



JOHN DOE I, JOHN DOE II,  
THROUGH HIS MOTHER 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 ISAIAH OF DENVER  
IN HIS OFFICIAL CAPACITY, AND THE  
GREEK ORTHODOX ARCHDIOCESE  
OF AMERICA BY AND THROUGH  
ARCHBISHOP DEMETRIOS IN HIS  
OFFICIAL CAPACITY,

Defendants.

IN THE DISTRICT COURT

95<sup>th</sup> JUDICIAL DISTRICT

DALLAS, COUNTY TEXAS

**AFFIDAVIT OF JOHN FAKLIS**

STATE OF ILLINOIS

COUNTY OF ILLINOIS <sup>Cal</sup> COOK

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§ KNOW BY ALL MEN BY THESE PRESENTS:  
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BEFORE ME, the undersigned notary public on the 11 day of August 2008, personally appeared John Faklis who being by me duly sworn, deposed and stated as follows:

"My name is John Faklis. I am over the age of twenty-one (21) years. I have never been convicted of a felony, suffer no legal or mental disabilities that prevent me from giving this affidavit or testifying to the facts stated below, and am therefore competent to make this affidavit. I have personal knowledge of the matters stated herein and know such matters to be true and correct.

1. My name is John Faldis. My date of birth is March 15<sup>th</sup>, 1922. I currently reside with my wife, Margaret T. Faldis, in Park Forest, Illinois.
2. In the late 1960s and early 1970s, I was a member of the Parish Council Board of Assumption Church in Olympia Fields, Illinois when Father Nicholas Katinas was first assigned as pastor there. I was assigned as the first Chairman of the Bingo Committee, as well as Chairman of the Fund Raising Dance Committee for the Assumption. I left this church and removed my wife and two sons before Katinas left Assumption primarily for two reasons: for what I thought were money improprieties involving certain officers of the Parish Council and rumors of sexual misconduct with boys involving Father Katinas.
3. When I was a member of the Parish Council, Assumption Church was run by a few influential members, including Leo Mania, Gust Dickett, and, of course, the priest, Father Nicholas Katinas. In the early 1970s, rumors were circulating at Assumption about Father Katinas and a teenager named Dan Ziagos. At first, I did not give much thought to these rumors as I thought that Father Katinas was just very dedicated towards the young people of this Parish. However, I personally observed Father Katinas with the Ziagos boy and thought the interaction was odd. In particular, Father Katinas was always hugging him in an all-too-familiar way. Another parish council member, James Kulidas ( a former high school coach and then secretary of the parish council) commented to me about Father Nick's curious interactions with the altar boys and the basketball players, but especially about his questionable interaction with young Ziagos.
4. Another incident concerning Father Katinas' conduct with a second teenage boy gave me further cause for alarm. A young basketball player, Spencer Psilopoulous, lay stricken with leukemia in Mount Sinai Hospital in Chicago. One day, Father Katinas telephoned me and asked me to accompany him to the hospital to visit Spencer (whose parents were away on a cruise at the time), who had been hospitalized for some time. When we arrived, he was barely alive and was calling for some Kool-Aid to drink. After a couple of sips of his drink, he began to act strangely and Father Katinas summoned the floor nurse to attend him. We were asked to leave the room while he was being attended and when we returned, Spencer's had passed away. His body was wrapped in a sheet and lying on the bed. Father Katinas began crying and wailing uncontrollably as he sat next to Spencer on the bed. He began hugging and kissing the corpse. This spectacle repulsed me. My first thought was that he was a very dedicated priest. However, I thought this was very weird and extreme, to say the least, for a priest especially, to act in such a manner under such conditions.
5. The other issue that caused me concern at Assumption was the irregular way that parish monies were handled by our Priest and one influential Parish Council officer. I was the licensed Bingo Chairman of the Bingo Committee, by the State of Illinois. (See a true and correct copy of the official card referenced above attached hereto). As such I was responsible to make reports to the State and see that the proper monies should be paid thereto from the Weekly Bingo games; However, I was not allowed to be in the counting room (Father Katinas' Office) or to witness the counting of monies from the Bingo

Games. I witnessed Father Katinas collecting monies from the cashiers at Bingo Games and running into his office while the games were going on. With no witnesses in his office, Father Katinas and Leo Manta secretly counted the cash and the door was locked to all others. Yet I was never provided with a receipt nor a spreadsheet showing the income and expenses of supplies etc. of these games. Furthermore, neither was the Church Council provided with any kind of report for any of the church income or payouts. No wonder! On Sundays, I, along with other Council members would collect donations from the parishioners and were ordered to bring them into the church office and turn them over to Leo Manta. I also witnessed Leo Manta, who, after counting the donations on Sunday, would roll up the cash, put it into his pocket, then write a personal check in place of it and then bank it. I wondered if he was reporting these checks to the Internal Revenue Service as donations to the church. In my position, I was afraid that I would be accused of being an accomplice to embezzlement and/or money laundering by the Illinois State Revenue Department of the Bingo monies, and/or other monies belonging to Assumption Greek Orthodox Church.

6. I became increasingly alarmed by these irregular activities of Leo Manta and Father Nicholas Katinas. These issues, coupled with Father Nick's disturbing conduct with young boys, prompted me to leave Assumption along with my wife and adolescent sons and join another church. When we left, Father Katinas was still pastor.

Further, the affiant sayeth not."

  
John Faklis

STATE OF ILLINOIS

COUNTY OF Cook

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BEFORE ME, the undersigned authority, on this day personally appeared JOHN  
FAKLIS

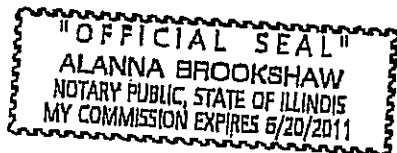
\_\_\_\_\_ Known to me

\_\_\_\_\_ Proved to me on the oath of \_\_\_\_\_

Proved to me through his identification card/license

to be the person whose name is subscribed to the foregoing instrument, and he acknowledged to me that he executed it for the purposes and considerations expressed in it.

Given under my hand and seal of office on this the 11<sup>th</sup> day of August, 2008.



[Seal]

Alanna Brookshaw  
Notary in and for the State of Illinois

6-20-2011  
My Commission Expires

BINGO LICENSEE

John Faklis

This certifies that John Faklis  
whose photograph is affixed on the reverse, is authorized  
to participate in the operation of BINGO games sponsored  
by Assumption Greek Orthodox Church of  
Olympia Fields, Ill.  
a duly constituted non-profit organization under the State  
of Illinois License and Tax Act. This authorization expires  
on July 1, 1972.

Signature

Department of Revenue

RS-6

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