

PARDALIS &
NOHAVICKA
ATTORNEYS

October 22, 2019

VIA ELECTRONIC MAIL

NOTICE TO CEASE AND DESIST

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

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 Board of Directors meeting, by a relevant electronic mail sent to the Board members on October 20, 2019, for the election of a new President. It is patently obvious that Mr. Galatoulas neither has the authority nor has he complied with the Constitution of the Federation in calling for such meeting.

Specifically, he has not complied with Clause 9 of the Constitution which provides that: "Special Elections may be held if: 1) 2/3 of the Board of Directors ask for such elections in a signed writing because of lack of confidence to the President; 2) the majority of the Board of Directors states in writings that there is dysfunction in the operation of the Federation and General Elections are required [...]; 3) it is suggested by the President and voted by 50%+1 of the Board of Directors members after a justified proposal; or 4) it is requested by 50+1 of the Members of the Federation." He has neither 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.

Therefore, any purported meeting called for October 22, 2019 is illegal and appropriate action will be taken to prevent it. You are, however, invited to attend the Federation's meeting, scheduled to take place at _____, at ___ 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.

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.

If you fail to comply with this letter upon receipt, and in any event within five (5) days with respect to the 2019 Parade accounting and return of records, the Federation will proceed with litigation to protect its rights and the rights of its members.

Be guided accordingly.

PARDALIS & NOHAVICKA, LLP

By:

Taso Pardalis