



LAW OFFICES

WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP

Matthew Oster
moster@wrslawyers.com

September 1, 2023

Via Email and U.S. Mail
metropolitan@oca.org

His Beatitude
Metropolitan Tikhon
Orthodox Church in America
PO Box 31409
Alexandria, VA 22310

Re: Further Complaint of Harassment of Father Constantin Alecse by the Romanian Orthodox Episcopate of America

Your Beatitude Metropolitan Tikhon:

We write to follow up to our August 16 and 18, 2023 letters complaining about an ongoing campaign of harassment and defamation perpetrated by the Romanian Orthodox Episcopate of America (the "ROEA") and its leader, Archbishop Nathaniel.

Regrettably, despite the passage of nearly two weeks since our initial communication, we have yet to receive a response from the Orthodox Church in America (OCA) regarding this matter.

I would like to reiterate the fact that Father Constantin Alecse is a respected member in good standing of the ROMA Metropolia, under the leadership of His Eminence Metropolitan Nicolae, for nearly a year now. His participation at ROMA Metropolia's annual Clergy Conference (24-26 August 2023, in Cleveland) is a testament to the fraternal love and respect he receives from the Metropolia administration, his colleagues, and fellow clergy. The enclosed images demonstrate the warm reception he experienced during the conference and the unequivocal support he has from the ROMA Metropolia.

As we move forward, the Father is diligently considering his legal options both in relation to this matter and several unrelated cases of financial misconduct involving Archbishop +Nathaniel, including instances of fraudulent misrepresentation in the St. Andrews Center for Orthodox Studies case. Given the gravity of these situations, we kindly request that Your Beatitude convey to us the official position of the OCA concerning the case at hand.

5584147.1

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

His Beatitude
Metropolitan Tikhon
Orthodox Church in America
September 1, 2023
Page 2

Father Alecse has taken every effort to preserve the integrity of the Orthodox Church over the past 18 months, refraining from any actions that could potentially damage or tarnish its reputation in the least. Unfortunately, the relentless persecution initiated by Archbishop Nathaniel has left Father Alecse with no choice but to contemplate a more assertive response, both through legal channels and within the public forum. Father Alecse believes that transparency and accountability are essential for the well-being of the Orthodox faith community.

In light of the urgency of the matter, we earnestly request Your Beatitude's prompt attention and response. Your guidance and perspective on this issue would greatly aid us in understanding the position of the OCA and inform our course of action moving forward.

Thank you for your time, understanding, and consideration. We are eagerly awaiting Your Beatitude's reply. All rights are reserved.

Very truly yours,

WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP

A handwritten signature in black ink, appearing to be 'MATTHEW OSTER', with a stylized, flowing script.

MATTHEW OSTER

Exhibits

Copy: chancellor@oca.org
ROMA, Metropolitan Nicolae, contact@mitropolia.us
Anthony Grossman, Esq., agrossman@sg-law.net

EXHIBIT 1



EXHIBIT 2



EXHIBIT 3

