

Court of the Oktyabrsky District of the City of Minsk

33, Semashko Str.,
220045, Minsk

Plaintiff:

citizen of the Kingdom of Sweden
NIKOLAS CHEROPOULOS,
Sweden, Stockholm, Dansbanevägen 28,
126 31 Hägersten

nicolas.cheropoulos@gmail.com

postal address in Belarus:

P.O.B. 60 Minsk 220114

to Attorney A.S. Korsak

Defendant:

Citizen of the Republic of Belarus
Liudmila Arkadeyevna Trafimovich
64-24, Kizhevatova Str., Minsk

Interested parties:

Department of Education of
the Administration of the Oktyabrsky District
of the City of Minsk

State duty: 81 rubles

paid to the account ¹, indicated on the official website of the Supreme Court of the Republic of Belarus, for payment by payers who are not tax residents of the Republic of Belarus and located outside the Republic of Belarus. Payment details: 1200513633451 of July 29, 2020, 1200731697910 of August 03, 2020

STATEMENT

**on resolving disagreements between parents
regarding parenting**

Since 2007, being in the territory of the Kingdom of Sweden, I lived together with the Belarusian citizen Liudmila Arkadeyevna Trafimovich. During our life together we have had two minor daughters – Anthoula Anthie Cheropoulou, born on June 08, 2012, and Alexandra Cheropoulou, born on April 01, 2015, who were born

¹<http://court.gov.by/online-help/duty/detales/>

Confirmation of the actual transfer of the state duty paid by payers who are not tax residents of the Republic of Belarus and located outside the Republic of Belarus to the republican budget is a certificate from the Inspectorate of the Tax and Duties Ministry of the Republic of Belarus for the city of Minsk, which is sent to a specially authorized state body, another authorized organization, to the official collecting the state duty, within five business days after the state duty is transferred to the budget (Part 2 of Paragraph 5 of Art. 251 of the Tax Code of the Republic of Belarus).

and permanently resided at the address: Sweden, Stockholm, Dansbanevägen 28, 126 31 Hägersten, before their removal to the Republic of Belarus.

Furthermore, between me and L.A. Trafimovich there are unresolved disagreements on the upbringing and education of the children. As it became known to it, since September 2019, my daughter Anthoula Anthie Cheropoulou, born on June 08, 2012, has been educated at **Ikhvis Private School** at the discretion of my wife L.A. Trafimovich, **but without agreement with me**, which is confirmed by the official response of the Department of Education of the Administration of the Oktyabrsky District of the City of Minsk (ref. No. 1-2/H-208-1-эл. of November 16, 2019).

In accordance with Part 2 of Article 75 of the Code on Marriage and Family, all issues regarding the forms and methods of raising children, their education, their attitude to religion, organization of free time and other issues of raising children shall be decided by both parents by mutual agreement. Disagreements between parents regarding parenting issues are resolved in court.

I adhere to the Orthodox religion (Greek Orthodox Church), the mother of the child L.A. Trafimovich adheres to the Orthodox religion (Russian Orthodox Church), however, I believe that a child should **receive a general education in a state secular school**, and not a private religious school. A child must have freedom of religion and exercise his or her right to freedom of religion at a conscious age, without the pressure of studying at a religious school at a young age.

I would also like to note that Ikhvis Private School is located far from my child's place of residence in Minsk, which means that either the child travels significant distances to and from school every day, which creates an additional danger for the child, especially in the context of the COVID-19 coronavirus pandemic, or the child lives in the premises of the school itself, which is unknown to the father. Studying at a public school at the place of residence would reduce the time spent on travel, which could be used to attend language courses, sports groups and other developing courses, and reduce the corresponding risks.

I believe that the state educational institution "Gymnasium No. 35 of the City of Minsk" (hereinafter referred to as Gymnasium No. 35) related to the child's place of residence creates better conditions for providing the child with basic education, has a better teaching staff and infrastructure, can better prepare the child for living and development in a universal social environment. Also, Gymnasium No. 35 is under the direct control of the Ministry of Education and state bodies and therefore deserves more trust than the Ikhvis school, which is controlled by the archpriest.

In addition, I would like to note that I have reasonable doubts regarding the legality of the activities of the Ikhvis private school, as well as the ability to properly fulfill the functions of an educational institution for children. Thus, religious rites are being conducted in relation to my daughter, to which I did not give my consent (confirmed by the photographs posted on the website <https://obitel-minsk.ru/smotret/foto/?galAlbum=250> ..

In accordance with Article 10 of the Law of the Republic of Belarus "On the Rights of the Child", every child has the right to independently determine his or her

attitude to religion, to profess any religion or not to profess any. The same article of the Law provides that the state cannot intervene in the upbringing of the child based on a certain religious worldview of the parents (guardians, custodians), and, therefore, it cannot interfere with the performance of religious rites with the participation of the child outside educational institutions, observing traditions, except when the incitement to religious actions directly threatens the life and health of the child, violates his or her rights and legitimate interests. For a child under the age of fifteen, religious rites shall be performed with the consent of the parents (guardians, custodians). Moreover, in accordance with Clause 1.10 of Article 2 of the Code of the Republic of Belarus on Education (hereinafter - the Code), the state policy in the field of education is based on the principles of the secular nature of education. Thus, these principles are grossly violated by Ikhvis Private School.

By virtue of Clause 3 of Article 2 of the Code, the establishment and anonymous or other activities of religious organizations contradicting the law are not allowed in educational institutions. According to Clause 4 of Article 2 of the Code, educational institutions can interact with registered religious organizations with regard to the issues of upbringing on the basis of written statements of students (legal representatives of minor students) after school hours, taking into account their influence on the formation of the spiritual, cultural and state traditions of the Belarusian people.

At the same time, I did not file such an application with Ikhvis Private School, I did not give my consent to this, and the obvious activities of a religious organization in this educational institution are expressly prohibited by Belarusian law.

As follows from numerous publications on Internet resources, Ikhvis Private School is based on the personality cult of its religious leader, Archpriest Andrei Lemeshonok, who established an authoritarian regime in the institution. Thus, during the COVID-19 coronavirus pandemic, the institution continued its activities as usual, without taking measures to protect the health of its employees, students and parishioners. As a result, most nurses and staff fell ill with pneumonia and the coronavirus COVID-19, but officially this information is hidden (<https://news.tut.by/society/683501.html>). As far as I know, my children were also in the hospital with an infection with their mother L.A. Trafimovich, they had the COVID-19 coronavirus, which they probably contracted in this institution.

FOR REFERENCE. *Ikhvis Private School is located within the territory of the St. Elisabeth Convent, located at 6, Vygotskogo Street in Minsk, and is an integral part of it. This monastery is often visited by odious individuals who hold radical neo-Nazi views that they do not hide, but, on the contrary, show publicly, in particular, Dmitry Lemeshonok - the son of Archpriest Andrei Lemeshonok (<https://nn.by/?c=ar&i=197309&lang=en>), and is also used as a platform for propaganda of hatred and the cult of war by people with a dubious reputation, namely the 'warrior of Christ Anthony' or as he calls himself 'lieutenant colonel of the Russian Military Intelligence Directorate Anton Manshin (<https://nn.by/?c=ar&i=197200&lang=en>).*

Under such circumstances and in accordance with Articles 75-76 of the Code on Marriage and Family, Article 6 of the Civil Procedure Code,

I demand:

1. To determine the state educational institution “Gymnasium No. 35 of the City of Minsk” as the place for receiving general secondary education for Anthie Anthoula Cheropoulou, born in 2012.

Annex:

1. A copy of the statement of claim on 4 sheets, in 2 copies.
2. A copy of the document confirming the payment of the state duty, 2 copies.
3. Copies of documents on the kinship with Anthoula Anthie Cheropoulou, 5 pages.
4. A copy of the response of the education department of the administration of the Oktyabrsky district of the city of Minsk dated 16.11.2019 No. 1-2 / N-208-1-e.
5. Copies of photographs on the website <https://obitel-minsk.ru/smotret/foto/?galAlbum=250> (7 copies).
6. A copy of the response of the Department of Education of the Administration of the Oktyabrsky District of the City of Minsk dated June 29, 2020.
7. A copy of the power of attorney for the representative.

Representative of Nikolas Cheropoulos

Attorney A.S. Korsak _____

per power of attorney

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August 05, 2020