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COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT
C.A. NO. 17CV00195

_____)
 MARIA KOTROTSOU, as)
 permanent judicial guardian for)
 Myrto Papadomichelaki,)
 Plaintiff)
 v.)
)
 FEDERATION OF HELLENIC)
 AMERICAN SOCIETIES OF NEW)
 ENGLAND,)
 Defendant)
)
 and)
)
 CITIZENS BANK)
 _____)

2017 Jan 24 Filed in Court
 [Signature]
 Assistant Clerk

AFFIDAVIT OF MILTON ATHANASOBOULOS

1. I, Milton Athanasoboulos, am the current President of the Federation of Hellenic American Societies of New England (“Defendant”).
2. In approximately 2013, Defendant used Youcaring.com, a crowdfunding website, to raise money to help Myrto Papadomichelaki (“Myrto”) after she was brutally beaten while walking on the beach in Paros, Greece as a part of an effort to bring the Greek community together and to demonstrate support and solidarity in the Greek community. Defendant was asked Myrto’s friends to assist in the fundraising efforts.
3. Plaintiff requested that Defendant raise money to pay for a Tobii Speech Generating Device, as Myrto was unable to speak. Defendant expended considerable time and effort to coordinate the crowdfunding endeavor and made numerous phone calls, including out of state calls. Through its efforts, and using the crowdfunding website, Defendant raised

approximately \$71,192. Plaintiff spoke directly with Defendant and advised that the Tobii machine was no longer necessary, but asked Defendant to provide the money to her directly. She made this request several times. Defendant declined.

4. In November 2013, Plaintiff advised Defendant that doctors recommended additional surgery. She indicated that it would cost approximately \$85,000.
5. In December 2013 Myrto underwent surgery at Children's Hospital for insertion of a Baclofen pump and catheter.
6. Defendant held a fundraising event, at its own expense, for Myrto in light of her ongoing medical needs, pursuant to which additional money was raised for purposes of paying for the surgery. All of the money raised was deposited into the Citizens' Bank account, without any deduction for any expenses.
7. Plaintiff attended the fundraising event, and thanked Defendant for its efforts.
8. Subsequently, Plaintiff came to meet with Defendant accompanied by an attorney, and demanded money from Defendant to bring Myrto back to Greece.
9. Children's Hospital submitted an initial bill for \$80,000, but later discounted the bill to approximately \$50,607. Defendant paid this bill from Children Hospital using the funds that were raised.
10. In January 2014, Plaintiff continued to demand that Defendant provide her with money. Defendant clarified a number of times that it was concerned about use of the funds for their intended purpose.

11. The funds are presently in the Citizen's bank account. Defendant has not used the funds for any other purpose other than to pay for Myrto's medical bills and has no intention of using the funds for any other purpose.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 24th DAY OF
JANUARY, 2017.

A handwritten signature in black ink, appearing to read "Milovan A. Stankovic", written over a horizontal line.