



LAW OFFICES
WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP

Matthew Oster
moster@wrslawyers.com

February 3, 2023

Via Email and U.S. Mail

nathaniel@roea.org
hgbnpopp@aol.com

Archbishop Nathaniel
The Romanian Orthodox Episcopate of
America
P.O. Box 309
Grass Lake, MI 49240-0309

Re: Demand that You Cease and Desist From Defaming and Harassing Father Alecse
and the Holy Trinity Romanian American Orthodox Church

Dear Archbishop Nathaniel:

We are litigation counsel to Father Constantin Alecse ("Father Alecse") and the Holy Trinity Romanian American Orthodox Church (the "Parish"). If you have, and/or the Romanian Orthodox Episcopate of America ("ROEA") has, legal counsel with regard to the matters addressed herein, please forward this letter to such counsel and ask them to respond. Otherwise, please address all future correspondence to me.

By this letter, we demand that you and the ROEA immediately cease and desist from unlawfully harassing and defaming Father Alecse.

Over the past two years, the ROEA has waged a campaign of unwarranted harassment and abuse against Father Alecse. Father Alecse voluntarily vacated his position with the ROEA on September 15, 2022 (the date of completion of his term with the Parish), and subsequently received the Blessing of Metropolitan Nicolae and the Romanian Orthodox Metropolia of the Americas ("ROMA"), being officially accepted in the Metropolia ROMA on November 11, 2022 by the Metropolitan Council. The Parish dissociated itself from the ROEA on October 25, 2022, and now is associated with Metropolitan Nicolae and the ROMA. Neither the Parish nor Father Alecse, therefore, remain under your guidance, authority, instruction, or spiritual influence. Attorney Anthony Grossman explained all this to you by letter dated November 8, 2022.

You and the ROEA nevertheless continue to threaten and defame Father Alecse and the Parish.

5343277.2

11400 West Olympic Boulevard, 9th Floor, Los Angeles, California 90064-1582
Tel 310.478.4100 Fax 310.479.1422
www.wrslawyers.com
Los Angeles • Las Vegas • Reno

For example, your website publicly claims that Father Alecse was “suspended” from priestly functions on November 4, 2022, based on his participation in unspecified “unlawful actions” of the Parish. The Parish, however, has not engaged in any unlawful actions – nor have any unlawful actions been identified by the ROEA. Father Alecse, furthermore, cannot have been suspended by the ROEA in November because he both vacated his position and was “retired” by the ROEA in September. There was no ROEA priestly status in November to “suspend.”

You also have publicly claimed that Father Alecse signed and violated a “Declaration and Act of Loyalty.” Attorney Grossman, however, requested a copy of any such declaration on November 8, and you provided none. Your inability to provide even this foundational document establishes the falsity and defamatory nature of this claim.

Now, on January 24, 2023, the ROEA sent Father Alecse a letter “summoning” him before the “Spiritual Consistory” of the ROEA to address the ROEA’s purported “investigation into various complaints” received about him. As explained above, you and the ROEA have no authority over Father Alecse and have no right to investigate or take any action against him. Instead, this “Spiritual Consistory” is a transparent effort to trump up false charges that may be used to further defame Father Alecse and the Parish.

Please understand that Father Alecse and the Parish have suffered real and quantifiable harm caused by your harassment and defamation. Parishioners have cited your published false claims in questioning Father Alecse’s status and conduct despite his Blessing by Metropolitan Nicolae and the ROMA. This has led to cancelled engagements (expressly based on the false statements issued by the ROEA) and a diminution of Father Alecse’s stellar reputation, built on decades of service. You have caused real harm to the Parish and Father Alecse, and they are prepared to seek legal redress for their injuries.

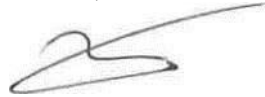
We therefore demand that you immediately cancel this false “Spiritual Consistory” and cease and desist from further defaming Father Alecse and the Parish. If your tortious conduct continues, the next step will be litigation.

Archbishop Nathaniel
The Romanian Orthodox Episcopate of America
February 3, 2023
Page 3

All rights are reserved.

Very truly yours,

WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP

A handwritten signature in black ink, appearing to be 'M. Oster', with a long horizontal stroke extending to the right.

MATTHEW OSTER

Copy: Priest Ioan Bogdan, "Spiritual Consistory" Secretary
Edvart Rastian, HTRAOC CEO