



CAUSE NO. DC-07-03807

JOHN DOE I AND JOHN DOE II,  
THROUGH HIS NOTHER AS  
NEXT FRIEND OF JOHN DOE II,  
A VULNERABLE (NON COMPOS  
MENTIS) ADULT, JOHN DOE III,  
JOHN DOE IV AND JOHN DOE V,

Plaintiffs,

vs.

REVEREND NICHOLAS E. KATINAS,  
PASTOR (FORMERLY) OF HOLY  
TRINITY GREEK ORTHODOX CHURCH;  
HOLY TRINITY GREEK ORTHODOX  
CHURCH; THE GREEK ORTHODOX  
METROPOLIS OF DENVER BY AND  
THROUGH BISHOP ISAAH OF DENVER  
IN HIS OFFICIAL CAPACITY, AND THE  
GREEK ORTHODOX ARCHDIOCESE  
OF AMERICA BY AND THROUGH  
ARCHBISHOP DENETRIUS IN HIS  
OFFICIAL CAPACITY,

Defendants.

IN THE DISTRICT COURT

95th JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

AFFIDAVIT OF ELAINE LOUMBAS

STATE OF ILLINOIS

COUNTY OF COOK

BEFORE ME, the undersigned notary, on this day personally appeared ELAINE LOUMBAS, the affiant, a person whose identity is known to me after showing me the proper identification. After I administered an oath to affiant, she testified as follows:

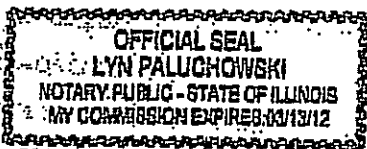
- I. I am over the age of eighteen (18), fully competent to execute this affidavit, have never been convicted of a felony and have personal knowledge of the facts herein stated, which are true and correct to the best of my knowledge.

AFFIDAVIT OF ELAINE LOUMBAS

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*Lyn Paluchowski*

6-5-08



2. My husband, John Lombas, and I have been parishioners at Assumption Greek Orthodox Church in Olympic Fields, Illinois ("Church") for over 45 years. Father Nicholas Kalinas ("Kalinas") was our pastor there from approximately 1968 through 1978. During many of those years, I was a member of the Assumption Women's Society (AWS), which included at various time periods SS Dena Kuchavos and Sophie Mania.
3. Leo Manta and his wife, Sophie, and my husband and I have known each other for over forty years, Leo and John served on the parish council of the Church over the years and each served at least one term as president of the parish council.
4. In 2007, when the details of a lawsuit filed in Dallas against Kalinas and the Greek Orthodox Archdiocese of America became public, many of the Church's parishioners, including myself, were very surprised about the allegations.
5. One Sunday in 2007, I, together with my husband, had a conversation with Leo Manta during the coffee hour after services at Church. Leo, my husband, and I sat down at a table and had a detailed conversation about Kalinas and the allegations of his sexual misconduct. During that discussion, Leo stated that sometime in the 1970s, Leo was advised by his own doctor, a psychiatrist who had also counseled Kalinas, that Kalinas should be kept away from boys.
6. Also during the same conversation with Leo one Sunday in 2007, Leo told us that following the conversation with his psychiatrist, Leo acted upon this information and advised the Greek Orthodox Diocese in Chicago ("Diocese"), as well as the Greek Orthodox Archdiocese in New York ("Archdiocese") of what the psychiatrist had told him for the purpose of protecting the children in the Church. Leo said that neither the Diocese nor the Archdiocese, to his knowledge, acted on the information he presented.
7. Also during the same conversation with Leo one Sunday in 2007, Leo told us that when a job opportunity opened for Father Kalinas in Dallas, it was convenient to tell the parishioners of the Church that Kalinas needed to leave the Church and move to Dallas in order to better provide for his large family. Furthermore, it was decided to keep the real reason secret in order to protect Kalinas' family and avoid scandal to the church.

Elaine F. Lombas  
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