

PARDALIS &  
NOHAVICKA  
ATTORNEYS

November 1, 2019

VIA ELECTRONIC MAIL

**NOTICE TO CEASE AND DESIST**

galatoulasp@  
dionysios@

**DEMAND TO CEASE AND DESIST AND DEMAND FOR RETURN OF PROPERTY**  
(This document should be presented to your legal representative upon receipt)

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Mr. Galatoulas, Mr. Pilarinos:

This firm represents the Board of Directors of the Federation of Hellenic Societies of Greater New York, Inc. ("Federation").

We have been advised that Mr. Galatoulas, currently a Board member, called for a purported meeting of all of the Federation's members, by a relevant communication dated October 25, 2019, for a "briefing on Mr. Kleanthis Meimaroglou actions in contravention of the Federation's Constitution which led to his removal from President by the majority of the Board of Directors, in accordance with the Federation's Constitution". As was the case with a previous communication sent by Mr. Galatoulas recently, Mr. Galatoulas neither has the authority nor has he complied with the Constitution of the Federation in calling for such meeting. Further, this purported meeting was scheduled on the same date as the legitimate General Assembly of the Federation, presumably to create confusion and obstruct the normal course of the Board of Director's business.

As a preliminary matter, we absolutely reject your assertion that Mr. Meimaroglou has been removed as President of the Federation. The Federation's Constitution sets forth a detailed process for the removal of the President, which has not been followed in this case.

Further, Mr. Galatoulas, in calling such "meeting", has not complied with Clause 15 (3) of the Constitution which provides that the Board of Directors convenes on special occasions if requested in writing by 1/3 of its members. It is also noted that the relevant communication

bears the signature of Mr. Pilarinos, who signs it as “Secretary”, although he no longer holds that position, and is not part of the Board of Directors.

Therefore, any purported meeting called for November 5, 2019 at 6:30 p.m. by Mr. Galatoulas is illegal and appropriate action will be taken to prevent it. The Federation is prepared to take all necessary disciplinary and legal measures, as necessary, to prevent any such illegal and impermissible activities. You are, however, invited to attend the Federation’s meeting, scheduled to take place at the Federation, on November 5, 2019 at 5 pm, should you choose to.

Additionally, you are in default under the Federation’s Constitution in failing to render a full accounting for the 2019 Parade, which should have been provided within sixty (60) days after the Parade (Clause 20 (9)). You are directed to provide such accounting, together with all relevant correspondence, letters, emails, permits and licenses, to the Board of Directors immediately, and in any event, no later than Monday, November 4, 2019.

Finally, you are directed to immediately return to the President and/or Secretary all records, including, without limitation, membership records, meeting minutes, access sheets records, as well as keys in your possession, upon receipt of this letter, and to cease and desist from using the Federation’s letterhead in any communications, unless specifically authorized by the President. Such items must be returned immediately, and in any event, no later than Monday, November 4, 2019.

This is the last of multiple requests for your immediate return of these items, and your compliance with the Federation’s Constitution.

Be guided accordingly.

**PARDALIS & NOHAVICKA, LLP**

By: