

## DALTON TOMICH

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July 1, 2017

His Grace, the Right Reverend Irineu,  
Bishop of Dearborn Heights, Michigan  
Holy Ascension Orthodox Monastery  
15143 Sheridan Road  
Clinton, MI 49236

*Attorney Client Privilege  
Confidential*

Your Grace,

As your legal counsel, I want to take the opportunity to share with you my observation of the your forced removal from the Orthodox Church of America. It clearly was an injustice.

The hearing confirmed that Archbishop Nathaniel has been humiliated, frustrated and enraged with jealousy by your popularity within the Romanian community. It appears that he has been plotting your removal through the past decade. The facts confirmed that he pressured three former residents of the Monastery to accuse you of improper activity. None of the three have the requisite character to make the accusations under Canon Six of the Second Ecumenical Council, the First Council of Constantinople A.D. 381. The initial complainant was to be removed by the OCA for his improper sexual relationship with a daughter of a Priest. Another accuser, a former priest, divorced his wife, abandoned his family and impregnated his girlfriend. The third accuser molested a 13-year-old girl and is currently facing criminal charges for destroying Monastery property. His reward for making false accusations is a home by Nathaniel.

The hearing was clearly designed for you to fail. The accusers sat as judges and refused to recuse themselves as required by Church law. They Synod provided a limited amount of documents a week prior to the hearing and refused to allow cross-examination of the accusers, even though required by Church law. The investigating report excluded all exculpatory information provided by you. The Synod refused an independent Court Reporter to transcribe the hearing and demanded that all cell phones and recording devices be removed from Bishop. And despite having two "judges" prejudice the case, and two others sound asleep during the proceedings, we presented numerous witnesses (including two that attended from Romania just for the hearing) who attesting to your character and describing the character of three accusers as well as Nathaniel. Other witnesses were available to testify but could not due to time constraints of the one-day hearing.

The Synod clearly ignored the witnesses by you, refused to allow a fair hearing, violated

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numerous provisions of Church law and ignored canon law. There is no surprise that they voted to remove you.

I have had the extraordinary opportunity to serve you as your attorney through this ordeal with the OCA. It has been my honor to do so as your credibility is impeccable. The OCA removal process was clearly a sham designed solely to remove you so that Nathaniel can achieve his goal of having a diocese free of a Bishop more popular, honorable and holier than him. It was truly a miscarriage of justice to remove you from the OCA

Thank you for the opportunity to serve. I wish you the very best, and remain,

Very truly yours,

**DALTON & TOMICH PLC**

/s/ Daniel P. Dalton

DPD/omo