concealment by Bishops of the Boston Archdiocese and others of Father Ronald Paquin's rampant and unbridled pedophilia. Paquin, a Roman Catholic Priest with the Boston Archdiocese, sexually molested boys from the 1970s through 1992. This civil claim is filed on behalf of ██████████ and ██████████ the parents of the late ██████████. A car operated by Ronald Paquin, overturned, crushing ██████████ because Paquin, drunk and tired after a night of sex and alcohol, fell asleep at the wheel. At the time of the incident, Ronald Paquin was returning with ██████████ and three other minors from a trip he had taken with the boys to New Hampshire. During the trip, ██████████ was given alcohol and was sexually molested by Ronald Paquin. The Roman Catholic Archdiocese in Boston had been well aware, at a minimum, for ten years before the November 1981 trip that Ronald Paquin had been accused of sexually molesting several minors at the St.

1985

Monica's Parish in Methuen and had molested children at St. John's Parish in Haverhill after being transferred there from Methuen. Despite this knowledge, the Archdiocese failed to remove Ronald Paquin or take other action to prevent the incident before [REDACTED] death in November of 1981. The Boston Archdiocese also knew that Paquin, while a sitting priest, molested boys through the 1980s into 1992, but kept these facts hidden. Cardinal Law arrived in the Boston Archdiocese in 1984. This claim seeks compensation for the intentional and negligent infliction of emotional distress caused by the Archdiocese's failure to act upon its knowledge of Paquin's child molestations and in failing to remove him from the Church. It also failed to warn the plaintiffs of Paquin's danger to children. If they had, [REDACTED] would not have been allowed to go with Paquin to New Hampshire. This claim will be further amended to assert a wrongful death claim on behalf of the estate of [REDACTED]

PARTIES

1. The plaintiff, [REDACTED] is an individual residing in Haverhill, County of Essex, Commonwealth of Massachusetts.
2. The plaintiff, [REDACTED], is an individual residing in Haverhill, County of Essex, Commonwealth of Massachusetts.
3. The defendant, The Roman Catholic Archbishop of Boston, a Corporation Sole ("the Archdiocese") is a body of politic organized under c. 506 of the Acts of 1897 of the laws of the Commonwealth of Massachusetts with its principal place of business located at 2121 Commonwealth Ave, Brighton (Boston), County of Suffolk, Commonwealth of Massachusetts.

1988

4. The defendant, Ronald Paquin, is an individual residing at 47 Presley Street, Malden, Massachusetts.

FACTS COMMON TO ALL COUNTS

5. At all times relevant hereto, Ronald Paquin was and is at this time a Catholic Priest with the Roman Catholic Archdiocese of Boston.
6. Between approximately 1971 and 1981, the Archdiocese was aware of allegations that Ronald Paquin was sexually abusing minors who he came in contact with through the church.
7. During the same time frame, employees, agents and servants of the Archdiocese were aware that he was transporting minors to New Hampshire for overnight trips during which sexual abuse was occurring and the minors were being provided with alcohol.
8. In approximately 1981, [REDACTED] a minor age 16, was a parishioner at St. John's Church, located in Haverhill, Massachusetts.
9. At that time, the Archdiocese owned, controlled and operated St. John's Church.
10. In late November, 1981, Ronald Paquin transported [REDACTED] and three other minors for an overnight trip in New Hampshire.
11. During the overnight visit, Ronald Paquin engaged in sex with [REDACTED], then a minor, age 16, and Paquin was seen with [REDACTED] in the same sleeping bag.
12. In the same overnight trip, Ronald Paquin provided [REDACTED] and the other minors with significant amounts of alcohol.

1987

- 13. On November 28, 1981, on the return trip from New Hampshire, Ronald Paquin, fatigued from a night of alcohol and sex, fell asleep, losing control of the motor vehicle on Route 93 near Tilton, New Hampshire, causing the motor vehicle to leave the roadway.
- 14. As a result of the collision, [REDACTED] was ejected from the motor vehicle whereupon it rolled over onto him, pinning him underneath it. His friends tried to lift the vehicle, but [REDACTED] died of asphyxiation.
- 15. As a result of the incident, [REDACTED] suffered.

**COUNT ONE**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
**[REDACTED] V. THE ARCHDIOCESE**

- 16. The plaintiff repeats and reaffirms all of the allegations contained in paragraphs 1-15 above, as if set forth fully herein.
- 17. The defendant owed a duty of care to the plaintiff.
- 18. The defendant breached his duty to the plaintiff by allowing a person within its employ, a known pedophile who had engaged in predatory sex with minors in his parish, to remain a priest where he could continue to prey upon children to satisfy his unbridled sexual desires.
- 19. As a direct and proximate result of the defendant's conduct, the plaintiff suffered severe emotional distress and related damages.

WHEREFORE, the plaintiff hereby demands judgment against the defendant, jointly and severally with all other defendants, in an amount the finder of fact deems meet and just, plus costs, interest and such other relief as allowed by law.

**COUNT TWO**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**[REDACTED] V. THE ARCHDIOCESE**

- 20. The plaintiff repeats and reaffirms all of the allegations contained in paragraphs 1-19 above, as if set forth fully herein.
- 21. The defendant owed a duty to the plaintiff under the circumstances then existing.
- 22. The defendant breached his duty to the plaintiff by intentionally engaging in extreme and outrageous conduct which was beyond all possible bounds of decency and was utterly intolerable in a civilized community, more specifically, allowing a person within its employ, a known pedophile who had engaged in predatory sex with minors in his parish, to remain a priest where he could continue to prey upon children to satisfy his unbridled sexual desires.
- 23. As a direct and proximate result of the defendant's conduct, the plaintiff suffered severe emotional distress, and related damages.

WHEREFORE, the plaintiff hereby demands judgment against the defendant, jointly and severally with all other defendants, in an amount the finder of fact deems meet and just, plus costs, interest and such other relief as allowed by law.

**COUNT THREE**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
**[REDACTED] V. RONALD PAQUIN**

- 24. The plaintiff repeats and reaffirms all of the allegations contained in paragraphs 1-23 above, as if set forth fully herein.
- 25. The defendant owed a duty of care to the plaintiff.
- 26. The defendant breached his duty to the plaintiff.

1999

27. As a direct and proximate result of the defendant's conduct, the plaintiff suffered severe emotional distress and related damages.

WHEREFORE, the plaintiff hereby demands judgment against the defendant, jointly and severally with all other defendants, in an amount the finder of fact deems meet and just, plus costs, interest and such other relief as allowed by law.

**COUNT FOUR**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**[REDACTED] V. RONALD PAQUIN**

28. The plaintiff repeats and realleges paragraphs 1- 27 above as if set forth herein.

29. The defendant owed a duty of care to the plaintiff under the circumstances then existing.

30. The defendant breached his duty to the plaintiff by engaging in intentionally extreme and outrageous conduct which was beyond all possible bounds of decency and was utterly intolerable in a civilized community.

31. As a direct and proximate result of the defendant's conduct, the plaintiff suffered injuries, pain and suffering, emotional distress and other substantial injuries.

WHEREFORE the plaintiff demands judgment against the defendant, jointly and severally with all other defendants, in an amount the finder of fact deems meet and just plus costs, interest and such other relief as allowed by law.

**COUNT FIVE**  
**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**  
**[REDACTED] V. THE ARCHDIOCESE**

32. The plaintiff repeats and reaffirms all of the allegations contained in paragraphs 1-31 above, as if set forth fully herein.

33. The defendant owed a duty of care to the plaintiff.

1970

34. The defendant breached its duty to the plaintiff by allowing a person within its employ, a known pedophile who had engaged in predatory sex with minors in his parish, to remain a priest where he could continue to prey upon children to satisfy his unbridled sexual desires.
35. As a direct and proximate result of the defendant's conduct, the plaintiff suffered severe emotional distress and related damages.

WHEREFORE, the plaintiff hereby demands judgment against the defendant, jointly and severally with all other defendants, in an amount the finder of fact deems meet and just, plus costs, interest and such other relief as allowed by law.

**COUNT SIX**  
**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**  
**[REDACTED] V. THE ARCHDIOCESE**

36. The plaintiff repeats and realleges paragraphs 1-35 above as if set forth herein.
37. The defendant owed a duty of care to the plaintiff under the circumstances then existing.
38. The defendant breached its duty to the plaintiff by engaging in extreme and outrageous conduct which was beyond all possible bounds of decency and was utterly intolerable in a civilized community, more specifically, allowing a person within its employ, a known pedophile who had engaged in predatory sex with minors in his parish, to remain a priest where he could continue to prey upon children to satisfy his unbridled sexual desires.
39. As a direct and proximate result of the defendant's conduct, the plaintiff suffered injuries, pain and suffering, emotional distress and other substantial injuries.

WHEREFORE the plaintiff demands judgment against the defendant, jointly and severally with all other defendants, in an amount the finder of fact deems meet and just plus costs, interest and such other relief as allowed by law.



1071

**COUNT SEVEN  
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS  
[REDACTED] V. RONALD PAQUIN**

- 40. The plaintiff repeats and reaffirms all of the allegations contained in paragraphs 1-39 above, as if set forth fully herein.
- 41. The defendant owed a duty of care to the plaintiff.
- 42. The defendant breached his duty to the plaintiff.
- 43. As a direct and proximate result of the defendant's conduct, the plaintiff suffered severe emotional distress and related damages.

WHEREFORE, the plaintiff hereby demands judgment against the defendant, jointly and severally with all other defendants, in an amount the finder of fact deems meet and just, plus costs, interest and such other relief as allowed by law.

**COUNT EIGHT  
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS  
[REDACTED] V. RONALD PAQUIN**

- 44. The plaintiff repeats and reavers all of the allegations contained in paragraphs 1-43 above, as if set forth fully herein.
- 45. The defendant owed a duty of care to the plaintiff under the circumstances then existing.
- 46. The defendant breached his duty to the plaintiff by engaging in extreme and outrageous conduct which was beyond the bounds of decency and was utterly intolerable in a civilized community.
- 47. As a direct and proximate result of the defendant's conduct, the plaintiff suffered severe emotional distress, and related damages.

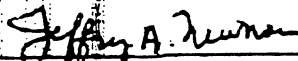
WHEREFORE, the plaintiff hereby demands judgment against the defendant, jointly and

1972

severally with all other defendants, in an amount the finder of fact deems meet and just, plus costs, interest and such other relief as allowed by law.

**THE PLAINTIFFS DEMAND A TRIAL BY JURY.**

Respectfully Submitted,  
The Plaintiff,  
By his Attorneys,



JEFFREY A. NEWMAN (BBO# 370450)  
JAMES PONSETTO (BBO#556144)  
NEWMAN & PONSETTO  
One Story Terrace  
Marblehead, MA 01945  
(781) 639-8677

Dated: April 10, 2002

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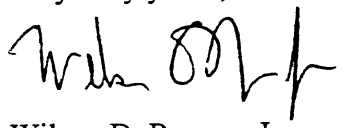
April 9, 2002

District Attorney William R. Keating  
Norfolk County  
45 Shawmut Road  
P. O. Box 380  
Canton, MA 02021

Dear District Attorney Keating:

In accordance with the Letter Agreement which this office signed on behalf of the Roman Catholic Archbishop of Boston, a Corporation Sole with the Attorney General's Office dated March 1, 2002, enclosed please find a copy of a Complaint which has now been filed in Middlesex County setting forth allegations of sexual abuse of [REDACTED] (John Doe) by Rev. Ronald Paquin.

Thank you for your attention to this matter.

Very truly yours,  
  
Wilson D. Rogers, Jr.

WDR/mc  
Enclosure

cc Kurt N. Schwartz, Esquire

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS

SUPERIOR COURT  
C.A. NO.:

JOHN DOE,  
Plaintiff

V.

COMPLAINT AND JURY TRIAL  
DEMAND

RONALD H. PAQUIN,  
AND THE ROMAN  
CATHOLIC ARCHBISHOP OF  
BOSTON, A CORPORATION  
SOLE,  
Defendants

PARTIES

1. The Plaintiff, John Doe, is an individual residing in Essex County, Commonwealth of Massachusetts.
2. The Defendant, Ronald Paquin, is an individual residing at 47 Presley Street, Malden, County of Middlesex, Commonwealth of Massachusetts.
3. The Defendant, The Roman Catholic Archbishop of Boston, A Corporation Sole (The Archdiocese) is a body political organization under c. 506 of the Acts of 1987 of the Laws of the Commonwealth of Massachusetts with its principal place of business located at 2121 Commonwealth Avenue, Brighton (Boston), County of Suffolk, Commonwealth of Massachusetts.

FACTS COMMON TO ALL COUNTS

4. The Defendant Paquin was an employee of the Boston Archdiocese in the 1980's and up to 1990 and he served as a priest at The St. John Baptist Parish ("St. John's") in Haverhill, MA for the period of approximately 1984 - 1990.

5. The Plaintiff was an alter boy at St. John's, a Parish in Haverhill, on or about 1988-1990.
6. Before the Defendant Paquin was assigned to St. John's Parish, Paquin served as a priest at St. Monica's Parish in Methuen, Massachusetts.
7. In the mid 1970s, the Defendant Paquin sexually molested at least one minor at a time when he served as a Priest at the St. Monica's Parish in Methuen, Massachusetts. Allegations of this became known to the Defendant Law at a later date but before 1988.
8. Before 1988, The Boston Archdiocese paid at least four monetary settlements to persons alleging that they were sexually molested by Paquin.
9. On various occasions, between 1989 through 1993, the Defendant Ronald Paquin sexually molested and orally copulated the Plaintiff when the Plaintiff was a minor, at diverse locations and on numerous occasions in Massachusetts, New Hampshire, Maine, Vermont, and in Canada.
10. Some time between 1990-1991, the Defendant Paquin resided at Our Lady's Hall in Milton, Massachusetts, a retreat home for alcoholic priests which also provides transitional housing for priests who have been removed from parishes following allegations or admissions of sexual abuse, is owned, controlled and operated by the Defendant Boston Archdiocese.
11. While the Defendant Paquin was residing at Our Lady's Hall in Milton, he sexually molested the Plaintiff and kept the Plaintiff overnight in his room on a number of occasions, all of which occurred when the Plaintiff was a minor.

COUNT ONE  
ASSAULT AND BATTERY  
JOHN DOE V. RONALD PAQUIN

12. The Plaintiff, repeats and realleges paragraphs 1 through 11 above as set forth herein.
13. The Defendant touched the Plaintiff without consent and performed oral sex upon him.
14. As a direct result thereof, the Plaintiff suffered severe personal injuries, suffered emotional distress, and suffered other related and substantial injuries.

WHEREFORE the Plaintiff, John Doe, demands judgment against the Defendant, Paquin jointly and severally with all other Defendants, in an amount the finder of fact deems meet and just plus costs, interest and such other relief as allowed by law.

COUNT TWO  
NEGLIGENCE  
JOHN DOE v. THE BOSTON ARCHDIOCESE

15. The plaintiff repeats and realleges paragraphs 1-14 above as if set forth herein.
16. The defendant The Boston Archdiocese owed a duty of care to The Plaintiff under the circumstances then existing.
17. The Defendant The Boston Archdiocese breached his duty to the Plaintiff, by among other things, allowing the Defendant Paquin to remain an active priest despite the Defendant's knowledge of numerous allegations that Paquin had sexually molested children and also in negligently supervising Paquin when he resided at Our Lady's Hall in Milton. The Defendant was negligent in failing to supervise Our Lady's Hall at the time Paquin molested the Plaintiff at Our Lady's Hall when he was a minor.

18. As a direct and proximate result of the Defendant's negligence, the <sup>1977</sup>  
Plaintiff suffered injuries, pain and suffering, emotional distress and other  
substantial damages.

WHEREFORE the Plaintiff, John Doe demands judgment against the  
Defendant The Boston Archdiocese, jointly and severally with all other  
Defendants, in an amount the finder of fact deems meet and just plus costs, interest  
and such other relief as allowed by law.

THE PLAINTIFF DEMANDS A JURY TRIAL.

Respectfully Submitted,  
The Plaintiff,  
By His Attorneys,



JEFFREY A. NEWMAN (BBO#370450)

NEWMAN & PONSETTO

One Story Terrace

Marblehead, MA 01945

(781)639-8677

March 19, 2002

COPY

1978

MEMORANDUM

TO: Fr. John B. McCormack  
FROM: Sr. Catherine Mulkerrin  
RE: Allegations pertaining to Fr. Paquin by [REDACTED] and [REDACTED]  
DATE: May 17, 1994

On May 6, 1994, CEM met in the presence of Attorney Benjamin Earle in his Lexington office, two brothers at individual appointments. *Benjamin Earle*

[REDACTED] is thirty-six years old, currently employed as a landscaper. He lives with his mother, his father died last December having spent his later years in sobriety and in his last months in improved relationship with [REDACTED]. [REDACTED] has been divorced twice and has three daughters in their teens for whom he provides support. He has two brothers and a sister.

As a youngster he attended St. Monica's School in Methuen for seven years. He said that he was abused by Father Paquin several times a week for at least two years and placed the incidents between 1971 and 1974 at St. Monica's Rectory and at a Scout camp in Raymond, N.H. [REDACTED] said that he was molested by a priest at St. Basil's Seminary six to nine months before he went to see Father Paquin. By then he was a 14 year old freshman and went at the advice of his mother (I am not sure what his mother knew, but his father would not have been sober then and able to help him). Nothing else was said about the St. Basil's incident during the interview.

[REDACTED] visited Father Paquin four or five times before he was invited upstairs to this room in the rectory. He was given liquor (beer and shots of whiskey), got tipsy, started opening up to Father Paquin who told him he was going to help him. He told [REDACTED] to lie down on the bed, undressed him, touched and fondled him and made him ejaculate. "This is the only way I can help you", Father Paquin told him.

When [REDACTED] did not go back for several days, his mother questioned him and he began to hang around the rectory again. He recalled being allowed to drive Father's Galaxy, going to Pier #4 (wearing a priest's collar at fifteen years old), going to New York, to Canada. In Montreal Father Paquin gave him a coat for his birthday. At the rectory, [REDACTED] slept with Father Paquin "one-half to a dozen times". In the morning he would have his outdoor jacket on, so that it looked as if he had just come in. Father Paquin would get [REDACTED] out of school to serve a funeral and then take him off for the day. When these statements were made is not clear, but



COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT DEPARTMENT  
CIVIL ACTION NO.:

\_\_\_\_\_ )  
 \_\_\_\_\_ )  
 Plaintiff )  
 vs. )  
 ROMAN CATHOLIC ARCHBISHOP OF BOSTON, )  
 A CORPORATION SOLE, and )  
 RONALD PAQUIN, )  
 Defendant(s) )

COMPLAINT

THE PARTIES

Now comes the Plaintiff in the above-entitled action and says as follows:

- a. That he is a resident of \_\_\_\_\_.
- b. That the Defendant, Roman Catholic Archbishop of Boston, A Corporation Sole, is a corporation duly organized by law and has an usual place of business at 55 Chapel St., Newton, Middlesex County, Massachusetts.
- c. That the Defendant, Ronald Paquin, is a resident of and/or has an usual place of business at St. John's Church, 110 Lincoln Avenue, Haverhill, Essex County, Massachusetts.

COUNT 1:

- 1. The Plaintiff says that he was born on \_\_\_\_\_.
- 2. That on or about July 1, 1972, and on other occasions prior to his achieving the age of majority, an agent, servant or employee of the Defendant, Roman Catholic Archbishop of Boston, sexually molested him and/or engaged in a variety of harmful and unlawful sexual contacts with him.
- 3. That the Defendant, Roman Catholic Archbishop of Boston, its agents, servants or employees, knew or should have known that said agent, servant or employee was engaging in and/or had a tendency to engage in such molestation and/or sexual contacts.
- 4. That the Plaintiff suffered and continued to suffer extreme mental distress and emotional harm, bodily harm, and consequential damages, and incurred great medical expense and suffered diminished earning capacity, as a result of being sexually molested and/or being subjected to unlawful sexual contacts as aforesaid.

7/1/72 (13)  
 1  
 3/15/76

5. That the negligence of the Defendant, Roman Catholic Archbishop of Boston, in its supervision and control of its agent, servant or employee was a proximate cause of the harm suffered by the Plaintiff.

6. Wherefore, the Plaintiff, [REDACTED], claims damages and demands judgement against the Defendant, Roman Catholic Archbishop of Boston, A Corporation Sole, with interest and costs.

JURY CLAIM

The Plaintiff, [REDACTED], claims and demands a jury trial on his cause of action.

COUNT 2:

1. The Plaintiff says that he was born on March 15, 1958.

2. That on or about July 1, 1972, and on other occasions prior to his achieving the age of majority, the Defendant, Ronald Paquin, sexually molested him and/or engaged in a variety of harmful and unlawful sexual contacts with him.

3. That the Plaintiff suffered and continued to suffer extreme mental distress and emotional harm, bodily harm, and consequential damages, and incurred great medical expense and suffered diminished earning capacity, as a result of being sexually molested and/or being subjected to unlawful sexual contacts as aforesaid.

4. Wherefore, the Plaintiff, [REDACTED], claims damages and demands judgement against the Defendant, Father Ronald Paquin, with interest and costs.

JURY CLAIM

The Plaintiff, [REDACTED], claims and demands a jury trial on his cause of action.

Dated: June 21, 1994

By His Attorney,

---

Bartholomew V. Earle  
Law Offices of S. George Bromberg, P.C.  
Suite 205, 57 Bedford St.  
Lexington, MA 02173  
Tel. (617) 861-3400  
BBO#: 150220

<b>CIVIL ACTION COVER SHEET</b>	<b>Trial Court of Massachusetts</b> <b>SUPERIOR COURT DEPARTMENT</b> Middlesex Division	DOCKET NUMBER <span style="font-size: 1.5em;">1981</span>
---------------------------------	---	--



PLAINTIFF(S) [REDACTED]	DEFENDANT(S) <b>ROMAN CATHOLIC ARCHBISHOP OF BOSTON and RONALD PAQUIN</b>
ATTORNEY(S) FIRM NAME, ADDRESS AND PHONE NUMBER <b>Bartholomew V. Earle</b> <b>Law Offices of S. George Bromberg, P.C.</b> <b>Suite 205, 57 Bedford St.</b> <b>Lexington, MA 02173 (Tel. (617) 861-3400)</b> <b>Board of Bar Overseers # (Required) 150220</b>	ATTORNEY(S) (if known)

**ORIGIN CODE AND TRACK DESIGNATION**

Place an  in one box only:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 1. F01 Original Complaint<br><input type="checkbox"/> 2. F02 Removal to Sup. Ct. c231, s. 104 (F)<br><input type="checkbox"/> 3. F03 Retransfer to Sup. Ct. c231, s. 102C (X) | <input type="checkbox"/> 4. F04 District Ct. Appeal c231, s. 97 (X)<br><input type="checkbox"/> 5. F05 Reactivated after Rescript; Relief from judgment/order (Mass. R Civ. P. 60 (X)<br><input type="checkbox"/> 6. E10 Summary process appeal (X) |
|---|---|

**TYPE OF ACTION AND TRACK DESIGNATION (See Reverse Side)**

CODE NO.	TYPE OF ACTION (specify)	TRACK	IS THIS A JURY CASE?
B04	Other negligence-personal injury	(F)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**1. PLEASE GIVE A CONCISE STATEMENT OF THE FACTS: (Required in ALL Types of Actions)**

The Plaintiff, while a minor, was sexually molested on a number of occasions the Defendant, Ronald Paquin, as a result of the negligence of the defendant, Roman Catholic Archbishop of Boston.

**2. IN A CONTRACT ACTION (CODE A) OR A TORT ACTION (CODE B) STATE, WITH PARTICULARITY, MONEY DAMAGES WHICH WOULD WARRANT A REASONABLE LIKELIHOOD THAT RECOVERY WOULD EXCEED \$25,000:**

The Plaintiff suffered severe emotional and mental distress, difficulty with relationships, substance abuse, insomnia, loss of appetite, marital difficulties, and diminished earning capacity.

**3. PLEASE IDENTIFY, BY CASE NUMBER, NAME AND DIVISION, ANY RELATED ACTION PENDING IN THE SUPERIOR COURT DEPARTMENT.**

None

SIGNATURE OF ATTORNEY OF RECORD OR PLAINTIFF	DATE <b>06/20/1994</b>
--	---------------------------

**OFFICE USE ONLY - DO NOT WRITE BELOW THIS LINE**

<b>DISPOSITION</b> A. Judgment Entered <input type="checkbox"/> 1. Before jury trial or non-jury hearing <input type="checkbox"/> 2. During jury trial or non-jury hearing <input type="checkbox"/> 3. After jury verdict <input type="checkbox"/> 4. After court finding <input type="checkbox"/> 5. After post trial motion	B. No Judgment Entered <input type="checkbox"/> 6. Transferred to District Court under G.L. c.231, s.102C. Disposition Date _____	<b>RECEIVED</b> BY _____ DATE _____ <b>DISPOSITION ENTERED</b> BY _____ DATE _____
---	---	---

RELEASE OF ALL CLAIMS

In consideration of [REDACTED]  
[REDACTED] the Receipt whereof is hereby acknowledged, I hereby  
remise, release and forever discharge the Roman Catholic  
Archbishop of Boston, a Corporation Sole, established by Chapter  
506 of the Massachusetts Acts of 1897, its agents, servants,  
officers, employees and all priests incardinated to the Roman  
Catholic Archdiocese of Boston, including but not limited to  
Rev. Ronald Paquin, of and from all debts, demands, causes of  
action, suits, accounts, covenants, contracts, agreements,  
damages, and any and all claims, demands and liabilities  
whatsoever of every name and nature, both in LAW and in EQUITY,  
which against the said Roman Catholic Archbishop of Boston, a  
Corporation Sole, its agents, servants, officers, employees and  
all priests incardinated to the Roman Catholic Archdiocese of  
Boston, including but not limited to Rev. Ronald Paquin, I now  
have or ever had from the beginning of the world to this date  
and more specifically, without limiting the generality of the  
foregoing, on account of the claim brought by me, [REDACTED] in  
the legal action of [REDACTED] v. Roman Catholic Archbishop of  
Boston, a Corporation Sole and Ronald Paquin, Middlesex Superior  
Court Civil Action No. [REDACTED]

It is the intention of all parties that this Release  
shall resolve any and all claims of any kind or nature which I  
have against the said Roman Catholic Archbishop of Boston, a  
Corporation Sole, its agents, servants, officers, employees and  
all priests incardinated to the Roman Catholic Archdiocese of

Boston, including but not limited to Rev. Ronald Paquin, including, specifically without limiting the generality of the foregoing, claims for injuries currently existing but unknown to any or all of the parties hereto.

I further agree that this settlement is in full compromise of a disputed claim and that the payment is not to be construed as an admission of liability on the part of the said Roman Catholic Archbishop of Boston, a Corporation Sole, its agents, servants, officers, employees and all priests incardinated to the Roman Catholic Archdiocese of Boston, including but not limited to Rev. Ronald Paquin. No promise or inducement which is not expressed herein has been made to me and in executing this Release, I do not rely upon any statement of representation made by any person, firm or corporation hereby released, or any agent, physician, doctor, or other person representing them or any other concerning the nature, extent, or duration of said damages or losses, or the legal liability therefore.

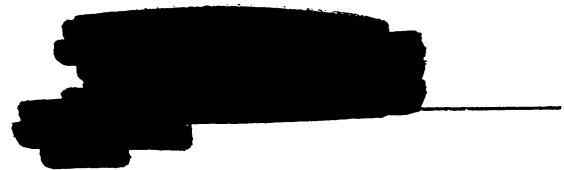
All of the parties hereto agree that no statement shall be made to any person or entity about the nature of the claim I have against the said Roman Catholic Archbishop of Boston, a Corporation Sole, its agents, servants, officers, employees and all priests incardinated to the Roman Catholic Archdiocese of Boston, including, but not limited to Rev. Ronald Paquin, except as may be required by a court of

competent jurisdiction or for the purposes of individual or family counselling.

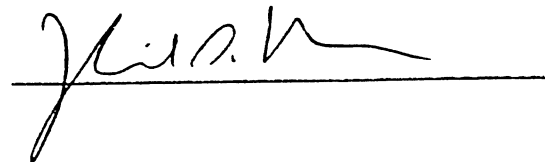
All of the parties hereto agree that they and their attorneys will maintain the confidentiality of this settlement in the specific and general terms thereof as set forth in this agreement. No information concerning this settlement will be disclosed to any party, except that the terms of this settlement may be disclosed to any public agency or entity mandated to receive this information according to applicable statutes or duly adopted rules and regulations thereunder. No other disclosure of the terms of this agreement may be made by any party or their attorneys.

I further state that I have carefully read the foregoing Release and know the contents thereof, and I sign the same as my own free act.

Witness my hand and seal this 15th day of April, 1995



Signed in the presence of:





2033

COPY

SECOND INTERVIEW  
May 6, 1994

██████████ regarding Fr. Paquin

██████████ is thirty-five years old; he is on disability for an industrial accident and came to the interview in a wheelchair. He has been married for two years. ██████████ attended St. Monica School until the fifth grade. He would go to the parish youth center in his teens when it was open weekends. He says that he talked to Fr. Paquin about something in his life, "might have been a problem with masturbation", when he was thirteen at the center when nobody was around. He was questioned by Fr. Paquin about how big he became, how he fantasized, and did he look at magazines.

██████████ along with other altar boys, started to go away to the camp in N.H. They would use the parish vestry on Friday evening to sleep over; he said they had the run of the camp and recalls using 22's to shoot beer cans.

██████████ said that in the summer, Fr. Paquin became "really interested in my problem". The priests and housekeeper were gone from the rectory; ██████████ was given a couple of beers in Fr. Paquin's room. He wanted ██████████ to fantasize about women and started taking the boy's clothes off. He said that they both ought to get comfortable (undressed). I don't know what I said, but he started playing with me, wanted me to play with him". They took a bath together and Father began "playing with me again". He told ██████████ he could make him feel better; he told ██████████ to put his mouth on his penis, saying it was normal. "I did it." Then ██████████ said that Father Paquin told him that what they were doing was "what guys do to women". ██████████ used the word sodomized when asked what he would name what happened. That night, also as a "help", they slept in the same bed. ██████████ was told by Fr. Paquin that when in gym he should look at the "other guys sizes and shapes".

Once at the N.H. camp (Ornway?), ██████████ needed to urinate. Fr. Paquin walked ██████████ to the back door and played with him while the other boys were sleeping. ██████████ described a place in Weston where there was a big swimming pool in the back (he remembers going by a big Jordan Marsh on the way). He said that Fr. Paquin molested him in one of the rooms up there and that another priest did the same things to him in the room, that the second man was older, had a little bit of grey hair and was dressed in black. He puts himself at age thirteen or fourteen; Fr. Paquin told him that he went to school there and that it was where he learned French. "Privileges" including responsibilities at the youth center, money, shooting rounds went on for about two years, until ██████████ stopped being an altar boy.

From that point on ██████████ describes himself as being mad at God and the Church and being that way for eighteen years. He went to church for his father's funeral. He has been in AA for over three years. ██████████ has attempted suicide, has lived on the road,



and has had two unsuccessful stints in the military because of his anger (1976 and 1980-81). His relations with women have been poor, when drunk he had had gay experiences. As a kid he was into football, soccer, etc., but then got into drinking and drugs and did not care about anything.

After some hesitation and questions about confidentiality [REDACTED] allowed the use of his name. He was the brother who did not want to come to any Church person for an interview.

CEM: [REDACTED] said that even though the two brothers came together, they did not know about each other when these incidents were happening and that driving home they would not talk about what happened to each because they do not talk about it to each other.

Through their lawyer, both men have been sent letters concerning the counseling which they will begin to obtain with the help of the same lawyer.

[REDACTED] seemed more credible, but that may be that personality-wise he is shy, while [REDACTED] though equally embarrassed about his narration, was a little dramatic.

As [REDACTED] was leaving, Attorney Earle said that he wanted to talk to the brothers as he had obtained more information (?). This attorney had nothing to say during both interviews, not even an introduction.

[REDACTED] tt

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT DEPARTMENT  
CIVIL ACTION NO.:

\_\_\_\_\_ )  
 [REDACTED] )  
 Plaintiff )  
 vs. )  
 ROMAN CATHOLIC ARCHBISHOP OF BOSTON, )  
 A CORPORATION SOLE, and )  
 RONALD PAQUIN, )  
 Defendant(s) )  
 \_\_\_\_\_ )

COMPLAINT

THE PARTIES

Now comes the Plaintiff in the above-entitled action and says as follows:

- a. That he is a resident of [REDACTED]
- b. That the Defendant, Roman Catholic Archbishop of Boston, A Corporation Sole, is a corporation duly organized by law and has an usual place of business at 55 Chapel St., Newton, Middlesex County, Massachusetts.
- c. That the Defendant, Ronald Paquin, is a resident of and/or has an usual place of business at St. John's Church, 110 Lincoln Avenue, Haverhill, Essex County, Massachusetts.

COUNT 1:

- 1. The Plaintiff says that he was born on [REDACTED].
- 2. That on or about July 1, 1972, and on other occasions prior to his achieving the age of majority, an agent, servant or employee of the Defendant, Roman Catholic Archbishop of Boston, sexually molested him and/or engaged in a variety of harmful and unlawful sexual contacts with him.
- 3. That the Defendant, Roman Catholic Archbishop of Boston, its agents, servants or employees, knew or should have known that said agent, servant or employee was engaging in and/or had a tendency to engage in such molestation and/or sexual contacts.
- 4. That the Plaintiff suffered and continued to suffer extreme mental distress and emotional harm, bodily harm, and consequential damages, and incurred great medical expense and suffered diminished earning capacity, as a result of being sexually molested and/or being subjected to unlawful sexual contacts as aforesaid.

7/72-7/77 (13)

5. That the negligence of the Defendant, Roman Catholic Archbishop of Boston, in its supervision and control of its agent, servant or employee was a proximate cause of the harm suffered by the Plaintiff.

6. Wherefore, the Plaintiff, [REDACTED], claims damages and demands judgement against the Defendant, Roman Catholic Archbishop of Boston, A Corporation Sole, with interest and costs.

JURY CLAIM

The Plaintiff, [REDACTED], claims and demands a jury trial on his cause of action.

COUNT 2:

1. The Plaintiff says that he was born on [REDACTED]
2. That on or about July 1, 1972, and on other occasions prior to his achieving the age of majority, the Defendant, Ronald Paquin, sexually molested him and/or engaged in a variety of harmful and unlawful sexual contacts with him.
3. That the Plaintiff suffered and continued to suffer extreme mental distress and emotional harm, bodily harm, and consequential damages, and incurred great medical expense and suffered diminished earning capacity, as a result of being sexually molested and/or being subjected to unlawful sexual contacts as aforesaid.
4. Wherefore, the Plaintiff, [REDACTED] claims damages and demands judgement against the Defendant, ~~Father Ronald Paquin,~~ with interest and costs.

JURY CLAIM

The Plaintiff, [REDACTED], claims and demands a jury trial on his cause of action.

Dated: June 21, 1994

By His Attorney,

Bartholomew V. Earle  
 Law Offices of S. George Bromberg, P.C.  
 Suite 205, 57 Bedford St.  
 Lexington, MA 02173  
 Tel. (617) 861-3400  
 BBO#: 150220

RELEASE OF ALL CLAIMS

In consideration of [REDACTED]  
[REDACTED] the Receipt whereof is hereby acknowledged  
and the Roman Catholic Archbishop of Boston, a Corporation  
Sole's agreement to continue to furnish [REDACTED]  
[REDACTED] for me through December 31, 1995, I hereby remise,  
release and forever discharge the Roman Catholic Archbishop of  
Boston, a Corporation Sole, established by Chapter 506 of the  
Massachusetts Acts of 1897, its agents, servants, officers,  
employees and all priests incardinated to the Roman Catholic  
Archdiocese of Boston, including but not limited to Rev. Ronald  
Paquin, of and from all debts, demands, causes of action, suits,  
accounts, covenants, contracts, agreements, damages, and any and  
all claims, demands and liabilities whatsoever of every name and  
nature, both in LAW and in EQUITY, which against the said Roman  
Catholic Archbishop of Boston, a Corporation Sole, its agents,  
servants, officers, employees and all priests incardinated to  
the Roman Catholic Archdiocese of Boston, including but not  
limited to Rev. Ronald Paquin, I now have or ever had from the  
beginning of the world to this date and more specifically,  
without limiting the generality of the foregoing, on account of  
the claim brought by me, [REDACTED] in the legal action of  
[REDACTED] v. Roman Catholic Archbishop of Boston, a  
Corporation Sole and Ronald Paquin, Middlesex Superior Court  
Civil Action No. [REDACTED]

It is the intention of all parties that this Release  
shall resolve any and all claims of any kind or nature which I

-2-

have against the said Roman Catholic Archbishop of Boston, a Corporation Sole, its agents, servants, officers, employees and all priests incardinated to the Roman Catholic Archdiocese of Boston, including but not limited to Rev. Ronald Paquin, including, specifically without limiting the generality of the foregoing, claims for injuries currently existing but unknown to any or all of the parties hereto.

I further agree that this settlement is in full compromise of a disputed claim and that the payment is not to be construed as an admission of liability on the part of the said Roman Catholic Archbishop of Boston, a Corporation Sole, its agents, servants, officers, employees and all priests incardinated to the Roman Catholic Archdiocese of Boston, including but not limited to Rev. Ronald Paquin. No promise or inducement which is not expressed herein has been made to me and in executing this Release, I do not rely upon any statement of representation made by any person, firm or corporation hereby released, or any agent, physician, doctor, or other person representing them or any other concerning the nature, extent, or duration of said damages or losses, or the legal liability therefore.

All of the parties hereto agree that no statement shall be made to any person or entity about the nature of the claim I have against the said Roman Catholic Archbishop of Boston, a Corporation Sole, its agents, servants, officers, employees and all priests incardinated to the Roman Catholic

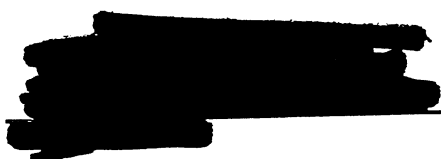
Archdiocese of Boston, including, but not limited to Rev. Ronald Paquin, except as may be required by a court of competent jurisdiction or for the purposes of individual or family counselling.

All of the parties hereto agree that they and their attorneys will maintain the confidentiality of this settlement in the specific and general terms thereof as set forth in this agreement. No information concerning this settlement will be disclosed to any party, except that the terms of this settlement may be disclosed to any public agency or entity mandated to receive this information according to applicable statutes or duly adopted rules and regulations thereunder. No other disclosure of the terms of this agreement may be made by any party or their attorneys.

I further state that I have carefully read the foregoing Release and know the contents thereof, and I sign the same as my own free act.

Witness my hand and seal this 15<sup>th</sup> day of

August, 1995



Signed in the presence of:

[Handwritten Signature]

2085

THE ROGERS LAW FIRM  
A PROFESSIONAL CORPORATION  
ONE UNION STREET  
BOSTON, MASSACHUSETTS 02108  
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WILSON D. ROGERS, JR.  
PETER POMMERSHEIM  
MICHAEL J. FAZIO, JR.  
WILSON D. ROGERS, III  
FRANCIS J. O'CONNOR  
MARK C. ROGERS

CHARLES J. DUNN (1901-1983)  
OF COUNSEL  
JOHN F. DUNN

May 3, 2002

Kurt N. Schwartz, Esquire  
Assistant Attorney General  
Chief, Criminal Bureau  
Office of the Attorney General  
One Ashburton Place  
Boston, MA 02108-1698

Dear Mr. Schwartz:

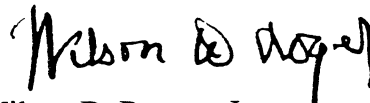
In accordance with the letter agreement, which this office signed on behalf of the Roman Catholic Archbishop of Boston, a Corporation Sole with your office dated March 1, 2002, enclosed please find correspondence which we have received on behalf of

[REDACTED]

and [REDACTED] each of whom have alleged allegations of sexual misconduct by a priest within the Archdiocese of Boston. The Tolling Agreements which are referenced within this correspondence provide no further information regarding the underlying claims, I have therefore not enclosed copies of any of the Tolling Agreements which are referenced.

Thank you for your attention to this matter.

Very truly yours,



Wilson D. Rogers, Jr.

WDR/ec

Enclosures

GREENBERG  
ATTORNEYS AT LAW  
TRAURIG

APR 12 2002

new vic / 4/12/02

2086

Robert A. Sherman, Esq.  
(617)310-6015  
shermanr@gtlaw.com

April 12, 2002

VIA HAND DELIVERY

Wilson Rogers, Jr., Esq.  
The Rogers Law Firm  
One Union Street, Third Floor  
Boston, MA 02108

Dear Mr. Rogers:

As we discussed, enclosed please find the revised Tolling Agreements for the following individuals who have suffered sexual abuse by priests within the Boston Archdiocese:

new	[REDACTED]	Father Bernard Lane	Alpha Omega
new	[REDACTED]	Father Geoghan <i>new</i>	
new	[REDACTED]	Father Shanley	
		Father Graham	
new	[REDACTED]	Father John Lane	St. Theresa's, No. Reading
new	[REDACTED]	Father John Lane	St. Theresa's, No. Reading
		Father Malony <i>new</i>	St. Theresa's, No. Reading
new	[REDACTED]	Father Pacquin	St. Monica's, Methuen
new	[REDACTED]	Father Joseph Welch	St. Theresa, Watertown
[REDACTED] <i>vsp</i>	[REDACTED]	Father Murphy, <i>David C.?</i>	St. Peter & Paul
new	[REDACTED]	Father Lane	Alpha Omega
		Father Lane	Alpha Omega
new	[REDACTED]	Father Lane	Alpha Omega
new	[REDACTED]	Father Mahan	St. Anne's
[REDACTED] <i>vsp</i>	[REDACTED]	Father Shanley	Camp Fatima
		Father Graham	Camp Fatima
		Father Gayle <i>Fr. Gale?</i>	Camp Fatima
new <i>v</i>	[REDACTED]	Father Lane	Alpha Omega

GREENBERG TRAURIG, LLP

ONE INTERNATIONAL PLACE 3RD FLOOR BOSTON, MASSACHUSETTS 02110  
617-310-6000 FAX 617-310-6001 www.gtlaw.com

MIAMI NEW YORK WASHINGTON, D.C. ATLANTA PHILADELPHIA TYSONS CORNER CHICAGO BOSTON PHOENIX WILMINGTON LOS ANGELES DENVER  
FORT LAUDERDALE BOCA RATON WEST PALM BEACH ORLANDO TALLAHASSEE

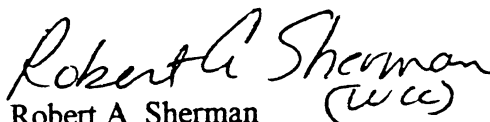


Wilson Rogers, Jr., Esq.  
April 4, 2002  
Page 2

We will be sending formal demands on behalf of each of our clients shortly. In the meantime we ask you to execute the enclosed tolling agreements in order that we can proceed in an orderly fashion.

Please call me or my paralegal Wendy Champagne with any questions.

Very truly yours,

  
Robert A. Sherman (wcc)

RAS/wcc  
Enclosures

#53180

## PERSONAL AND CONFIDENTIAL

MEMORANDUM

TO: Rev. Charles Higgins  
 FROM: Sister Rita McCarthy, CSJ  
 DATE: March 8, 2002  
 RE: [REDACTED] (Rev. Bernard Lane)  
 [REDACTED] DOB [REDACTED]

[REDACTED] came for an interview at the Chancery today. He appeared shaken and emotional. He is a self-employed electrician with two children and lives with their mother. [REDACTED] claims he is an alcoholic, has been sober for 3 months, and attends AA regularly. He went to Wayside Family Counseling in Milford. A counselor, Brenda Frasier, put him on prozac. His life is stable at present.

[REDACTED] father died when [REDACTED] was 14. He started acting out so his mother took out a CHINS on him. His probation officer suggested that [REDACTED] go to Alpha Omega for a year to stabilize his life. He was greeted by Father Lane and made to feel very comfortable. He was put in a room with 4 sets of bunk beds. He began to look on Father as a sort of mentor who knew what was best for young boys. At first [REDACTED] was squeamish about skinny dipping in the pool and sitting around naked in the recreation lounge. He said that Father wanted them to feel good about their bodies. He made three plaques while there and gave them all to Father Lane.

[REDACTED] remained at Alpha Omega for 10 months. [REDACTED] claims that three weeks before he left Father invited him to his house in Littleton. He knew others had gone so he was thrilled to be asked. He went alone with Father. When he went to bed, Father joined him. He lay on top of him and asked him if he got "rushes." He continued having sex with him. Father finally got off him saying that he was sorry to have been "carried away." [REDACTED] says that he was horribly shaken.

This experience only tended to make him more angry and guilty. He has never gone to Church, but now wishes he could. He asked for prayers that he will be able to straighten out his life. He signed a waiver and hugged me spontaneously as he left. He took a list of therapist with him.

[REDACTED] lives at:  
 [REDACTED]

