

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

Index No.:

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FEDERATION OF HELLENIC SOCIETIES OF  
GREATER NEW YORK, INC.

Plaintiff designates  
QUEENS County as the place of trial

Plaintiff,

-against-

**SUMMONS**

DEMETRIUS KALAMARAS, CLEANTHIS  
MEIMAROGLOU, DIMOS SIOKIS, ELIAS  
TSEKERIDIS, NIKOLAOS DIAMANTIDIS and  
DIMITRIS GONIAS,

The basis of venue is:  
Plaintiff's residence

Defendants.

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To the above names Defendant(s):

**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 Plaintiff's Attorney(s) 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 herein.

Dated: Long Island City, New York  
March 21, 2022

KALAVESIOS LAW GROUP PLLC

By:



Ted Kalavesios, Esq.  
Attorney(s) for Plaintiff(s)  
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Defendants' Addresses:

Demetrius Kalamaras  
63 Harbor View Pl.  
Staten Island, NY 10305

Cleanthis Meimaroglou  
141-42 11th Avenue  
Whitestone, NY 11357

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 03/22/2022

Dimos Siokis  
340 E 64th Street  
New York NY 10065

Elias Tsekeridis  
53 Apple Hill Road  
Brewster NY 10509

Nikolaos Diamantidis  
214-38 26th Avenue  
Bayside NY 11360

Dimitris Gonias  
108 River Rd.  
Bogota, NJ 07603

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X Index No.

FEDERATION OF HELLENIC SOCIETIES OF  
GREATER NEW YORK, INC.

Plaintiff,

-against-

**VERIFIED COMPLAINT**

DEMETRIUS KALAMARAS, CLEANTHIS  
MEIMAROGLOU, DIMOS SIOKIS, ELIAS  
TSEKERIDIS, NIKOLAOS DIAMANTIDIS and  
DIMITRIS GONIAS

Defendants.

-----X  
Plaintiff, Federation of Hellenic Societies of Greater New York, Inc., by its attorney  
Kalavesios Law Group PLLC, as and for its verified complaint alleges upon information and  
belief as follows:

**THE PARTIES**

1. Plaintiff Federation of Hellenic Societies of Greater New York, Inc. (hereinafter the "Federation") is a New York domestic non-profit organization, located at 22-51 29<sup>th</sup> Street, Astoria, New York.
2. Upon information and belief, Defendant Demetrius Kalamaras (hereinafter "Kalamaras") is an individual residing at 63 Harbor View Pl., Staten Island, NY 10305 and has improperly held himself out and represents to others that he is an officer of the Plaintiff.
3. Upon information and belief, Defendant Cleanthis Meimaroglou (hereinafter "Meimaroglou") is an individual residing at 141-42 11th Avenue, Whitestone, NY 11357 and has improperly held himself out and represents to others that he is an officer of the Plaintiff.

4. Upon information and belief, Defendant Dimos Siokis (hereinafter “Siokis”) is an individual residing at 340 E 64th Street, New York NY 10065 and has improperly held himself out and represents to others that he is an officer of the Plaintiff.
5. Upon information and belief, Defendant Elias Tsekeridis (hereinafter “Tsekeridis”) is an individual residing at 53 Apple Hill Road, Brewster NY 10509 and has improperly held himself out and represents to others that he is an officer of the Plaintiff.
6. Upon information and belief, Defendant Nikolaos Diamantidis (hereinafter “Diamantidis”) is an individual residing at 214-38 26th Avenue, Bayside NY 11360 and has improperly held himself out and represents to others that he is an officer of the Plaintiff.
7. Upon information and belief, Defendant Dimitris Gonias (hereinafter “Gonias”) is an individual residing at 108 River Rd., Bogota, NJ 07603 and has improperly held himself out and represents to others that he is an officer of the Plaintiff. Defendant Gonias’s activities in New York are continuous and systematic and the causes of action are related to those activities.

#### FACTS/BACKGROUND

8. The Federation is a non-profit organization, based in Astoria, consisting of Greek member organizations, societies and associations.
9. It holds various social, cultural and educational events, including the Annual Greek Independence Day Parade on NYC’s Fifth Avenue.
10. The election of the Board of Directors and every other procedure having to do with the Federation’s operation and administration is set forth in the Federation’s Bylaws (“Bylaws” or “Federation Articles” or “constitution”). They were originally drafted in Greek (a copy of the Bylaws in Greek is attached hereto as **Exhibit A**), and upon information and belief

- were never translated in English until presently when the new Board properly translated them (a copy of the translated Bylaws with an affidavit by the translator are attached hereto as **Exhibit B**).
11. The Federation is normally governed by a 21-member Board of Directors, elected every two (2) years, in the month of June by the representatives of the member societies belonging to the Federation.
  12. The General Assembly constitutes the supreme administrative body of the Federation. It is composed by the representatives of the member societies of the Federation (Art. 17., par 1 of the bylaws)
  13. The previous Executive Board had been elected in 2018, with defendant Meimaroglou as the President.
  14. Meimaroglou, from the outset, became involved in a prolonged conflict with his Vice-President, Petros Galatoulas (“Galatoulas”) and the majority of the Board, a conflict based on different issues involving the Administrative of the Federation and further exacerbated by personality conflicts (and additional personal business quarrels between Meimaroglou and Galatoulas).
  15. As a result, Meimaroglou became abusive and confrontational. In addition, he and a minority of the Board that was favoring him, including defendant Kalamaras, started acting unconstitutionally and behaving as if they owned the Federation. Knowing that a majority of the Board members were against him, Meimaroglou started disregarding the Federation’s bylaws which mandated convening a General Assembly to deal with such issues of friction and dissent that had resulted in the Federation’s inactivity and dysfunctionality.

16. In 2019, due to the above described dissension among the members of the Executive Board, and the fact that Meimaroglou refused to follow the will of the majority and the bylaws, a majority of the members who were decidedly against Meimaroglou, were calling for his replacement, pursuant to the Bylaws and for convening General Assembly.
17. Specifically, on, September 29, 2019, twelve (12) members of the Executive Board, a clear majority of the 21-member Board, expressed officially, and in writing, as per article 11 paragraph 9 (2), their conviction that there was dysfunctionality in the Executive Board and asked President Meimaroglou, to follow the directions of the Federation's constitution<sup>1</sup> for such a case.
18. Defendant Meimaroglou failed to call two special Executive Board Meetings, within 10 days from the above official written notification-letter, in which, as it is mandated by the Bylaws [article 11 paragraph 9 (2)], if dysfunctionality is confirmed, in both of these Special Executive Board meetings, president Maimaroglou must call, within 30 days, an Extraordinary Executive Board meeting for the election of a new President.
19. After Meimaroglou's failure to call the aforementioned executive Board Meetings, Galatoulas, the Federation's A' Vice President (and former President himself) called the two (2) special executive Board meetings, as it is mandated by the same article of the Bylaws.
20. Dysfunctionality was confirmed in both of these Special executive Board meetings, which convened on October 15, 2019 and October 17, 2019.
21. Following such confirmation of dysfunctionality, Galatoulas called an *Extraordinary* Executive Board meeting on October 22, 2019, in which Meimaroglou was removed and A. Aronis was elected as the new President with the constitutional responsibility to lead the Federation to a General Election. (pursuant to Article 11 paragraph 9 (2)).

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<sup>1</sup> Bylaws

22. The Executive Board then called a General Assembly, which took place on November 5th 2019, in order to inform the society members of Meimaroglou's unconstitutional refusal to comply with the federation bylaws and to prepare for elections.
23. However, this General Assembly was held outside the Stathakeion Cultural Center ("Stathakeion" or "the federation building"), since Meimaroglou, improperly and contrary to the bylaws, closed the Stathakeion and did not allow the General Assembly to convene inside the building (this was the first of many occasions when defendant Meimaroglou, treating the federation's building as his personal abode, locked out those he disagreed with, even though they represented the majority of the representatives of the member societies).
24. The General Assembly having achieved the required quorum, upheld the decisions of the Executive Board.
25. These steps were also supported, on legal grounds, by the then legal adviser of the Federation, attorney Mamie Stathatos-Fulgieri.
26. Meimaroglou refused to accept the decisions of the Executive Board and the General Assembly.
27. Furthermore, Meimaroglou never convened the constitutionally-mandated Ordinary General Assembly, which constitutes the supreme administrative body of the Federation to decide on the above and many other issues:
28. It is constitutionally required to have at least three (3) regular General Assemblies per year. There were only two (2) General Assemblies in 2019. The last regular General Assembly that Meimaroglou convened was on June 6, 2019.
29. By late spring of 2020, it became impossible, due to Covid-19, to have General Assemblies or any large gatherings.

30. Due to Covid-19 restrictions, the 2020 Annual Greek Independence Day parade on Fifth Avenue in New York City was cancelled.
31. In addition, due to the same Covid-19 restrictions, the Bylaws-mandated Elections for June 2020 were also canceled.
32. For all practical purposes the Federation was not functioning and facing two separate challenges: A) the Covid-19 crisis and B) the dysfunctionality of the Executive Board which was split in two parts, a majority of at least 12 members supporting Galatoulas and a minority supporting Meimaroglou.
33. Meimaroglou was refusing to: a) recognize the decisions of the majority; b) accept the existence of dysfunctionality and to take the bylaws-required steps for general elections and c) call an Ordinary General Assembly, even before the Covid-19 crisis and deal with the dysfunctionality and many other issues.
34. It had become evident, to most members of the Federation, that due to the dysfunctionality of the executive Board and the Covid-19 crisis the Federation needed an amendment to the bylaws so that the Federation would be able to cope with the unforeseen, and not covered by the Bylaws, dual crisis.
35. At the end of 2020, beginning of 2021, in an effort to resolve the impasse which had developed, a group of former presidents and other individuals stepped in to smooth things over so that the Federation would function better and the scheduled, although doubtful, upcoming Annual Greek Independence parade would succeed.
36. Following that, Meimaroglou as President with Galatoulas as his A' Vice President (and former President himself) and all the members of the Board supporting them agreed to ask for a Bylaws amendment, titled "Temporary Addition, Article Sixteen, Paragraph Seven"

- (“constitutional Amendment” or “amendment”) that gave the right to an Administrative Committee of former presidents of the Federation (“Administrative Committee”) to take over the Administration of the Federation, **until the next elections in 2021**.
37. The constitutional Amendment was sent to the Federation’s member societies and their representatives and passed, in or about the beginning of January, 2021.
38. The Amendment was set to take effect immediately and to be in effect only for a short period of time, for several months, **until the next elections in 2021**, after which it would cease to be in operation.
39. It is very important to emphasize that the Administrative Committee was to decide issues **unanimously**, per the specific mandate of the amendment, and if unanimity was not possible then the coordinator was to convene, within twenty (20) days, a General Assembly to decide the issue of disagreement.
40. Seven and only seven former Presidents accepted, *in writing*, to be part of the Administrative Committee.
41. The Administrative Committee of seven (7) presidents took over the Federation in the beginning of February 2021. Timoleon Kakouros (“Kakouros”), who was *not* himself a former president, was elected, unanimously, as the Coordinator, without the right to vote.
42. By agreement of the Administrative Committee, quorum was set at four (4) (as the members were only seven) and they had to be physically present (this was also part of the agreement they signed).
43. On or about February 9, 2021, during a Administrative Committee meeting, among other issues, an accounting (a “protocol” per the bylaws) of assets and liabilities of the Federation was rendered by the previous Board of Directors to the new Administrative Committee.

44. On a subsequent meeting of the Administrative Committee, on February 15, 2021, the issue of positions of responsibility of the different former presidents was decided with, *inter alia*, Apostolos Tomopoulos (“Tomopoulos”) being elected as Secretary and Timoleon Kakouros as Coordinator.
45. In or about the end of February 2021, the defendants insisted on hiring a part-time three-day, \$600-per-week, secretary, Katerina Efthimiadou (“Efthimiadou”), who was upon information and belief a close acquaintance of defendant Siokis (“Siokis”), to act, as it was later proven, on the defendants’ behalf, without advertising for the position, a clear violation of the bylaws and an indication of their intentions.
46. Upon coordinator Kakouros’s objections about the lack of transparency, the defendants who were in the Administrative Committee acceded to at least, inadequately, advertise for the position, only once, in the National Herald, an Astoria-based Greek newspaper (eventually, Efthimiadou ended up working one day a week and later on an as-needed basis). It is noteworthy that subsequent to the Coordinator’s objections, after the meeting and on that very night, Kakouros was verbally attacked and cursed by defendant Siokis.
47. Upon being hired, Efthimiadou acted as if she was the private Secretary of the Defendants in several ways:
- a. The final version of any letter she prepared was in accordance with the wishes of Siokis and without the final approval of Tomopoulos, the elected General Secretary, or coordinator Kakouros.
  - b. She never helped the Coordinator, in anything he asked, under the extremely difficult task, under the Covid-19 conditions, for primarily organizing the three Bicentennial events honoring the Hellenic Revolution of 1821.

- c. Efthimiadou always entered Meimaroglou's name, the former President, in the letterhead with the title of Administrative President of the Administrative Committee, even though, no such decision was taken, there were repeated objections to such usage and Mr. George Razis, the Federation's legal advisor, was against the inclusion of Meimaroglou in the letterhead.
48. As a result, some of the correspondence by the Administrative Committee was necessary to be generated by Efthimiadou and some by Ioannis Koutalis ("Koutalis"), the latter acting, amongst other things, at the request of Coordinator Kakouros and Secretary Tomopoulos.
49. In or about April 2021, Kalamaras, Siokis, Elias Tsekeridis ("Tsekerides") and Nicholas Diamantidis ("Diamantidis") (supporters of the previous Executive Board), raising insignificant issues, engaged in obstructing, and delaying the Secretary Tomopoulos and the Acting Treasurer Dimitrios Paliouras ("Paliouras") from sending a letter to ask our society members to pay their dues and if necessary to update their mailing and other pertinent information concerning their societies. The letter was eventually mailed, as it is constitutionally demanded after more than a week delay.
50. It is presumed that their intent behind their dilatory tactics was to impede, by any means, the process leading to the General Elections, since they did not have enough "votes" to win and elect their members as Directors of the Board and transform the Federation from a second-tier/degree to a first-degree<sup>2</sup> (πρωτοβάθμιο) Organization/Federation, with individuals at large as members, an idea favored and proposed, upon information and belief, by honorary President Stathakos.

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<sup>2</sup> First-tier or first degree or primary organizations have physical persons as members. Secondary or second-tier, second-degree organizations (often federations like the Plaintiff) have other organizations or societies as members.

51. As an example of their tactics, Defendant Kalamaras did not update the pertinent addresses of his society “Asylon Aniaton” with the Federation’s Secretary and as a result the letter was sent to a previous address which however he somehow received, anyway.
52. Almost from the start, due to the divisive actions of the Defendants, a 4-3 schism developed in the Administrative Committee, between the defendants who had also supported Meimaroglou and his actions in the previous Board (the four members being defendants Kalamaras, Siokis, Tsekeridis and Diamandidis and those opposing the defendants’ unconstitutional illegal actions (George Georgopoulos [“Georgopoulos”], Tomopoulos, and Nicholas Vellios [“Vellios”])<sup>3</sup>.
53. A point of disagreement between the two factions in the Administrative Committee was how to handle complaints made by and against various former presidents. Defendant Kalamaras brought forth to the Administrative Committee a list of accusations against Galatoulas (“Galatoulas”), who however, having had prepared his own accusations against defendants, former presidents, Kalamaras, Siokis and Meimaroglou, proceeded to file them.
54. These mutual accusations were not only destructive to the spirit of consensus and unanimity that should have prevailed in the work of the Committee but were also time-consuming and interfering with the preparations to host the Annual Greek Independence Day parade and to handle other substantive issues of the Federation.
55. Even more importantly, there was no standing disciplinary Committee at that time to refer these accusations, since pursuant to the Bylaws the disciplinary Committee would have to include existing members but *also* two (2) new members who would be elected by the

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<sup>3</sup> The defendants and their supporters claimed a 5-3 “majority” counting Stathakos, who although being a former President, had, for months, refused to participate and has never formally accepted the position.

- General Assembly, which had *not* been convened yet because, *ironically*, the four (4) members of the Administrative Committee were opposed to holding a General Assembly.
56. Thus, the function of the Administrative Committee degenerated into a continuous series of disputes between the two sides. Specifically, the “4” of the Administrative Committee, with Meimaroglou and Stathakos supporting them, were making accusations, without definite and verified proof, especially targeting Galatoulas (whom they considered to have somehow an all pervasive pernicious and deleterious power and influence), suspecting the majority of the representatives of the General Assembly (the highest body of the Federation) and setting themselves up and acting as the paragons of virtue and excellence and acting as if they, themselves, were the highest body of the Federation and above the General Assembly.
57. They disregarded the fact that that very attitude and any actions stemming from it was against the spirit and letter of the bylaws which clearly stated that the General Assembly (not the Executive Board or in this case the Administrative Committee) was the highest body of the Federation, and that the Audit Committee (and to a large extent the Institutions and Transparency Committee) were independent Committees elected by the General Assembly to, first, examine and check, *inter alia*, the finances and the administrative conformity to the bylaws, of the Executive Board, and second to examine the membership of the Federation.
58. Thus, they were asserting that the Federation’s membership rolls were incomplete and/or inaccurate, (even though Meimaroglou was in charge, being the President for the last three years), that several Society members were not fulfilling the criteria for full membership participation, that, on the basis of Kalamaras’s accusations, disciplinary action should be taken against Galatoulas, and in general demanding, in addition to the disciplinary action, that a thorough membership and financial investigation take place, before General Elections.

59. However as previously indicated, they were neither proponents of due process nor of other steps that were complying with the Federation's bylaws so that the Federation would be brought to normalcy and elections would be held within the time frame provided by the Bylaws and the Constitutional Amendment.
60. To begin with, the defendants of the Administrative Committee were contradicting themselves on several grounds. Firstly, they disputed the validity of membership rolls but were themselves elected, a short while ago, on the basis of them, as these rolls had been provided by Meimaroglou.
61. Secondly, the defendants of the Administrative Committee were pushing for an investigation of the accusations filed against Galatoulas and demanding action against Galatoulas but were against convening a General Assembly which was necessary to fill in the unoccupied positions of the members of the Disciplinary Committee so that such Committee could function and conduct its investigation.
62. Thus in general, the defendants of the Administrative Committee proposed all kinds of investigations which could only be performed, pursuant to the bylaws, by the different appropriate committees which had either been elected or could be elected by the General Assembly but they were nevertheless opposed to convening such General Assembly.
63. In addition, they were creating obstacles in inviting the members to pay their dues, a necessary precondition for the existence of the committees, the General Assembly and Federation itself.
64. Acting in the same spirit, they were vehemently against convening the May 16, 2021 General Assembly, which is the highest body of the Federation, in which transparency

- issues could be raised and the two missing members for the Disciplinary Committee would be elected, enabling the Committee to function.
65. They also opposed, later on, the two-day Convention in which all the Committees, and especially the Institutions and Transparency Committee and the Audit Committee, would give their report, and continue their investigations if needed, and where any concerns, accusations pertinent questions, or allegations would be presented, reported and decided on.
66. In contradistinction, the remaining three (3) members of the Administrative Committee and those supporting them were pushing for due process and took the proper measures to accomplish financial and Administrative transparency by following the bylaws-mandated steps, by asking the members to pay their dues, convening the General Assembly and the Two-Day Convention (during which the different Committees give their report and the representatives can ask pertinent questions and get answers). The three such members were always pressing, at the end, for the bylaws-mandated General Elections to take place and allow the stagnant Federation to move on under a newly-elected Executive Board.
67. Relative to the elections, the arguments between the two sides centered also on the need to notify the member societies to pay their dues and update their information thus becoming eligible to vote and especially convening a General Assembly and a two-day Convention, with the defendants doing their best to delay such outcome and resisting even the suggestion that a letter should be mailed out to said members, to pay their dues which mentioned the possibility of a two-day Convention and elections.
68. On or about April 24, 2021, as the above described events were transpiring, defendant Meimaroglou, who was not a member of the Administrative Committee, presumably with the knowledge and support of the rest of the defendants changed the locks at the entrance door of

- the Federation's building, at 22-51 29<sup>th</sup> Street, Astoria, NY 11105, without authorization and without informing the Coordinator, the President of the Building Committee G. Georgopoulos or the General Secretary A. Tomopoulos.
69. Upon information and belief, such illegal action was done with the support of the rest of the defendants. Such action was unauthorized, totally unilateral, unwarranted, improper, unconstitutional, illegal, contrary to the letter and spirit of the Federation bylaws and reflective of defendant Meimaroglou's, and those supporting such actions, autocratic personality and attitude.
70. That was not the only time of conducting a lock-down of the building, as Meimaroglou and the rest of the defendants proceeded to act accordingly two (2) more times and eventually permanently since September 19, 2021, by placing chains at the premises' different entrances.
71. On April 24, 2021, upon finding out of such illegal lock down, the Coordinator of the Administrative Committee consulted with the Federation's legal counsel, George Razis, and acting on counsel's advice, summoned the police and a locksmith and changed back the locks
72. On or about April 27, 2021, during an emergency meeting of the Administrative Committee, member Georgopoulos, renewed his proposal first made in writing on April 25, 2021, that a letter be mailed out to all the member societies in order to convene a General Assembly to resolve the problem of dysfunctionality of the Administrative Committee which was divided, deadlocked, and unable to resolve said multifaceted problem, pursuant to the bylaws, and bring the Federation to normalcy and hold elections in 2021.

73. His motion was opposed by Kalamaras and the rest of the defendants in the Administrative Committee, and the Coordinator, upon Georgopoulos's request, decided, pursuant to the constitutional amendment when there is no unanimity, to convene a General Assembly.
74. On or about May 16, 2021, with 34 out of 52 dues-paid member societies present, constituting a quorum, pursuant to Art. 17, par. 4, of the Federation's Bylaws, a proposal containing several parts was voted by the member societies in attendance, to resolve the issue of dysfunctionality of the Federation.
75. An important part of this proposal, that *passed unanimously*, was to prepare and convene a bylaws-mandated two-day Convention to take place on June 5-6, 2021.
76. In response to, and in retaliation for, the convening of the General Assembly, the defendants met the next day, on May 17, 2021 and attempted to replace Coordinator Kakouros. Present were the former presidents, Diamantidis, Kalamaras, Tsekeridis and Meimaroglou. In addition, by phone participated Bill Stathakos, the honorary president of the Federation, Siokis and Tasos Pardalis, Esq. ("Pardalis"), who was requested to be one of the two legal advisers of the Federation (together with Razis), even though Pardalis (unlike Razis), had never responded to Coordinator Kakouros's phone calls seeking advice, as for example in the occasion when Meimaroglou locked the doors of the Stathakeion.
77. Also invited was Christos Vournas ("Vournas") who, as per the defendants' announcement, claimed to be President of the Federation's Transparency Committee. The decisions of the improper "Administrative Committee Meeting" were taken on May 17 and announced on May 19, 2021.
78. Said Meeting was improper for a number of reasons:

A) there were only 3 former presidents physically present, Meimaroglou not being a regular member of the Administrative Committee. As such there was no quorum since it was necessary to have 4 members out of the 7 physically present for quorum purposes (importantly, this “meeting” was not called by the coordinator, had not been formally requested by any member of the Administrative Committee and coordinator Kakouros and 3 of the members of the Administrative Committee, Georgopoulos, Velios and Tomopoulos, had not been invited and were not present).

B) As far as the persons on the phone, phone participation had not been authorized or even contemplated by the Bylaws Amendment and in addition, Stathakos had never formally accepted his participation in the Administrative Committee and Pardalis and Vournas were never members of said Committee;

C) No action or decision of the Administrative Committee had a legal or binding effect unless it was unanimous (per the constitutional amendment). If unanimity did not exist, the only available course of action was for the Coordinator to call for a General Assembly. The defendants’ “Meeting” had failed to satisfy all of the above conditions.

79. The defendants of the Administrative Committee, during that meeting, made several findings and decisions, all of them beyond the authority conferred upon them by the constitutional Amendment, the rules of the Administrative Committee and the Federation’s bylaws.
80. As a result, the defendants decided to improperly replace coordinator Kakouros (on a motion by Diamantidis and seconded by Siokis) to vote Tsekeridis as the new Coordinator (on a motion by Diamantidis and seconded by Siokis), as it was published in the local Greek press, and to schedule another meeting to take place on May 24, 2021.

81. However, in response to the Defendants' continued improper and unlawful actions, Coordinator Kakouros had already called for a meeting of the Administrative Committee on May 24, 2021, on the same day and time as the defendants' subsequently scheduled improper new meeting.
82. On May 24, 2021, there was only one formal meeting of the Administrative Committee, with six former presidents present (Kalamaras, Georgopoulos, Tomopoulos, Vellios, Tsekerides and Diamantidis) and only Siokis absent. In this meeting Kakouros presided as the Coordinator. There was no motion for Tsekeridis to preside or to be accepted as the Coordinator.
83. In said meeting there was also a Zoom conference with legal adviser attorney George Razis who heard the arguments of Kalamaras and Tsekeridis against the constitutionality of the General Assembly and other issues. Razis expressed his clear legal opinion that the General Assembly, as the highest body of the Federation, has the last word and it is, as he said descriptively, "the boss" and that its decisions stand above all other decisions.
84. In the end Tsekeridis left after declaring that he resigned from his position and related responsibilities, as member of the Administrative Committee. He also made the same statement in the Greek press.
85. During the Two-Day Convention of June 5th- 6th, 2021, coordinator Kakouros gave an account of the difficulties he encountered since he was elected and the dysfunctionality of the Administrative Committee and informed the attendees that the Audit Committee and the Institution and Transparency Committee were ready to give their report and that the Convention could decide if the Federation was ready to elect an Election Committee and proceed as it was required to do by its bylaws.

86. Accordingly, the Audit Committee and the Transparency Committee gave their reports, the reports were accepted by the Convention and subsequently an Election Committee was elected preparing the way for the much needed Federation elections.
87. In addition, the Convention decided that Pylarinos was still the President of the Institution and the Transparency Committee (as the *minutes* related to his earlier replacement by Vournas, carried out by the defendants, were not in order and/or reflected decisions by the Board) thus resolving a previous dispute among the members of the Administrative Committee. The Convention also decided that George Razis was the sole legal advisor of the Federation.
88. The members of the Election Committee had been elected during the Two-Day Convention, with Gonias D. as President, Karagounis T. as Secretary, Chrysomalidis G., Karapetridis J., Mpakakis K. as members and Demetroulakos G. as alternate.
89. Pursuant to Article 11, section 2 of the Federation's bylaws and the fact that the two-day Convention ended on June 6, 2021, elections should have taken place, on or about June 16, 2021 and in the case of something unexpected no later than the end of June.
90. At about this time, on June 10, 2021 the Election Committee met with the Administrative Committee, in which the Coordinator promised the assistance of the Administrative Committee in anything it could do, without interfering in any way in its bylaws responsibilities, with defendant Siokis declaring that the bylaws stated mission of the Election Committee is to lead the Federation to elections.
91. During said meeting, right after the two day Convention, but in the absence of the Members of the Election Committee, defendant Meimaroglou disclosed, for the first time, that he had *improperly handled* about \$23,000.00 in cash, first collected by him more than two (2) years

- ago and made *unauthorized and poorly documented payments*, neither of which had been reported to the Auditing committee or the Executive Board.
92. Said improper and highly questionable action by Meimaroglou, who had not reported this to the Audit Committee, and who was now pledging to give his report, not to the Administrative Committee, but to the Election Committee, led the Federation's legal advisor to advise that an immediate report be made and the CPA be informed to make an amendment to the Federation's tax returns.
93. Pursuant to the bylaws (Article 11(2)), and keeping with the spirit of such bylaws, under these circumstances, elections should have been scheduled on or about June 16, 2021. Not only this did not happen but Gonias, as the president of his Committee, failed to request, at this time, from the Administrative Committee to convene an Extraordinary General Assembly to resolve any issues delaying the elections so that the bylaws-mandated elections would take place by the end of June. and further failed to make such request at a meeting on June 24, 2021.
94. In said meeting, convened on June 24, 2021, by the Election Committee with the Coordinator and the Administrative Committee, in which only the "3" members of the Administrative Committee came, (the "4" were all suspiciously absent), President Gonias apologized for not getting in touch with the Coordinator and the Administrative Committee sooner, that to a great extent they had finished their investigations in relation to the eligibility of candidates but he spoke of the difficulties the Elections Committee faced due to the many accusations, for alleged administrative and Financial irregularities, it had received. He was advised that he should follow the bylaws. He failed to comply and did not request, even at this late date, an Extraordinary General Assembly nor did he disclose that he did not intend to have the elections.

95. However, the bylaws-related responsibility of the Committee is to carry out an administrative and financial audit and examine the pertinent accusations only in relation to the elections whether it involved Society members, candidates etc., examining the payment dues receipts of all the member societies of the Federation, determining on the basis of that the eligibility of candidates etc., and in the end preparing the relevant audit report (per Article 10, par. 4. of the bylaws). The election Committee is not responsible for a general financial audit, as this is the responsibility of the Audit Committee (per Article 20, par. 7.)
96. At any case, Gonias did not state that he considered that these accusations constitute an Emergency event and that due to the accusations for unproven administrative and financial irregularities he did not intend to have elections, in which case the Administrative Committee, would convene an Extraordinary General Assembly to deal with the issue, and have elections within June, as it is mandated by the bylaws. (Article 11, par.2).
97. Instead, the process was delayed. Gonias, cunningly, promised that the Election Committee will set the date of the Elections in their next meeting, which was convened for June 27, 2021. Gonias, also, did not disclose that he is in secret correspondence (something that was accidentally discovered later) from his Committee and the Administrative Committee, with Kalamaras, in violation to the bylaws (Article 10, par. 11) asking him and getting written advise in setting the reasons for not having elections.
98. However, the Election Committee did not decide to have elections even on their June 27, 2021 meeting. The majority of the Election Committee was in disagreement with Gonias about the open meeting (instead of the bylaws-mandated General Assembly) that he wanted to convene and voted against such proposal, but Gonias went ahead and convened it.
99. Contrary to the bylaws (which state that if due to an emergency event Elections are delayed, the Executive Board convenes an Extraordinary General Assembly so that the issue is

- handled and elections take place before the end of June), Gonias convened an open meeting of representatives and press, on June 28, 2021 (which has no official bylaws authority to decide on anything) in which, amongst other things, he proposed (not a decision by his Committee which disagreed with him) *that* elections take place on September 12, 2021.
100. By doing that, Gonias inexplicably had decided to delay the elections, which pursuant to the Federation's bylaws, were to take place every two (2) years, in the month of June [As per article 11, paragraph 2, elections must take place in the first week of June and in no less than 10 days after the end of the two-day Convention, and in case of emergency, then the executive Committee must call within a week an emergency General Assembly and move forward the day of the Election but no later than the end of June.]
101. Gonias's conduct of delaying the elections was also contrary to the Constitutional Amendment, which stated that its mandate for the existence of the Administrative Committee was to expire upon the elections to be held in 2021.
102. Subsequently, on or about June 28, 2021, it is discovered that defendant Kalamaras, a member of the Administrative Committee, advised, in writing, defendant Gonias, the President of the Election Committee, what reasons to proffer for not having the elections, thereby undermining and corrupting the process.
103. On July 1, 2021, defendant Kalamaras, without disclosing that he was in secret correspondence with Mr. Gonias, sent an email to the Administrative Committee, the Election Committee and others stating similar arguments as those he expressed in his secret correspondence with Gonias and that, according to his reading of the bylaws, there could be no federation elections in the summer months of July and August.
104. On July 6, 2021, upon the verbal and written request of the Election Committee (absent Gonias), the Administrative Committee convened another meeting with the Election

- Committee to deal with the election delay issue, which however did not have a quorum as the 4 defendants members of the Administrative Committee were again suspiciously absent.
105. On or about July 6, 2021, as a result of the inaction by the Election Committee to organize the long overdue elections, Georgopoulos requested to have an emergency General Assembly, with the simultaneous similar request by thirty (30) Federation Society members.
106. Therefore, the Coordinator prepared and forwarded an invitation for such a General Assembly to the representatives of the member Societies as it is mandated by the bylaws Article 17 (11), for such cases even in the summer.
107. It is to be noted that on or about the same day, the Federation's legal advisor advised in writing, that the elections could be held, pursuant to the bylaws, even in the summer.
108. It should also be noted that Gonias was in open disagreement with the other four members of the election Committee and he was acting unilaterally and not following the majority. Thus, on or about July 6, 2021, in clear 4 to 1 disagreement with the members of the Election Committee, he sent invitations to have another open meeting on July 7, 2021 making clear that his intention was to avoid having a bylaws-required General Assembly.
109. On July 15<sup>th</sup>, 2021 The Extraordinary General Assembly convened, having a quorum of 33 society members, out of 63 paid members. It unanimously decided the creation of an independent Special Economic Auditing Committee, consisting of five members and two CPAs (two such members were proposed by defendant Kalamaras and accepted), to examine the finances of the Federation in the last five years, including defendant Meimaroglou's financial irregularities reported after the two day Convention, of withholding the \$23,000.00 for more than two years.
110. In addition, Election Committee Secretary Karagounis announced that his committee had completed its investigation and the Federation was now ready to hold elections in

September 2021. Election Committee President Gonias apologized for not following the decisions of the Election Committee.

111. Finally, there was a motion, which passed, for another *Extraordinary* General Assembly on September 19, 2021, subsequently changed to September 14, 2021, so that the Special Economic Committee could provide its report. Said report was expected but was not a prerequisite to have elections since the Audit Committee had already rendered its own report at the two-day Convention (and anyway, the report was welcome by the Plaintiff but the defendants' action of locking the Federation building made impossible said report since there was no General Assembly convened).

112. It is to be emphasized that, until that time, the defendants acting in concert with their supporters, were intentionally abstaining from the meetings of the Administrative Committee, called for by the Committee's coordinator Kakouros, apparently intending to sabotage the Committee's work and to render it ineffective since there was no quorum.

113. Upon information and belief, realizing that the elections were now scheduled to take place in September, 2021, and in retaliation for the two-day Convention and the election of a Special Economic Audit Committee (which took away their pretext for lack of transparency), the defendants, being wholeheartedly against these decisions and with the express intent of derailing said elections convened, in or about July 22, 2021, an unconstitutional, improper and illegal Administrative Committee meeting, (as per the legal adviser George Razis) with the express purpose to replace coordinator Kakouros.

114. Thus, on or about July 22, 2021, four (4) of the defendants and Bill Stathakos, purporting to represent a "Majority" of the Administrative Committee (which could not exist as such

- since the Committee could only decide issues by unanimity) “decided” and “voted” to replace Coordinator Kakouros, with Board Members Tsekerides and Kalamaras.
115. Tsekeridis improperly attended this meeting since he had resigned officially in a Administrative Committee meeting, on or about May 24, 2021 and had never attended another meeting since.
116. Acting improperly again, the five disregarded the former choice and without due process replaced Tsekeridis with defendant Diamantidis.
117. It is to be noted that not only there was no unanimity to replace coordinator Kakouros but such move run afoul of the Federation Bylaws which, in case of a complaint against the president (or Presiding officer, such as the Coordinator) a referral must be made to the Disciplinary Committee to decide, pursuant to Article 13 Par. 6 of such bylaws.
118. The election of *two* (2) co-coordinators was another novelty that was not provided or authorized by the Constitutional Amendment. It is important, also, to note that the Constitutional Amendment did not provide for two Coordinators and the Coordinator(s) was not, as per the Constitutional Amendment, a voting participant. Nevertheless, the “five” members improperly elected two Coordinators.
119. In addition, continuing their unconstitutional practices the two coordinators disregarding the Constitutional Amendment voted, among other issues, against Tomopoulos’s motion to call the General Assembly to decide in this case as the vote was not unanimous.
120. On July 26, 2021 Kakouros received an email of cease and desist from the law office of Murtha and Bird, representing five former Presidents, defendants Kalamaras, Siokis, Diamantidis, Tsekeridis herein and non-defendant Stathakos.

121. An Emergency General Assembly is called by the Secretary Tomopoulos, to deal with the dysfunctionality, as also requested by about 25 Society members. Tomopoulos acted as the next in line senior officer (he was the General Secretary) after the Coordinator.
122. On July 30, 2021, another Emergency General Assembly was convened, having a quorum of 29 paid member Societies out of 63. (the threshold requirement of 30% participation was satisfied).
123. Nikos Bardis (“Bardis”) was elected as the new Coordinator, the Elections Committee, with Gonias as president, announced that Elections will take place on September 19, 2021, and further a resolution was passed that all activities of the Federation shall cease until the next General Assembly, to be convened on September 14, 2021.
124. On August 2, 2021, the Election Committee announced the replacement of Gonias as the president of this Committee by Chrysomalidis and reaffirmed that the election would take place on September 19, 2021. It is of note that the Election Committee is an independent body, acting of its own volition and without control by anyone and after its election the Administrative Committee, (as per the bylaws the president and some essential officers) acts only as an auxiliary body to provide any help needed and for emergency cases.
125. On or about September 14, 2021, on the day of the scheduled General Assembly, defendant Meimaroglou, in concert with the other defendants, placed locks and chains on the Federation’s building’s doors and physically prevented the members of the plaintiff from having access to the building, in order to prevent the General Assembly from taking place and the Economic Auditing Committee to give a report about Meimaroglou’s actions and five (5) years of the Federation’s financials.

126. On September 19, 2021, the Election Committee conducted the planned elections, outside of the locked federation building, with 70.03% of the Societies having voted (45 dues-paid Societies in total).
127. It is to be noted that no person under accusations for financial irregularities was a candidate. The elected Board of Directors does not include any of the defendants.
128. On September 24, 2021, the Election Committee received objections from Mr. Meimaroglou which were responded to.
129. In or about the beginning of October, 2021, the first meeting of the newly elected Board of Directors took place at the offices of a society member in Astoria, New York, as the defendants did not provide access to the Stathakeion Center, the building of the Federation.
130. Amongst other decisions, the following were taken:
  - A). all the bank accounts belonging to the Federation to be updated and have new signatories from this newly elected Executive Board;
  - B). an updated Resolution to be signed in order to arrange legal access to the Federation Building, to wit: "that for security concerns, it is ordered and directed that all locks and security systems relating to the premises located at 22-51 29th Street, Astoria, NY 11105 be changed, so that the only access to keys and other security devises shall be provided to the members of the Board of Directors";
  - C). to get Directors and liability Insurance since the 2018 elected Executive Board, under Meimaroglou as President, being extremely negligent, had not paid the dues and the Federation officers were not covered by liability Insurance; and,
  - D). to inquire as to the progress of the Special Economic Audit Committee that was elected in July and urge it to continue its investigation.

131. On or about October 6, 2021, the defendants acting, under false pretenses, as the Federation of Hellenic Societies of Greater New York, commenced an action in the Supreme Court of Queens County, against G. Georgopoulos, A. Tomopoulos, N. Vellios, T. Kakouros and Ioannis Koutalis, under index number 722284/2021.
132. Upon information and belief, on or about October 6, 2021, the defendants convened an improperly called “General Assembly”, without issuing proper notices pursuant to the Bylaws and with participants who were not proper representatives of the member Societies of the Federation, during which they made accusations mainly against Galatoulas.
133. On or about November 14, 2021, persons who were not affiliated with the parties herein attempted to broker a limited agreement so that the annual 2022 Greek Independence Day parade will take place on Fifth Avenue in New York but the defendants, contrary to their promises, refused to provide keys of the Federation’s building to Plaintiff.
134. Upon information and belief, on or about December 1, 2021, the defendants convened another “meeting”, which they may have improperly titled it as a “General Assembly”, without complying with the notice requirements of the Bylaws and with persons who were not representatives or members of the Federation during which they made changes to the officers of the Federation’s Committees and “registered” several new member societies. It is to be noted that on that “meeting”, the defendants were inviting participants to sign the attendance sheet falsely claiming it to be part of the Covid-19 protocol.
135. The defendants, by their actions, have caused hundreds of thousands of dollars in lost revenue to the Federation as members and friends of the Greek community, confused by the defendants’ false claims, have withheld the customary donations which are the main

revenue of the Plaintiff and by occupying the Federation's building have effectively terminated the services that Plaintiff was offering to the public in the past.

**AS AND FOR A FIRST CAUSE OF ACTION**  
**(Preliminary and Permanent Injunction against the Defendants)**

136. Plaintiff repeats and re-pleads the allegations in paragraphs 1 through 135 as if same were set forth more fully at length herein.
137. Plaintiff has no adequate remedy at law.
138. The defendants' wrongful conduct is ongoing, likely to recur and unless enjoined, will continue causing further irreparable harm to Plaintiff.
139. Plaintiff has a substantial likelihood of success on the merits of this action, since the General Elections of September 19, 2021 were proper and lawful and elected a new Board of Directors.
140. As a direct and proximate result of the foregoing, Plaintiff is entitled to a preliminary and permanent injunction against the named defendants: (i) ordering the defendants to cease misrepresenting their status and holding themselves out as legitimate representatives of the Plaintiff and presenting themselves to others as such and using the name and letterhead of the Federation in their communications with the member societies, the press, the general public and the courts of the State of New York; (ii) ordering the defendants to cease the occupation of the Federation's building at 22-51 29<sup>th</sup> Street, Astoria, New York, to remove all locks and surrender to Plaintiff all keys to said building; (iii) ordering the defendants to cease interfering, obstructing and otherwise disrupting the operation of the Plaintiff.

**AS AND FOR A SECOND CAUSE OF ACTION**  
**(Declaratory Judgment)**

141. Plaintiff repeats and re-pleads the allegations in paragraphs 1 through 140 as if same were set forth more fully at length herein.
142. There is an actual, justifiable controversy among the parties concerning the validity of the General Elections, which Plaintiff maintains they were proper and lawful.
143. On September 19, 2021, the Plaintiff held General Elections and elected a new Executive Board.
144. Said elections were held pursuant to the Plaintiff's Bylaws and had the requisite quorum of Member Societies present.
145. The defendants by words and deeds are contending that said elections were null, void and of no force and effect.
146. The defendants' refusal to acknowledge the validity of the elections and to recognize the present Executive Board is directly subverting the function of said Board and the financial and administrative well-being of the Federation itself.
147. As a direct and proximate result of the foregoing, Plaintiff is entitled to a declaratory Judgment pursuant to CPLR 3001.

**WHEREFORE**, Plaintiff respectfully demands judgment as follows:

- (a) On their First Cause of Action preliminary and permanent relief (i) ordering the defendants to cease misrepresenting their status and holding themselves out as legitimate representatives of the Plaintiff and presenting themselves to others as such and using the name and letterhead of the Federation in their communications with the member societies, the press, the general public and the courts of the State of New York; (ii) ordering the defendants to cease the occupation of the Federation's building at 22-51 29th Street, Astoria, New York, to remove all locks and surrender all keys to said

- building; (iii) ordering the defendants to cease interfering, obstructing and otherwise disrupting the operation of the Plaintiff;
- (b) On the Second Cause of Action, a declaration that the General Elections of September 19, 2021 were lawful and proper;
- (c) Granting Plaintiff such other and further relief as to the Court may seem just, proper and equitable.

Dated: Long Island City, New York  
March 21, 2022

Yours, etc.

KALAVESIOS LAW GROUP PLLC

By: 

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VERIFICATION

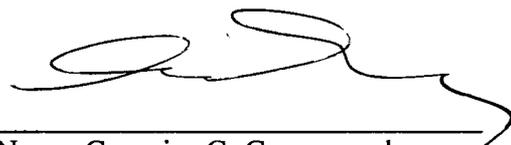
STATE OF NEW YORK)

ss.:

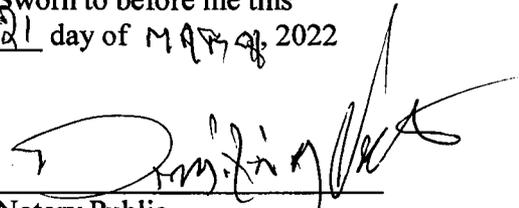
COUNTY OF QUEENS )

GEORGIOS G. GEORGOPOULOS, being duly sworn, hereby deposes and says:

I am an officer of the Plaintiff in the above-entitled action; I have read the foregoing Complaint and know the contents thereof; that the same is true to my knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters I believe them to be true.

  
Name: Georgios G. Georgopoulos

Sworn to before me this  
21 day of MAR, 2022

  
Notary Public

DIMITRIOS VASSOS  
Notary Public, State of New York  
No. C1VA4089720  
Qualified in Queens County  
Certificate Filed in New York County  
Commission Expires July 31, 2025

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X Index No.

FEDERATION OF HELLENIC SOCIETIES OF  
GREATER NEW YORK, INC.

Plaintiff,

-against-

DEMETRIUS KALAMARAS, CLEANTHIS  
MEIMAROGLOU, DIMOS SIOKIS, ELIAS  
TSEKERIDIS, NIKOLAOS DIAMANTIDIS and  
DIMITRIS GONIAS

Defendants.

-----X

**SUMMONS AND VERIFIED COMPLAINT**

Signature (Rule 130.1.1-a)



Ted Kalavesios, Esq.

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