

**STATE OF MAINE
PENOBSCOT, SS.**

**SUPERIOR COURT
CIVIL ACTION
DOCKET NO: CV-16-**

F, an individual) residing in the
Town of Middlesex)
County of Washington, State)
of Vermont,)

Plaintiff)

v.)

ADAM METROPOULOS,)
an individual residing in the)
Town of Windham, County of)
Cumberland, State of Maine,)

and)

THE GREEK ORTHODOX)
ARCHDIOCESE OF AMERICA,)
a New York corporation)
conducting business in the State,)
of Maine,)

and)

THE GREEK ORTHODOX)
METROPOLIS OF BOSTON,)
a Massachusetts corporation)
conducting business in the State)
of Maine,)

and)

GREEK ORTHODOX)
COMMUNITY OF BANGOR,)
MAINE,)
a Maine corporation doing business)
in the County of Penobscot,)
State of Maine,)

and)

HIS EMINENCE)
METROPOLITAN)
METHODIOS , an individual)
residing in the city of Brookline,)
County of Norfolk State,)
of Massachusetts)
)
THEODORE BARBAS ,)
an individual believed to be)
residing in City of Boston, County)
of Suffolk, State of Massachusetts,)
)
Defendants)

AMENDED COMPLAINT

NOW COMES the Plaintiff and hereby complains against the Defendants as follows:

1. Plaintiff F (“Plaintiff F”) is an individual born on May 29, 1991, in the City of Castine, Maine. Plaintiff F resided in the City of Castine, County of Hancock, State of Maine from May 29, 1991 until on or about March 16, 2014. Between March 16, 2014 and February 25, 2016, Plaintiff F resided in the City of Hancock, County of Addison, State of Vermont.
2. From February 25, 2016 to the present, Plaintiff F resided in the City of Middlesex, County of Washington, State of Vermont.
3. At all times relevant to this Complaint, Defendant Adam Metropoulos (“Defendant Metropoulos”) was an individual residing in the City of Bangor, County of Penobscot, State of Maine. Upon information and belief, Defendant Metropoulos has been incarcerated at the Maine Correctional Center, located in the Town of Windham, County of Cumberland, State of Maine since on or about March 16, 2015.

4. At all times relevant to this Complaint, Defendant Greek Orthodox Archdiocese of America was a New York corporation conducting business in the State of Maine.
5. At all times relevant to this Complaint, Defendant Greek Orthodox Metropolis of Boston was a Massachusetts corporation conducting business in the State of Maine.
6. At all times relevant to this Complaint, Defendant Greek Orthodox Community of Bangor was a Maine corporation doing business in the County of Penobscot, State of Maine.
7. At all times relevant to this Complaint, Defendant Metropolitan Methodios was an individual residing in the City of Brookline, County of Norfolk, State of Massachusetts.
8. At all times relevant to this Complaint, Defendant Theodore Barbas was an individual believed to be residing in the City of Boston, County of Suffolk, State of Massachusetts and believed to be in the employ of Defendant Metropolitan Methodios and or the Greek Orthodox Metropolis of Boston.
9. Upon information and belief, on or about September 14th, 1983, in the Saginaw County Circuit Court in the State of Michigan, Defendant Metropoulos pled guilty to the charge of Unlawful Sexual Touching of a minor child under the age of 13.
10. Upon information and belief, Defendant Metropoulos was sentenced to a period of probation and psychological counseling.
11. Upon information and belief, in the year 1990, Defendant Metropoulos moved to Millinocket, Maine and became gainfully employed as a high school teacher.

12. Upon information and belief, Defendant Adam Metropoulos began attending the St. George Greek Orthodox Church, and befriended the biological parents of Plaintiff F.
13. Upon information and belief, in the year of 1997, Defendant Metropoulos was accepted into the Greek Orthodox Seminary Program and began attending the Holy Cross Greek Orthodox School of Theology in Brookline, Massachusetts.
14. Upon information and belief, Defendant Metropoulos was temporarily removed from the seminary and sanctioned for actions involving illicit, inappropriate and/or illegal sexually oriented behavior.
15. Upon information and belief that Defendants “fast tracked” Metropoulos’ training at the seminary despite his past history.
16. Upon information and belief, in the year 2000, Defendant Metropoulos completed the Greek Orthodox Seminary Program and became gainfully employed as a priest and the spiritual leader of the St. George Greek Orthodox Church in Bangor, Maine.
17. In the year 2000, Defendant Metropoulos used his status and position as a priest in the St. George Greek Orthodox Church, to exert special and significant spiritual influence over Plaintiff F and his family.
18. As a direct and proximate cause of Defendant Metropoulos’ role as a priest within the Greek Orthodox Church, Plaintiff F began serving as an altar boy for the St. George church in the year 2000. Plaintiff F served directly under, and reported to, Defendant Metropoulos.

19. Upon information and belief, from the year 2000 to on or about June 3rd, 2006, Defendant Metropoulos used his unique and special position in the Greek Orthodox Church to gain the trust of Plaintiff F.
20. Defendant Metropoulos would often refer to Plaintiff F as his “protégé” would assign Plaintiff F special tasks, hold Plaintiff F to a higher standard than the other altar boys, and would have higher expectations for Plaintiff F than other altar boys.
21. As a direct and proximate result of Defendant Metropoulos’ manipulation of Plaintiff F, Plaintiff F would serve as an altar boy for Defendant Metropoulos twice a week, once on Sunday and once during a service in the middle of the week.
22. Upon information and belief, from the year 2000 to on or about June 3rd 2006, Defendant Metropoulos also used his unique status and position as a priest in the Greek Orthodox Church to gain Plaintiff F and the other altar boys’ trust by helping them with their schoolwork. Defendant Metropoulos would often use the St. George Church to provide Plaintiff F and the other altar boys with tutoring in the subjects of math and science.
23. From the year 2000 to on or about June 3, 2006, Defendant Metropoulos would host “overnight sleepovers” for Plaintiff F and the other altar boys.
24. The sleepovers would take place at Defendant Metropoulos’ home the night before a scheduled church service.
25. Defendant Metropoulos used his unique position as a priest in the Greek Orthodox Church to advertise the sleepovers as a method of carpooling.

26. Specifically, Defendant Metropoulos would suggest that these sleepovers would relieve the altar boys' parents the obligation of driving their children from their homes to the St. George Church in the early morning.
27. During these sleepovers Defendant Metropoulos would also often engage the altar boys and Plaintiff F in activities such as board games, card games, and video games in order to gain their trust.
28. During these sleepovers Plaintiff F would either sleep in a guest room or on a futon in the living room at Defendant Metropoulos' home.
29. On or about the early hours of June 3rd, 2006, during one sleepover, Defendant Metropoulos entered the guest room and/or sleeping area of 15-year old Plaintiff F, finding Plaintiff F sleeping on his back.
30. Defendant Metropoulos kneeled on Plaintiff F's bed, pulled down his pajama pants, and proceeded to put Plaintiff F's penis in his mouth and perform oral sex on him.
31. At some point during this encounter Plaintiff F awoke and became aware of the fact that Defendant Metropoulos was performing a sex act on him.
32. In a state of shock and unsure of what the consequences would be if he shouted out or resisted Defendant Metropoulos, Plaintiff F decided to pretend to be asleep and tried his best to remain still.
33. After Defendant Metropoulos finished performing oral sex on Plaintiff F, Defendant Metropoulos pulled up Plaintiff F's pajama pants, laid down next to him, and fell asleep.

34. On or about the early hours of June 10th, 2006, Defendant Metropoulos entered the guest room and/or sleeping area of 15-year old Plaintiff F, finding Plaintiff F sleeping on his stomach.
35. Defendant Metropoulos pulled off Plaintiff F's pajama pants, and inserted his erect penis into Plaintiff F's anus.
36. At some point Plaintiff F awoke and became aware of the fact that Defendant Metropoulos was performing a sex act on him.
37. In a state of shock and unsure of what the consequences would be if he shouted out or resisted Defendant Metropoulos, Plaintiff F decided to pretend to be asleep and did his best to remain still.
38. Even though Plaintiff F was in extreme pain, he remained steadfast in his attempt to convince Defendant Metropoulos that he was still asleep by trying to control his breathing to a normal rhythm.
39. After Defendant Metropoulos had finished performing anal sex on Plaintiff F, Defendant Metropoulos pulled up Plaintiff F's pajama pants, laid down next to him, and fell asleep.
40. On or about the early hours of June 17th, 2006, Defendant Metropoulos entered the guest room and/or sleeping area of 15-year old Plaintiff F, finding Plaintiff F sleeping on his side.
41. Defendant Metropoulos pulled down Plaintiff F's pajama pants, manually stimulated Plaintiff's penis until he achieved an erection, laid down on next to Plaintiff F, and inserted Plaintiff's erect penis into Defendant Metropoulos' anus.

42. Defendant Metropoulos proceeded to hold Plaintiff F's body still, while he moved himself back and forth in order to generate and satisfy his own sexual pleasures.
43. At some point Plaintiff F awoke and became aware of the fact that Defendant Metropoulos was performing a sex act on him.
44. In a state of shock and unsure of what the consequences would be if he shouted out or resisted the advances of Defendant Metropoulos, Plaintiff F decided to pretend to be asleep, tried his best to remain still, and even tried to control his breathing to a normal rhythm so as to convince Defendant Metropoulis that he was still asleep.
45. After Defendant Metropoulos had finished, Defendant Metropoulos pulled up Plaintiff F's pajama pants, laid down next to him, and fell asleep.
46. On or about the early hours of June 24th, 2006, Defendant Metropoulos entered the guest room and/or sleeping area of 15-year old Plaintiff F and found Plaintiff F sleeping on his back. Defendant Metropoulos crawled on the bed, pulled down his own pants, and attempted to insert his erect penis into Plaintiff F's mouth.
47. At some point Plaintiff F awoke and became aware of the fact that Defendant Metropoulos was attempting insert his penis into F's mouth.
48. Although Plaintiff F pretended to be asleep, as he had done numerous times before, Plaintiff F silently resisted this advance of Defendant Metropoulos by refusing to open his mouth, even while Defendant Metropoulos pressed the head of his erect penis to the Plaintiff F's lips.

49. After failing to insert his penis into Plaintiff F's mouth, Defendant Metropoulos proceeded lay down next to Plaintiff F and fall asleep.
50. During these overnight sleepovers, from on or about June 3, 2006 until May 29, 2007, Defendant Metropoulos would routinely enter the guest room and/or sleeping area of Plaintiff F.
51. During these encounters Defendant Metropoulos would perform oral sex on Plaintiff F, perform anal sex on Plaintiff F, and would manipulate Plaintiff F's penis until he could achieve an erection, so that Defendant Metropoulos could insert Plaintiff F's penis into Defendant Metropoulos' anus.
52. During this time. Plaintiff F feared that by disclosing this sexual abuse he would effectively ruin the lives of his family, devout parishioners of the St. George Church.
53. Defendant Metropoulos' sexual abuse of Plaintiff F stopped on or about May 29, 2007, when Plaintiff F reached the age of 16.
54. However, Plaintiff F continued to serve the St. George Church as an altar boy and continued to spend overnights at Defendant Metropoulos' home until he moved to Vermont on or about May 29, 2013.
55. Plaintiff F feared that if he were to abandon the routine that he had kept since approximately the year of 2000, his family would question why, and uncover the secret he had kept since on or about June 3rd, 2006.

56. On or about September 15, 2015, the Bangor Police Department received a complaint from the niece of Defendant Metropoulos, a person by the name of Jane Doe.¹
57. Upon information and belief, Jane stated that she was showering at Defendant Metropoulos' home and that she had found a video camera that appeared to have been hidden in the bathroom and pointed at the shower area.
58. Jane collected the camera, rewound the footage and observed that the camera had been recording her in the shower, capturing her at various states of undress and her totally naked body.
59. Upon information and belief, Jane ejected the camera's storage drive and brought it to the attention of Detective Shaw of the Bangor Police Department.
60. On or about September 15, 2015, Detective Shaw interviewed Defendant Metropoulos. The interview was audio and/or video recorded.
61. In the interview, Defendant Metropoulos admitted that he planted the video camera to record his niece Jane, taking a shower.
62. Defendant Metropoulos admitted that he also videotaped a minor child taking a shower in Massachusetts and proceeded to admit that he had a sexual predilection towards children, and he viewed images of several children on the internet.
63. Defendant Metropoulos admitted that he slept with two boys who were parishioners at his church and that he touched their genitals over their clothing.
64. Detective Shaw concluded the interview and placed Defendant Metropoulos under arrest.

¹ The name of the young woman is not known at this time.

65. Detective Shaw proceeded to recover over 400 images of nude children from Defendant Metropoulos' computer, and purportedly amateur images of a minor child taking a shower, pursuant to a valid search warrant.
66. As a result of Defendant Metropoulos' admissions to Detective Shaw and the evidence recovered from Defendant Metropoulos' computer and video camera, Defendant Metropoulos was subsequently charged with Unlawful Possession of Sexually Explicit Material, class C and Violation of Privacy, class D.
67. On or about September 21, 2015, Plaintiff F, now living in Vermont, became aware that Defendant Metropoulos had been charged with Unlawful Possession of Sexually Explicit Materials, class C and Violation of Privacy, Class D.
68. Plaintiff F phoned his family and encouraged them to come meet him in Vermont.
69. During the family meeting, Plaintiff F made a full disclosure of the abuse that he had suffered at the hands of Defendant Metropoulos.
70. At the urging of his family Plaintiff F called Detective Shaw, and made a full report.
71. Defendant Metropoulos would be charged with four counts, Sexual Abuse of a Minor, class C.
72. On or about March 16, 2015, after a bench trial in the Penobscot County Unified Criminal Court, Defendant Metropoulos was convicted of all five counts: Possession of Sexually Explicit Materials, class C, Violation of Privacy, class D, and four counts of Sexual Abuse of a Minor class C.

73. At the sentencing hearing, Plaintiff F submitted a victim impact statement.
- The statement read, in part “This man stole my life. He picked it apart and put himself where he pleased...My formative years were spent learning how to hide what I felt behind a mask. I learned so well I could smile when my heart was full of fear and laugh when all I wanted to do was scream... He told me I was special and that no one would understand, no one but him... I was completely alone... I have been drifting through life ever since, unable to make meaningful connections with anyone.”
74. Defendant Metropoulos was sentenced to twelve years in prison with all but six and one half years suspended.
75. Defendant Metropoulos will be subject to mandated counseling, probation, and will have to register as a sex offender for the rest of his life.

COUNT I

NEGLIGENCE-ADAM METROPOULOS

76. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-75 above as if set forth fully herein.
77. Defendant Metropoulos had a duty to Plaintiff to act appropriately in regard to his role as a priest in the Greek Orthodox Church.
78. Defendant Metropoulos breached his duty to Plaintiff by acting in a negligent and careless manner towards Plaintiff.
79. As the direct and proximate result of Defendant Metropoulos’ conduct towards Plaintiff, Plaintiff sustained significant personal injuries, including pain and

suffering, mental anguish, substantial medical expenses, loss of enjoyment of life and lost wages and income.

WHEREFORE, Plaintiff demands judgment against Defendant Metropoulos in an amount to be determined at trial, together with interest and costs.

COUNT II

SEXUAL ASSAULT AND BATTERY-ADAM METROPOULOS

80. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-79 above as if set forth fully herein.
81. On numerous occasions from May 2006 to June 2007, Defendant Metropoulos committed sexual assaults and batteries on Plaintiff.
82. Due to Plaintiff's age, mental condition and fragile emotional condition, the above described sexual assaults and batteries were involuntary and nonconsensual.
83. As the direct and proximate result of the above described sexual assaults and batteries by Defendant Metropoulos, Plaintiff has sustained severe permanent personal injuries, pain and suffering, future and past medical expenses, mental anguish and disability.

WHEREFORE, Plaintiff demands judgment against Defendant Metropoulos in an amount to be determined at trial, together with interest and costs.

COUNT III

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS- ADAM METROPOULOS

84. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-83 above as if set forth fully herein.
85. Defendant Metropoulos coerced Plaintiff to perform nonconsensual sexual acts on numerous occasions while Plaintiff was a minor and under pastoral care and guidance.
86. Defendant Metropoulos violated his duty of care, trust and loyalty to Plaintiff.
87. Defendant Metropoulos breached his professional, ethical and fiduciary duties as a priest.
88. Defendant Metropoulos knew or should have known that his actions would likely cause Plaintiff severe emotional distress.
89. Defendant Metropoulos's actions were extreme, outrageous and exceeded all bounds of decency in a civilized society.
90. Plaintiff's emotional distress was severe and of a nature that no reasonable person should be expected to endure it.
91. As the direct and proximate result of Defendant's intentional actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Metropoulos in an amount to be determined at trial, together with interest and costs.

COUNT IV

CLERGY MALPRACTICE- ADAM METROPOULOS

92. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-91 above as if set forth fully herein.

93. Defendant Metropoulos undertook to render services in his profession as a priest of the Diocese of Bangor, Maine.
94. Defendant Metropoulos was obligated to exercise the skill and knowledge normally possessed by members of his profession in good standing in similar circumstances.
95. Defendant Metropoulos's conduct and actions towards Plaintiff failed to meet the standards and expected skill required of his profession.
96. As the direct and proximate result of Defendant Metropoulos' clergy malpractice, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Metropoulos in an amount to be determined at trial, together with interest and costs.

COUNT V

BREACH OF FIDUCIARY DUTY- ADAM METROPOULOS

97. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-96 above as if set forth fully herein.
98. Plaintiff had trust and confidence in Defendant Metropoulos due to his status as a priest.
99. As Plaintiff's priest, Defendant Metropoulos owed Plaintiff a fiduciary duty.
100. Defendant Metropoulos breached his duty to Plaintiff and abused his position of trust and confidence for his own benefit and advantage.

101. As the direct and proximate result of Defendant Metropoulos' breach of fiduciary duty, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Metropoulos in an amount to be determined at trial, together with interest and costs.

COUNT VI

NEGLIGENT SUPERVISION-THE GREEK ORTHODOX ARCHDIOCESE OF AMERICA

102. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-101 above as if set forth fully herein.

103. Defendant The Greek Orthodox Archdiocese of America owed a duty to Plaintiff in its role in providing religious services, counseling, and religious education to Plaintiff.

104. Defendant The Greek Orthodox Archdiocese of America owed a duty to Plaintiff to hire and supervise, competent, fit and otherwise qualified priests for the Diocese of Bangor and its parishes.

105. The Greek Orthodox Archdiocese of America knew or should have known that Defendant Adam Metropoulos before, during and after the time he was assigned to be a priest in the State of Maine, was incompetent, unfit and otherwise unqualified to serve Defendant The Greek Orthodox Archdiocese of America as a priest.

106. Defendant The Greek Orthodox Archdiocese of America breached its duties to Plaintiff in a negligent and careless way.

107. Defendant The Greek Orthodox Archdiocese of America failed to provide proper oversight of its priests and other employees, including Defendant Metropoulos.
108. Defendant The Greek Orthodox Archdiocese of America failed to take proper action upon notice of inappropriate behavior by Defendant Metropoulos.
109. Defendant The Greek Orthodox Archdiocese of America failed to show a proper respect and regard for the physical and mental health of Plaintiff.
110. As the direct and proximate result of Defendant The Greek Orthodox Archdiocese of America's negligent supervision, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Archdiocese of America in an amount to be determined at trial, together with interest and costs.

COUNT VII

BREACH OF FIDUCIARY DUTY-THE GREEK ORTHODOX ARCHDIOCESE OF AMERICA

111. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-110 above as if set forth fully herein.
112. Plaintiff had trust in Defendant Metropoulos as a priest of the Diocese of Bangor.
113. Plaintiff had trust in Defendant The Greek Orthodox Archdiocese of America to employ appropriate persons as its priests.

114. Defendant, The Greek Orthodox Archdiocese of America was the supervisor of Defendant Metropoulos and as fiduciary to Plaintiff, owed Plaintiff a duty of trust and loyalty.
115. Defendant The Greek Orthodox Archdiocese of America breached its duty to Plaintiff.
116. Defendant The Greek Orthodox Archdiocese of America abused its position of trust and confidence with Plaintiff to its own benefit and advantage.
117. As the direct and proximate result of Defendant The Greek Orthodox Archdiocese of America's breach of fiduciary duty, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Archdiocese of America in an amount to be determined at trial, together with interest and costs.

COUNT VIII

CANONICAL AGENCY- THE GREEK ORTHODOX ARCHDIOCESE OF AMERICA

118. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-117 above as if set forth fully herein.
119. Under the doctrine of canonical agency, a priest's duties require his attention 24 hours per day, seven days per week.
120. Under the doctrine of canonical agency, there is no discernable line of distinction between priestly and personal functions.

121. Under canonical agency, the actions of Defendant Metropoulos and the actions of Defendant The Greek Orthodox Archdiocese of America towards Plaintiff occurred within the official scope of their respective duties.
122. Defendant The Greek Orthodox Archdiocese of America, as the principal of Defendant Metropoulos, is responsible for all damages suffered by Plaintiff as a consequence of the actions of Defendant Metropoulos.
123. As the direct and proximate result of Defendant The Greek Orthodox Archdiocese of America's actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.
- WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Archdiocese of America in an amount to be determined at trial, together with interest and costs.

COUNT IX

NEGLIGENCE-THE GREEK ORTHODOX ARCHDIOCESE OF AMERICA

124. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-123 above as if set forth fully herein.
125. Defendant The Greek Orthodox Archdiocese of America had a legal and/or equitable duty to investigate Defendant Metropoulos' character and relevant background information before inviting him to join the seminary and placing him in a position of trust.
126. Defendant The Greek Orthodox Archdiocese of America breached its legal and/or equitable duty to investigate Defendant Metropoulos' character and relevant background information with due care.

127. As the direct and proximate result of Defendant The Greek Orthodox Archdiocese of America's actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Archdiocese of America in an amount to be determined at trial, together with interest and costs.

COUNT X

VICARIOUS LIABILITY-THE GREEK ORTHODOX ARCHDIOCESE OF AMERICA

128. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-127, as if set forth fully herein.

129. A master/servant relationship existed between Defendant The Greek Orthodox Archdiocese of America and Defendant Metropoulos.

130. The abuse that Plaintiff suffered at the hands of Defendant Metropoulos occurred while Defendant Metropoulos was acting within the scope of his employment as a priest in the Greek Orthodox Church.

131. Due to the existence of the agency relationship between The Greek Orthodox Archdiocese of America and Defendant Metropoulos, Defendant Metropoulos was aided in injuring Plaintiff and would not have been able to injure Plaintiff but for the agency relationship.

132. Defendant The Greek Orthodox Archdiocese of America is therefore vicariously liable to Plaintiff for the tortious acts committed upon him by Defendant's servant.

COUNT XI

FRAUDULENT CONCEALMENT-THE GREEK ORTHODOX ARCHDIOCESE OF AMERICA

133. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-132, as if set forth fully herein.
134. Defendant The Greek Orthodox Archdiocese of America possessed a legal or equitable duty to Plaintiff to disclose that Defendant Metropoulos present presented a risk to him and other children.
135. Defendant The Greek Orthodox Archdiocese of America failed to disclose material facts regarding Defendant Metropoulos' background and character with the intention of inducing Plaintiff and his family to act in reliance on the non-disclosure.
136. Plaintiff and his family in fact relied upon Defendant The Greek Orthodox Archdiocese of America's non-disclosure to their detriment.
137. As the direct and proximate result of Defendant The Greek Orthodox Archdiocese of America's actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

COUNT XII

NEGLIGENT SUPERVISION-THE GREEK ORTHODOX METROPOLIS OF BOSTON

138. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-137 above as if set forth fully herein.

139. Defendant The Greek Orthodox Metropolis of Boston owed a duty to Plaintiff in its role in providing religious services, counseling, and religious education to Plaintiff.
140. Defendant The Greek Orthodox Metropolis of Boston owed a duty to Plaintiff to hire and supervise, competent, fit and otherwise qualified priests for the Diocese of Bangor and its parishes.
141. The Greek Orthodox Metropolis of Boston knew or should have known that Defendant Adam Metropoulos before, during and after the time he was assigned to be a priest in the State of Maine, was incompetent, unfit and otherwise unqualified to serve Defendant The Greek Orthodox Archdiocese of America as a priest.
142. Defendant The Greek Orthodox Metropolis of Boston breached its duties to Plaintiff in a negligent and careless way.
143. Defendant The Greek Orthodox Metropolis of Boston failed to provide proper oversight of its priests and other employees, including Defendant Metropoulos.
144. Defendant The Greek Orthodox Metropolis of Boston failed to take proper action upon notice of inappropriate behavior by Defendant Metropoulos.
145. Defendant The Greek Orthodox Metropolis of Boston failed to show a proper respect and regard for the physical and mental health of Plaintiff.
146. As the direct and proximate result of Defendant The Greek Orthodox Metropolis of Boston's negligent supervision, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Metropolis of Boston in an amount to be determined at trial, together with interest and costs.

COUNT XIII

BREACH OF FIDUCIARY DUTY- THE GREEK ORTHODOX METROPOLIS OF BOSTON

147. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-146 above as if set forth fully herein.
148. Plaintiff had trust in Defendant Metropoulos as a priest of the Diocese of Bangor.
149. Plaintiff had trust in Defendant The Greek Orthodox Metropolis of Boston to employ appropriate persons as its priests.
150. Defendant, The Greek Orthodox Metropolis of Boston was the supervisor of Defendant Metropoulos and as fiduciary to Plaintiff, owed Plaintiff a duty of trust and loyalty.
151. Defendant The Greek Orthodox Metropolis of Boston breached its duty to Plaintiff.
152. Defendant The Greek Orthodox Metropolis of Boston abused its position of trust and confidence with Plaintiff to its own benefit and advantage.
153. As the direct and proximate result of Defendant The Greek Orthodox Metropolis of Boston's breach of fiduciary duty, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Metropolis of Boston in an amount to be determined at trial, together with interest and costs.

COUNT XIV

CANONICAL AGENCY- THE GREEK ORTHODOX METROPOLIS OF BOSTON

154. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-153 above as if set forth fully herein.
155. Under the doctrine of canonical agency, a priest's duties require his attention 24 hours per day, seven days per week.
156. Under the doctrine of canonical agency, there is no discernable line of distinction between priestly and personal functions.
157. Under canonical agency, the actions of Defendant Metropoulos and the actions of Defendant The Greek Orthodox Metropolis of Boston towards Plaintiff occurred within the official scope of their respective duties.
158. Defendant The Greek Orthodox Metropolis of Boston, as the principal of Defendant Metropoulos, is responsible for all damages suffered by Plaintiff as a consequence of the actions of Defendant Metropoulos.
159. As the direct and proximate result of Defendant The Greek Orthodox Metropolis of Boston's actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Metropolis of Boston in an amount to be determined at trial, together with interest and costs.

COUNT XV

NEGLIGENCE-THE GREEK ORTHODOX METROPOLIS OF BOSTON

160. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-159 above as if set forth fully herein.
161. Defendant The Greek Orthodox Metropolis of Boston had a legal and/or equitable duty to Plaintiff to investigate Defendant Metropoulos' character and relevant background information before inviting him to join the seminary and placing him in a position of trust as a priest.
162. Defendant The Greek Orthodox Metropolis of Boston breached its legal and/or equitable duty to Plaintiff by failing to investigate Defendant Metropoulos' character and relevant background information with due care.
163. As a result of this failure, Defendant The Greek Orthodox Metropolis of Boston failed to disclose to Plaintiff that Defendant Metropoulos presented a danger to him and placed him in a position to harm Plaintiff and others.
164. As the direct and proximate cause of Defendant The Greek Orthodox Metropolis of Boston's negligence, Plaintiff sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Metropolis of Boston in an amount to be determined at trial, together with interest and costs.

COUNT XVI

VICARIOUS LIABILITY-THE GREEK ORTHODOX METROPOLIS OF BOSTON

165. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-164, as if set forth fully herein.
166. A master/servant relationship existed between Defendant The Greek Orthodox Metropolis of Boston and Defendant Metropoulos.
167. The abuse that Plaintiff suffered at the hands of Defendant Metropoulos occurred while Defendant Metropoulos was acting within the scope of his employment as a priest in the Greek Orthodox Church.
168. Due to the existence of the agency relationship between The Greek Orthodox Metropolis of Boston and Defendant Metropoulos, Defendant Metropoulos was aided in injuring Plaintiff and would not have been able to injure Plaintiff but for the agency relationship.
169. The Greek Orthodox Metropolis of Boston is therefore vicariously liable to Plaintiff for the tortious acts committed upon him by Defendant's servant.

COUNT XVII

FRAUDULENT CONCEALMENT-THE GREEK ORTHODOX METROPOLIS OF BOSTON

170. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-169, as if set forth fully herein.

171. Defendant The Greek Orthodox Metropolis of Boston possessed a legal or equitable duty to Plaintiff to disclose that Defendant Metropoulos presented a risk to him and other children.
172. Defendant The Greek Orthodox Metropolis of Boston failed to disclose material facts regarding Defendant Metropoulos' background and character with the intention of inducing Plaintiff and his family to act in reliance on the non-disclosure.
173. Plaintiff and his family in fact relied upon Defendant The Greek Orthodox Metropolis of Boston's non-disclosure to their detriment.
174. As the direct and proximate result of Defendant The Greek Orthodox Metropolis of Boston's actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

COUNT XVIII

NEGLIGENT SUPERVISION-THE GREEK ORTHODOX COMMUNITY OF BANGOR

175. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-174 above as if set forth fully herein.
176. Defendant The Greek Orthodox Community of Bangor owed a duty to Plaintiff in its role in providing religious services, counseling, and religious education to Plaintiff.
177. Defendant The Greek Orthodox Community of Bangor owed a duty to Plaintiff to hire and supervise, competent, fit and otherwise qualified priests for the Diocese of Bangor and its parishes.

178. The Greek Orthodox Community of Bangor knew or should have known that Defendant Adam Metropoulos before, during and after the time he was assigned to be a priest in the State of Maine, was incompetent, unfit and otherwise unqualified to serve Defendant The Greek Orthodox Community of Bangor.
179. Defendant The Greek Orthodox Community of Bangor breached its duties to Plaintiff in a negligent and careless way.
180. Defendant The Greek Orthodox Community of Bangor failed to provide proper oversight of its priests and other employees, including Defendant Metropoulos.
181. Defendant The Greek Orthodox Community of Bangor failed to take proper action upon notice of inappropriate behavior by Defendant Metropoulos.
182. Defendant The Greek Orthodox Community of Bangor failed to show a proper respect and regard for the physical and mental health of Plaintiff.
183. As the direct and proximate result of Defendant The Greek Orthodox Community of Bangor's negligent supervision, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Community of Bangor in an amount to be determined at trial, together with interest and costs.

COUNT XIX

BREACH OF FIDUCIARY DUTY- THE GREEK ORTHODOX COMMUNITY OF BANGOR

184. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-183 above as if set forth fully herein.
185. Plaintiff had trust in Defendant Metropoulos as a priest of the Diocese of Bangor.
186. Plaintiff had trust in Defendant The Greek Orthodox Community of Bangor to employ appropriate persons as its priests.
187. Defendant The Greek Orthodox Community of Bangor was the supervisor of Defendant Metropoulos and as fiduciary to Plaintiff, owed Plaintiff a duty of trust and loyalty.
188. Defendant The Greek Orthodox Community of Bangor breached its duty to Plaintiff.
189. Defendant The Greek Orthodox Community of Bangor abused its position of trust and confidence with Plaintiff to its own benefit and advantage.
190. As the direct and proximate result of Defendant The Greek Orthodox Community of Bangor's breach of fiduciary duty, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Community of Bangor in an amount to be determined at trial, together with interest and costs.

COUNT XX

**CANONICAL AGENCY- THE GREEK ORTHODOX COMMUNITY OF
BANGOR**

191. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-190 above as if set forth fully herein.
192. Under the doctrine of canonical agency, a priest's duties require his attention 24 hours per day, seven days per week.
193. Under the doctrine of canonical agency, there is no discernable line of distinction between priestly and personal functions.
194. Under canonical agency, the actions of Defendant Metropoulos and the actions of Defendant The Greek Orthodox Community of Bangor towards Plaintiff occurred within the official scope of their respective duties.
195. Defendant The Greek Orthodox Community of Bangor, as the principal of Defendant Metropoulos, is responsible for all damages suffered by Plaintiff as a consequence of the actions of Defendant Metropoulos.
196. As the direct and proximate result of Defendant The Greek Orthodox Community of Bangor's actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.
- WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Community of Bangor in an amount to be determined at trial, together with interest and costs.

COUNT XXI

NEGLIGENCE-THE GREEK ORTHODOX COMMUNITY OF BANGOR

197. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-196 above as if set forth fully herein.

198. Defendant The Greek Orthodox Community of Bangor had a legal and/or equitable duty to investigate Defendant Metropoulos' character and relevant background information before inviting him to join the seminary.
199. Defendant The Greek Orthodox Community of Bangor breached its legal and/or equitable duty to investigate Defendant Metropoulos' character and relevant background information with due care.
200. As a result of this failure, Defendant The Greek Orthodox Community of Bangor failed to disclose to Plaintiff that Defendant Metropoulos presented a danger to him and placed Defendant Metropoulos in a position of trust.
201. As the direct and proximate result of Defendant The Greek Orthodox Community of Bangor's actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.
- WHEREFORE, Plaintiff demands judgment against Defendant The Greek Orthodox Community of Bangor in an amount to be determined at trial, together with interest and costs.

COUNT XXII

VICARIOUS LIABILITY-THE GREEK ORTHODOX COMMUNITY OF BANGOR

202. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-201, as if set forth fully herein.
203. A master/servant relationship existed between Defendant The Greek Orthodox Community of Bangor and Defendant Metropoulos.

204. The abuse that Plaintiff suffered at the hands of Defendant Metropoulos occurred while Defendant Metropoulos was acting within the scope of his employment as a priest in the Greek Orthodox Church.
205. Due to the existence of the agency relationship between The Greek Orthodox Community of Bangor and Defendant Metropoulos, Defendant Metropoulos was aided in injuring Plaintiff and would not have been able to injure Plaintiff but for the agency relationship.
206. The Greek Orthodox Community of Bangor is therefore vicariously liable to Plaintiff for the tortious acts committed upon him by Defendant's servant.

COUNT XXIII

FRAUDULENT CONCEALMENT-THE GREEK ORTHODOX COMMUNITY OF BANGOR

207. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-206, as if set forth fully herein.
208. Defendant The Greek Orthodox Community of Bangor possessed a legal or equitable duty to Plaintiff to disclose that Defendant Metropoulos presented a risk to him and other children.
209. Defendant The Greek Orthodox Community of Bangor failed to disclose material facts regarding Defendant Metropoulos' background and character with the intention of inducing Plaintiff and his family to act in reliance on the non-disclosure.
210. Plaintiff and his family in fact relied upon Defendant The Greek Orthodox Community of Bangor's non-disclosure to their detriment.

211. As the direct and proximate result of Defendant The Greek Orthodox Community of Bangor's actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

COUNT XXIV

NEGLIGENT SUPERVISION- HIS EMINENCE METROPOLITAN

METHODIOS

212. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-211 above as if set forth fully herein.
213. Defendant Metropolitan Methodios owed a duty to Plaintiff in his role in providing religious services, counseling, and religious education to Plaintiff.
214. Defendant Metropolitan Methodios owed a duty to Plaintiff to hire and supervise, competent, fit and otherwise qualified priests for the Diocese of Bangor and its parishes.
215. Metropolitan Methodios knew or should have known that Defendant Adam Metropoulos before, during and after the time he was assigned to be a priest in the State of Maine, was incompetent, unfit and otherwise unqualified to serve.
216. Defendant Metropolitan Methodios breached his duties to Plaintiff in a negligent and careless way.
217. Defendant Metropolitan Methodios failed to provide proper oversight of his priests and other employees, including Defendant Metropoulos.
218. Defendant Metropolitan Methodios failed to take proper action upon notice of inappropriate behavior by Defendant Metropoulos.

219. Defendant Metropolitan Methodios failed to show a proper respect and regard for the physical and mental health of Plaintiff.
220. As the direct and proximate result of Defendant Metropolitan Methodios' negligent supervision, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.
- WHEREFORE, Plaintiff demands judgment against Defendant Metropolitan Methodios in an amount to be determined at trial, together with interest and costs.

COUNT XXV

BREACH OF FIDUCIARY DUTY- HIS EMINENCE METROPOLITAN METHODIOS

221. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-220 above as if set forth fully herein.
222. Plaintiff had trust in Defendant Metropoulos as a priest of the Diocese of Bangor.
223. Plaintiff had trust in Defendant Metropolitan Methodios to employ appropriate persons as his priests.
224. Defendant, Metropolitan Methodios was the supervisor of Defendant Metropoulos and as fiduciary to Plaintiff, owed Plaintiff a duty of trust and loyalty.
225. Defendant Metropolitan Methodios breached his duty to Plaintiff.
226. Defendant Metropolitan Methodios abused his position of trust and confidence with Plaintiff to his own benefit and advantage.
227. As the direct and proximate result of Defendant Metropolitan Methodios' breach of fiduciary duty, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Metropolitan Methodios in an amount to be determined at trial, together with interest and costs.

COUNT XXVI

CANONICAL AGENCY- HIS EMINENCE METROPOLITAN METHODIOS

228. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-227 above as if set forth fully herein.
229. Under the doctrine of canonical agency, a priest's duties require his attention 24 hours per day, seven days per week.
230. Under the doctrine of canonical agency, there is no discernable line of distinction between priestly and personal functions.
231. Under canonical agency, the actions of Defendant Metropoulos and the actions of Defendant Metropolitan Methodios towards Plaintiff occurred within the official scope of their respective duties.
232. Defendant Metropolitan Methodios, as the principal of Defendant Metropoulos, is responsible for all damages suffered by Plaintiff as a consequence of the actions of Defendant Metropoulos.
233. As the direct and proximate result of Defendant Metropolitan Methodios' actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Metropolitan Methodios in an amount to be determined at trial, together with interest and costs.

COUNT XXVII

NEGLIGENCE- HIS EMINENCE DEFENDANT METROPOLITAN

METHODIOS

234. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-233 above as if set forth fully herein.
235. Defendant Metropolitan Methodios had a legal and/or equitable duty to investigate Defendant Metropoulos' character and relevant background information before inviting him to join the seminary and placing him in a position of trust.
236. Defendant Metropolitan Methodios breached his legal and/or equitable duty to investigate Defendant Metropoulos' character and relevant background information with due care.
237. As a result of this failure, Defendant Metropolitan Methodios failed to disclose to Plaintiff that Defendant Metropoulos presented a danger to him and caused Plaintiff's injuries.
238. As the direct and proximate result of Defendant Metropolitan Methodios' actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Metropolitan Methodios in an amount to be determined at trial, together with interest and costs.

COUNT XXVIII

VICARIOUS LIABILITY- HIS EMINENCE METROPOLITAN METHODIOS

239. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-238, as if set forth fully herein.

240. A master/servant relationship existed between Defendant Metropolitan Methodios and Defendant Metropoulos.
241. The abuse that Plaintiff suffered at the hands of Defendant Metropoulos occurred while Defendant Metropoulos was acting within the scope of his employment as a priest in the Greek Orthodox Church.
242. Due to the existence of the agency relationship between Metropolitan Methodios and Defendant Metropoulos, Defendant Metropoulos was aided in injuring Plaintiff and would not have been able to injure Plaintiff but for the agency relationship.
243. Defendant Metropolitan Methodios is therefore vicariously liable to Plaintiff for the tortious acts committed upon him by his servant.

COUNT XXIX

FRAUDULENT CONCEALMENT-HIS EMINENCE

METROPOLITAN METHODIOS

244. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-243, as if set forth fully herein.
245. Defendant His Eminence Metropolitan Methodios possessed a legal or equitable duty to Plaintiff to disclose that Defendant Metropoulos present presented a risk to him and other children.
246. Defendant His Eminence Metropolitan Methodios failed to disclose material facts regarding Defendant Metropoulos' background and character with the intention of inducing Plaintiff and his family to act in reliance on the non-disclosure.

247. Plaintiff and his family in fact relied upon Defendant His Eminence Metropolitan Methodios' non-disclosure to their detriment.
248. As the direct and proximate result of Defendant His Eminence Metropolitan Methodios' actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

COUNT XXX

NEGLIGENT SUPERVISION-THEODORE BARBAS

249. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-248 above as if set forth fully herein.
250. Defendant Barbas owed a duty to Plaintiff to hire and supervise, competent, fit and otherwise qualified priests for the Diocese of Bangor and its parishes.
251. Defendant Barbas knew or should have known that Defendant Adam Metropoulos before, during and after the time he was assigned to be a priest in the State of Maine, was incompetent, unfit and otherwise unqualified to serve Defendant The Greek Orthodox Archdiocese of America as a priest.
252. Defendant Barbas breached his duties to Plaintiff in a negligent and careless way.
253. Defendant Barbas failed to provide proper oversight of the priests and other employees, under his control and supervision, including Defendant Metropoulos.
254. Defendant Barbas failed to take proper action upon notice of inappropriate behavior by Defendant Metropoulos.
255. Defendant Barbas failed to show a proper respect and regard for the physical and mental health of Plaintiff.

256. As the direct and proximate result of Defendant Barbas' negligent supervision, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Barbas in an amount to be determined at trial, together with interest and costs.

COUNT XXXI

BREACH OF FIDUCIARY DUTY- THEODORE BARBAS

257. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-256 above as if set forth fully herein.

258. Plaintiff had trust in Defendant Metropoulos as a priest of the Diocese of Bangor.

259. Plaintiff had trust in Defendant Barbas to employ appropriate persons as priests.

260. Defendant, Barbas was the supervisor of Defendant Metropoulos and as fiduciary to Plaintiff, owed Plaintiff a duty of trust and loyalty.

261. Defendant Barbas breached his duty to Plaintiff.

262. Defendant Barbas abused his position of trust and confidence with Plaintiff to its own benefit and advantage.

263. As the direct and proximate result of Defendant Barbas' breach of fiduciary duty, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Barbas in an amount to be determined at trial, together with interest and costs.

COUNT XXXII

CANONICAL AGENCY- THEODORE BARBAS

264. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-263 above as if set forth fully herein.
265. Under the doctrine of canonical agency, a priest's duties require his attention 24 hours per day, seven days per week.
266. Under the doctrine of canonical agency, there is no discernable line of distinction between priestly and personal functions.
267. Under canonical agency, the actions of Defendant Metropoulos and the actions of Defendant Barbas towards Plaintiff occurred within the official scope of their respective duties.
268. Defendant Barbasas the principal of Defendant Metropoulos, is responsible for all damages suffered by Plaintiff as a consequence of the actions of Defendant Metropoulos.
269. As the direct and proximate result of Defendant Barbas' actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Barbas in an amount to be determined at trial, together with interest and costs.

COUNT XXXIII

NEGLIGENCE-THEODORE BARBAS

270. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-269 above as if set forth fully herein.

271. Defendant Barbas had a legal and/or equitable duty to Plaintiff to investigate Defendant Metropoulos' character and relevant background information before inviting him to join the seminary and placing him in a position of trust as a priest.
272. Defendant Barbas breached his legal and/or equitable duty to Plaintiff by failing to investigate Defendant Metropoulos' character and relevant background information with due care before "rushing" him through the seminary.
273. As a result, Defendant Barbas failed to disclose to Plaintiff that Defendant Metropoulos presented a danger to him and placed him in a position to harm Plaintiff and others.
274. As the direct and proximate cause of Defendant Barbas' negligence, Plaintiff sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendant Barbas in an amount to be determined at trial, together with interest and costs.

COUNT XXXIV

VICARIOUS LIABILITY-THEODORE BARBAS

275. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-274 as if set forth fully herein.
276. A master/servant relationship existed between Defendant Barbas of Boston and Defendant Metropoulos.
277. The abuse that Plaintiff suffered at the hands of Defendant Metropoulos occurred while Defendant Metropoulos was acting within the scope of his employment as a priest in the Greek Orthodox Church and under Barbas' control and authority.

278. Due to the existence of the agency relationship between Defendant Barbas and Defendant Metropoulos, Defendant Metropoulos was aided in injuring Plaintiff and would not have been able to injure Plaintiff but for the agency relationship.
279. Defendant Barbas is therefore vicariously liable to Plaintiff for the tortious acts committed upon him by Defendant's servant.

COUNT XXXV

FRAUDULENT CONCEALMENT-THEODORE BARBAS

280. Plaintiff repeats and realleges all of the allegations contained in paragraphs 1-279, as if set forth fully herein.
281. Defendant Barbas possessed a legal or equitable duty to Plaintiff to disclose that Defendant Metropoulos presented a risk to him and other children.
282. Defendant Barbas failed to disclose material facts regarding Defendant Metropoulos' background and character with the intention of inducing Plaintiff and his family to act in reliance on the non-disclosure.
283. Plaintiff and his family in fact relied upon Defendant Barbas' non-disclosure to their detriment.
284. As the direct and proximate result of Defendant Barbas' actions, Plaintiff has sustained severe and permanent physical injuries, emotional distress, mental anguish, and future and past medical expenses.

COUNT XXXVI

PUNITIVE DAMAGES

DEFENDANT ADAM METROPOULOS

DEFENDANT THE GREEK ORTHODOX ARCHDIOCESE OF AMERICA

DEFENDANT THE GREEK ORTHODOX METROPOLIS OF BOSTON

DEFENDANT THE GREEK ORTHODOX COMMUNITY OF BANGOR

DEFENDANT HIS EMINENCE METROPOLITAN METHODIOS

DEFENDANT THEODORE BARBAS

285. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-284 above as if set forth fully herein.
286. Defendant Metropoulos' conduct towards Plaintiff was flagrant, intentional, reckless and outrageous and was done with malice or in such a way that malice may be implied.
287. Upon information and belief that Defendants Greek Orthodox Church of America, Greek Orthodox Metropolis of Boston, His Eminence Metropolitan Methodios, and Theodore Barbas have engaged in a pattern of disregarding known risks of priests and placing them in the priesthood in positions of trust and authority.
288. Defendant The Greek Orthodox Archdiocese of America's conduct towards Plaintiff was flagrant, intentional, reckless and outrageous and was done with malice or in such a way that malice may be implied.
289. Defendant The Greek Orthodox Metropolis of Boston's conduct towards Plaintiff was flagrant, intentional, reckless and outrageous and was done with malice or in such a way that malice may be implied.
290. Defendant The Greek Orthodox Community of Bangor's conduct towards Plaintiff was flagrant, intentional, reckless and outrageous and was done with malice or in such a way that malice may be implied.

291. Metropolitan Methodios' conduct towards Plaintiff was flagrant, intentional, reckless and outrageous and was done with malice or in such a way that malice may be implied.

292. Defendant Barbas' conduct towards Plaintiff was flagrant, intentional, reckless and outrageous and was done with malice or in such a way that malice may be implied.

293. Plaintiff seeks punitive damages against all Defendants.

WHEREFORE, Plaintiff demands judgment against Defendant Adam Metropoulos, Defendant The Greek Orthodox Archdiocese of America, Defendant The Greek Orthodox Metropolis of Boston, Defendant The Greek Orthodox Community of Bangor, Defendant Metropolitan Methodios, and Defendant Barbas in an amount to be determined at trial, together with interest and costs.

Date: May 23, 2016

Verne E. Paradie, Jr.
Bar No. 8929
217 Main Street, Suite 400
Lewiston, Me 04240
207-344-9362
Counsel for Plaintiff

Date: May 23, 2016

Patrick R. Nickerson
Bar No. 5484
217 Main Street, Suite 400
Lewiston, Me 04240
207-344-9362
Co-Counsel for Plaintiff