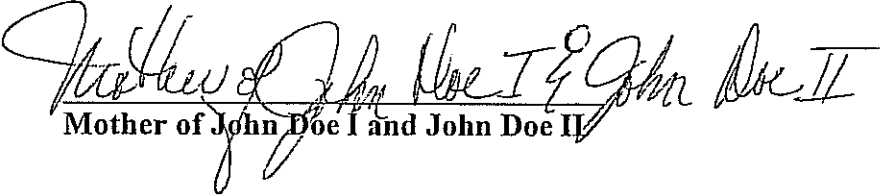


3. Since the lawsuit was filed, rumors have been rampant in the parish concerning the identities of all of the victims. There is still a large contingency of folks who profess to believe the victims have “made the whole thing up and are just after money.” Some people told they blame me for “bringing shame to the church.” I have been so ostracized and threatened by the parish community I loved and worked for that I can no longer attend worship there. The stress has been overwhelming.
4. For example, one prominent female parishioner told me that my son “needed to repent and admit that he only gave back and shoulder rubs to Katinas”. She said my son was “mixed up and needs to do soul searching”. She wants my son to be the perpetrator and her priest the victim.
5. On February 23, 2007 when the Chancellor of the Archdiocese came to the church to publically announce the reasons for Father Katinas’ removal, I attended the service. A very prominent male parishioner who was sitting behind me forcefully grabbed my arm and hissed, “Why are you destroying our church?” I nearly jumped out of my seat. I felt threatened and afraid. I thought he was going to hit me.
6. Some church patrons of Holy Trinity are also very wealthy and powerful. Some are even connected with what I consider disreputable and dangerous businesses, such as strip clubs where criminals frequent and where sex crimes have been committed. Attached hereto as *Exhibit 1* to this affidavit is a “D Magazine” article about one such club, Silver City whose family members are important parishioners at the Holy Trinity parish. I fear for our personal safety if our identities are forced to be in public documents. I fear we would fall victim to the same criminal element referenced in this disturbing document. I worry especially for my older son, John Doe II, who is mentally impaired. His child-like nature makes him very trusting. Would someone lure him into harm’s way? His priest did.
7. In February 2007, Metropolitan Isaiah addressed the congregation in person. His statement was published and passed among parishioners. A true and correct copy of this letter is attached to my affidavit as *Exhibit 2*. This letter was very upsetting to my sons and me, as it seems to place the blame on the victims, even equating them with Satan. Many parishioners who had accepted that Katinas had abused minors changed their minds after the statement by the Archdiocese and began shunning me even more.
8. Another threat came in March 2007 when I received an early phone call from a parish council member telling me that I should persuade my son to take the slated \$30,000 earmarked for Katinas’ going away gift and “go away” and leave Holy Trinity alone. If I did not accept, the caller said, the monies would be put into the pool of general monies and I would get nothing. He wants it to be “all about the money.” On Mother’s Day this year, I was cornered in the church hall by this same parish council member. He told me it would be a “good idea for me to accept \$125,000,” half of what he said their attorney was charging as the retainer, and leave Holy Trinity alone. I was “ruining Holy Trinity financially,” he said. He was so angry, he alarmed me. Now I am afraid he will “make me an offer I can’t refuse.”

9. I have also been retaliated against by being removed from some of my board positions with the church. I was tossed off of Philoptochos board because, as I was told, I "have a family member involved in a suit." I have been a member of that board for over fourteen years. I also have been very involved in the food festival for over twenty year. I was terminated from that job this year. Now I am afraid they might decide to "terminate" me.
10. I feel we are being blamed for telling the truth. I am asking the court not to force me or my boys to reveal their identities publically. I fear further retaliation and threats if this personal information becomes more widely known and pressure is put on certain powerful members "do something about us."

I declare under penalty of perjury that the foregoing is true and correct. Executed on this _____ day of August, 2007.


Mother of John Doe I and John Doe II



Issue Date: D Magazine JAN 2007, Posted On: 12/8/2006

The Ugly Truth

Paul Kix



Silver City Cabaret is the worst strip joint in Dallas. It's probably best-known as the last stop of the night for former Cowboy Dwayne Goodrich, before his BMW hit and killed two good

Samaritans trying to save a motorist from a burning car. But maybe it's best to start obliquely, away from the stark details that have earned the club its ugly reputation, generator of a thick file of police reports chronicling a violent, six-year tale of rapes, ripoffs, assaults, shootings, and murder. Maybe it's best to start with Dr. Michail Mantas.

Mantas—in some filings, "Michael"—lives with his wife Mary in Preston Hollow, on Deloache Avenue, in a home valued at \$3.6 million. A graduate of the medical school at Texas Tech, Mantas is a charitable man, known for his generosity to Crystal Charity, amfAR, and TACA. He also gives a great deal of money to the Holy Trinity Greek Orthodox Church.

But there is a darker side. In 1989, the Texas Medical Board reprimanded Mantas for writing prescriptions for "abnormally and excessively large amounts of barbiturates" for a patient while failing "to order medication to treat the patient's admission diagnosis of depression." Mantas, who has a thriving medical practice, was unable to write prescriptions for three years. In April 2004, Irving police arrested Mantas for sexually assaulting a woman. A Dallas County grand jury indicted him. But in December 2004, the woman dropped her charges. This summer, Allstate Insurance Company filed suit against Mantas' practice, saying he billed Allstate with fraudulent claims dating back to at least 2001. (*D Magazine* first wrote about the case in September 2006.) Allstate is suing for \$1.8 million. John Scott, Mantas' lawyer, says, "Dr. Mantas strongly denies all the allegations."

Scott also says Mantas is not tied in any way to Silver City. On paper, he isn't. But his family is. The strip club is owned by Green Star Incorporated, whose registered agent and president is Thanasi Mantas, Michail's 25-year-old son. According to numerous sources, Thanasi has owned Silver City since it opened in November 2000, six months after he graduated from St. Mark's. (Thanasi referred all questions to his lawyer, who did not answer questions. Michail, through his lawyer, did not respond to *D*'s interview requests.) As recently as 2002, Thanasi lived with his parents on Deloache. Today, however, he owns a place in University Park, on McFarlin Boulevard, valued at \$580,000. Presumably, he can afford it. According to Texas Alcohol and Beverage Commission records, Silver City sells more liquor than almost every other strip club in Texas. Its August 2006 receipts put it at No. 8 in the state.

Ceno Limited, the company that owns the land on which Silver City sits, on 7501 N. Stemmons Fwy., lists as its registered agent Alexi Mantas, Michail's 26-year-old son. Its registered office is the family's home on Deloache. Alexi, also a St. Mark's graduate and a fourth-year medical student at UT Southwestern, owns a condo on Routh Street. According to Corey Robinson, who worked at Silver City for six years, Alexi has wanted nothing to do with the club from the start. (Alexi could not be



GETTING TO THE POINT: Corey Robinson worked at Silver City when he was attacked by another employee outside the VIP room on September 15, 2005

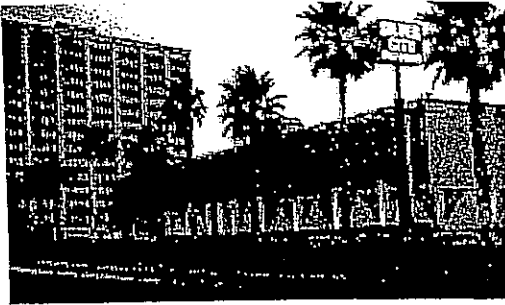
EXHIBIT

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reached for comment.)

Robinson, who was the first employee at Silver City and describes his relationship with the Mantas family as "excellent," also says Michail was "involved in the day-to-day operations. He made most of the decisions." Robinson says he left the club in June 2005 because it was "micromanaged" by Michail and "mismanaged" by Thanasi.

The biggest problem was that Silver City kept bringing back employees it had fired—most notably, Thomas Charalambopoulos, aka Tommy C. An imposing man, 6 feet tall and 250 pounds, Tommy C is a friend of the Mantases. They call him "cousin," Robinson says. He was fired in 2003 after he allegedly raped a dancer but was rehired in September 2005—only to oust Robinson days later



IN DA CLUB: The Mantas family operates Silver City in a building off Stemmons Freeway

Despite the club's sordid reputation, most of what goes on there has never made the news. To know the extent of its activity, you have to see the police reports. Dave Neumann, chairman of the Stemmons Corridor Business Association, says they "are appalling" and has petitioned the city to take away Silver City's sexually oriented business license. So far, to no avail. We thought it might be useful for more people to see what Neumann has seen. Since Silver City opened six years ago, Dallas police have filed well over 100 incident reports. Here are excerpts from some of the most heinous, in ascending order of brutality.

WARNING: these reports contain graphic descriptions of violent sexual assaults.

Date: 2/12/2003

Incident: Aggravated Assault

COMP [Complainant]: Srinivasan, L.

SUSP [Suspect]: W/M · **WEIGHT:** 180 · **HEIGHT:** 5'6"

Narrative: At approximately 2:40 am, RO [Responding Officer] responded to a call for the police at the Silver City bar, regarding an injured person. RO met comp who stated that he had paid over \$2,000 bar tab and had walked out the front door of the location. Comp stated that one of the valet people told him that his friend was waiting on the south side of the building. The location was outside the vision of anyone entering or exiting the tavern or the valet people. Comp stated that above listed suspect met him and said, "You stole some money from my girls. I want you to pay them back." Comp stated that before he could say a word the susp took what looked like a blue steel revolver and the suspect began striking comp on the head and the left side of his face with the pistol. After knocking comp to the ground the susp left in an unknown direction according to comp. Comp walked back inside the location and called 911. RO interviewed several people at the location and no one admitted to seeing anything. ... Comp felt that the valet attendant was involved in the incident.

Date: 2/21/2001

Incident: AGG [Aggravated] assault; SUSP assaulted COMP by hitting with hands and burning COMP

COMP: Grizzaffi, Victor

SUSP: Lankford, Mark

Narrative: Comp stated he was working in the kitchen, when the Susp asked him to leave. The comp departed and returned to the kitchen area. The comp and the susp became engaged in a verbal dispute. The comp stated he placed out his hands to shake the susp hands when the susp grabbed him and shoved him over the metal tables in the kitchen. The comp was then held down and struck open handed about the face area. The susp then placed the comp's hand against a hot stove burning it. ... The comp refused any medical attention, saying he would seek it out on his own.

Supplemental Narrative: 2/22/2001. The witness Porfirio was contacted. The witness said that he and the comp are cooks for the business. The witness said the comp was arguing with everyone and

complaining about the job. ... The comp and chef, the suspect, became involved in an argument. The suspect told the comp to go home several times. The comp agreed to leave but came back into the kitchen several times to argue with the suspect. The witness said the suspect told the comp that he was fired on the third time that he came into the kitchen. The witness said the comp lunged toward the suspect to hit him. The witness said the suspect began pushing the comp into the work station tables. The witness and other employees broke up the disturbance. The manager of the business gave the comp a criminal trespass warning.

Date: 5/9/2005

Incident: Sexual Assault

COMP: [BLACKED OUT]

SUSP: W/M/30 · WEIGHT: 214 · HEIGHT: 6'3" · HAIR COLOR: Brown

Narrative: Comp stated she was working at listed loc [Location] when susp entered for a birthday party. Comp stated susp began by attempting to put his hand up her skirt. comp stated she felt uncomfortable and would pull away. Comp stated the area susp was sitting in was her area to work so she had to return to susp's table which was located in a private room. Comp stated the last time she returned to the room susp grabbed hold of her and put his hand up into her shorts and placed his fingers into her vagina. Comp stated she told susp to stop. Comp stated she was threatened by susp that if she said anything he would tell members of management and have her fired. Comp stated she attempted to run from the room but susp pulled her back. Comp stated susp pushed aside the table and that is when she observed he was not wearing any pants. Comp stated susp forced comp on top of him pushing aside her shorts and placing his penis into her vagina. Comp stated she continued to struggle to get away from susp. Comp stated she did not know if susp ejaculated or was wearing a condom. Comp was transported to hospital for medical treatment.

Supplemental Narrative: Comp on 5/12/05 originally stated that she did not wish to pursue, but later called back and scheduled appointment for 5/16/05 at 10:30 am. Failed to show or call. 5/19/05 left voice mail for comp. No further contact.

Date: 6/12/2006

Incident: Sexual Assault

COMP: [BLACKED OUT]

SUSP: Mendoza, Rhory

Narrative: Comp stated she went to the location attempting to get a job. Comp stated the listed susp took her to a private room and wanted to help her learn to dance as a stripper. Comp stated she had a t-back on and as she danced the comp would grab it and slide it over. Comp would then move it back. Susp stated he wanted the Comp to rub him with her crotch area. Comp was unsure if this was okay but she went ahead and began to perform this and stated she mostly rubbed her crotch against his legs but the susp would grab her and pull her back against his penis area. Susp then pulled his penis out and put on a condom. Comp stated she would not dance anymore unless he put his penis back inside his pants. This occurred several times. Comp later moved onto the couch and stated the suSp got on his knees and then penetrated her vagina with his penis. Comp told him no and then the susp again penetrated her vagina with his penis. At this time the comp got up and left the VIP area which the susp had taken her to.

Supplemental Narrative: The comp has not made any attempt to contact [officer] for follow-up investigation. The address listed for her does not exist.

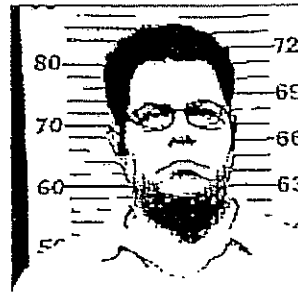
Date: 3/1/2003

Incident: Sexual Assault

COMP: [BLACKED OUT]

SUSP: Charalambopoulos, Thomas

Narrative: Please route a copy of report to vice*****. Comp advised reporting officers that on 3/1/03 between the hours of 16:30 and 17:00, the known SUSP intentionally and forcefully penetrated her vagina with his penis without her consent. Comp informed reporting officers that she was informing the SUSP that she was quitting her job at offense location. At that time the SUSP asked COMP not to quit. SUSP then began trying to persuade the Comp not to quit by showing her the new VIP area and rooms at location. Once in the back the SUSP grabbed the Comp by her arm and forced her to the ground, with her face downward. SUSP then moved her g-string to the side and penetrated her anus with his penis as he held her head down. Comp attempted to scream but SUSP placed his hand over her mouth as the assault occurred. After a few moments SUSP stood Comp up and bent her over a chair, with her face downward, and penetrated her vagina, without Comp consent. After a few minutes, Comp advised reporting officers that the SUSP forced her to perform oral sex as she sat in the chair, at that point the SUSP ejaculated into her mouth. SUSP left area after assault occurred. Comp notified police while she was still at offense location. ... Comp informed reporting officers that she and the SUSP have never had a relationship, but stated that the SUSP receives oral sex from other employees, in fear of losing their jobs at location.



BUSTED: Tommy C, a family friend of the Mantases, allegedly gutted Corey Robinson.

Supplemental Narrative: I spoke with the Comp and arranged an appointment to prosecute the investigation. She said that she would call me back after consulting her attorney. She never called back.

Date: 3/11/2006

Incident: Murder; UNK [Unknown] Susp Assaulted Comp, Comp died as a result of his injuries

COMP: Brown, George

SUSP: Unknown

Narrative: Dallas Police Patrol Officer Arispe responded to the call at 7501 N. Stemmons. Comp was found bleeding from multiple wounds. Comp was transported to PMH [Parkland] where he was pronounced dead from his injuries.

Supplemental Narrative: Weapon type: pocket knife. On March 26, 2006, SUSP Gonzales, Steve was arrested on the warrant for murder in this offense. Gonzales admitted to committing this offense of murder.

Date: 9/15/2005

Incident: AGG Assault

COMP: Robinson, Corey

SUSP: Charalambopoulos, Thomas

Narrative: Thursday, September 15, 2005, at about 2:48 am Comp Corey Robinson and SUSP Thomas (Tommy) Charalambopoulos both walked into the private VIP room inside the Silver City Topless Club at 7501 N. Stemmons Fwy. in the city of Dallas, Dallas County, Texas. While inside the VIP room, SUSP Charalambopoulos cut the Comp from his left shoulder to his abdomen with an unknown sharp object believed to be a knife. The SUSP also cut the Comp on the left wrist severing four tendons and several nerves. Wit Whalen overheard the SUSP say, "I gotta take care of something" before she observed the comp and susp walk into the VIP room together. The club was closed and there were no customers in the VIP room. ... Wit Whalen observed the susp immediately exit the club through a fire door after he left the VIP room. ... Witness Proctor became aware that there was a disturbance in the VIP room and tried to open the door but the comp's body was blocking it. When witness Proctor finally got the door open, he observed the comp on the floor bleeding heavily. The comp told witness Proctor "Tommy did it" before he was loaded in the ambulance. Witness Mantas who is the manager of the club received a phone call from the susp in which the susp told witness Mantas that he had stabbed the COMP. ... Witness Mantas did observe the susp opening

boxes earlier in the day with a black handled pocket knife. ... The cut to the comp's chest and abdomen was massive and allowed the comp's intestines to spill out his abdomen onto the floor. The comp's intestines were also lacerated. Det [Detective] has not been able to establish why the comp was assaulted and self defense does not appear to be a motive. ... The comp stated to Det Weissenborn that the SUSP has "pulled" a knife on him at least three previous occasions.

Epilogue

Robinson currently works in a bar. Charalambopoulos disappeared for a month after the incident but was eventually arrested on October 18. His trial is scheduled to begin in February.



GREEK ORTHODOX METROPOLIS OF DENVER

February 22, 2007

Reverend Christopher Constantinides, Proistamenos
The Esteemed Parish Council
The Faithful Members of
The Holy Trinity Greek Orthodox Church
13555 Hillcrest Road
Dallas, Texas 75240

EXHIBIT

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Beloved in the Lord,

Having been informed of devastating news regarding your beloved priest, Father Nicholas Katinas, I am expressing my deepest sadness to all of you.

I had been informed last summer of rumors regarding his assignment in a Chicago parish thirty or more years ago, but I have waited for more clarification before communicating with you. Due to a recent eye operation, I am not allowed to travel to be with you. But I feel very strongly that it is most important to share my thoughts and feelings with you with this letter.

I have known Father Katinas since 1954 when I entered our Holy Cross Seminary. Never in the past fifty-three years have I ever heard anything detrimental against his character or behavior. On the contrary, he has proven himself to be one of our finest priests, who has helped many people and who has served the Lord most faithfully. Holy Trinity parish stands as a visible reminder of his hard work and dedication to the Lord and his faithful service to thousands of our people.

It is truly ironic that, during this first week of Great Lent, we are faced with troubling situations which happened long ago and which are happening today. It never fails that, when Great Lent arrives, I am faced with very serious situations in several of our parishes. I am certain that this holds true in every one of our metropolises. Obviously, Satan never sleeps. And, to compound the problems, it is our own people who believe themselves to have a mandate from God; indeed, they take pride in sharing bad news with as many as they can.

We know that the Church is God's spiritual hospital where believers come to be healed. All of us are sinners before God, and all of us come to the Church because we know that God is compassionate and merciful and forgiving. Yet, many of those who consider themselves good Christians have no concept of compassion, mercy, and forgiveness. How fortunate we are, how blessed we are, to have a God Who is all-merciful and all-forgiving.

This is what Great Lent is all about: the holiness of God and the sinfulness of Man.

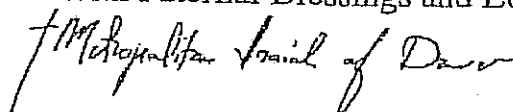
Beloved members of the Church, we are in the most sacred time of the

ecclesiastical year wherein we look within ourselves to recognize and admit our sinfulness before God. Actually, the Church gives to us seventy days of introspection, from the beginning of the Triodion to Resurrection Sunday. God knows that we need time to come to ourselves, as the Prodigal came to himself and returned to the Father.

The Church has undergone untold numbers of crises and scandals throughout Her two thousand year existence, but She continues on, as our Lord promised. She continues on for our sake, for our place of shelter and solace, and for our salvation.

Let us, then, forgive the errors and the sins of others, whoever they may be. We should forgive; we must forgive, for God may have already forgiven them; and we may find only ourselves holding back, like the son who did not welcome his Prodigal brother back to the Father.

With Paternal Blessings and Love,

A handwritten signature in cursive script that reads "Metropolitan Isaiah of Denver". The signature is written in dark ink and is positioned below the printed text "With Paternal Blessings and Love,".

✠ Metropolitan Isaiah of Denver

ORIGINAL

CAUSE NO. F05-73581-M

1 THE STATE OF TEXAS * IN THE DISTRICT COURT
 2 vs. * 194TH JUDICIAL DISTRICT
 3 THOMAS G. CHARALAMBOPOULOS * DALLAS COUNTY, TEXAS
 4

5
6
7
8
9 REPORTER'S RECORD

10 EXCERPT TESTIMONY OF

11 BASIL P. XEROS and CHRISTOPHER CONSTANTINIDES

12 JURY TRIAL

13 Volume 1 of 1 Volume(s)
14
15
16

17
18
19 BE IT REMEMBERED THAT on this the 7th day of May,
 20 A.D., 2007, the above-styled and -numbered cause(s) came on
 21 for hearing before the HONORABLE ERNEST B. WHITE, III, of the
 22 194th Judicial District Court of Dallas County, State of
 23 Texas, the following is a true and correct transcription of
 24 the proceedings had, to-wit:

25 (Proceedings Reported by Computerized Machine Shorthand)

Belinda G. Baraka, Official Court Reporter
214-653-5803

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A P P E A R A N C E S

HON. BRANDON MCCARTHY
Assistant District Attorney
State Bar No. 24027486

HON. ROBERT ROGERS
Assistant District Attorney
State Bar No. 00797342

FOR THE STATE OF TEXAS

HON. MARTIN LENOIR
Attorney at Law
State Bar No. 12204300

HON. PHILLIP HAYES
Attorney at Law
State Bar No. 24012803

FOR THE DEFENDANT

* * * * *

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P R O C E E D I N G S

(May 7, 2007)

(Prior proceedings omitted per request.)

BASIL P. XEROS

was called as a witness, and having been duly sworn by the Court, testified under oath as follows:

DIRECT EXAMINATION

BY MR. LENOIR:

Q. Sir, would you state your name, please.

A. Basil P. Xerox, B-a-s-i-l, P., X-e-r-o-s.

Q. You say Xeros. I state it correctly, Xeros.

A. You did, that's fine.

Q. I will try not to butcher it?

A. That's quite all right.

Q. Mr. Xeros, how old are you?

A. Seventy-seven.

Q. Do you work?

A. I am employed.

Q. Where are you employed?

A. Holy Trinity Greek Orthodox Church.

Q. And what do you do?

A. Primarily two functions, first one, most and foremost, I assist the clergy in all services and all matters pertaining to ecclesiastical things such as services being prepared and assisting in public factors. Secondly, I am also

Belinda G. Baraka, Official Court Reporter
214-653-5803

1 in charge of the catechetical school, commonly referred to as
2 the Sunday School. I have been doing it 50-plus years.

3 Q. Are you sometimes referred to as a Canter?

4 A. Occasionally.

5 Q. Is that accurate?

6 A. That's close enough.

7 Q. If I call you a Canter?

8 A. That will be fine.

9 Q. Mr. Xeros, let me ask you, do you know Tommy
10 Charalambopoulos?

11 A. Yes, I do.

12 Q. Do you see him here in courtroom?

13 A. I do, gentleman on the right.

14 Q. And would you tell the members of the jury how long
15 you have known Tommy Charalambopoulos?

16 A. Since infancy.

17 Q. And would you tell the members of the jury, how you
18 have known Tommy Charalambopoulos?

19 A. I know Tommy through the parish life. I don't know
20 about his deeply personal or business life in that matter,
21 only in the parish life that I have seen him all these years.

22 Q. Okay. So you are not prepared to tell the members of
23 the jury about what he does when he is not church, right?

24 A. Correct.

25 Q. You are only here based on what you know about him

1 personally; is that correct?

2 A. Yes.

3 Q. Would you tell the members of the jury about Tommy's
4 involvement with the Greek Orthodox Church?

5 A. As a parishioner, if you will, since a very young
6 man, he has been a student in our catechetical school. And
7 that's where I probably -- I would say that I have very close
8 observation in one respect. He has served a period of time on
9 our parish counsel, which is the governing lay body of the
10 church. And he has also been a participant in young adult,
11 this is after graduation of college, this is singles gathering
12 together one of the ministries of the church.

13 As knowing him primarily largely in the catechetical
14 school, there has been nothing that would be adverse as far as
15 knowing him personally through these year. In this respect,
16 if we have a student that may be giving us a problem, negative
17 behavior, something, we have a progressive discipline
18 situation that we have as a precedent. The student is dealt
19 with, the teacher directly first and foremost. If the
20 behavior isn't corrected, then the teacher, by the way the
21 teacher will inform me that she tried to correct the behavior.
22 If the behavior doesn't correct itself, whatever the
23 behavioral may be, the teacher will engage me and we will
24 discuss it with the student again. And the third time we will
25 bring in the parent to assist us in correcting that.

1 Tommy, personally was never in a situation like that. He
2 was never a matter where he had to be corrected for any reason
3 whatsoever. And his participation attendance in the
4 catechetical school for those years was definitely positive.

5 Q. Mr. Xeros, you said that Tommy was on the church
6 board?

7 A. Uh-huh.

8 Q. Would you tell the members of the jury what all that
9 involves being on the church board?

10 A. They are the lay governing body in which they deal
11 with the financials of the church and all matters dealing with
12 maintenance, and any other problems extraneous, or somewhat
13 extraneous that come up that may be a part of the
14 responsibility of this counsel to make decisions, render such
15 a decision. They are the -- they are the governing body --
16 outside of the clerical, they don't deal with the clerical
17 aspect, strictly the business end of the church probably is
18 putting it simply.

19 Q. Did Tommy serve on the board?

20 A. Yes, he did.

21 Q. Do you recall when Tommy served on the board of the
22 church?

23 A. Not exactly, huh-uh.

24 Q. Now, are you still -- you are still affiliated with
25 the church; is that correct?

1 A. Yes, sir.

2 Q. Do you still see Tommy at church?

3 A. Yes, I do, uh-huh.

4 Q. Based on your knowledge of Tommy and based on what
5 you have seen of him, do you believe that he is a religious
6 man?

7 A. I do, very much so.

8 Q. Mr. Xeros, when I talked to you, I told you that a
9 jury had found Tommy guilty of aggravated assault, did I
10 inform you of that?

11 A. Yes, I did.

12 Q. And you agreed to come down here as a witness on his
13 behalf; is that correct?

14 A. Yes, uh-huh.

15 Q. All right. You are not a courthouse insider or
16 anything like that, are you?

17 A. No, sir.

18 Q. Do you know what probation is?

19 A. Yes, sir.

20 Q. You know that's where an individual is served a
21 sentence outside the penitentiary under rigid conditions that
22 they have to comply with?

23 A. Yes, sir.

24 Q. If this jury were to see fit to place Tommy on
25 probation in this case, would you continue to support him,

1 encourage him and do everything that you could within your
2 power to see to it that he lives up to those conditions of
3 probation?

4 A. Absolutely.

5 Q. Is he still welcome at your church?

6 A. Yes.

7 Q. Are you asking this jury to place him on probation?

8 A. I would ask them to do that.

9 MR. LENOIR: I pass this witness Your Honor.

10 CROSS-EXAMINATION

11 BY MR. MCCARTHY:

12 Q. You go by Father? What is the correct title?

13 A. Just Basil.

14 Q. I'm sorry?

15 A. Just Basil, no particular title.

16 Q. Oh, okay. And Xeros?

17 A. Yes.

18 Q. Obviously, you just said you don't know anything
19 about how he is outside of church, you just know how he is in
20 church?

21 A. Correct.

22 Q. And you had a progressive, I think, disciplinary
23 system?

24 A. Correct, uh-huh.

25 Q. And as Mr. Lenoir said, you understand that this jury

1 has found him guilty of aggravated assault with a deadly
2 weapon?

3 A. Yes, uh-huh.

4 Q. And in your progressive disciplinary system, would
5 you agree with me that a person, I guess, willing to change or
6 going to change the first thing they have to do is accept
7 responsibility for their actions?

8 A. I'm sorry, would you restate the question.

9 Q. Will you agree that before someone can be
10 rehabilitated they need to accept responsibility for their
11 actions?

12 A. I can understand that.

13 Q. That's really the first step, if they are not really
14 willing to do that, then after that doesn't matter, that first
15 step is not there?

16 A. Uh-huh.

17 MCCARTHY: Nothing further, Judge.

18 THE COURT: Mr. Lenoir.

19 MR. LENOIR: Thank you Mr. Xeros, appreciate you
20 coming down.

21 THE COURT: You may step down, sir.

22 (Prior proceedings omitted per request.)

23 CHRISTOPHER CONSTANTINIDES

24 was called as a witness, and having been duly sworn by the
25 Court, testified under oath as follows:

DIRECT EXAMINATION

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BY MR. LENOIR:

Q. Sir, would you state your name, please.

A. Father Christopher Constantinides.

Q. Spell that.

A. C-o-n-s-t-a-n-t-i-n-i-d-e-s.

Q. And you are a member of the clergy; is that correct?

A. Yes, sir.

Q. Father Chris, are you a priest?

A. Yes, sir.

Q. Will you tell the members of the jury where you are a priest at?

A. I am the presiding priest at Holy Trinity Greek Orthodox Church in Dallas, Texas.

Q. And how long have you been the presiding priest for that church?

A. Since August 1st, 2006.

Q. August 1st, 2006?

A. Yes, sir.

Q. Do you know Tommy Charalambopoulos?

A. Yes, I do.

Q. Do you see him here in the courtroom?

A. Yes, I do.

Q. Would you point him out.

A. (Witness complies.)

1 Q. How do you know Tommy Charalambopoulos?

2 A. I used to be the assistant priest when the church was
3 down on 4005 Swiss Avenue in Dallas, Texas, and I was here
4 from 1979 to 1983; and that the time I had the opportunity to
5 meet and get to know Tommy and the family.

6 Q. All right. So how long have you known Tommy all
7 together?

8 A. Well, from 1979 when I first got here, which would be
9 somewhat almost 27, 28 years.

10 Q. So you know him through the church?

11 A. Yes, sir.

12 Q. Has Tommy been active in the church?

13 A. Yes, sir.

14 Q. Will you tell the members of the jury what he was
15 involved in?

16 A. Well, at the time when I was first here, he was
17 involved in the Sunday School program and involved in the
18 church with his family.

19 Q. Have you -- for example, has Tommy ever served on the
20 board of directors of the church?

21 A. That I don't know that, because I was absent between
22 1983 and 2006.

23 Q. So what time period were you not there?

24 A. From 1983 I left and I returned in 2006.

25 Q. And who were the priests in the interim there?

1 A. Father -- well, Father Nicholas Cantines (phonetic),
2 Father John Thompson, Father Jordan Brown, Father George
3 Naifas (phonetic); Father Pavlakos.

4 Q. You need to spell that one?

5 A. P-a-v-l-a-k-o-s. Those are just some of them, I
6 don't recall all of them off the top of my head.

7 Q. Since you returned here in Dallas, are you familiar
8 with Tommy's participation in the church?

9 A. Yes, I am.

10 Q. And would you describe for the jury.

11 A. He has always been a participant from the very
12 beginning when I was here, even through the years when I left,
13 and I have a number of friends here and we have always been in
14 contact with one another, Tommy and his family have always
15 been participants within the church in all different aspects,
16 whether it was helping out with the different activities of
17 the church, they have always been there for the church and
18 part of the church.

19 Q. Okay. Father Chris, you understand and I have
20 explained to you that this jury found Tommy guilty of the
21 offense of aggravated assault; you understand that?

22 A. Yes, sir.

23 Q. And you agreed to come down here and testify as a
24 witness in this case?

25 A. Yes, sir.

1 Q. Do you understand that this jury is going to be
2 called upon to decide what the appropriate sentence for Tommy
3 is in this case?

4 A. Yes, sir.

5 Q. Now, first off, do you understand what probation is?

6 A. Yes, I do.

7 Q. What is your understanding of it?

8 A. My understanding of probation is that they are put in
9 charge -- they are given to work with somebody to watch over
10 them in order to serve out a sentence for what they had done.
11 And they work underneath the guidance of somebody or some
12 person or myself or church or things of that nature. That's
13 how I understand that.

14 Q. So you understand that a person on probation have to
15 live in accordance with certain guidelines set down by the
16 Judge or probation officer?

17 A. Yes, sir.

18 Q. Are you telling the members of the jury if they see
19 fit to place Tommy on probation in this case, you will do
20 everything within your power to support him, to encourage him,
21 and help him comply with any conditions of probation?

22 A. Absolutely.

23 Q. Would he be welcome in your church?

24 A. Absolutely.

25 Q. Father Chris, are you asking the members of the jury

1 to place Tommy on probation in this case?

2 A. Yes, we are. I would like to encourage them and ask
3 them to show their mercy and God's mercy and orders that Tommy
4 can receive probation, so that we can work with him and to
5 help him in any possible way that we can.

6 MR. LENOIR: That's all the questions that I
7 have, thank you.

8 THE COURT: Mr. McCarthy?

9 MCCARTHY: Nothing from the State, Judge.

10 THE COURT: You may step down, sir.

11 THE WITNESS: Thank you.

12 (End of requested proceedings.)

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1 THE STATE of TEXAS)

2 COUNTY of DALLAS)

3 I, BELINDA G. BARAKA, Official Court Reporter in and
 4 for the 194th Judicial District Court of Dallas County, State
 5 of Texas, do hereby certify that the foregoing contains a true
 6 and accurate transcription of all portions of evidence and
 7 other proceedings requested in writing by counsel for the
 8 parties, to be included in this volume of the Reporter's
 9 Record, in the above-styled and -numbered cause(s), all of
 10 which occurred in open court or in chambers and were reported
 11 by me.

12 I further certify that this Reporter's Record of the
 13 proceedings truly and correctly reflects the exhibits, if any,
 14 admitted by the respective parties.

15 I further certify that the total cost for the
 16 preparation of this Reporter's Record is \$ and was
 17 paid by the State/Defense.

18 WITNESS MY OFFICIAL HAND this the 23rd day of
 19 July, A.D., 2007.

20

21

22

Belinda G. Baraka
 BELINDA G. BARAKA, CSR #5028
 Official Court Reporter
 133 N. Industrial
 Dallas County, Texas 75207

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Certification Expires: 12-31-07

Belinda G. Baraka, Official Court Reporter
 214-653-5803

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DISCLOSURE

NOTE: Supreme Court Rule Adopted and Promulgated in Conformity with Chapter 52 of the Government Code, V.T.C.A.

Please be advised that pursuant to Supreme Court Rule IV, B.4 with regards to disclosure, I to the best of my knowledge, have no existing or past financial, business, professional, family, or social relationships with any of the parties of their attorneys which might reasonably create an appearance of partiality, except as follows: NONE.

Belinda G. Baraka
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