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23954-002

April 25, 2024

VIA ELECTRONIC MAIL ONLY
pgaspari@weintraub.com

Paul E. Gaspari
weintraub|tobin
10250 Constellation Blvd.
Suite 2900
Los Angeles, CA 90067

Re: Notice and Demand of ROEA

Mr. Gaspari:

I write in response to your April 1, 2024 letter demanding that the Holy Trinity Romanian American Orthodox Church (the “Parish”) and Father Constantin Alecse transfer all Parish assets to the Romanian Orthodox Episcopate of America (“ROEA”) and provide an accounting of the same.

While we are aware of the articles you reference dated May 1, 1998, we have found nothing that could support your assertion that the Parish has been under the authority of the ROEA since 1940. Please explain the basis for these claims and provide any relevant documentation.

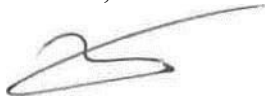
Your letter also relies upon an Orthodox Church in America (“OCA”) “Statute” to support ROEA’s claim to the Parish’s assets. The Parish has no record of having adopted any OCA “Statute,” nor do the ROEA Bylaws and Constitution make any reference to any such document. Indeed, until its receipt of your letter, the Parish was unaware of the existence of any such document. As such, please provide a copy of this OCA “Statute” and evidence that it was adopted by the Parish.

Peter E. Gaspari
April 25, 2024
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Once we receive this information, we will be in a better position to respond to your letter.
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: OCA, His Beatitude, Metropolitan Tikhon, metropolitan@oca.org
ROMA, Metropolitan Nicolae, contact@mitropolia.us