



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

95<sup>th</sup> JUDICIAL DISTRICT

DALLAS, COUNTY TEXAS

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**AFFIDAVIT OF MARY GRANT**

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STATE OF CALIFORNIA

ORANGE COUNTY

KNOWN BY ALL MEN BY THESE  
PRESENTS

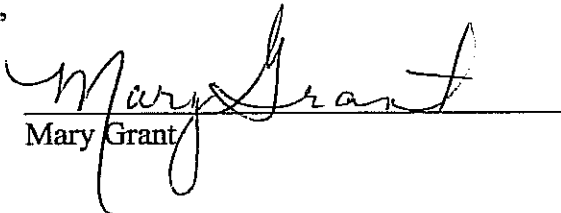
On this day personally appeared before me the person known as Mary Grant who,  
upon presenting proper identification, was duly sworn and then stated as follows:

My name is Mary Grant. 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."


1. I am a survivor of sexual abuse by an Orange County priest, Fr. John Lenihan. I filed a civil lawsuit against the Diocese of Orange in 1990 after church officials refused to remove my perpetrator from ministry. Since 1991 I began advocacy work on behalf of other victims as a meeting facilitator, activist and support provider. I founded the Southern California chapter of SNAP in 1992. Since 2002, I have been working full time as SNAP's Western Regional Director. I live in Long Beach, California.
2. I have reviewed the Defendants' Special Exceptions filed in this case. I offer my opinion to the court not only as a victim of sexual abuse by clergy but as someone who has met with victims and anguished with them. I want to help the court understand the unique circumstance victims of clergy sexual abuse find themselves in when "outing" them is employed by church attorneys as a menacing legal tactic.
3. Forcing victims of child sexual abuse to publicly disclose their identities is very threatening and harmful in a variety of ways. In a nutshell, it makes recovery from this devastating crime much more difficult and it deters others from reporting predators to law enforcement so that they can be prosecuted and their potential victims can be safe.
4. A particularly debilitating and distressing part of childhood trauma is the feeling of utter helplessness. Therefore, a key part of healing for most victims of childhood sexual abuse is overcoming that helplessness and taking back as adults some of the power and control that was stolen from them as children by perpetrators. This cannot happen, though, when the men who victimized us as kids are permitted to victimize us again as adults.
5. Another devastating aspect of childhood victimization is the powerful though false notion that somehow we were to blame for the crimes we suffered. Sometimes that self-blame is the result of immature, confused childhood minds trying to process and cope with inexplicable pain and betrayal. Other times, that self-blame is carefully fostered by our shrewd predators themselves. At still other times, it is perpetuated by the enablers and supporters of perpetrators. So an important part of recovery is realizing that we did nothing wrong and are not to blame for the intense pain we have suffered. When, as adults, we do what responsible citizens do --- report crimes to the proper authorities or file civil lawsuits --- we expect and believe that we will not be treated as if we were responsible for our own victimization. If the legal system, however, allows our perpetrators and their enablers to "out" us in public before we can stand united in court at trial, we almost invariably again feel those painful childhood feelings of shame and self-blame. We became targets. This dramatically sets back our efforts to rebuild our lives.

6. When our names are forcibly disclosed in the public arena, we victims often endure tremendous bouts of shame, confusion, self-blame, self-loathing and regret again, just like we did when we were children. Exposing the names of perpetrators is part of their punishment; it is deserved. Exposing the names of victims is also punishment; it is not deserved. The protection that was absent in childhood should at last be present in adulthood. We thus pray of the court what the church has denied us.
7. Therapists teach us child abuse victims to take care of ourselves. Obviously, as children, someone (parents, teachers, ministers) failed to keep us safe. After having been abused, many of us grew up thinking we could not be safe or didn't deserve to be. Taking legal action against our predators can be and should be a safe, healthy way of taking care of ourselves.
8. For years our society has wisely and justly permitted victims of adult sexual violation (i.e. rape) to protect their privacy while taking action to expose predators and warn families and safeguard others. Despite this well-grounded and long-standing practice, this Defendant religious organization wants to deny the same protection to victims of more horrific sexual violation (i.e. child molestation by trusted clergy). It is especially sad and ironic that the institution seeking to deny this fundamental right and, in effect, punish its victims advertises itself publicly as a spiritual body whose declared mission is care of souls, especially children's.

"Further, the affiant sayeth naught."

  
Mary Grant

SWORN AND SUBSCRIBED BEFORE ME on this the 3 day of August 2007 to certify which witness my hand and seal of office.

  
NOTARY IN AND FOR THE STATE OF CALIFORNIA

Apr 9 2011  
My Commission Expires

