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VIA OVERNIGHT AND ELECTRONIC MAIL
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VIA OVERNIGHT AND ELECTRONIC MAIL
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VIA OVERNIGHT MAIL

Tom Ortenberg
Open Road Films, LLC
12301 Wilshire Blvd, Suite 600
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Re: Jack Dunn/Spotlight

Dear Messrs. McCarthy, Singer, Fierson, Brakin and Ortenberg:

Please be advised that this firm acts as counsel to Jack Dunn ("Mr. Dunn") in connection with his claim for defamation against you (and potentially others whose identities are unknown to him) arising from your false, malicious and fabricated portrayal of him in the feature film, *Spotlight*. You have repeatedly and unambiguously represented to the public that the events depicted in *Spotlight* are factually true and accurate, and actually took place. As one example only, the promotional movie poster for *Spotlight*, which appears prominently in hard copy in theaters and on the Internet, represents unambiguously to the public that the film tells, "[t]he **true story behind the scandal that shocked the world.**" The film itself begins with the following representation to the audience appearing on the screen: "**Based on actual events.**" Yet, the defamatory portrayal of Mr. Dunn in the film fails utterly to present the truth. Instead, as to Mr. Dunn, it is a devastating fabrication.



The detailed outline below sets forth just some of the ways in which *Spotlight* defames Mr. Dunn, who the film identifies by name, employer and occupation. In general, the film, in dramatic fashion, divides the individuals it depicts into those who heroically searched for the truth about the horrific sexual abuse of children by members of the clergy and those who sought to suppress facts about the abuse. In a critical scene in the film, which is nearly entirely fabricated, *Spotlight* squarely and falsely places Mr. Dunn in the category of those who actively attempted to interfere with and thwart the efforts of the *Boston Globe* reporters to unearth and report on the abuse scandal.

In the fabricated scene, Mr. Dunn is shown attending a meeting at Boston College High School with the Acting President of the school, William Kemeza (played by Tim Progosh), reporter Walter Robinson (played by Michael Keaton), reporter Sacha Pfeiffer (played by Rachel McAdams), and a fifth person named "Pete Conley" (played by Paul Guilfoyle). In the film, Mr. Conley is a supposed representative of the Roman Catholic Archdiocese of Boston; in reality, he is a fictional character (a fact that is not disclosed to the audience).

The events depicted both during and immediately after the meeting, the words used, and the dramatic expressions of the characters themselves, all drive a clear message: Mr. Dunn was brought in to the meeting to help suppress the truth and minimize the *Globe's* reporting about the abuse of children. At one point in the scene, it is literally stated by the fictitious Mr. Conley that the purpose of the meeting is to keep the story "between us," and away from the public, "until we all get on the same page" about the scandal. Mr. Dunn and Mr. Conley are shown appealing to Mr. Robinson not as head of the *Globe* Spotlight team but rather as "an important alumnus" of BC High and "a friend" in order to minimize the damage to BC High and the Church. Mr. Dunn goes on to say to Mr. Robinson, "we know you care about the school as much as we do." In your manufactured scene, Mr. Dunn also dismissively downplays the potential abuse by questioning, "And we're talking about seven alleged victims over, what, eight years?" None of this ever happened. Indeed, the extent and consciousness of your fabrication, and your utter disregard for its effect on Mr. Dunn, is shown by the fact that an earlier version of the script had those damning words - "And we're talking about seven alleged victims over, what, eight years?" - coming from the fictional Mr. Conley, not from Mr. Dunn.

Making matters far worse, however, is the fact that *Spotlight* portrays Mr. Dunn in a manner that is the exact opposite of the documented truth about who he is and how he personally responded to the clergy sex abuse scandal. In 2002, Mr. Dunn's efforts to reach out and help the victims of the scandal through a transparent, compassionate and ongoing response were not just well-known but also were reported on publicly by some of the very same *Boston Globe* reporters who are the subject of the movie. For example, in a story written by Mr. Robinson that appeared in the March 7, 2002 edition of the *Boston Globe*, literally two days after the actual meeting at BC High that is so grossly misrepresented in the film, Mr. Dunn is quoted as stating: "**We want to clear the air, help the victims and reach out to anyone who contacts us.**" See Exhibit A (emphasis supplied). Of course, this is the well-documented truth – that upon his receipt of information about the abuse of children by clergy, Mr. Dunn took a leading role in making sure



that the facts would come out, that all individuals involved would be held fully accountable, and that the victims would be helped in any way possible.

All of this information was either known to you or readily available to you before you fabricated a scene to the exact opposite effect in *Spotlight*. Indeed, Mr. McCarthy, you met personally with Mr. Dunn and *Globe* Spotlight reporter Michael Rezendes when Mr. Rezendes asked for a tour of the former residence of Cardinal Law more than two years before the release of the film. Yet you utterly failed to seek any information from him whatsoever regarding his involvement in the clergy abuse scandal and failed in any manner to disclose to him how he would be portrayed in the film so he could even react. This is inexcusable.

Even though the movie has been in limited release and in theaters for only a short time, the impact upon Mr. Dunn and his family, and Mr. Dunn's reputation, has been devastating. Having seen the movie, Mr. Dunn became and remains physically ill at how he has been falsely portrayed. He has been humiliated and damaged both personally and professionally in every familial, educational, social and professional community of importance to him, communities in which he has spent a lifetime building a well-earned reputation for honesty, integrity and decency. The prospect of his four children walking away from the movie thinking that others will believe that their father protected pedophiles, obfuscated an investigation, and dismissed the suffering of victims, is unbearable.

By and through this letter, Mr. Dunn demands that you, and all those acting in concert with you, take immediate steps to remove the scenes that falsely portray and specifically identify Mr. Dunn, and that you publicly acknowledge that the scene was fabricated and is not an accurate portrayal of Mr. Dunn. We ask that you have your legal counsel contact us immediately to discuss these steps and others that will be necessary to remedy, to the extent possible, the damage inflicted upon Mr. Dunn. Given that the alleged purpose and message of *Spotlight* is to document and celebrate the truly exemplary work of the *Boston Globe* Spotlight team in exposing the truth, we expect that you and those responsible for the destruction of Mr. Dunn's reputation will approach this matter with equal concern for the actual facts and the fallout from your distortion of them.

Set forth below is an outline of how the film defames Mr. Dunn, both generally and specifically, with appropriate support:

Spotlight's Overall Defamatory Sting Of and Concerning Mr. Dunn

At its core, *Spotlight* honors the remarkable work of the *Boston Globe*'s investigative journalists in their search for the truth. As Mr. McCarthy told *Entertainment Weekly* in an article published online on November 10, 2015:

Whenever you're telling a story about **true-life events** and about real people, there's a tremendous responsibility-slash-burden to **get it right**," McCarthy



said. “And I think with this one, because of the nature and the topic of it ... and also just the hard work that these journalists put in, we grew to know and be very connected to these people.” The goal, he continued, was “not to over-sensationalize [the story] or sentimentalize it or romanticize it, but **to present it as they presented their investigation**, which was straightforward, hard-hitting, no-nonsense and to the point. I think to some extent their investigation was our inspiration for making the movie. (Emphasis supplied).¹

As noted above, the movie portrays as a critical event in the *Globe's* investigative reporting and search for the truth a meeting said to have taken place at Boston College High School. The participants in the meeting are shown as Ms. Pfeiffer, Mr. Robinson, Mr. Dunn, BC High's then acting President Kemeza, and the fictional Mr. Conley, a representative of the Roman Catholic Archdiocese of Boston. The film depicts the meeting as following a very dramatic and emotional meeting in Rhode Island between Mr. Robinson and a former BC High student who, upon being asked by Mr. Robinson about potential abuse by former BC High teacher, Father Talbot, breaks down in a public restaurant. As depicted, the meeting at BC High that then follows is set up as the ensuing confrontation by the *Globe* reporters with the offending institution in their unshakable search for the truth. Set up this way, intentionally, the scene literally pits good versus evil in the minds of the audience with the *Globe* reporters on the side of the horribly injured child victims, and Mr. Dunn firmly on the side of and representing the offending institution - the Archdiocese of Boston under Cardinal Bernard Law, and priests who abused children. A transcript from the film's scene, as well the brief scene which follows, is attached as Exhibit B.

As discussed more specifically below, the film's portrayal of this meeting is an utter fabrication. As but one example, Mr. Dunn, who is directly and specifically identified by name and as an individual who works doing “PR for Boston College,” is affirmatively shown to have tried to dissuade the *Globe* reporters from pursuing a story by telling them, “[y]ou're **reaching for a story here**,” and that Mr. Robinson should avoid reporting about allegations of abuse by priests at BC High because “**we know you care about the school as much as we do**.” The film likewise falsely portrays Mr. Dunn as having actually downplayed and minimized the abuse of students, and suggesting that there was no way BC High could have known about it at the time, by having him state to Mr. Robinson, with a callously dismissive tone, “**We're talking about seven alleged victims over, what, eight years?**” As all of this is unfolding, Pete Conley, the supposed representative of the Archdiocese, lurks in the background of the meeting making the link between Mr. Dunn and the Church's efforts to cover up the scandal (including a later threat by Mr. Conley to Mr. Robinson) crystal clear for the audience. In an extremely poignant

¹ It is barely worth mentioning that following the movie credits, there is a non-specific “disclaimer” concerning the movie. Of course, the “disclaimer” only appears well after the audience has left the theater, is buried after the post-movie credits, and is rendered wholly irrelevant by the bold and unqualified on-screen statement: “Based on actual events,” displayed at the outset of the movie and at a moment when the audience's attention is rapt.



moment in the movie, in response to Mr. Dunn's efforts to discourage the *Globe* reporters, Mr. Robinson actually lectures Mr. Dunn on how lucky they both were that they themselves avoided being abused by Father Talbot.

The message is inescapable: Jack Dunn, the PR person for Boston College, has been brought in to BC High to help thwart the investigation of a horrific child sex abuse scandal and, in concert with a representative of the Archdiocese of Boston who is also an alumnus, tries to get the *Globe* reporters, and in particular, Mr. Robinson, to back off by questioning the story and appealing to the fact that he too was a graduate of the school and that any events that took place were minimal. For his absurd and evil efforts, Mr. Dunn is effectively admonished by the hero of the movie, Mr. Robinson.

About Jack Dunn, His Actual Response to the Clergy Abuse Scandal and His Interactions With Mr. Robinson

Here are the facts about the real Jack Dunn: he is a lifelong resident of the Boston area, a 1979 graduate of BC High, and a 1983 graduate of Boston College. After graduating from Boston College, Mr. Dunn worked at BC High for five years as a Spanish, history and government (social studies) teacher. Over that time, he supplemented his income by acting as a reporter for local newspapers such as the Dorchester Reporter and Boston Irish Reporter. In 1988, Mr. Dunn was asked to transition from his teaching role at BC High to an administrative role at the school. For the next six years, Mr. Dunn worked as BC High's Assistant Director of Development and Public Relations. Thereafter, he became the school's Director of Development and Director of Public Relations.

He then worked for four years as Director of Development and then Vice President for External Affairs at Catholic Charities, which oversees social service outreach programs for the "poorest of the poor" of all faiths throughout Eastern Massachusetts.

Beginning in 1998 and continuing to the present, Mr. Dunn has worked at Boston College as the School's Director of News and Public Affairs and University Spokesman. He also serves as an adjunct professor (now called a professor of the practice) in public relations. In 2000, Mr. Dunn was given the honor of being asked to sit on the Board of Trustees at BC High. He served two six-year terms as a trustee, and is now in the first year of his third term. In 2005, Mr. Dunn was elected Chairman of the Board of Trustees at BC High by his fellow Board members. His life has been devoted to his family, education, service and faith.

Not only was Mr. Dunn's actual involvement in matters concerning the subject matter of *Spotlight* well known to those involved with the making of the film, but facts about his involvement were, as stated above, actually published in several March, 2002 *Boston Globe* articles.



Specifically, and without limitation, in or around February, 2002, Mr. Dunn received a telephone call from Mr. Robinson. Although the two did not have a personal relationship, they had met once before and Mr. Robinson, a fellow BC High graduate, knew that Mr. Dunn served on BC High's Board of Trustees and knew about Mr. Dunn's work as Boston College's spokesperson. Mr. Robinson advised Mr. Dunn that the *Boston Globe's* Spotlight Team had been interviewing BC High alumni about allegations of sexual abuse by Father James Talbot, SJ, and Father Stephen Dawber, SJ, at BC High in the 1970s. Mr. Robinson further advised that the *Globe* intended to report on these allegations but wanted to provide BC High, through Mr. Dunn, with the opportunity to comment on the story before it was published.

After speaking with Mr. Robinson, Mr. Dunn immediately contacted the Chairman of the Board of Trustees at BC High, Robert Howe, who convened a full board meeting. The meeting commenced with Mr. Howe asking Mr. Dunn to inform the trustees about the details of Mr. Robinson's call. After doing so, the discussion then turned to BC High's response to the information that Mr. Dunn had provided. In this regard, Mr. Dunn himself proposed a response that was based upon *full* cooperation, *full* transparency and most of all, *full* support and assistance to any victim who came forward.

Mr. Dunn was particularly sensitive to these issues because he recognized that some of the victims may have been his classmates at BC High in the 1970s when Fathers Talbot and Dawber were at the school. Mr. Dunn personally suggested that BC High immediately set up an 800 number to provide BC High alumni with a confidential telephone line to contact the school to report their experiences. Mr. Dunn proposed that BC High immediately retain an outside expert in the field of child abuse who would be available to counsel those who contacted the school. Mr. Dunn proposed that any information that was reported to the school be immediately reported to the police and that BC High offer to provide counseling and compensation to any victim who requested it. After active discussion among the board members, and Acting President Kemeza, the Trustees unanimously approved each of these recommendations.

Immediately after the meetings, Mr. Dunn contacted the Dean of Boston College's Graduate School of Social Work, Alberto Godenzi, and reported that the BC High Trustees had just learned of allegations of sexual abuse by priests at BC High in the 1970s and that BC High was looking to retain an independent, third-party expert to assist in the matter. Dr. Godenzi recommended Loretta Kowal, the former Executive Director of the Society for the Prevention of Cruelty to Children. Ms. Kowal was hired by BC High shortly thereafter.

BC High in fact implemented all of the proposals suggested by Mr. Dunn and approved by the Board and Mr. Kemeza. BC High set up a hotline for all victims. It implemented a program to provide compensation to each victim who came forward through a neutral arbitrator, Paul Finn. BC High President Kemeza met with and personally apologized to each abuse victim. Mr. Dunn himself has met (and still meets with) several of the victims (several of whom, as it turned out, he indeed had known as a BC High student), to assist them in any way he can personally.



Mr. Dunn also contacted Mr. Robinson after the board meeting and told him the outcome of the meeting and the actions BC High was taking. It was at this point that Mr. Robinson then asked if he and Sacha Pfeiffer could come to BC High to meet in person with Mr. Dunn and President Kemeza. Mr. Dunn arranged the meeting.

The Inaccurate Depiction of the Arrangement of the March 5, 2002 Meeting Falsely Portrays Mr. Dunn.

The film inaccurately portrays the way in which the meeting was arranged, and the reporters' expectations as to who would be attending, in an effort to further the suggestion of a conspiracy and a cover-up. The following exchange is depicted as having taken place between Mr. Robinson and Ms. Pfeiffer, as they walk back from BC High to the *Globe* following the fabricated meeting:

Pfeiffer: **Does Jack Dunn work for the school?**

Robinson: **No, he's PR for Boston College. They call him when they need help.**

Pfeiffer: And Pete Conley. Why was he there?

Robinson: Good question. Pete's a big alum. **But I called Bill directly and asked for a sit down. I never mentioned anyone else.**

Pfeiffer: It's like everybody already knows the story.

Robinson: Yeah, except us. And we work right there.

See Exhibit B (emphasis supplied).

The entire premise of the BC High meeting that took place as depicted in *Spotlight* is thus false. The scene asserts that Mr. Dunn was not expected at the meeting and suggests that he must have been brought in to help run interference with respect to the story. But Mr. Robinson did not call "Bill" Kemeza. He called Mr. Dunn. Mr. Robinson was not surprised by Mr. Dunn's attendance at the meeting. He asked Mr. Dunn to set up and attend the meeting, and Mr. Dunn did so. The meeting was not the time or place where Mr. Robinson disclosed facts the *Globe* intended to report about Father Talbot and Father Dawber. He had done that already. By the time of the meeting, Mr. Robinson had already been advised of BC High's constructive response to the information it had received. Mr. Conley, of course, was not at any meeting because he does not exist, but, again, *Spotlight* represents the opposite to the audience. While Mr. Dunn did not 'work' for BC High as an employee, he participated in the meeting as an acting member of the Board of Trustees, just as the *Boston Globe's* March 6, 2002 article concerning the meeting actually reported. See Exhibit C ("Dunn is the public relations director for Boston College, but



he emphasized that he was speaking only as a former BC High student and member of the school's board of trustees."); see also Exhibit A (March 7, 2002 *Boston Globe* article which refers to Mr. Dunn as "a BC High trustee").

Further as conclusive evidence of the reckless manner in which *Spotlight* portrays even just the setting up of the fabricated meeting, we are in possession of a 2013 version of the screenplay. In that version, Mr. Dunn is *not even mentioned* in this post-meeting scene between Mr. Robinson and Ms. Pfeiffer. Instead, the scene reads only as follows:

Pfeiffer: Why was **Pete Conley** there?

Robinson: Good question.

Sasha glances over at Robby, reads him.

Pfeiffer: You alright?

Robinson: Not really.

As he pushes out the high school doors.

See Exhibit D (emphasis supplied).

Clearly, the earlier script reveals that the authors of the scene themselves knew that Mr. Dunn's attendance at the meeting was not a surprise to anyone.

The Actual March 5, 2002 Meeting

The meeting portrayed in the film in no way even remotely resembles the actual meeting between Mr. Robinson, Ms. Pfeiffer, Mr. Dunn and acting President Kemeza. The meeting in the film is portrayed as taking place in 2001 (the film ends on January 6, 2002). The actual meeting took place on March 5, 2002. The meeting, again, included only those four individuals. No individual named "Pete Conley" participated in the meeting, nor did any representative of the Archdiocese attend.² No doubt, by placing a fictitious character representing the Archdiocese in the meeting, you were attempting to portray the Church as having some pervasive control over Mr. Dunn's actions in attempting to thwart the Globe reporters' efforts to reveal the truth.³

² In this regard, it bears noting that, in reality, a priest named Rev. Monsignor Peter Conley served as the Editor of the Archdiocese's newspaper, *The Pilot* from 1991 through May, 2002.

³ It bears noting that the film overtly suggests that BC High was an Archdiocesan school when it was and remains an independent school sponsored by the Jesuits.



The real March 5, 2002 meeting in no way resembled what is portrayed in the film. The meeting actually began with Ms. Pfeiffer and Mr. Robinson asking if BC High possessed any records with regard to allegations of abuse by Father Talbot or Father Dawber. President Kemeza indicated that the school had no such records. The *Boston Globe* accurately reported on this fact at the time, including in an article by Ms. Pfeiffer and Mr. Robinson in the March 6 edition of the *Boston Globe*. See Exhibit C (“BC High officials insisted yesterday they have no record of any sex abuse complaints against Talbot while he taught at the school.”).

The conversation then turned to Father Talbot’s practice in the 1970s of wrestling on Saturdays in the school’s athletic equipment room with students he coached and taught. Mr. Dunn told Ms. Pfeiffer and Mr. Robinson that as a student at BC High in the 1970s, he was aware that Father Talbot was wrestling with students but that he was not aware of allegations of molestation and abuse. The question was then asked if officials at the school knew or would have been aware of Father Talbot’s wrestling with students wearing athletic supporters. In response, President Kemeza indicated that, given the then-current structure of the school, someone in his position as of the date of the meeting (2002) would be aware if a faculty member was wrestling with students wearing athletic supporters at the school. This fact too was reported in the *Boston Globe* on March 6, 2002:

Back at BC High, Kemeza, asked yesterday whether someone in his position today would know if a faculty member was wrestling with students wearing athletic supporters: “Yes, I would know ‘about it.’” He added: “The way the school is structured today, events like this would not take place.”

See Exhibit C.

The Film Invents An Admission By BC High And Then Falsely Portrays Mr. Dunn As Denying It And Seeking to Conceal The Truth

The film intentionally twists Acting President Kemeza’s statement that he would know in 2002 if a faculty member was wrestling with a student as described, into a statement that he would have known about the sexual abuse of students years earlier if he had been president then. Critically, the film then utterly fabricates Mr. Dunn’s reaction to Acting President Kemeza’s supposed comment. The dialogue in the scene is as follows (obviously this letter cannot adequately describe the dramatic fashion in which the words are delivered at a critical moment in the film):

Pfeiffer: We just want to know if it was possible that the president, the faculty, the board – that no one knew what was going on at the time.



Dunn: **I graduated in 1979 and I had no idea about any of this.** So if you're suggesting Father Gibbons and Father Callahan had in any way ...

Robinson: Gibbons and Callahan ... they ran this place like the Navy. You really think they didn't know?

Dunn: **It's a big school Robbie, you know that. And we're talking about seven alleged victims over, what, eight years?**

Robinson: We're talking about seven that we know about ...

Dunn: **This is ridiculous! You're reaching for a story here ...**

Kemeza: **Jack, Jack. If I had been president then, I would have known.**

Dunn: **Bill, I'm not sure that's relevant.**

Kemeza: Why do you think they sent Talbot out to Cheverus? You know they wanted him out of town.

Conley: As well intentioned as Bill's remarks are, **I'm hoping we can keep this between us until we all get on the same page.**

Robinson: Is that why we're here? To get on the same page?

Conley: No, **We're here because you're an important alumnus, Robbie, and a friend.**

Dunn: **Exactly. We know you care about the school as much as we do.**

See Exhibit B (emphasis supplied).

That you fabricated this scene is beyond doubt. Clearly, you took Acting President Kemeza's statement as reported in the *Globe* and fully available to you about likely knowing about a faculty member wrestling with students wearing athletic supporters in 2002 and twisted it into a full admission that the school's administration, faculty and trustees would have known about sexual abuse decades earlier. You then used that non-existent admission to have Mr. Dunn react defensively, and call the *Globe* reporters' efforts "**ridiculous.**" Worse, you then added Mr. Dunn's manufactured active interference with (and attempt to downplay) the admission by Acting President Kemeza and to seek suppression of the overall story in response by having him agree with the Pete Conley character that everyone should "get on the same page" and that Mr. Robinson should do so as well because he was an important alumnus who should not want to hurt the school.



You did all of this despite the existence of a screenplay prepared in 2013 in which virtually *none* of the statements you attribute to Mr. Dunn in the film even appear. See Exhibit D. More specifically, Mr. Dunn's statement in the film: "It's a big school Robbie, you know that. And we're talking about seven alleged victims over, what, eight years?" is *actually attributed to the fictional character Pete Conley* in the earlier script. See Exhibit D. The movement of such an inflammatory statement from the mouth of a fictitious character to the mouth of Mr. Dunn is overwhelming evidence of fabrication and actionable defamation. The following statements attributed to Mr. Dunn in the film are likewise nowhere to be found in the 2013 script, let alone placed in the mouth of Mr. Dunn: "You're reaching for a story here ..." and "Bill, I'm not sure that's relevant."

Further, while some minor aspects of the meeting portrayed in *Spotlight* loosely follow the reporting contained in the March 6, 2002 *Globe* article (e.g., Ms. Pfeiffer and Mr. Robinson showed Mr. Dunn and Mr. Kemeza documentation they had obtained with regard to Father Talbot's transfer from BC High to Cheverus High School in Maine in 1980 and asked if either had any information or knowledge of the transfer. Both replied that they did not. See Exhibit C (referencing transfer in March 6, 2002 article)), this only makes clear that you were fully aware of the actual timing and content of the meeting which did take place, ignored that information, and chose to manufacture dialogue that better fit your purposes without making clear that it was fictionalized.

March 6, 2002 Press Conference

The day after the March 5, 2002 meeting, and after the *Globe* published its March 6, 2002 article, Acting President Kemeza and Mr. Dunn held a press conference at BC High. The press conference was widely covered by dozens of members of the media, including multiple reporters from the *Boston Globe*. At the press conference, Acting President Kemeza and Mr. Dunn outlined BC High's plan to be responsive and transparent to the claims of clergy abuse. In a March 7, 2002 news article written by Walter Robinson entitled, "**BC High To Set Up Victim Hot Line**," the *Boston Globe* reported that "**the acting president of Boston College High School said yesterday that the school will set up a hot line and contact all its graduates to see if there are other victims of three Jesuit priests who allegedly molested some students at the school two decades ago.**" See Exhibit A (emphasis supplied). The article continues, "**Kemeza, who is the principal, and John Dunn, a BC High Trustee, said last night that Alberto Godenzi of the Boston College Graduate School of Social Work, a specialist in dealing with child sexual abuse, will today provide the school a plan for a hot line that will be staffed by trained counselors. BC High will send letters to all of its alumni, encouraging them to come forward if they were the victims of sexual abuse at school.**" Mr. Dunn is then quoted in the article as stating, "**We want to clear the air, help the victims and reach out to anyone who contacts us.**" Id. (emphasis supplied). So there is no confusion, Mr. Dunn's declaration was reported upon in the *Boston Globe* by Mr. Robinson a mere two days after the actual meeting that you misrepresent in your film.



If this reporting were not enough to place you on actual notice that Mr. Dunn's portrayal in the film was false, *Boston Globe* columnist Adrian Walker also wrote about the press conference on March 7, 2002 in an article entitled, "**Facing Up To Trouble.**" See Exhibit E. In direct contradiction to the meeting depicted in the film, Mr. Walker reports: "**A major question is whether the allegations of abuse, some of which date back to the 1970s, were reported to administrators at the time. The short answer is, Kemeza doesn't know.**" See Exhibit E (emphasis supplied).

Likewise, the article further eviscerates the notion that Mr. Dunn and BC High were in league with the Archdiocese. The article notes, "**in responding to the allegations, Kemeza's conduct was in sharp contrast to that of Cardinal Bernard F. Law and the Archdiocese of Boston.**" Exhibit E (emphasis supplied). The article, reporting on the conclusion of the press conference, notes Acting President Kemeza, Mr. Dunn and BC High's stated goal: "**We're going to do this the right way.**" Id. All of this information was available to you and all of it was ignored. Instead, you elected to identify Mr. Dunn by name and portray him as a villain, apparently for purposes of creating a heightened sense of drama and supporting the narrative that the corruption and cover-up of the Archdiocese of Boston under Cardinal Law touched every single Catholic entity, including Catholic schools and independent Catholic colleges.

In the months and years that followed, Mr. Dunn went about quietly trying to help and support those BC High classmates and others who were the victims of clergy sex abuse.

Filmmakers Meet With And Speak To Jack Dunn
But Do Not Ask Him About His Experience or Disclose His Portrayal in the Movie

In or around 2013, Mr. Dunn received a call from *Boston Globe* Spotlight team reporter Michael Rezendes. Mr. Rezendes asked if Mr. Dunn would be willing to set-up a tour of Cardinal Law's former residence at 2101 Commonwealth Avenue for Tom McCarthy, an individual Mr. Rezendes identified as the film's screenwriter and director. By 2013, the former residence had become the property of Boston College.⁴ Mr. Dunn agreed and provided Mr. McCarthy, who was accompanied by Mr. Rezendes, with a tour. At no time during the tour did Mr. McCarthy inform Mr. Dunn about his intention to name and misportray Mr. Dunn in the film. Moreover, Mr. McCarthy asked Mr. Dunn no questions about his experiences relative to the clergy abuse scandal or the March 5, 2002 meeting. Instead, Mr. McCarthy thanked Mr. Dunn for his courtesy in providing the tour.

In 2014, Mr. McCarthy's assistant called Mr. Dunn to ask if Boston College would be willing to grant permission to the filmmakers to film Cardinal Law's former residence for use in the film. Mr. Dunn advised Mr. McCarthy's assistant that Boston College would not be willing

⁴ Between 2004 and 2007, Boston College purchased 65 acres of land and 5 buildings from the Archdiocese of Boston, including the Cardinal's residence.



to grant such permission. Several days later, Mr. Dunn received a second call from one of the film's producers. At no time during this call was Mr. Dunn asked any questions about his experiences or interactions in 2001 and 2002 relative to the matters portrayed in the film. Instead, he was again asked if Boston College would permit filming of the Cardinal's former residence for use in the film. Mr. Dunn explained that Boston College was taking the property and turning it into a public art museum and, as a result, Boston College was unwilling to permit the filming as it did not want the property to be forever associated with Cardinal Law and the Archdiocese of Boston during his years as Cardinal Archbishop.

Mr. Dunn Sees The Movie

In the fall of 2015, Mr. Dunn learned that *Spotlight* would soon be shown in theaters in limited release in Boston, New York and California. He was told by a BC High administrator that the film depicted BC High and, in particular, Mr. Dunn, in a negative light. As a result, Mr. Dunn went to see the film on November 6, 2015 at the AMC Loews Theatre in Boston. Upon seeing the film's false portrayal of him, Mr. Dunn became so disturbed that he literally vomited upon exiting the theater. Since seeing the film, he has been deeply distressed, both professionally and personally. He dreads how he will be misperceived in light of the inaccurate, false and defamatory portrayal of him in the film. The harm to Mr. Dunn has been exacerbated by the fact that his portrayal in the film stands in such stark contrast to his actual behavior, actions and conduct. Most of all, he is heartsick that those victims he tried to counsel, support and assist over the years will conclude from the false depiction in a movie "based on actual events" that he was a faker and a fraud and that they will believe his true goal was to suppress the truth. His life has literally been irretrievably altered by the defamation of him in *Spotlight*.

Among other things, Mr. Dunn worries how his depiction in the film will impact his four children, whose classmates and friends will all watch the film's false and defamatory portrayal of him. Mr. Dunn fears the film has irrevocably tarnished his legacy and reputation at BC High, an institution around which his life has revolved since he was fourteen years old, including his reputation among his high school classmates, his former students, the current student body and their parents, those with whom he served in the development office and his former and current board members, among others. Mr. Dunn rightly fears how reporters and media members will view his credibility in light of *Spotlight's* false portrayal and the impact that the film will have on his ability to do his job effectively as Boston College's spokesman and as a public relations professor. The damage done to Mr. Dunn is profound and severe.

Mr. Dunn's Demand

As set forth above, Mr. Dunn demands that you take immediate action to prevent any further harm to him or his reputation. In this regard, he demands that you remove the offending scenes from the movie and publicly state that the scenes were fabricated and that the dialogue was false and contrived for dramatic effect. Finally, Mr. Dunn demands that you have your legal counsel contact us to discuss these and other forms of relief which will be required to help



repair the damage to Mr. Dunn's reputation and undo, to the extent possible, the harm you have caused him.

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David H. Rich



Howard M. Cooper

cc: Jack Dunn

EXHIBIT A

The Boston Globe | Abuse in the Catholic Church

THIS STORY HAS BEEN FORMATTED FOR EASY PRINTING

BC High to set up victim hot line

By Walter V. Robinson, Globe Staff, 3/7/2002

The acting president of Boston College High School said yesterday that the school will set up a hot line and contact all its graduates to see if there are other victims of three Jesuit priests who allegedly molested some students at the school two decades ago.

William T. Kemeza, who on Tuesday suspended the only one of the three priests who was still at the Dorchester school, said he was "saddened and shocked" by the allegations against the three priests.

Kemeza, who is also the principal, and John Dunn, a BC High trustee, said last night that Alberto Godenzi of the Boston College Graduate School of Social Work, a specialist in dealing with child sexual abuse, will today provide the school a plan for a hot line that will be staffed by trained counselors.

BC High will send letters to all of its alumni, encouraging them to come forward if they were the victims of sexual abuse at the school.

"We want to clear the air, help the victims, and reach out to anyone who contacts us," Dunn said.

The Jesuit New England Province, which will be investigating the allegations, did not respond to questions from the Globe yesterday about whether its files on the three priests reflected any complaints about them during the years the alleged abuse occurred in the 1970s and early 1980s.

Suspended by Kemeza was the Rev. Stephen F. Dawber, S.J., 63, who was teaching history and social studies at BC High. It was a step Kemeza took after the Globe asked him about a former student who had recounted for the newspaper how Dawber allegedly lured him into a sexual encounter in the mid-1970s.

Yesterday, a second BC High graduate said in an interview that Dawber molested him as well, in a Dorchester house where several of the school's priests resided at the time.

"There is a lot of shame and a lot of guilt associated with what happened to me. It's with me all the time," said the man, who is now 43, successful, and married with children. "But I have nothing to be ashamed of, and nothing I should feel guilty for."

Both of Dawber's alleged victims said they will relate their experiences to Jesuits who are investigating Dawber's behavior.

Today, an attorney for the Jesuit New England Province is scheduled to meet with Suffolk County prosecutors to turn over the names of the Revs. James Talbot and Francis J.

McManus, both former BC High teachers. Kemeza said he was uncertain whether Dawber's name will also be given to prosecutors. On Tuesday, an attorney for the province said he expected to turn over the names of some other Jesuits, but declined to say whether any of them had been associated with BC High.

Dawber, Talbot, and McManus have not returned phone calls from the Globe seeking comment this week.

The Globe reported yesterday that at least seven former BC High students say they were molested by Talbot, almost all of them during private wrestling sessions initiated by Talbot.

In 1980, after eight years at BC High, Talbot was transferred to Cheverus High School in Portland, Maine, another Jesuit school. Two letters obtained by the Globe suggest that he left BC High under a cloud of suspicion about his behavior. Talbot was removed from Cheverus in 1998 after charges surfaced that he molested a student there in the mid-1980s.

Also on Tuesday, the Jesuit province placed McManus on administrative leave from his position as a chaplain at St. Luke's Hospital in New Bedford, after allegations that he molested one student and groped another in the early 1980s.

The number of Talbot's alleged victims grew to at least 11 yesterday. Two lawyers, Jeffrey A. Newman and Roderick MacLeish Jr., said they were contacted by four other BC High graduates who say they were molested by Talbot.

Kemeza said he had found nothing in BC High's files to suggest that the school's Jesuit administrators were made aware of the sexual misbehavior when it allegedly occurred. But he said the school has virtually no personnel files on its priests from that period.

If such files exist, the provincial office is likely to have them. But through a spokesman, Jesuit provincial officials declined yesterday to answer any questions.

At the school itself, however, Kemeza and Dunn fielded many questions.

Dunn, the high school trustee, told reporters: "I do not want the alleged actions of three men to tarnish the reputation of so many good Jesuits who, over 139 years, have left an indelible impression on this city and on so many young men who have benefitted from BC High."

The school today is a far different place than it was when Talbot and McManus were there, though it is still considered by many to be the best Catholic high school in New England. Ninety-nine percent of its students go on to college.

BC High's 1,260 students, all of them boys, receive virtually all their education from lay teachers. A generation ago, only a handful of lay teachers were on hand. Now, there are only five Jesuits among the estimated 100 teachers, according to Kemeza, himself a layman.

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For complete coverage of the priest abuse scandal, go to <http://www.boston.com/globe/abuse>

EXHIBIT B

JD (voiceover): We understand the nature of the allegations, Robbie.

(interior, conference room at BC High)

JD: I'm just not sure what you want from Principal Kemeza. Talbot taught long before Bill took over.

SP: Hmm, of course. We just want to know if it was possible that the president, the faculty, the board – that no one knew was going on at the time.

JD: I graduated in 1979 and I had no idea about any of this. So if you're suggesting Father Gibbons and Father Callahan had in any way...

WR: Gibbons and Callahan...they ran this place like the Navy. You really think they didn't know?

JD: It's a big school Robbie, you know that. And we're talking about seven alleged victims over, what, eight years?

WR: We're talking about seven that we know about ...

JD: This is ridiculous! You're reaching for a story here...

BK: Jack. Jack. If I had been president then, I would have known .

JD: Bill, I'm not sure that's relevant.

BK: Why do you think they sent Talbot out to Cheverus? You know they wanted him out of town.

PC: Robbie, as well intentioned as Bill's remarks are, I'm hoping we can keep this between us until we all get on the same page.

WR: Is that why we're here? To get on the same page?

PC: No. We're here because you're an important alumnus, Robbie, and a friend.

JD: Exactly. We know you care about the school as much as we do.

WR: Did you play a sport here, Jack?

JD: Yea, football. Why?

WR: I ran track. I went to Providence yesterday to talk to one of Father Talbot's victims. He played hockey here. One of the better ones. He's got a wife, kids, good job. About ten minutes into the conversation, the guy breaks down, you know

couldn't stop crying. He says he could never figure out why Father Talbot picked him. Father Talbot coached the hockey team. So I guess we just got lucky. You and me.

(exterior, on Morrissey Boulevard, outside of BC High)

SP: Does Jack Dunn work for the school?

WR: No he's PR for Boston College. They call him when they need help.

SP: And Pete Conley. Why was he there?

WR: Good question. Pete's a big alum. But I called Bill directly and asked for a sit down. I never mentioned anybody else.

SP: It's like everybody already knows the story.

WR: Yeah, except us. And we work right there.

EXHIBIT C

The Boston Globe | Abuse in the Catholic Church

THIS STORY HAS BEEN FORMATTED FOR EASY PRINTING



BC High suspends priest accused of student molestation

By Sacha Pfeiffer, Thomas Farragher, and Walter V. Robinson, Globe Staff, 3/6/2002

One day after a disclosure that two Jesuit priests allegedly molested students at Boston College High School two decades ago, a third Jesuit was suspended from his teaching position yesterday after accusations that he, too, molested a student during the same period.

In addition to the school's suspension of the Rev. Stephen F. Dawber, the Jesuits' New England province removed a second of the three, the Rev. Francis J. McManus, from his job as a hospital chaplain in New Bedford yesterday.

The third Jesuit, the Rev. James Talbot, was removed from active ministry in 1998 after he was accused of molesting a student at Cheverus High School in Portland, Maine. Eight other men who say Talbot molested them at BC High in the 1970s, in some cases forcibly, have now come forward - several of them yesterday after news reports about Talbot and McManus.

The prestigious Society of Jesus, identified for the first time in the priest abuse scandal that has enveloped the Archdiocese of Boston, said Talbot's 1980 transfer to Maine was "routine." But interviews with numerous former BC High students, and two letters from 1979 and 1980, suggest that Talbot's transfer occurred under a cloud of suspicion.

For a tight-knit and devoutly Catholic Maine family who befriended Talbot as he taught and coached their sons at Cheverus, the consequences of that transfer have been calamitous. Talbot kept a room, and a closetful of clothes, at their Freeport home. Then he repeatedly molested their youngest son, Michael Doherty, the family said. Michael's lawsuit against Talbot, Cheverus, and the Portland diocese was settled last year.

Late yesterday, William T. Kemeza, BC High's acting president, said he had temporarily suspended Dawber, a history teacher at the school, saying he felt it "prudent" because of an allegation of sexual abuse against Dawber and "a desire to protect the students of BC High."

Kemeza's action, endorsed by the school's trustees, came after the school learned a BC High graduate had related to the Globe in detail how Dawber, now 63, became his mentor in the early 1970s, in a relationship that became increasingly sexual until Dawber allegedly molested him.

In an interview, Kemeza said Dawber was advised not to respond to the allegation and he did not. Attempts by the Globe to reach Dawber for comment, by telephone and in person, were

unsuccessful. On Monday and yesterday, McManus and Talbot did not return calls seeking comment.

Last night, Kemeza said there is a "sadness" on the campus of the elite high school, where virtually all the teachers are now laypersons. Using the school's public address system, Kemeza reminded the 1,260 boys that all of the alleged incidents occurred before any of them were born.

McManus was placed on administrative leave yesterday from his longtime job as chaplain at St. Luke Hospital in New Bedford by the Jesuit provincial administrator after one former BC High student told authorities that McManus molested him in the early 1980s.

Another alleged victim of McManus, Thomas J. Bunszell, said in an interview last night that he was so upset that McManus groped him twice that he returned his diploma to the high school in 1988.

Thomas H. Hannigan Jr., an attorney for the Jesuit New England province, said in an interview that he plans to turn over the names of an unspecified number of Jesuits, including Talbot and McManus, to prosecutors when he meets Thursday with aides to Suffolk District Attorney Daniel F. Conley.

He declined to say whether any other Jesuits involved had been affiliated with BC High.

Reports spur more allegations

The publication of Talbot's name yesterday brought more alleged victims forward, including one man who told the Globe he dropped out of BC High and had serious problems for years after Talbot molested him in the mid-1970s. The man asked that details of his plight be withheld.

Under Globe policy, victims of sexual abuse are not identified unless they wish to be.

Roderick MacLeish Jr., an attorney who represents victims of sexual abuse, said he has been recently contacted by four alleged Talbot victims, three of them former BC High students. The fourth was a student at another high school.

Two additional alleged victims have been interviewed by the Globe. All seven said they were molested by Talbot during the eight years he was at BC High, from 1972 to 1980. An eighth former student settled a claim against BC High and Talbot within the past two years.

When Talbot was sued for the molestation at Cheverus, he responded under oath last year to interrogatories. To several questions, including whether he had sexually abused students at BC High, Talbot did not answer, invoking his Fifth Amendment right against self-incrimination.

BC High officials insisted yesterday they have no record of any sex abuse complaints against Talbot while he taught at the school.

How much BC High administrators knew about Talbot at the time may never be certain. The Rev. Raymond J. Callahan, the school's president from 1973 to 1987, died in 1997. The principal at the time, the Rev. Thomas J. Gibbons, died just last week.

But the signs were there, Talbot's alleged victims said. There was his bizarre habit of wrestling with students, sometimes one-on-one, often in various states of undress - and sometimes after persuading the teenage boys he taught and coached to strip down to their athletic supporters.

There was, after eight years at BC High, his transfer to Cheverus, a move accompanied by a paper trail that hinted at inappropriate behavior.

"No outward talk about internal situation here so it looks like a smooth transition," Talbot wrote in a Dec. 17, 1979 letter to Dawber made available to the Globe. Dawber, the priest who was suspended yesterday, was the principal of Cheverus at the time.

And Dawber, in a Feb. 14, 1980 letter recommending Talbot for a faculty position at Cheverus, described the school as having better "oversight" and being "far more conducive to a healthier lifestyle than BC High." Talbot made the move in mid-1980.

But the oversight proved deficient, and Talbot's move to Maine was ultimately devastating for the Doherty family of Freeport, who welcomed Talbot into their home, only to learn years later that he had molested one of their four children.

Even today, across a span of 20 years, Talbot's conduct at BC High is regarded by some of his former players as the benign product of the intense persona of a hard-driven soccer coach - the stern man in long, dark sideburns who demanded much from his team and accepted no less.

His nickname was Mad Dog Talbot.

John Dunn, a 1979 BC High graduate who was subsequently a teacher and administrator at the school, recalled that after the team performed disappointingly in a game against Quincy, Talbot ordered the team bus to depart empty. The players ran back to school. Dunn is the public relations director for Boston College, but he emphasized that he was speaking only as a former BC High student and member of the school's board of trustees.

"I look back on Father Talbot as one of the better influences in my life in terms of discipline," said Dennis Boyd, who played for Talbot in 1979. "He made sure we busted our tails and that's why we were successful as we were. We were in so much better shape than other teams."

But several of Boyd's contemporaries recall Talbot's strange fondness for wrestling with his players in the soccer team's locker room. Foam mats would be placed on the floor. Talbot would suggest his schoolboy opponent strip down to his athletic supporter.

Michael T. Giordano, a 1979 graduate of the school, said he and another player were called to the locker room to wrestle with their teacher. Giordano, who said he ultimately did not wrestle Talbot that day, said the coach wore shorts. His teenage opponent wore an athletic supporter.

"Wrestling in jock straps. That did go on," said Giordano. "It was really hush-hush. People said that was a bad thing."

Some of the wrestlers say that the private sessions Talbot lured them to have caused them lasting damage.

One of Talbot's alleged victims, a 43-year-old South Shore man who is now married with children, said Talbot persuaded him to go to the school locker room during his free period for private wrestling sessions that turned increasingly rough.

"He said it would be a good way for me to stay in shape, and I just thought he was this possessed wrestling guy," said the man, who graduated in the mid-1970s and owns a contracting business. "Before I knew it, he had me down and reached under my jock strap. He got me in a position where I think he was waiting for me to get aroused. Then it all hit me - he had led me up to it step by step."

Struggling with after-effects

Another alleged victim, a BC High hockey player who is now a local businessman, said he has been troubled for years by the psychological after-effects of what Talbot did to him in early 1978. Arriving for a Saturday wrestling session only to find that no one else had been invited, the man recalled how Talbot pinned him before allegedly molesting him.

"As I think back - and I have honestly tried not to for the last 20 years - I thought it was just me, that it had just happened to me. As I got older, I would not bring it up for that reason," he said. "Throughout my adolescence, I wondered if I was a homosexual because of what happened."

"You know, you hear it said of women when they are raped, 'They brought it on themselves.' And that is exactly how I felt . . . I was 15. Your hormones are going crazy and all. Suddenly this guy is doing this to you, and so you question yourself."

Because Talbot left Massachusetts for Maine in 1980 and did not return to reside at the Jesuit Campion Center in Weston until two years ago, the criminal statute of limitations on many of the incidents has not expired. The statute clock stops running when someone who commits a crime leaves the state.

While Talbot allegedly used force to molest some of his victims, BC High graduates who said they were molested by McManus and Dawber described mentoring relationships in which the two priests gradually sought to introduce intimate behavior.

For example, a Connecticut businessman who filed a complaint against McManus with the Bristol district attorney's office last Sunday said McManus befriended him over two years, taking him on weekend day trips and giving him alcohol.

In the complaint and in interviews with the Globe, the 1983 BC High graduate said McManus sought to molest him when the two were house-sitting for friends one evening. "I ended my friendship with McManus when I realized his primary interest in me was sexual," the man said in his complaint.

A 1976 BC High graduate who says he was molested by Dawber described a similar scenario in an interview with the Globe. The man said Dawber frequently invited him and other students to his room at an off-campus residence for young Jesuits on Bushnell Street in Dorchester, where they discussed ideas and theories, often while drinking alcohol.

Often, Dawber also met with the man alone, and with time, "suddenly there were a lot of sexual advances," the man said.

Eventually, one of the meetings became physical. "It happened after over a year of these drinking sessions and heart-to-hearts and discussions of philosophy and politics and art.

"There had been previous times when he'd say, 'Why don't we just take our clothes off and sit. I won't touch you,'" the man said. "I had managed to sort of say no, but I didn't have the sense to cut the relationship off on those previous occasions. He was someone I admired and trusted and who really took great time and care to talk with me about every aspect of my life."

Revelations shock family

In Maine, the Doherty family was stunned by Michael Doherty's disclosure that he was sexually abused by Talbot when he was 15 and 16.

Talbot was a constant presence in the Doherty home, and he was given freedom to come and go as he pleased, the family said. He shared weekends and holidays with the family, often taking the Dohertys' three sons on outings to a local racetrack and elsewhere.

"I felt he had actually shared in the raising of my children," said Frank Doherty, Michael's father, who graduated from Cheverus in 1957.

In an interview with the Globe in Freeport, Michael Doherty said that, as a teenager, he grew to consider Talbot a valued companion, a sentiment that he now believes Talbot recognized and exploited.

"He played on that - that feeling of being special, of having a friend nobody else had," Michael said.

As time progressed, Michael said, Talbot's relationship with him took a sexual turn and came to involve suggestive comments by the priest.

The inappropriate remarks persisted until, on an overnight trip to northern Maine, "the situation escalated," and Talbot molested him, Michael said.

For years, he told no one what had occurred. But in the early 1990 he began to reveal bits of the story to his siblings, who for several years honored his request that they keep the abuse secret.

His sister, Courtney Doherty Oland, broke that promise in 1998 when she wrote a letter to the Portland diocese notifying church officials of the abuse. Soon after, Talbot was removed from the school and sent to a Maryland treatment center for sexually abusive priests, marking the second teacher at Cheverus, in addition to Charles Malia, to be ousted over sex abuse complaints.

In 1998, the case broke into public view when Michael filed a lawsuit against Talbot, Cheverus, and the diocese. And then the family suffered another blow: Expecting to receive widespread support from friends, neighbors, and Cheverus alumni, the Dohertys say they

instead found themselves shunned by area residents. The phone stopped ringing. Longtime acquaintances averted their eyes when passing them on the street.

Michael, too, was pained by the public response.

"I think he felt everyone would support him," Oland said "and no one did."

Back at BC High, Kemeza, asked yesterday whether someone in his position today would know if a faculty member was wrestling with students wearing athletic supporters: "Yes, I would know about it." He added: "The way the school is structured today, events like this would not take place."

In recent years, Kemeza said, the school has held faculty workshops on appropriate behavior with students. To increase student safety, he said, BC High has also installed windows in the doors to some rooms.

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EXHIBIT D

Mike starts throwing clothes into his suitcase.

MIKE (INTO PHONE)
Got it, I'll get on the first-- Can
somebody book me a--

ROBBY (INTO PHONE)
You've got a flight at noon.

MIKE (INTO PHONE)
Ah, that's freakin' great, that's,
man that's freakin' great. Wanna
meet me at the courthouse?

ROBBY (INTO PHONE)
No, I've got something I have to
take care of.

Robby snaps his phone shut as he parks the car in front of --

EXT. BROOKLINE HOUSE - DAY

The SUBURBAN HOUSE we saw Robby at before 9/11. Robby gets out of the car, walks past the AUTUMN LEAVES, knocks on the door. The WOMAN we saw earlier with three children answers.

ROBBY
Mrs. Lyons.

MRS. LYONS
Yes?

ROBBY
I'm Walter Robinson from the Boston
Globe. I was a few years ahead of
your husband at BC High, we're doing
a story about one of his teachers.
Do you have a minute?

Off Mrs. Lyons, her expression darkening --

EXT. BC HIGH, DORCHESTER - DAY

The BC HIGH SIGN. Teenagers play football in the foreground.

JACK DUNN (V.O.)
We understand the nature of the
allegations, Robby...

INT. BC HIGH, PRINCIPAL KEMEZA'S OFFICE - DAY

Robby and Sacha sit with PRINCIPAL BILL KEMEZA, 50s, and the mucks we saw at the Gala, Jack Dunn and Peter Conley.

JACK DUNN

I'm just not sure what you want from Principal Kemeza.

ROBBY

Well, Talbot taught history and economics from 1972 to 1980. He coached soccer and hockey.

JACK DUNN

That was long before Principal Kemeza took over.

ROBBY

He knows how this place works. We want to know how it's possible that the faculty, the Principal, the President... how no one knew what was going on at the time.

JACK DUNN

I graduated in 1979 and I had no idea about any of this, so if you're suggesting that Brother Gibbons and Brother Callahan --

ROBBY

Gibbons and Callahan ran this place like the goddamn navy, you really don't think they knew?

PETER CONLEY

It's a big school, Robby, you know that. You're talking about seven alleged victims over eight years.

ROBBY

Seven we know about, Pete.

JACK DUNN

This is ridiculous.

PRESIDENT KAMEZA

Jack --

JACK DUNN

It's a witch hunt.

PRESIDENT KAMEZA

Jack. If I had been President back then, I would have known.

Conley looks at him, sharp.

PETER CONLEY

Bill, I don't think you should --

PRESIDENT KAMEZA

Come on, why do you think they sent him up to Cheverus? You know they wanted to get him out of town.

JACK DUNN

(to Robby, direct)

This is off the record. This conversation never happened.

ROBBY

Of course not.

Robby shakes his head and rises. A beat, then he turns back.

ROBBY (CONT'D)

I went to see one of Talbot's victims in Brookline yesterday. The guy was one of the better ones, he had a wife, kids, good job. Never told anyone. His wife learned about it in his suicide note.

(beat, to Jack)

He graduated in '79 too, Jack. For the record.

Robby slams out. Off Sacha, watching him.

INT. BC HIGH, HALLWAY - DAY

Robby and Sacha walk down the hall. We hear kids in the classrooms. Robby looks UPSET.

SACHA

Why was Pete Conley there?

ROBBY

Good question.

Sacha glances over at Robby, reads him.

SACHA

You alright?

ROBBY

Not really.

As he pushes out the high school doors, we --

EXT. SUFFOLK COUNTY COURTHOUSE - DAY

Mike walks down the COURTHOUSE STEPS, starting to look through Garabedian's refiled EXHIBITS.

EXHIBIT E

The Boston Globe | Abuse in the Catholic Church

THIS STORY HAS BEEN FORMATTED FOR EASY PRINTING

Facing up to trouble

By Adrian Walker, Globe Columnist, 3/7/2002

What could a fading photograph of a group of Jesuit priests have to do with the sexual abuse scandal roiling the Archdiocese of Boston?

A lot -- if you're Bill Kemeza, the principal and acting president of Boston College High School.

The picture in question was taken on Founders Day in 1958, and depicts about 200 Jesuit priests in front of the school. For Kemeza, it represents the legacy he is now charged with protecting.

"I look at that picture, and I owe it to the best of those men -- and that's a lot of them -- to face the past squarely, and to face the future as the dynamic school we are," Kemeza said yesterday.

The present Kemeza is facing these days is unlikely to ever make anyone's list of warm memories. The Rev. Stephen F. Dawber was suspended from the faculty this week, while the Rev. Francis J. McManus was suspended by the Society of Jesus for allegations dating back to his time on the BC High faculty.

In responding to the allegations, Kemeza's conduct was in sharp contrast to that of Cardinal Bernard F. Law and the Archdiocese of Boston.

He has been forthcoming, sharing what he knows -- which isn't very much -- and admitting what he does not know. He answered difficult questions without a trace of defensiveness.

A major question is whether the allegations of abuse, some of which date back to the 1970s, were reported to administrators at the time. The short answer is, Kemeza doesn't know.

"I don't think we have good records," he said. "I know we don't have good records. It's very haphazard. I don't have any individual personnel files."

One day after suspending Dawber, Kemeza met with the 1,260-member student body yesterday by grade. He reminded them that the allegations date back to the 1970s, before any of them were born. He wanted them to know, when they heard the name of their school on the news and read it in the papers -- that the charges had nothing to do with them.

"It's very easy to internalize this stuff," he said. "I wanted to say, 'This isn't you.' They get it. They know this isn't about them."

He ticked off the measures the school would be taking following the charges. First, there will be letters to parents of Dawber's students, and letters to the school's alumni. The school will also set up a hot line for former students to report past abuse.

Asked if he would encourage former students to report abuse he said, "If there's an issue, I don't see why they shouldn't raise it."

This has been a painful turn of events for BC High, and for Kemeza personally. Until this week, no teacher had been suspended for allegations of sexual misconduct in the school's 139-year history.

Kemeza, 53, has been at the school since 1983 -- when, he believes, he was hired to replace Father McManus teaching religious studies. This is his second stint as principal, a post he previously held from 1990 to 1996. It has been years since Jesuits made up the bulk of BC High's faculty, and Kemeza is a case in point: He is a layman, married to an Episcopal priest.

As of yesterday, Kemeza had not had an opportunity to speak to any of the alleged victims. In fact, he said he did not yet know who any of them were, and was getting much of his information from this newspaper.

Still, Kemeza deserves some credit for facing a difficult situation with some grace. As he said repeatedly, "We're going to do this the right way."

He didn't seem daunted by the possibility of further allegations or revelations; indeed, he seemed to relish a chance to get things out into the open.

"I just hope we get to some kind of truth," he said. If only everyone in authority felt that way.

Adrian Walker can be reached by e-mail at walker@globe.com.

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For complete coverage of the priest abuse scandal, go to <http://www.boston.com/globe/abuse>