



CAUSE NO.0703807D

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

Plaintiffs,

vs.

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

Defendants.

IN THE DISTRICT COURT

95th JUDICIAL DISTRICT

DALLAS, COUNTY TEXAS

UNSWORN DECLARATION OF "DZ" UNDER PENALTY OF PERJURY

1. I am the person known as "DZ" in Plaintiffs' Third Amended Petition. I am over the age of twenty-one (21) years. I have never been convicted of a felony and I am competent to testify to the truth of the matters stated herein. I have personal knowledge of the matters stated herein and know such matters to be true and correct."
2. I was sexually abused by Father Nicholas Katinas when I was a minor. My family members were parishioners at Assumption Greek Orthodox Church, in Olympia Fields, Illinois. Katinas was my pastor. I am not a party to this lawsuit. I have never met any of the Plaintiffs who are.
3. I finally settled my sexual abuse claims with the Greek Orthodox Archdiocese in January 2007. I am submitting this unsworn declaration to the court to shed light on the issue of why it is often psychologically impossible for sexual abuse survivors, such as me, to

reveal their identities to the public, and to emphasize the damage that results if someone else does.

4. It took me almost thirty years to realize that I had been sexually abused as a child and to connect in my mind the abuse I suffered as a victim with my dysfunctional life. Then, even after I made the momentous decision to come forward, I did not want to do so publically because of the shame I felt, a debilitating emotion that continues to this day. The powerlessness one feels as a child victim never really goes away.
5. I was not ready then and am not ready now to reveal my identity to the public. However, I have revealed my name, current address and telephone number to the attorneys in this case though Plaintiffs' counsel, Tahira Khan Merritt, in order to assist the jury who will hear this case with whatever testimony the court may find relevant. I will give a deposition under oath and I will appear at the trial, if necessary. In good conscience, I feel bound to do so.
6. I am not ready to deal with the emotions that may be triggered if my name is prematurely forced from me into the public realm. Just thinking about it releases a flood of emotion and stress, including feelings of betrayal, shame, embarrassment, fear of judgment by others, blame and ostracism --- in other words, the same stigma I felt by being sexually abused by Katinas.
7. I have already suffered the trauma of the abuse itself when I was young and vulnerable. I believe I should now have the right to control when, where and how my identity might be revealed to others, including the public, in the context of clergy sexual abuse.
8. I am angry that the Defendants and Defendants' lawyers are demanding that the identities of Katinas' victims be made public. I believe they intend to revictimize me, to punish me for having, at last, come forward and to intimidate other victims so they will not. Their demand is humiliating and insensitive.
9. I beg the court to understand how very difficult it is for victims to come forward at all and identify the perpetrator, much less publicly reveal their full family name BEFORE they are ready to do so.
10. Victims fear retribution. I certainly do. In my case, there are some church members who attend Assumption Greek Orthodox Church in Olympia Fields, Illinois, who still do not wish to believe Katinas is guilty of sexual crimes even though the Greek Orthodox Archdiocese of America has recommended that he be defrocked for sexual misconduct against minor males. To concede that he is a perpetrator is to acknowledge that I am a victim so I fear that my name being revealed publically will, at least, emotionally harm my mother and sister, who still attend that church. My fear is that these disbelieving church members will spread false rumors and ostracize my family when they attend liturgy and other communal church functions.

11. For example, just this past week I heard rumors from the parish that I had received one million dollars (\$1,000,000.00) from the church in my settlement and that my coming forward was just about their money and my greed; not my injury, or the justice of holding Katinas accountable for his despicable actions. This lie further injures me and my family. My case was never about money, although theirs may be. I asked to be reimbursed for past counseling and for future counseling. I also asked that the Dallas parish be informed of Katinas' sexual misconduct with the expectation that he would be removed as pastor so other boys would be safe and their families undisturbed. Mean-spirited gossip makes me feel like a powerless victim all over again. If my name is made public, I have reason to fear retribution towards myself, my mom and my sister for "hurting the church". Protect the pedophile; attack his victim; avoid scandal and restitution; that is what I see in this unnecessary, aggressive tactic by the Defendants and their lawyers.
12. I am asking the court to show compassion and sensitivity to victims of sexual abuse by protecting their identities from the public – regardless of the perpetrator and victims. Even most journalists follow this code of ethics. Because our society recognizes child sexual abuse as particularly heinous, it affords victims protection from retribution and further humiliation.
13. I believe it is hypocritical for the Defendants to state they publicly care about the victims, body and soul, but then demand that the victims reveal their identity before they are psychologically able. In my opinion, Defendants have tried to silence victims, then failing that, determinedly worked to expose them. It is also my opinion that the Defendants are acting out of vengeance and vindictiveness, which is contrary to the precepts of that Orthodox Christianity they preached to me as a child, and to my too-trusting family.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2nd day of August, 2007.



The person known as "DZ"