

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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ANASTASIOS KOULARMANIS and
MARY KOULARMANIS,

Index No.

Plaintiffs,

SUMMONS

-against-

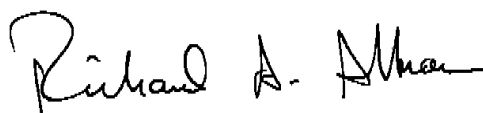
HELLENIC ORTHODOX COMMUNITY
OF ASTORIA ST. DEMETRIOS,
GERASIMOS ASPROGERAKAS,
CONSTANTINE BALTZIS,
ELIZABETH BALTZIS,
EMMANUEL DRITSAS,
NEKATRIOS PAPAZAFIROPOULOS,
NIKOS STAMATAKIS,

Defendants.

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To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the plaintiffs' attorney within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: June 15, 2020



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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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ANASTASIOS KOULARMANIS and
MARY KOULARMANIS,

Index No.

Plaintiffs,

VERIFIED COMPLAINT

-against-

HELLENIC ORTHODOX COMMUNITY
OF ASTORIA ST. DEMETRIOS,
GERASIMOS ASPROGERAKAS,
CONSTANTINE BALTZIS,
ELIZABETH BALTZIS,
EMMANUEL DRITSAS,
NEKATRIOS PAPAZAFIROPOULOS,
NIKOS STAMATAKIS,

Defendants.

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Plaintiffs ANASTASIOS KOULARMANIS and MARY KOULARMANIS, by their attorneys, Law Office of Richard A. Altman, for their verified complaint, allege as follows:

INTRODUCTION; THE PARTIES

1. Since 2017, the plaintiffs, who are husband and wife, have been the victims of an ugly and malicious campaign of harassment and defamation by the defendants in this action, both acting separately and in concert.

2. The plaintiffs bring common-law claims for defamation, unpaid salary and commissions, intentional infliction of emotional distress, and *prima facie* tort. They also

bring claims under New York State and New York City statutes against sexual harassment in the workplace.

3. Plaintiff Anastasios Koularmanis (“Anastasios”) is an educator by profession. He was for many years a tenured teacher in the New York City Department of Education, and also in Hicksville, Long Island. In February 1999, he was hired as an Assistant Principal at the St. Demetrios School (“the School”) in Astoria, Queens. In September 2000, he became Principal of the School for grades K-12.

4. The School is a parochial school which is owned and operated by the defendant Hellenic Orthodox Community of Astoria St. Demetrios, which is an educational institution licensed by the Department of Education of the State of New York. .

5. Prior to plaintiff Anastasios’s joining the School, it was suffering both in registration and academics. But as a result of his efforts, by his second year there, several of its students were accepted to top-rated universities, such as Yale, Barnard, Columbia and NYU. The School’s status and reputation increased substantially.

6. In 2018, plaintiff Anastasios’s title was changed to Superintendent. At that time, he had hoped to break the School into three separate mini-schools, to promote the growth of the institution. As result of his efforts, he brought in to the School millions of dollars in grants and donations. In 2018, the School was awarded a grant from the Stavros Niarchos Foundation for \$25 million.

7. However, and unfortunately, the community turned down the grant, because accepting it would have required opening the School to non-Greek students. The subsequent political battles after this rejection began the course of events which have caused substantial harm to the plaintiffs, and have compelled the bringing of this action.

8. In October 2019, the Greek Archbishop of the United States offered plaintiff Anastasios the honor of becoming Director of Greek Education of the Greek-Orthodox Archdiocese of America.

9. Plaintiff Anastasios accepted the position, and the Archbishop formally announced it, saying that he was chosen because he was the best school administrator in the United States, and because his past results were exemplary.

10. On January 1, 2020 plaintiff Anastasios took over the position. His duties include traveling throughout the United States, to help local parish communities and schools implement new programs and improve existing programs.

11. As a direct result of the events of the past few years, set forth in detail below, it became impossible for plaintiff Anastasios to continue to function in his position, and he was forced to resign his position at St. Demetrios. He was recently offered a teaching position at a Junior High School in New Jersey, which he has accepted.

12. Plaintiff Mary Koularmanis (“Mary”) is the wife of plaintiff Anastasios. She has a Bachelor’s Degree from New York University, and is employed as a Director of Oncology

Data Management for Bayer Pharmaceuticals. She was previously employed by Novartis Pharmaceuticals and Hoffman La Roche Pharmaceuticals.

13. Defendant Gerasimos Asprogerakas is a resident of the City of New York, a member of the Parish Council of the St. Demetrios Cathedral of Astoria. He is also its treasurer.

14. Defendant Constantine Baltzis (“Constantine”) is a resident of the City of New York, and a member of the Parish Council. He is the husband of defendant Elizabeth Baltzis.

15. Defendant Elizabeth Baltzis (“Elizabeth”) is, on information and belief, a resident of the City of New York.

16. Defendant Emmanuel Dritsas (“Dritsas”) is a resident of the City of New York and the President of the Parish Council.

17. Defendant Nekatrios Papazafiroopoulos is a resident of the City of New York, a Greek Orthodox priest, and is the Dean of the Parish Council.

18. Defendant Nikos Stamatakis is, on information and belief, a resident of Deer Park, New York, and owns and operates an internet website named www.helleniscope.com.

**THE SEXUAL HARASSMENT BY DEFENDANT ELIZABETH BALTZIS,
AND THE INDIFFERENCE OF THE PARISH COUNCIL DEFENDANTS.**

19. Plaintiff Anastasios first met defendant Elizabeth in 2015, as the parent of a child in the School. Although she had no official position in the School, she would visit it frequently. Initially, she would just socialize with the office staff for a short time, but as the year progressed, she said that she wanted to get more involved.

20. But her visits became more frequent and disruptive. She was often dressed inappropriately, with tight-fitting and revealing clothing. Plaintiff Anastasios reminded her that many of the high school students were young men, and he and other administrators suggested to her that she dress more appropriately.

21. She replied “My husband enjoys seeing me dressed this way.”

22. Defendant Elizabeth then started sending text messages to plaintiff Anastasios on his cell phone. Initially the texts were about her children and their progress in school. But after a while they became personal and seductive, and were often sent after school hours.

23. Both plaintiffs believed these messages to be inappropriate. Plaintiff Anastasios explained to defendant Elizabeth that whatever she wanted to know about her children could be discussed during school hours.

24. The texts continued and became highly sexual and alarming. Plaintiff Anastasios blocked defendant Elizabeth’s text messages, but she then commenced sending them from the phone of her husband, defendant Constantine, and sent them to plaintiff’s wife, Mary, who then blocked them.

25. Defendant Elizabeth frequently came to plaintiff Anastasios’s office during the school day. She offered to, and sometimes did, remove articles of her clothing in his office, telling him on one occasion that she had “just been waxed,” asking him if he wanted to see.

26. On many occasions, staff members witnessed defendant Elizabeth touching plaintiff Anastasios in his office, without his consent. He had to ask staff members to stay

in his office until she had left the building, in order to protect against the possibility of rumors arising about him.

27. In all, her vexatious conduct made it almost impossible for plaintiff Anastasios to perform his duties as the school administrator and principal.

28. She then began stalking him, by parking her car next to his in the school parking lot, awaiting his departure at the end of the school day, so that she could approach him. He frequently would send a staff member to the parking lot to occupy her, so that he could leave.

29. Plaintiff Anastasios was repelled by her advances, and repeatedly rejected her offers, at all times. He continually told her that he was responsible for the safety and well-being of six hundred students in the school.

30. He repeatedly told her that her outrageous behavior was a present danger to the school and to both of their reputations and implored her to stop. But she continued to stalk him.

31. As a result of her behavior, he became fearful of his position and his reputation. Given the heightened sensitivity around sexual harassment in the workplace, occasioned in part by the #Metoo movement, he became concerned that she could easily accuse him of harassing her, and that she would be far more likely to be believed if she made such accusations.

32. In fact, on more than one occasion, she threatened to do exactly that if he continued to reject her advances.

33. But because her husband was a board member, plaintiff Anastastios was placed in an uncomfortable and indeed impossible position.

34. On one occasion, plaintiff Anastastios approached her, and told her that his wife was very upset by her conduct. She replied, “Your wife has issues.”

35. The texting continued until 2016, when plaintiff Anastastios blocked her number. But she then started texting plaintiff Anastastios from her husband’s number. Plaintiff Anastastios immediately blocked that number as well.

36. Thereafter, her visits to the school increased in frequency. She would come every day or every other day and spend hours in the office.

37. Her visits became the subject of gossip and rumors. On one occasion, plaintiff Mary received a telephone call accusing plaintiff Anastastios of “having an affair with a blonde.”

38. Defendant Elizabeth would bring her children into plaintiff Anastastios’s office, and then dismiss them and close the office door.

39. She would complain about her life, and tell plaintiff Anastastios that she had never “cheated” on her husband, but if she did, she would do so with him.

40. Plaintiff Anastastios repeatedly told her that he was married, with children, and could never consider doing so, and he rejected her offers.

41. Her egregious behavior became a constant embarrassment, and was noticed by nearly everyone who worked in the school.

42. Moreover, that her husband was a board member, and the fact that he apparently condoned her behavior represented a threat to plaintiff Anastasios's continued employment and reputation.

43. Both plaintiffs registered numerous complaints with members of the Parish council and school officials about the behavior of defendant Elizabeth, but none of them took any action to resolve the situation.

44. In particular, plaintiff Anastasios complained to defendant Asprogerakas, who responded by saying that he could easily have him any other teacher in the school fired. He also told plaintiff Anastasios that any further complaints about Mr. and Mrs. Baltzis would "cause problems for you."

45. On April 2, 2019, plaintiff Anastasios sent an email letter regarding the situation to Father Nektarios and Mr. Andriotis, the former School Board Chairman, a copy of which is annexed as Exhibit A.

46. On or about April 8, 2019, a meeting about the situation took place, and in particular about the son of the Baltzises, who had been acting out. Both Mr. and Mrs. Baltzis were present.

47. Also present were Mr. Andriotis, Father Nektarios, defendant Asprogerakas, and Alexandra Tsongas, an Assistant Principal.

48. The President declined to attend, and defendant Asprogerakas took his place. plaintiff Anastasios told them that Mrs. Baltzis's behavior was unacceptable, that she could not come to the school every day, and that she had to dress more appropriately.

49. Plaintiff Anastasios said that he was receiving telephone calls at home, accusing him of having an affair with Mrs. Baltzis.

50. Defendant Constantine then began verbally attacking plaintiff Anastasios.

51. Suddenly defendant Elizabeth rose from her seat, approached plaintiff Anastasios, and said "why don't you love me? I love you." Her remark was heard by everyone in the room.

52. Immediately after the meeting, defendant Asperogerakas told plaintiff Anastasios that there were many people on the board who were not on plaintiff Anastasios's side, and that plaintiff Anastasios would be fired if he "caused problems for Costa" (*i.e.*, defendant Constantine Baltzis).

53. Then plaintiff Anastasios was advised that he could ask the Baltzizes to leave the School, and that it would be his decision, and if he did so, they would support his decision to do so. But they did not.

54. When plaintiff Anastasios told defendant Elizabeth that she could no longer come to the school without an appointment, she threatened to "ruin your career, your marriage and your life." She spoke to his executive secretary, and told her to tell him to "watch his back."

55. Plaintiff Anastasios then received a call from defendant Asperogerakas, who said “I thought we had an agreement.”

56. Defendant Dritsas then sent a letter falsely accusing plaintiff Anastasios of mismanaging a grant.

57. At that time, the school was celebrating its 40th anniversary, and the community decided to honor plaintiff Anastasios.

58. Defendants Constantine and Asprogerakas told the board that plaintiff Anastasios was not worthy of the honor.

59. The plaintiffs decided that, because of the accusations and false charges, they would not attend. Instead, plaintiff Anastasios sent a letter to defendant Dritsas and the priest, explaining the decision and setting forth what had happened up to that point. A copy of the letter is annexed as Exhibit B.

60. Plaintiff Anastasios requested and expected that the letter would be provided or read to the entire board, but to his knowledge none of its contents were disclosed.

61. Instead, the plaintiffs were left to defend themselves against false charges of sexual harassment and a campaign of defamation, which the defendants immediately commenced.

62. Defendant Asprogerakas informed plaintiff Anastasios that he was a friend of defendant Stamatakis, and that an article about plaintiff Anastasios would soon appear, and taunted him about what would happen.

63. As a direct result of these and other highly offensive and unlawful action, plaintiff Anastasios was compelled to resign his position, and he did so.

64. Since his resignation, the defendant School has continued to use plaintiff Anastasios's name as its principal, and has failed to inform the New York State Department of Education that he is no longer affiliated with the School.

65. Defendants' continuing to use plaintiff Anastasios's name without his consent permits them to continue to benefit from his reputation, and is a false and deceptive practice, further damaging his reputation.

66. In addition, plaintiff Anastasios is owed sums of money from the defendant School, for unpaid salary and commissions based on his contractual right to a percentage of the grants and other contributions which he brought to the School during his time there.

THE DEFAMATION CAMPAIGN BEGINS

67. Beginning in late August 2019, defendants Constantine, Elizabeth, Asprogerakas and Dritsas made good on their threat to destroy the plaintiffs' good names and reputation.

68. On or about August 28, 2019, defendant Stamatakis published the first in a series of increasingly vicious and defamatory blog posts about the situation at the St. Demetrios School. The most recent one was only a few weeks ago.

69. Much of the language in his screeds went far beyond fair commentary, into vile personal accusations and attacks on plaintiff Anastasios's reputation, honesty, professionalism and integrity. The excerpts to be quoted herein below are all of and

concerning plaintiff Anastasios, and both individually and taken as a whole are false and defamatory.

70. All of the postings were on a website which is, on information and belief, operated by defendant Stamatakis, the name of which is www.helleniscope.com.

71. On information and belief, defendant Asprogerakas has been communicating with defendant Stamatakis on a regular basis, and is assisting him with the below-described articles, by providing him with confidential information about the internal workings of the School.

72. In addition to the statements on the website, plaintiff Mary Anastasios, and the plaintiffs' son, have received telephone calls accusing her of being a prostitute, and asking if she is willing to provide sexual services. She was asked "how much do you charge?"

73. In that first publication, on or about August 28, 2019, defendant Stamatakis wrote the following¹ in pertinent part (original in Greek; translation of entire posting annexed as Exhibit C):

But what happened lately? Andriotis and Koularmanis began to threaten and blackmail openly on the basis of purely personal matters without any shame the group of members of the community council that had opposed them last

¹ The entire posting may be viewed at this website: <https://www.helleniscope.com/2019/08/28/i-kinotita-astorias-sta-prothyra-synolikis-ekrixis/> The excerpts from this posting and subsequent postings (which will be footnoted and sourced to the original websites) are in Greek, except for three which are in English. The original language is noted in each one, and all emphases are in the originals. The translations of the postings which are in Greek are annexed to this complaint as exhibits, and accompanying each exhibit is a certification by the translator, pursuant to CPLR 2101(b). All quotation marks, capital letters and bold type are present in the original translations; apparent typos are noted with [sic].

year. We remind you that this group became a vast majority that eventually forced the Niarchos donation of \$ 25 million to be accepted through which the school with buildings of value of \$ 70-100 million (without a mortgage loan) would become a charter school and pass on the hands of the board which would be controlled by the private company Alma Bank Alma Realty and A. Diamataris (former owner of Ethnikos Kirikas). All with a "symbolic rent" of about \$ 10-12,000 a month to the community ...

But what would they get themselves? 1) They would gain the control of a school of 600 students and an annual budget of about \$ 4.5 million. 2) Alma Bank add to her asset the donation of \$ 25 million of the Niarchos Foundation and would give the school about \$ 800,000 in interest per year. Indeed, when they saw the problems coming, they began to suggest privately that the amount of "thieving level" of \$ 800,000 could somewhat go up! You are allowed to laugh: And the most incompetent money manager who would undertake an investment of \$ 25 million could easily promise a 5-7% annual return of \$ 1.2 million or more. While the "do-gooders" of Alma Bank could not promise not even a 3%! 3) By changing the status of the school into a charter subsidies could be collected by the State of New York amounting in millions of dollars annually.

...

One can understand why now the main protagonists do not comply with the decisions of the Community board and insist on changing its leaders to SEIZE the school from the community. There is a lot of money at stake!. Recently therefore, with unacceptable personal accusations, with a "mafia like" behavior and threats, they have attempt to undermine the new leadership of the community and overthrow the overwhelming majority of the community board in order to bring the community under their control and to try once more to seize the School. With this effort, they believe that the new Archbishop, whose enthronement was enhanced with \$100,000 by Mr. Andriotis and so he received the title "grand underwriter". In order to accomplish that, they have begun to blackmail the head priest father Nektarios Papazafirooulos (using Mr. Elpidophoros's boogeyman). On one hand they threaten him that he will lose his position and on the other hand they temp [sic] him by saying that they will support him to become a Bishop! They blackmail him and demand for his help in getting rid of the "annoying" people who demand transparency and protect the interests of the community.

"Little Napoleon" Nikos Andriotis, who at the age of 80 only cares about keeping the "leading position", is gathering the outrage of the overwhelming majority of community members who have witnessed his evil actions.

Arrogant, as he is, he has the impression that he "is ought to be respected" when the community does not want him. For decades, he has desegregated every meaning of democracy and collegiality, and makes decisions for the school and the community as if they were his own business. He even passes on the same "dictatorial" mentality to Mr. Koularmanis who acts as his "subordinate". Both addicted to the lack of rules and transparency, they have forgotten what budget means and what "statute" means and "distribute the game" to various "agent provocateur" so that enough of them can consume of the pie of Community money and silence the scandals. In other words, "gangs" have been created around some powerful community agents who serve purely personal interests. No budgets, checks are "lost", one nail is charged for \$100 (in a manner of speaking), and other comic-tragedy events. ("Lord, set a guard upon my lips" according to the pipe [sic] saying) And above all the blackmails to council members and the priest. If this is not a mafia organization then words have lost their meaning.

The reason for this behavior is obvious to the independent observer: If they lose control of the community and the school's finances and are taken over by someone who is "not in the game", then the "heist" that has been around for decades will be revealed and not only are they going to disgrace themselves but they will also have legal responsibilities. We wish for them to read these lines as a last warning. We hope that they will not make us start the investigation of highly suspicious cases such as the management and sale of the Long Island Wantagh property donated to the community by Dr Tamvakis. We sincerely hope that they will quietly withdraw so that the peaceful and honest management of the Community and of the School will be ensured by the large group of young people who have quit their jobs in order to clear somehow this mess. If they persist, let them rest assured that the next notice will be sent to them by the New York City Attorney for the nonprofit foundations 501c3...

74. On or about September 12, 2019, defendant Stamatakis published the following² in pertinent part (original in Greek; translation of entire posting annexed as Exhibit D):

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<https://www.helleniscope.com/2019/09/12/pios-ine-o-kyrios-ypefthynos-ton-provlimaton-tou-scholiou-tou-ag-dimitriou/>

WHO IS THE MAIN RESPONSIBLE FOR THE SAINT DEMETRIOS SCHOOL PROBLEMS?

...

The school's principal, Mr. Koularmanis, could be the executive instrument and be held responsible for "antipedagogic," decisions that hid other motives. But the "tactician" - and diabolical - designer is the well-known suspect Nikos Andriotis. What does the Archbishop say about this mess? Which side will he take at the beginning of his service? Will he side with the people or with the stooges?

...

But let us first see how is Mr. Koularmanis responsible for the school of Saint Demetrios of Astoria: To start with, his salary is not justified, which, along with the various types of extras and "bonuses" is highly considerable (no one knows precisely due to the nontransparency that prevails everywhere - Mr Koularmanis himself gives no account to anyone except his "boss", Andriotis!) If one has such high payroll, one must behave accordingly and not make a leave early at '2.15 pm', and without leaving someone responsible for answering the school phone line! Which private school would pay Mr. Koularmanis a "big salary" and tolerate this kind of behavior? If in recent years he left the school premises at 2.15 pm. now with three jobs (even if both are unpaid) when does he intend to leave?

This matter is no joke at all. Mr. Koularmanis has been in charge of the school for the past 20 years and it is common ascertainment that the school has remained almost stagnant both in terms of enrollment and educational level. This does not mean that he does not have the appropriate skills and abilities. He seems to have both. But he showed a false judgment. Indeed he works in a non-professional environment under the miserable guidance of "little Napoleon", Andriotis is completely... clueless in matters of education.

His decision (in collaboration as always with scheming Andriotis) to refuse the enrollment in the next school year of children of a member of administration who opposed to the plans of conversion the school into a charter was particularly odious. These children even happen to be honorary students. This is an unacceptable decision for which there is no grave pedagogical reason. Worst of all, the decision was taken without all the school board members being informed, and without officially informing the parents! The parents were informed after August 15, verbally (!!), when they went to enroll their children! It was very difficult for them to find another private school for their children! In terms of "Educational Law", this is an

"arbitrary decision" of the principal, to be noted that if the parents wanted to file a lawsuit against the community school they would force their children's enrollment and they would also get a great compensation! Usually such decisions are made during a school board meeting (with parental knowledge / participation) and it is absolutely essential for parents to be informed promptly and in writing ... Whatever happened, this decision is illegal and the community is obliged to revoke it - even if the children are already enrolled in another school!

75. On or about October 17, 2019, defendant Stamatakis published the following³ in pertinent part (original in Greek; translation of entire posting annexed as Exhibit E):

Anastasis Koularmanis - the energizer bunny or the wild horse of Mr. Elpidoforos? Or something else?

By Nick Stamatakis October 17, 2019

Dear Readers I am not sure that you have been following the developments in Greek education in New York lately, but they are really outrageous. And they are expected to intensify, as the position of Education Director of the Archdiocese is open and a decision has to be made to fill it sometime...the principal of the school of St. Demetrius of Astoria Mr. Koularmanis has become a "multitasker", since Mr. Elpidoforos strongly favored him and assigned him various positions ...

So initially Mr. Koularmanis took up the position of headmaster at Manhattan Cathedral School "occasionally" in the summer, reorganizing the school. Immediately afterwards, Mr Elpidoforos appointed him president of the Corona community - perhaps the richest community in America - where he was surrounded by a group of well-known and / or associates from St. Demetrios.

Since she lives in New Jersey it is reasonable to wonder how she will manage to do so ... The grapevine has long emphasized that it is not a solution to work for only 5 hours at the school of St. Demetrius (9-2pm). This is in no way justified for a school with over 600 pupils ... Much more justified by its hefty pay - for which no one has a clear picture ... However, it must be six-digit

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<https://www.helleniscope.com/2019/10/17/anastasis-koularmanis-to-energizer-bunny-i-to-balante-r-tou-k-elpidoforou-i-mipos-kati-allo/>

based on "local market" data. Of course he is presented as a natural "multi-tasker" and indeed as an energizer bunny ... But something else is going on here and it seems that Mr. Elpidophoros and those around him want him in a role ... "wild" in the Queens region and not just ... let's say as a "layman" of the district ...

I will stop here by saying that all this is fine and well and the Archbishop's right to make his own choices. If there was not the famous "conflict of interest" for the various posts no one would have said the slightest (see also related article by Dimitris Robotis in adjacent columns). But as far as one's human abilities are concerned, there are limits. How will the school of St. Demetrius succeed in becoming a "model" with a "part-time" principal? We think Mr. Koularmanis himself owes some explanations to the students' parents and the community ...

76. On or about October 28, 2019, defendant Stamatakis published the following⁴ in pertinent part (original in Greek; translation of entire posting annexed as Exhibit F):

The “irreplaceable” Mr. Koularmanis goes to his head of arrogance...
October 28th, 2019
By Nikos Stamatakis

Prior to the end of the beautiful ceremony with the participation of students from all classes on the initiative of a middle school teacher-coordinator it was announced that this would be Mr. Koularmanis's last day as principal of the school and several students were given the opportunity to speak about the skills of the departed in a tearful style some even burst into tears ... A young man, with an utterly inappropriate style, expressed the point of view that "the school due to the departure of Koullarmanis will go downhill ..." All these tragicomic facts in the presence of the Greek and Cypriot consulates and many parents and the audience who had come to celebrate our glorious anniversary.

I talked to the people who attended and they were outraged about two main things. Firstly, with the unacceptable conversion of the well-organized school

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<https://www.helleniscope.com/2019/10/28/o-anantikatastatos-k-koularmanis-kavala-sto-kalami-tis-alazonias/>

celebration of October 28th into a miserable 'operetta' for Mr Koularmani's departure. Second and foremost, it was obvious that this 'operetta' was set up knowingly - if not prom[o]ting- by Mr. Koularmanis. Unfortunately, Mr. Koularmanis is convinced that he is irreplaceable. Last week, our website had received information that he took every action in order to remain in the position of the school's principal. Indeed my fellow compatriots, Mr. Koularmanis thinks he is a "Superman" - I correctly named him "energizer bunny" in a previous comment of mine.

He believes that he can have 4-5 seats without any problem: as the Director of Education of the Archdiocese, as the president of the community in Corona, as the vice president of the Manhattan Cathedral, as the principal of the St. Demetrios School and some whisper - as the Head of the Cultural Center of the Archdiocese in Astoria ... And because he has these "divine" abilities he must be paid accordingly. What if we wasted enough ink and gray matter for the Astoria community to understand these magic words, "conflict of interest"? Mr. Koularmanis does not give a dime and prefers to "live in his own world". He even took many of his associates from Saint Demetrios to Corona.

For months we have been saying again and again that he had a five-hour 9 am-2 pm work hour, something unacceptable and incompatible to his very high salary, but also with his obligations towards about 600 students ... Maybe that's why the school enrollments have stagnated for years in between 500-600 students; And finally, why last August did he have to make statements for a 10% increase in enrollments, which when something like this does not seem to have happened?

Unfortunately, as it seems Mr. Koularmanis himself has not forgotten the matter of the Niarchos donation and is determined to use every method to bring the issue back, apparently using his new position in the Archdiocese. And for this reason alone, the community should show him the door definitively and irrevocably.

I shall stop here. I could write a lot about the character of Mr. Koularmanis, which I found out from my direct contact with him. I will not, hoping that he will finally understand that his "cycle" at the school of St. Demetrios has come to an end. His "cycle" had practically ended the moment the community rejected the Niarchos donation and decided to keep the school under the community's control. At that moment, Mr. Koularmanis - due to him having invested everything in the case - should have to man up and submit his

resignation. He did not and he harmed both the school and the community but, above all, his dignity.

77. On or about November 18, 2019, defendant Stamatakis published the following⁵ in pertinent part (original in Greek; translation of entire posting annexed as Exhibit G):

Can the community of St. Demetrios finally kick out NOW the blackmailer Koularmanis!...

Nick Stamatakis

November 18th, 2019 By Nick Stamatakis

For months we have been pointing out one after another the missteps of the Saint Demetrios of Astoria school principal Mr Koularmanis (his title is "Mr." - the title "Dr." should be attributed only to doctors and PhD holders).

We initially talked about his involvement in the Niarchos Foundation case, where dreaming of money and greatness he had the leading role in the attempted seizure of the school from the hands of the community. In fact, it recently came to light that Mr. Koullarmanis - for the sake of simply enforcing the School's rules under the Niarchos donation - "managed" to charge hundreds of thousands of dollars in legal fees (!!) For a document that would normally cost nothing more but a few thousand dollars in the worst case ... And not tell us that fairy tale stories about him having "permission" by the President of the School Committee. The permission he had - if he actually had it- was not to sit on the phone for hours talking to the lawyers when he knew that each hour is charged God knows how much, it is possible \$1000, or even more... Did he make a love confession or something? We have repeatedly pointed out that he had the bad habit of working a 5-hour day (9-2 pm), which is not justified by the number of students and school obligations, nor by his high salary. And without even worrying about having someone answer the phone lines of the school after 2 pm! .. If he even wanted to upgrade the school, he should have to spend all day there

But along the way, others facts were revealed regarding his character, and especially his pathological mendacity: In August he publicly stated that the school enrollments would be increased by more than 10%, i.e. there would be more than 50 new students. While we have recently learned the whole truth: Only three (number 3) are new students for this year!! If he in fact continues

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<https://www.helleniscope.com/2019/11/18/epitelous-i-kinotita-ag-dimitriou-na-dioxi-tora-ton-ek-viasti-koularmani/>

his miserable behavior it won't be long before a fall to occur!. Also at a recent Education meeting organized by Arch. Elpidoforos, he dared to say that the School is a "model"! It is common knowledge that the pathological liars soon start to believe their own lies. Thus Mr. Koularmanis imagines that the school is already a model

We believed that severe criticism would force Mr. Koularmanis - after he was appointed as the Director of Education of the Archdiocese - to leave decently and let the people of the community to lead the school into the new era. It should be noted here that he was appointed to the post of Director of Education completely unmerited, since not only does he not know the Greek language, but (as the school teachers mentioned us) he hates it. After all, Mr Elpidoforos himself felt the need to explain his unmerited choice at a recent conference on education as we already wrote and stated that he did it "urgently". But what is the point of appointing one who has poor knowledge and hates the Greek language as a director of education? Is Education the true purpose of its employment or is it used as a wildcard in many positions to hide other intentions?

It was not enough for him to forbid back in August the enrollment of (honored) children of a member of the community board to the school, because this member disagreed with the conversion of the school to a charter school (and without any timely verbal or written notice to parents!). Recently another honor high school student (with a score of 98) was forced to drop out of school because he refused to enroll her in the honors class. **Question: How many other students has he kicked out in the past, and how many will still be kicked out if the community doesn't kick him out?**

Then the following amazing complaint from our parents was heard: He gathered the 4th and 7th grade students and demanded that they are not to complain about their teachers to their parents! Is this a teacher behavior? Or some king of "stooge"?

But before he did that to the children, another more tragic fact was heard, that he had blackmailed the school teachers! Because he "suspected" that they were vilifying him ... And that they leak his actions to the press! The whole of Astoria (and not only) had already been aware of his infliction and his bossy behavior, and he suspected the teachers. So, in order to take revenge on them, he began the transfers. This is how a teacher with astonishing degrees ended up teaching at the kindergarten. The joke is that at the same kindergarten a relative of his is at service who does not even own a degree nor other educational experience, other than a work experience in a ... hair salon. Like other relatives of his who have been positioned in various places and who are

adamantly irrelevant in every sense of education and hired without qualifications!!

In the meantime, of course, apart of him being appointed as the Education Director of the Archdiocese he was also appointed as the president of the Corona community, which is known to operate a school. So after first detaching employees from St. Demetrios to staff the Corona school, it is widely rumored that he has begun to advertise that the school of Corona is for free with the aim of getting students out of St. Demetrios! We have already written about Mr. Koularmani's multiple "conflicts of interest", but we didn't think he would confirm us so soon and so jubilantly!

Of course, he continues to act peremptorily as a tyrant, "deciding and ordering" as if there is no school committee nor a community in which the school belongs to. Among other serious matters there are also the perversions of the narrow-minded Koularmanis: He lets parents and teachers waiting for him outside his office while he comes in and out "loose" and "snooty" and is indifferent to their presence

And yet another simpler example: He has taken off every procedure of complaint filing (even the simple "box") and so there is no way for the community and the school to know the truth for what has possibly gone wrong!

Question: Is there a school in America without a complaint filing procedure? Answer: probably NOT! The one and only is the one of Saint Demetrios! So if anyone asks - let's say - an education inspector (or even the community itself) to find out what complaints have been filed by parents or teachers, the answer will be NONE! The school is perfect! According to the logic of the Greek saying "if the head hurts, the head must be cut", for not having to deal with complaints we take off the complaint filing procedure!... And what there is to say about the school budget management that is on his hands? Many rumors have been whispered about the past but what has recently been heard is outrageous: WHILE HE IS RETIRED AND IS EXPECTED TO WITHDRAW AT THE END OF THE YEAR, he decided the last month before his departure to proceed with an expensive purchase so that the computer room to be organized. It is unfair for someone to wonder why he is so "persistent" in this purchase before his departure from the school. Now that he is leaving he is so considerate? All these years how did the "model" school which he administrated has survived without a "computer room"?

After all these, the only question left to ask for all of us who closely observe the school of St. Demetrios is only one: Why has the community not thrown Koularmanis (sorry, but the tile "Mr." does not suit him anymore) out forcefully!. He should have been thrown out YESTERDAY by the community and the community should not have to wait for a meeting upon meeting for the

sake of a blackmailer! Which blackmailer has the nerve to wish to remain as a "consultant"!! Consultant for what? How to drive a school towards downhill and depreciation? To paraphrase an older expression, Koularmanis "has put himself out of school and community." NOW AND NOT TOMORROW. AND FOREVER.

78. On or about December 13, 2019, defendant Stamatakis published the following⁶

(original in Greek; translation of entire posting annexed as Exhibit H):

Days are counted one by one at the school of Saint Demetrios and the community of Astoria until January 1st, when the destructive service of A. Koularmanis will come to an end. Almost every week new testimonies come out about his blackmails or his unacceptable behavior (and some of his close associates who have neither the teaching qualifications nor the slightest sensitivity...) towards teachers, children and even parents. There are a lot of allegations regarding mismanagement and maladministration of the School. **The general conclusion of the school condition during Kourlamani's service is summarized into two words: "autocracy" and "terrorism".** In particular, the last word, "terrorism", is heard more and more all around the school. **And even now, in recent days, he continues to badmouth and undermine the school in all directions...**

It is a general finding that only after his departure the school will revive again. It will revive financially, because of his unacceptably high salary but also of his mismanagement regarding the budget (which unfortunately the previous administration assigned to him) Koularmanis damaged the school. Will the time come for a possible salary increase for the teachers (once an evaluation takes place). The school will most certainly revive physiologically, **because the educational process does not thrive in conditions of terrorism ...** With threats and forceful actions how can teachers perform according to their abilities?...There is also a positive mood and will for work from both the school board and the community, in order to bring order to the chaos left by Koularmanis...

The ideas are many and begin with the introduction of new programs that could have already been introduced if Koularmanis had done something ... Suddenly, he thought, a month prior to his leaving, that the school needed a

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<https://www.helleniscope.com/2019/12/13/to-scholio-tou-ag-dimitriou-na-bi-sto-dromo-gia-tin-aristia/>

computer room. In his 20 years harmful service in school, couldn't he have done it already? Was he in a money shortage? The school is known to have money reserve, but has also received significant donations. The money were there, which he was spending, but unfortunately he lacked vision and proper planning. We wonder, apart from the absolutely necessary computer room, how many more are needed and how many more could be done?

...

But the most certain method of development will come when teachers, students, and parents breathe an air of freedom with the departure of the unacceptable Koularmanis and begin themselves to give their ideas with joy for the development of the school.

79. On or about December 30, 2019, defendant Stamatakis published the following⁷ in pertinent part (original in English at the website):

Elpidophoros's first half year was marked by many unacceptable choices of people for sensitive positions....Many other choices that followed confirmed our worst fears: 1) The promotion of Mr. Costas Eliades as well as Mr. Koularmanis, known for their involvement in moral scandals (the first) or for blackmail and mismanagement at least (the second) in Astoria is a truly bad omen. Especially because it revealed the existence of bad advisors in Elpidophoros' inner circle...

...

With the departure of former principal Koularmanis, the community and the school are on the path to renewal. The road will not be easy, but rationalization on financial and all other issues already brought the first positive results.

80. On or about January 15, 2020, defendant Stamatakis published the following⁸ in pertinent part (original in Greek; translation of entire posting annexed as Exhibit I).

The impenitent Koularmanis continues the blackmails ...

By
Nick Stamatakis

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<https://www.helleniscope.com/2019/12/30/goa-and-the-greek-american-community-at-a-crossroads/>

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<https://www.helleniscope.com/2020/01/15/o-ametanoitos-koularmanis-synechizi-tous-ekviasmous/>

January 15th 2020

...

In the context of our journalism on the case of the seizure the school of St. Demetrios of Astoria by a group of businessmen with the participation of the former deputy minister and former publisher of E.Kirikas A. Diamataris, we had referred several times to the Director of the school, Mr. Koularmanis, the man who essentially destroyed the school during his 20-year service. We did not criticize him because we find pleasure in "bringing down" persons and institutions, but because the exactly opposite is happening: We wanted to contribute to the ending of the school's demolition and community and the start of constructing a new one. How is it possible for one to build something right, if one does not uncover the disgraces and scams of the past? Unfortunately, this man, who served as a demolition man in community's finances during his 20 years of service at the school and played a leading role in the case of the school's seizure with pretext of the donation of Niarchos, **continues even now having left the school finally (on January 1st, to give us the right to criticize his criminal behavior.** For months after submitting his resignation as the school's director, he has been trying to persuade the community to retain him after January 1st of 2020 for an indefinite period as a school "consultant" with payment of over \$ 50,000 a year! Yes, my fellow expatriates, this school destroyer and exploiter of the community's funds wanted to remain a "consultant"!! After he saw the strong reactions, he was forced to step down and **suddenly found out that he is entitled to two months' pay to compensate for his 2020 vacation time.** When he was notified that according to the labor Law HE IS NOT entitled of this (due to him being resigned and not fired) he began to plead on the one hand the blackmail on the other hand, the same bossy acts he performed to all sides for 20 years. He even managed to persuade some, fortunately just a few, "sensitive" people (with the money of others!) To "give this man a tip"! The overwhelming majority of the school board and executive committee decided not to give him a dime. However, a few, the small minority, insist on keeping the matter open ... And push it to the board that will take its final decision in a few days. Due to the issue remaining open without a reason and showing suspicious interference to the democratic operation of the community, let's list here the reasons why there should not even be a debate on the matter. Not only does he not have any right of vacation compensation, but he violated many other obligations he had as a director:

a) When in the late 2019 his service was at its ending **he handed over all the official data (documents, codes, etc.) that he had in his possession as a director to his secretary!!** Not even to the Chairman of the School Board,

nor of course to the President of the community as he normally should have, since he was hired by the community and MISTAKENLY allowed him to manage the \$ 5.5 million school budget per year!

b) Since last September **he gave himself a raise of thousands of dollars per year without asking for permission from the school committee, not the executive committee of the community!!** Similar raises he also gave to other relatives and friends of his that he has assigned to school. It should be noted here that none of his relatives has the required educational qualifications!

c) He continued until the end to receive as part of his payment an amount up to 10% of the school grants received by the state. We are talking of course about the "grants" of 2020 - which means that he will NO longer be a director - for which, let it be noted, he has done absolutely NOTHING. He has not even submitted the required application and at the time that these lines are written the community due to his mercilessness is at risk of losing more than \$ 400,000!! And in any case he should have never been paid for "grants" that are automatically given by the state and actually require the push of a couple of buttons!

All these examples of illegal behavior are nothing compared to the rest of the matters of malpractices in which he was involved for 20 years. We will remain mainly in the most recent ones.

- When Mr. Elpidoforos (badly) decided to appoint him president of the community of Corona, he chose for the board as well as for the school of this community either relatives of his or other people who worked at St. Demetrios. And **he never ceased to undermine the school of St. Demetrios by inviting parents to send their children to Corona 'which is free of charge'!** These are extreme cases of the same nepotism that has always characterized him.

- **He damaged the community by about \$ 200,000 in legal fees for the Niarchos case** while talking to lawyers for hours after hours about drafting the new statute, something that certainly does not cost anything more but only a few thousand dollars!

- **He repeatedly blackmailed parents, students, and teachers and essentially expelled many students from school with his miserable behavior.** Last August he did not even hesitate to refuse to re-enroll two excellent students (with grades above 95!) due to them being children of members of the board who opposed him ...

- **He wasted community money in ways that do not fit the human imagination.** One striking example is of having a school cash account ("petty cash") worth over \$ 60,000 (no one knows exactly how much!!) Dear expatriates, many among us are business owners. Has anyone ever heard of a petty cash account with so much money?
- **He used a credit card in his own name supposedly for community purchases.** He charged whatever he wanted, and was compensated by the community by presenting the total amount due on the card each month without delivering statements so that the community will know exactly what he was purchasing with the card. We're talking about thousands of dollars per month. It makes us reasonably suspect that he raised his fat salary by many thousands of dollars (officially \$ 130,000 plus over \$ 50,000 extra for grants, plus, plus, plus ...) by using the card.
- As we have already noted, he **had the "bad habit" of working 5 hours a day from 9 to 2 pm.** How can a school evolve with such a lazy and indifferent principal? When last May I tried twice to contact him at 2.45 pm (I was not aware of his work hours back then) no one picked up the phone while the answering machine was not even on!!!
- A few months ago he sold the winter service vehicle, the only car the community had bought with its own money in his name for \$ 9,000 (it was bought about 4 years ago for \$ 17,000 and was almost never used) **without asking anyone.**

I could write down many other misconducts, illegalities, immoralities and crimes of Koularmanis. I will say one thing and one thing only: **He would not have wasted the money - but also the trust- of the community if Nikos Andriotis had not protected him. He should be the one to be ashamed of eternity for calling him his "son." But before he feels ashamed he owes some explanations. How long will he hiding behind his finger? The damage caused by "his son" for the duration of 20 years amounts to millions...**

As for Mr. Elpidoforos, we shall remind him of the known Greek saying: "Show me your friends so that i can tell you who you truly are ..." Besides we had repeatedly warned him about the true kind of Koularmanis and his associates. They were not our own journalistic

information but things that many people know inside and outside the community.

81. On or about January 17, 2020, defendant Stamatakis published the following⁹

(original in Greek; translation of entire posting annexed as Exhibit J):

Nikos Andriotis owes compensation to the Astoria community
By Nick Stamatakis
January 17th 2020

...

We wrote the day before yesterday that in the matter of the multiple offences of the former principal and destroyer of the school of St. Demetrios of Astoria Mr. Koularmanis, the main liable is his "foster" father Nikos Andriotis. Andriotis, who has been reported to have been bothering the community for more than four decades, used "stooge" Koularmanis for all the works out of which the community suffered millions...

The appointment of Koularmanis as head of the charter school conversion project was against to any regulation - with Andriotis' personal intervention. The seizure project provided for the following:

- The \$ 25 million of Niarchos would go to Alma Bank, boosting her assets (she had and still has significant problems). The school would receive \$ 800,000 per year as "interest" / dividend from this money - amount much lower than current market values.
- In the board of Directors would be composed by "their own people" (with salaries of course), while everyone would benefit from school expenses and other "tax exemptions".
- The Principal would be Koularmanis who dreamed (justifiably because charter schools do not set salaries boundaries) of doubling his already fat salary and appointing other of his "people" (he had already appointed 5-6 friends and relatives at school).
- The community would receive a monthly rent of \$ 10-12,000 for \$ 80,000,000 worth of property - without consideration of the name and reputation of its school that is priceless!!

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<https://www.helleniscope.com/2020/01/17/o-nikos-andriotis-ofili-apozimiosi-stin-kinotita-astorias/>

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82. On or about January 18, 2020, defendant Stamatakis published the following¹⁰

(original in English):

The Unholy Alliance in the GOA to Keep the Failing Status Quo
By Nick Stamatakis
The School Principal Mr. Koularmanis

For the last 20 years Andriotis had been using Mr. Koularmanis, his hand-picked school principal, to apply threats on all school employees, teachers, parents and children. Mr. Koularmanis had been reported to us by many parents and teachers – and even children – to act as a real thug, terrorizing the community and causing the community to lose untold amounts of cash, totaling millions of dollars over his tenure, which ended last December 31. I detailed his actions in many articles throughout 2019 (recently the story was summarized here – in Greek). Abusing the community’s finances through the use of a credit card was the lightest of his numerous schemes; A “petty cash” account with over \$60,000 (!!), self-rewarding himself with raises of tens of thousands without proper approval; Hiring his relative, a former hairdresser, to work at the kindergarten (!!); Hiring other relatives, none of whom had any educational background; getting 10% commission for automatically approved NY State grants; Working daily 9am-2pm – how can you run a school in five hours of work? At two occasions I called the school at 2.45pm and nobody answered, not even a voicemail..

Mr. Koularmanis, was hired by Mr. Elpidophoros a few months ago as the new Education Director (a useless office that should have closed long ago). He was also “installed” as president of the dying parish in Corona (Queens), which happens to have a large real estate property and he was given permission to hire friends and relatives as the parish council members. Persistent rumors have Corona unite with the Jackson Heights parish, another dying community nearby... For the last 6 months since his installment, he is reported to have never appeared in the Corona community, not even once for Sunday service. He is also part of the Cathedral’s (Manhattan) school board. And he insisted to stay as “consultant” at the Astoria School – which the parish council refused. Does anyone see the “grand plan” by the Archdiocese here?

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<https://www.helleniscope.com/2020/01/18/the-unholy-alliance-in-the-go-a-to-keep-the-failing-stat-us-quo/>

...

What Andriotis, Karloutsos, Diamataris, Koularmanis and the rest of the lawbreakers need to do is come out and come clean and relieve the Greek community of their presence... Before the Feds and other prosecutors force them to do so. The end of their “career” in the community is approaching very fast...

83. On or about February 6, 2020, defendant Stamatakis published the following¹¹

(original in English):

St. Demetrios’ Alumnus Denounces the “Thug Koularmanis”

By Nick Stamatakis

Last night the “gang” led by Nick Andriotis, which ruthlessly abuses the Astoria community for many decades, decided to “honor” the former principal (and now director of Education at the Archdiocese under AB Elpidophoros) Koularmanis. The teachers and the priest participated, as they were threatened and were afraid to lose their jobs – although many have expressed their true opinions (mostly in private) for years... What a joke!

As a tribute to Koularmanis we are publishing below a letter we received a few days ago by a former student of St. Demetrios School, a recent graduate. The letter verifies our reporting and reveals more horrific accusations... The name of the student is available to Archbishop Elpidophoros, should he decide to take action against the “thug Koularmanis” (I am quoting the actual student’s words)... At the same time we are anxiously awaiting the lawsuit threatened “by his wife”... Thugs like Koularmanis are known to be “hiding behind their wives’ dresses”... Go ahead Koularmanis, make our day!!

BELOW YOU CAN SEE THE LETTER BY THE ST. DEMETRIOS ALUMNUS...

“I want to start off by thanking you for these articles you’ve been writing on St. Demetrios. It has revealed and confirmed truths that anyone with a brain would have noticed if they were a parent or even a student of the school. As an alumni I first hand experienced the thug Koularmanis who was just as much as an absentee principal as he is absent in Corona. He not only stole money from my senior class, and cornered me with a smirk on his face when I asked for that money back, so that my class can use that money for what we had

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<https://www.helleniscope.com/2020/02/06/st-demetrios-alumnus-denounces-the-thug-koularmanis/>

planned; he also stole money from the two senior classes that followed after mine.

On top of the theft of senior class money that was collected through bake sales and school events, he also would make the girls in my class feel uncomfortable during meeting with him. If you as a student wanted to speak to him, you had to make an appointment, YES an appointment, and even then you'd have to make sure you told your teachers that you were going to miss their classes; because if you agree to see him at 12, get ready to see him at 1:30 instead. If my mother would want to speak to him, good luck to her because he would either be in a "meeting" with God knows who, or he was simply not in his office doing God knows what...."

The student keeps piling on more horrific accusations which we will reveal at a more appropriate time....

84. On or about February 6, 2020, defendant Stamatakis published the following¹² in pertinent part (original in English):

Andriotis' Most Evil Act: Blackmailing an Opponent by Using His Children...
By Nick Stamatakis

Of all the abuses of rights and all the violations of the law for non-profit corporations that I have been reporting for a whole year regarding the St. Demetrios of Astoria School, nothing was more repulsive than the cases where the lives of children were touched, the lives of the students of the St. Demetrios School. A few weeks ago, I published part of a letter of an alumnus, who reported that A. Koularmanis, the school principal, had stolen the money, a few thousand dollars, the 12th graders had collected from bake sales for their projects! And that he had done the same in years past!!

But the most offensive case of student abuse during last year happened in mid-August, when the principal Koularmanis, refused to register for the upcoming school year the two children of a Parish Council member; this Parish Council member was also an alumnus of the St. Demetrios School and served simultaneously as an executive committee member and a school board

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<https://www.helleniscope.com/2020/02/28/andriotis-most-evil-act-blackmailing-an-opponent-by-using-his-children/>

member! Both children were exceptional students with grades in the high 90s! How could anyone cause such harm to young students without any reason at all? Koularmanis offered no serious explanation at that time. But even if he could have any pretense of a “good reason”, he never bothered to inform the family in writing and in a timely manner. This was the minimum of their rights, so that they have enough time to find another school for their children... How is this despicable behavior as an example of “professionalism” by Koularmanis?

In the days and weeks that followed I raised the issue in my writings. I even connected with Koularmanis via email – he was the one who initiated “annoyed” by my reporting... He changed his story at least three times in a series of 4-5 emails, proving that he was trying to evade the truth. What was the truth then? The truth was that this Parish Council member, whose kids were denied registration, opposed Andriotis and Koularmanis, in their efforts to convert the School to a charter school and take it away from the community.

The issue of turning the School to a charter school had caused great tension in executive committee meetings and school board meetings – and it was directly related to the denial of registration for the two children. The role of the principal, Koularmanis, who badly wanted to pursue the conversion to a charter school for personal reasons (probably expecting to double his already high salary – charter schools set no salary caps), came under question. His multiple ethics violations, his mishandling of money and his other abuses made many parish council members to suggest his firing...

...
In a meeting the Parish Council member and his wife had with, among others, Andriotis, Koularmanis and Fr. Nektarios Papazafiroopoulos, the presiding priest of Astoria, to address numerous instances of retribution against the Parish Council member’s children, Andriotis threatened the parents that he would “Get rid of the children from the School, before Koularmanis would be fired.” In that meeting, Koularmanis admitted that he punished the children more severely because the father was a Parish Council member and on the School Board.

Should we remind everyone that this is a parochial school and all conflicts should be resolved in the spirit of Christianity, with love and forgiveness? Fr. Nektarios Papazafiroopoulos, was fully informed of Andriotis’ vengeful decision and, instead of raising his voice, he sat there idly, not daring to oppose the “Godfather”... Fr. Nektarios had the authority to intervene and

demand, at the minimum, a school board meeting or even an executive committee meeting. He dared not oppose Andriotis AT ALL and allowed two young children to be emotionally harmed. It was rumored that Fr. Nektarios was afraid that his bid to become a Bishop would be ended, as Andriotis could make one phone call to the Archbishop to derail Father Nektarios's ambitions. The plan was simple: attack the children so that the Parish Council member is no longer an obstacle to the "mafia duo", Andriotis and Koularmanis, in regaining their full control of the Parish Council. Yes, this was their true goal, to force the parents to get out of the community by not registering their kids... And in so doing, reduce the majority of their opposition in the Parish Council and get rid of one of a dissenting voice.

...

And there are more examples of teachers being threatened and also students being abused by the "duo" Andriotis – Koularmanis... The "Godfather" did not know of any other way... And he did not hesitate one moment to act on these threats, even if the issue was affecting innocent children...

By the same token, this is the real character of the man, Koularmanis, whom Bishop Apostolos (Koufalakis), obviously in close cooperation with Andriotis, proposed to the new AB Elpidophoros (without any formal application process!) to appoint as the new director of Education at the Archdiocese!... Could someone explain to us why Bishop Apostolos is acting as a true satrap or, at best, as the "third Archbishop" of GOA? Don't we have enough problems by having two archbishops already?

85. On or about May 22, 2020, defendant Stamatakis published the following¹³in pertinent part (original in English):

What's Going On With Greek Education, Charter Schools and GOA?
When we hear the name of the abuser Koularmanis in the same sentence with the idea "charter schools", we must be suspicious....
By Nick Stamatakis

...

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<https://www.helleniscope.com/2020/05/22/ti-trechi-me-tin-elliniki-pedia-ta-charter-schools-ke-tin-archiepiskopi/>

Due to my intense involvement with the sinful history of the transformation of the school of St. Demetrios of Astoria into a charter school, where the abuser Koularmanis in collaboration with his “adoptive” father and “godfather” of the community, Andriotis and the other great greed of the Greek community former publisher and former deputy minister A. Diamataris, tried unsuccessfully to appropriate the school for their own personal benefit and to extract it from the community, I am particularly sensitive to the issue...

...

However, when I hear the name Koularmanis in any situation – knowing the background of this man – I immediately have suspicions. It is true that the arrival of AB Elpidoforos gave a new impetus to the development of charter schools. But in this case the main reason was not so much the idealism for the development of hellenic education in the USA, as it was financial. When the state or federal government subsidizes these schools with more than \$ 10,000 per student, it makes them profitable from the start.

Koularmanis, who always prioritizes money in his mind and he would excel if he was a used car salesman (but in education he made a mess with the disaster he brought to the St. Demetrios School), conceived the idea quite early. In fact, he had the opportunity to present it to the newly arrived Mr. Elpidoforos last August in a 3-hour private meeting at the Archdiocese, which obviously led to his recruitment for the position of Director of Education. Koularmanis’ idea was simple: Create charter schools everywhere with the goal of generating income. Mr. Elpidoforos, who received a bankrupt Archdiocese and he did not know the true character of Koularmanis, was certainly convinced. The bad advisers around him – and especially the Bishop of Medea Apostolos and the “godfather” Andriotis himself – persuaded him

...

In our case, however, there is not only the professional abuser Koularmanis but also a similarly questionable character from Delaware, Dimitris Dandolos, former – and I emphasize the former – president of the Odyssey Charter School. Why is Mr. Dandolos “former”? He is a “former” because he was forced to resign by the Delaware State Department of Education, which investigated the school’s affairs and put it on probation... It is true, dear friends, you heard right... The school of which Mr. Dandolos was president is under probation, and yet his name was heard so many times at the Archdiocese’s webinar that everyone thought he was the “God of Greek Education in America”... I will not go into the – mostly financial – reasons that led Delaware’s Department of Education to change the Odyssey administration. However, the fact is that Mr. Dandolos was at the center of the

scandal. Well, we didn't have enough of Koularmanis' scandals in St. Demetrios, will we now deal with Dandolos' work in Delaware? We really deserve a brake from the deviant behavior of certain characters... Can Mr. Mitkas explain why Dandolos, who was forced to resign because of his financial abuses, was suddenly "sanctified" in the webinar?

...

Koularmanis, who did not speak a single sentence properly in Greek during the teleconference, Greek education in America cannot move forward. Why they didn't ask the advice of successful schools and teachers from Florida?

FIRST CAUSE OF ACTION

(Gender discrimination; New York Executive Law)

86. Plaintiff Anastasios re-alleges paragraphs 1 through 66.

87. The above-described actions of defendants School, Asprogerakas, Constantine Elizabeth, and Dritsas substantially interfered with plaintiff Anastasios's employment and duties, and created an intimidating, hostile and offensive work environment, in violation of New York Executive Law § 296.

88. The refusal of these defendants to act to protect plaintiff Anastasios, and their complete disregard for his rights and sensibilities have caused him to lose, and he will continue to lose, substantial income including, but not limited to, wages, social security, fringes, pension and seniority benefits, and other benefits due him

89. As a further direct and proximate result of these unlawful employment practices, plaintiff Anastasios has suffered the indignity of discrimination on the basis of his gender, the invasion of his rights to be free from discrimination and sexual harassment, and great humiliation, which has manifested in physical illness and emotional stress.

90. As a further direct and proximate result of these unlawful employment practices, plaintiff Anastasios has suffered extreme mental anguish, outrage, severe anxiety about his future and his ability to support himself and his family, harm to his employability and earning capacity, painful embarrassment among his friends and co-workers, damage to his good reputation, disruption of his personal life and loss of enjoyment of the ordinary pleasures of everyday life.

91. Accordingly, plaintiff Anastasios is entitled to compensatory and punitive damages against the defendants, in an amount to be determined by a jury and the Court, and to a reasonable attorney's fee.

SECOND CAUSE OF ACTION
(Sexual Discrimination and Harassment; New York City Administrative Code)

92. Plaintiff Anastasios re-alleges paragraphs 1 through 66,

93. The above-described actions by defendants School, Asprogerakas, Constantine, Elizabeth, and Dritsas constitute an unlawful discriminatory practice and/or acts of discriminatory harassment as defined in Chapter 1 and Chapter 6 of Title 8 of the New York City Administrative Code respectively.

94. Pursuant to § 8-502 of the Administrative Code of the City of New York, plaintiffs have a cause of action for commentary and punitive damages, and are entitled to a reasonable attorney's fee.

THIRD CAUSE OF ACTION
(Unpaid salary and commissions)

95. Plaintiff Anastasios re-alleges paragraphs 1 through 66.

96. During his tenure at the School, plaintiff Anastasios had an employment contract with the School, one provision of which paid him a commission, consisting of ten percent of any grants or monies which he might bring to the School. That provision was approved by the Board of the Parish Council.

97. Plaintiff Anastasios was also entitled by his contract to reimbursement for his expenses incurred.

98. During the five years prior to his resignation, he procured for the School several grants, amounting to approximately \$825,000. They were (a) a grant from the Universal Pre-K program of \$540,000, (b) a Security Grant of \$125,000, and (c) more than \$200,000 in a Mandated State Aid program.

99. In addition to those grants, plaintiff Anastasios obtained the gift to the School of an office building, from a physician. On information and belief, the School recently sold the building for approximately \$650,000.

100. In sum, for the past five years, plaintiff Anastasios is entitled to a commission bonus of approximately \$578,000.

101. In addition, Plaintiff Anastasios is entitled to payment for accumulated vacation time, and unpaid salary, in the amount of \$9600.

102. Plaintiff Anastasios is entitled to a money judgment against the School for the unpaid commissions and salary, in the sum of \$587,600, with interest.

FOURTH CAUSE OF ACTION
(Defamation)

103. Plaintiff Anastasios re-alleges paragraphs 1 through 72 and 73. .

104. The foregoing language, taken as a whole, is of and concerning plaintiff Anastasios, and is false and defamatory *per se*.

105. It asserts as a fact that plaintiff Anastasios is guilty of blackmail, authoritarianism and terrorism.

106. It impugns his excellent record as an educator and administrator.

107. It accuses him of mishandling funds and of possible embezzlement.

108. It falsely accuses plaintiff Anastasios of theft, of being incompetent in his profession, of neglecting his responsibilities, and of sexual harassment of female students.

109. Defendant Stamatakis either knew, or had reason to know, that his allegations were false, but published them anyway, with constitutional malice and with intent to harm and destroy plaintiff Anastasios's reputation in the community.

110. Plaintiff Anastasios is entitled to a judgment against defendant Stamatakis, declaring that the complained-of statements allegations are false and defamatory, compensatory and punitive damages, a judgment requiring a retraction and the removal of the false and defamatory statements from the internet, and such other damages as a jury and the Court may determine.

FIFTH CAUSE OF ACTION
(Defamation)

111. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 74 and 104 through 110.

SIXTH CAUSE OF ACTION
(Defamation)

112. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 75, and 104 through 1101.

SEVENTH CAUSE OF ACTION
(Defamation)

113. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 76, and 104 through 110.

EIGHTH CAUSE OF ACTION
(Defamation)

114. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 77, and 104 through 110.

NINTH CAUSE OF ACTION
(Defamation)

115. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 78, and 104 through 110.

TENTH CAUSE OF ACTION
(Defamation)

116. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 79, and 104 through 110.

ELEVENTH CAUSE OF ACTION
(Defamation)

117. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 80, and 104 through
110.

TWELFTH CAUSE OF ACTION
(Defamation)

118. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 82, and 104 through
110.

THIRTEENTH CAUSE OF ACTION
(Defamation)

119. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 82, and 104 through
110.

FOURTEENTH CAUSE OF ACTION
(Defamation)

120. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 83, and 104 through
110.

FIFTEENTH CAUSE OF ACTION
(Defamation)

121. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 84, and 104 through
110.

SIXTEENTH CAUSE OF ACTION
(Defamation)

122. Plaintiff Anastasios re-alleges paragraphs 1 through 72, 85, and 104 through 110.

SEVENTEENTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress)

123. Plaintiffs re-allege paragraphs 1 through 85.

124. In addition to writing the words quoted above, and sending the letters referred to above, defendants have engaged in other malicious acts of humiliation, embarrassment, harassment and vilification of plaintiffs, including but not limited to: (a) communicating to plaintiff Mary, and their son the lies about defendant Elizabeth's relationship with plaintiff Anastasios, (b) making repeated harassing telephone calls to the plaintiffs' residence; (c) sending numerous other letters and missives to the plaintiffs, in addition to those alleged above, all with the intent of harassing and maliciously distressing the plaintiffs.

125. The defendants' actions are both outrageous and shocking and exceed all bounds of decency. The defendants' actions exceed what any average member of the community should be required to tolerate.

126. Defendants have engaged in their outrageous campaign against the plaintiffs intentionally and maliciously for the purpose of injuring the plaintiffs and/or in reckless disregard of the effects their conduct would have upon the plaintiffs.

127. By reason of the foregoing, the plaintiffs have suffered severe emotional distress and anguish and, if the defendants are not permanently enjoined from continuing their outrageous and malicious course of conduct, the plaintiffs will continue to suffer severe emotional distress and anguish.

128. In addition, the defendants' conduct has been intentional, willful and malicious and so plainly in excess of accepted standards of behavior that plaintiffs are entitled to punitive damages in an amount to be determined at trial.

WHEREFORE, plaintiffs demand judgment against defendants as follows:

1. On their First and Second Causes of Action against all defendants other than defendant Stamatakis, compensatory and punitive damages, as may be determined by a jury and the Court, together with a reasonable attorney's fee.

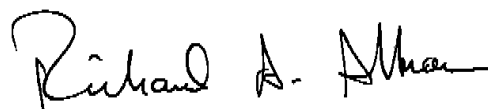
2. On their Third Cause of Action, a money judgment against defendant School for \$587,600, with interest;

2. On each of their Fourth through Sixteenth Causes of Action, a judgment declaring that the statements contained therein which are of and concerning plaintiff Anastasios are false and defamatory, and awarding compensatory and punitive damages against defendant Stamatakis in such sums as may be awarded by a jury and the Court;

2. On their Seventeenth Cause of Action, compensatory and punitive damages, as may be determined by a jury and the Court;

Together with the costs and disbursements of this action, and such other relief as may
be just.

Dated: New York, New York
June 15, 2020



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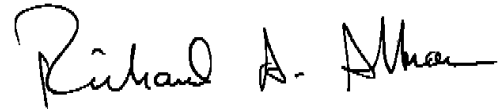
VERIFICATION

Richard A. Altman affirms under penalty of perjury that I am the attorney for plaintiffs in this action, that I know and have read the contents of the foregoing complaint, and that the allegations in the complaint are true to my own knowledge, except as to matters alleged upon information and belief, and as to those matters I believe them to be true.

The sources of my information and grounds of my belief as to all matters in the foregoing document not stated to be made upon my knowledge are review of documents and conversations with the plaintiffs.

This verification is made by me because the plaintiffs do not reside in the county where my office is located.

Dated: New York, New York
June 15, 2020



RICHARD A ALTMAN