

STATE OF NEW YORK  
SUPREME COURT: COUNTY OF ERIE

PB-16 DOE,

Plaintiff,

-against-

THE DIOCESE OF BUFFALO, N.Y., ST.  
GREGORY THE GREAT ROMAN CATHOLIC  
CHURCH and PAUL NOGARO,  
Defendants.

Index No.

**AFFIDAVIT OF PB-16 DOE**

I, PB-16 Doe, being duly sworn, hereby declare and say:

1. I am the Plaintiff in the above referenced matter.
2. I make this affidavit in support of the within application to maintain my anonymous identity in this matter.
3. I am the victim of sexual assault by my priest, Paul Nogaro ("Fr. Nogaro").
4. When I was an altar boy at St. Gregory the Great Parish, at approximately 10 to 12 years old, Fr. Nogaro sexually abused me on multiple occasions. The sexual abuse included inappropriate touching of intimate parts of my body.
5. During the time Fr. Nogaro sexually abused me, I was a minor and, to the best of my recollection, he was over 21 years old.
6. The long-term results of these sexual assaults have included emotional distress, depression, suicidal ideation, anxiety, feelings of worthlessness, sadness, shame, embarrassment, isolation, and many other psychological damages, painful feelings, as well as physical manifestations of these problems such as nightmares and flashbacks. Due to the horrific and

sensitive nature of the facts and allegations of sexual assault in this case, I respectfully request that my identity be kept anonymous and that I continued to be identified by my pseudonym only.

7. I currently live in Erie County where Defendants also reside.

8. Should my identity be revealed to the public, I will likely immediately suffer personal and/or economic hardship, backlash from the community, irreparable injury, loss and damage. Further, doing so will almost certainly exacerbate the very injuries I am suing for, including additional emotional distress, depression, shame, embarrassment, and other psychological injuries.

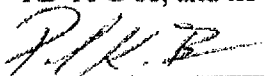
9. There is no prejudice to Defendants in maintaining the anonymous caption.

10. Therefore, I respectfully request that an order be entered:

- 1) Permitting this action to proceed or continue with the anonymous caption above; and
- 2) Granting a Preliminary Injunction to preserve the anonymous name of Plaintiff in this action; and
- 3) Granting a Temporary Restraining Order (TRO) prohibiting the divulging of the identity of the anonymous Plaintiff in this action; and
- 4) Granting such other and further relief as this Court deems just and proper.

 Plaintiff

On the 20<sup>th</sup> day of January, 2020 before me came the individual known to me by his full name but identified in this affidavit as Plaintiff in this action by his pseudonym PB-16-Doc, and he signed the within document in my presence.



Notary Public

{00049287}