

Estate Planning
Estate Tax Returns
Estate Settlements/Probate
Tax Audits
Corporate/Business
Contracts

Schofield & Grossman, APC

Lawyers and Counselors
201 S. Lake Ave, 403
Pasadena, California 91101
Telephone (626) 578-0708
Facsimile (626) 578-0244

Charles T. Schofield
cschofield@sg-law.net

Anthony C. Grossman
agrossman@sg-law.net

November 8, 2022

Via Email and U.S. Mail

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

Re: Father Constantin Alecse

Dear +Archbishop Nathaniel,

As you now know, our firm is general counsel to the Holy Trinity Romanian Orthodox Church (the "Church"). Our firm also represents Father Constantin Alecse, personally. Father Alecse forwarded to me your letter to him dated November 4, 2022 and instructed me to respond directly to you.

At the outset, please be advised that your purported suspension of Father Alecse as stated in your letter is of no force or effect whatsoever, and as such, will have no bearing on Father Alecse's continued leadership of the Church or on his continued religious and spiritual activities. To be abundantly clear, as a result of the Church's disassociation from the Episcopate, Father Alecse no longer serves under your guidance, authority, instruction or spiritual influence.

You should be further advised that, effective as of November 4, 2022, Father Alecse received the Blessing of another Orthodox Hierarchy of a higher rank, and with this Blessing, Father Alecse will continue undeterred to serve the Church and its community and to conduct religious and spiritual activities on behalf of the Church in the same manner as he has always undertaken the same, notwithstanding any attempts on your part to impede or undermine Father Alecse's efforts in this regard. Simply put, because of the Church's disassociation with the Episcopate and by receiving the Blessing of another Orthodox Hierarchy of a higher rank, Father Alecse will continue his priestly functions under the guidance, authority, instruction or spiritual influence of another Orthodox Hierarchy of a higher rank, and as such, he no longer answers, and he is no longer otherwise beholden, to you or the Episcopate in any manner whatsoever.

In your letter, you reference a "Declaration and Act of Loyalty" that was allegedly signed by Father Alecse. Setting aside the categorical unenforceability of the terms of this document as you have described them in your letter, I would nonetheless direct you to immediately provide me with a copy of this document so that I may discuss the same with Father Alecse.

+ Archbishop Nathaniel
Romanian Orthodox Episcopate of America
P.O. Box 309
Grass Lake, MI 49240-0309
Re: Father Constantin Alecse
November 8, 2022
Page 2 of 2

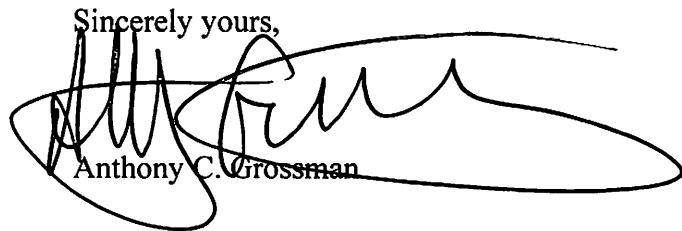
Accordingly, for the reasons discussed above, I hereby demand that you and all persons acting under your direction immediately cease and desist from any further attempts to threaten Father Alecse or to challenge the validity and legitimacy of the election by the Church to disassociate from the Episcopate. We also direct that you remove from any Episcopate documents, whether printed or online, including your website, any and all references to the Church as a parish within your Episcopate, as the Church has disassociated from the Episcopate and any references indicating a continued affiliation between the Church and the Episcopate would be inaccurate and misleading.

Should you nonetheless continue in your fruitless efforts to threaten Father Alecse or to challenge the validity and legitimacy of the election by the Church to disassociate from the Episcopate, or if you otherwise continue to act in any manner that is inconsistent with the Church's disassociation from the Episcopate, or if you fail to comply with our demands contained herein, we will be forced to immediately commence legal proceedings against you and the Episcopate, through which we will, among other things, seek from the Court a restraining order and other injunctive relief against you and the Episcopate. We hope that will not be necessary.

Further, as counsel for Father Alecse, please cease all future communication directly with Father Alecse, as he is no longer required, and he has no further desire, to communicate directly with you on any matter relating to his religious and spiritual activities. Accordingly, I am insisting that you direct all future communications in this matter exclusively to me, in my capacity as counsel to Father Alecse and the Church.

Please note that nothing herein shall constitute a waiver of any of my clients' rights, remedies, claims or defenses with regard to the above-referenced matter, at law or in equity, all of which are hereby expressly reserved.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Anthony C. Grossman', is written over a large, loopy, horizontal line that spans the width of the signature area. The signature is positioned above the printed name 'Anthony C. Grossman'.

Anthony C. Grossman

Cc: Edvart Rastian, C.E.O.