

JOHN DOE I AND 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

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**AFFIDAVIT OF** [REDACTED]

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STATE OF ILLINOIS

COUNTY OF COOK

BEFORE ME, the undersigned notary, on this day personally appeared [REDACTED] the affiant, a person whose identity is known to me. After I administered an oath to affiant, affiant testified as follows:

1. I am over the age of eighteen (18), fully competent to execute this affidavit, have never been convicted of a felony and have personal knowledge of the facts herein stated, which are true and correct to the best of my knowledge.
2. I was born in [REDACTED] 1961. I currently reside in Cook County, Illinois .
3. I was raised in the Greek Orthodox faith and taught by my parents to respect and

trust members of the clergy. When I was a boy, my family were parishioners at Assumption Greek Orthodox Church in Olympia, Fields., Illinois. Father Nicholas Katinas was the pastor.

4. I began playing [REDACTED] professionally at the age of ten. [REDACTED]  
[REDACTED]
5. In the spring of 1974, just after I turned thirteen years old, Father Katinas asked my parents if I could help fix the church organ. I had known Father Katinas as our priest and I trusted him. He had come to our house for dinner on several occasions. He had even watched my brother and me swimming in our backyard swimming pool a few times. My mother was very involved at the church. It was considered a great honor to have a family friend who was a priest.
6. That day, I believe it was a Thursday, my parents dropped me off around lunch-time. When I first arrived Father Katinas greeted my parents. After they left he took me into his office for a brief time. He was dressed in his collar, black shirt and pants. He explained about the problem they were having with the church organ. I had a Panasonic electronics catalog with me because I was very interested at the time in portable televisions. I placed the catalog on Father Katinas' desk and then Father took me to where the organ was located. I spent some time working on the organ. After I was done, Father Katinas asked me if I wanted to shoot some hoops on the basketball court. I said OK and he led me to the gym located on the church property. After we played some basketball, I remembered I had left my Panasonic catalog in Father Katinas' office. I went to retrieve it and Father Nick followed me.
7. After we entered the office, Father Katinas closed the door. I reached for the catalog on the desk. There was a chair by the desk. Father Katinas seemed very interested in the catalog and began asking me questions about the electronics products pictured in it. As I answered his question. He moved around the desk until he was leaning over me, from behind. He was close enough that I could feel his breath on my neck.
8. He asked me if I wanted a back rub and started massaging my shoulders. He told me to unbutton my shirt and loosen my belt and pants so he could give me a better massage. At this point, I became alarmed. I grabbed the chair with both my hands and held on. I told him No, I did not want to take off my shirt and pants and I did not want to get on the floor. He then started forcibly pushing me to the floor, telling me to lie down on the floor so he could rub me. I said to him, "I don't know what you think you are doing but I need to get out of here." I knew what he wanted to do---touch my privates. I was scared. When Father Nick saw that I was panicked, he started asking me questions about the catalog again. I told him, "I want to go home." He looked very guilty. He led me out of the office, took me

to his car and drove me home. I sat in the back seat of his car with my hand on the door handle the entire ride. I wanted to get away from him. He did not say a word about what he had just done. He acted as if it never happened.

9. When I arrived home, my parents' friend, [REDACTED] who lived with us opened the door. I ran inside. I was still thinking about what had just happened and began crying. [REDACTED] asked me what was wrong. I blurted out, "The priest molested me today." I asked [REDACTED] to tell my parents because I was too upset. Katinas was held in such high esteem by my parents, especially my mother. I was afraid of how she would react. I was embarrassed and ashamed, as if it had been my fault.
10. When my parents arrived home, I heard [REDACTED] tell them, "Father tried to molest [REDACTED]" They asked me what happened. I was crying but told them. My father was furious, He bolted up to go "kill" Katinas. My mother, [REDACTED] and I pleaded with him not to. We were afraid of what Dad really would do to the priest. After a little while, when my Dad had calmed down a little, my mother called her friend, [REDACTED], and told her what had happened. We never went back to that church again.
11. Long after the incident, I had nightmares about it. From time to time I would think about what Father Katinas had tried to do and could have done to me and I get angry like my Dad. When I read about Katinas lawsuit in the Chicago newspaper, I told my parents, "Good, he finally got caught."

Further Affiant sayeth not.

[REDACTED]

Affiant

SUBSCRIBED AND SWORN TO me this the 05 day of November 2007 to certify which witness my hand and seal of office.

My Commission Expires:

7/21/11

Deborah Bishton  
Notary Public State of Illinois

