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BY: Jeffrey M. Scott, ESQUIRE (Attorney I.D. No. 60184)
Attorney for Plaintiff

Loren R. Douglass [REDACTED] Orlando, Florida 32819 Plaintiff, vs. Grand Boulé of Sigma Pi Phi Fraternity, a Pennsylvania Non-Profit Corporation 5235 North Front Street Harrisburg, Pennsylvania 17110 Defendant.	IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY, PENNSYLVANIA CIVIL ACTION - LAW NO.
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NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you, and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiffs. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA COUNTY BAR ASSOCIATION
Lawyer Referral and Information Service
One Reading Center
Philadelphia, PA 19107
(215) 238-1701

AVISO

Le Han demandado a usted en la corte. Si usted quiere, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Se avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y require que uested cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otors derechos importantes para usted.

LLEVE ESTA DEMANDA A TUN ABOGADO IMMEDIATAMENTE . SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME FOR TELEFONO A LA OFICINIA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUDED CONSEGUIR ASISTENCIA LEGAL.

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Attorneys for Loren R. Douglass

Loren R. Douglass  Orlando, Florida 32819 Plaintiff, v. Grand Boulé of Sigma Pi Phi Fraternity, a Pennsylvania Non-Profit Corporation Registered Pennsylvania Office 5235 North Front Street Harrisburg, Pennsylvania 17110	COURT OF COMMON PLEAS CIVIL TRIAL DIVISION May Term, 2025 No. 2319 JURY TRIAL DEMANDED
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COMPLAINT

INTRODUCTION

Plaintiff seeks declaratory relief in the form of an injunction to stop and prevent the unlawful and egregious actions taken by board members of Philadelphia's most prestigious and historical association, the Grand Boulé.

On April 9, 2025, the board members of the Grand Boulé sought to remove Loren R. Douglass, the duly elected Grand Sire Archon of the Grand Boulé, in a sham proceeding that was completely devoid of due process and contrary to the plain language of the Grand Boulé's Bylaws and governing regulations. There is no dispute that the Grand Boulé Board failed to obtain at least 10 votes to remove Mr. Douglass as the Grand Sire Archon. Despite the lack of votes, the Grand Boulé Board took affirmative steps to replace Mr. Douglass and strip him of his title. After Mr. Douglass protested, various members of the Grand Boulé Board embarked on a campaign to discredit, disparage, and defame Mr. Douglass, to the entire membership. This action seeks to restore the integrity of the Grand Boulé governance, cure the irreparable harm to the Grand Boulé and its members, deter and prevent further unlawful acts by the Grand Boulé Board members, and to restore the parties to their rightful positions that existed before April 9, 2025. The Complaint also seeks damages for the tortious acts of the Defendant.

PARTIES

1. The Plaintiff is Loren R. Douglass, the duly elected Grand Sire Archon of Grand Boulé of Sigma Pi Phi Fraternity. Mr. Douglass has been a member of the Grand Boulé since October 15, 2011.

2. Defendant Grand Boulé of Sigma Pi Phi Fraternity ("The Grand Boulé" or "Boulé") is a Pennsylvania Non-Profit Corporation founded in 1904 in the City of Philadelphia, Pennsylvania. The Grand Boulé is a professional fraternity which was incorporated under the laws of the Commonwealth of Pennsylvania on June 10, 1912, by Court Decree in the City and County of Philadelphia, Pennsylvania. The Grand Boulé's Articles of Incorporation were filed on June 11, 1912. The Fraternity's registered office is located at 5235 North Front Street, Harrisburg, Pennsylvania 17110. Its executive offices are located at 260 Peachtree Street, N.W., Atlanta, GA

30303-1202. The Fraternity's registered agent is Corporation Service Company located at 5235 North Front Street, Harrisburg, Pennsylvania 17110.

JURISDICTION AND VENUE

3. This Court has jurisdiction over the claims asserted against the Fraternity pursuant to 42 Pa. C.S.A. § 5301 *et seq.* and 15 Pa. C.S.A. § 5793.

4. Venue is proper as the Fraternity was incorporated in the City and County of Philadelphia, Pennsylvania by Court Decree on June 10, 1912. The Grand Boulé's Articles of Incorporation were filed in City and County of Philadelphia, Pennsylvania on June 11, 1912. The Fraternity conducts continuous business in the City of Philadelphia and has a Chapter, Alpha Chapter, which is located in the City and County of Philadelphia, Pennsylvania.

STATEMENT OF FACTS

5. The Grand Boulé, ("Boulé") founded in 1904, is oldest continuously existing Greek-letter fraternity for Black professional men. On May 15, 1904, the Boulé would begin the journey of going from 6 founding members and 1 member boule to 144 member boules and 5,800 members. <https://sigmapiphi.com/>. At its inception, the Boulé was a secret and private association and operated in secret to protect its members. Today, the Boulé continues to keep all internal matters, operating procedures, and operating decisions confidential for the benefit of its members and constituents. Confidential is the utmost importance to the Boulé.

6. The "Boule" is the term used to describe the fraternity's national convention. The purpose of the Boulé is to bring together individuals of like qualities " into a close, sacred fraternal union, that they may know the best of one another, and that each in this life may to his full ability aid the other and by concerted action bring about those things that seem best for all that cannot be accomplished by individual effort." <https://sigmapiphi.com/>.

7. The value associated with leading the continued mission of building a network of black professionals from which to grow mutually beneficial relationships in the organization and community is immeasurable.

8. Mr. Douglass has been a member of the Grand Boulé since October 15, 2011.

9. On or about February 21, 2021, Mr. Douglass sought to be nominated for the position of Grand Sire Archon-Elect. On August 22, 2022, Mr. Douglass was nominated to the position of Grand Sire Archon-Elect.

10. On August 22, 2022, Mr. Douglass was duly elected to the position of Grand Sire Archon-Elect, receiving the majority vote amongst all candidates.

11. The Grand Sire Archon-Elect is the successor to the Grand Sire Archon.

12. Mr. Douglass served as Grand Sire Archon-Elect from August 22, 2022 to June 17, 2024. As Grand Sire Archon-Elect, Mr. Douglass was Vice-Chairman of the Grand Boulé Board.

13. On June 17, 2024, Mr. Douglass commenced his term as Grand Sire Archon. As Grand Sire Archon, and pursuant to the Bylaws, Mr. Douglass served as the chairman of the Grand Board and the Executive Committee, and Chief Executive Officer (“CEO”) of the Grand Boulé, an ex-officio member of all committees of the Grand Boulé, except the Audit Committee. His term is set to expire on or about July 1, 2026.

14. The Grand Sire Archon has the authority, among others, to act on behalf of the Grand Boulé on corporate matters and public relations.

The Grand Boulé Operating Procedures

15. On August 22, 2022, the Grand Boulé adopted its Constitution and Bylaws (“Grand Boulé Governance Laws”) and were recodified on September 6, 2024.

16. Section III of the GBL state that “[t]he actions of the Grand Boulé are binding upon all member boulés and their members, and Regional Boulés.”

17. The Board of Directors (“Grand Board”) governs the Grand Boulé when the Grand Boulé is not in session.

18. Article IV of the Grand Boulé Governance Laws states that members of the Grand Board shall function as fiduciaries for the benefit of the member boulés and their members, and the Regional Boulés. They shall be jointly and severally accountable for their actions to the members of the Grand Boulé.

19. Article V of the *Grand Boulé Governance Laws* provides that the officers of the Grand Boulé, in hierarchy are, Grand Sire Archon, Grand Sire Archon-Elect, Grand Grammateus, Grand Thesauristes, Grand Chapter, Grand Agogos Archon, and Grand Rhetoricos Archon. The officers are considered the “Grand Officers” of the Grand Boulé. The Grand Officers are governed by the Grand Boulé Governance Laws.

20. Bylaw 1, Section 1F, dictates that the most recent edition of Robert's Rules of Order, Newly Revised (“Robert’s Rules”), shall guide the transacting of business at a meeting of the Grand Boulé.¹

21. Bylaw 2, Section 1, states: The composition of the Grand Board shall be:

- A. Grand Sire Archon, who shall be the Chairman;
- B. Grand Sire Archon-Elect, who shall be the Vice Chairman;
- C. Grand Grammateus, who shall be the Secretary;
- D. Grand Thesauristes, who shall be the Treasurer;
- E. Grand Grapter, who shall be the media liaison;
- F. Grand Agogos;

¹ Robert's Rules is a set of guidelines for running meetings that emphasizes democratic principles and ensures fair treatment for all members. It provides a structured way to handle motions, debate, voting, and other aspects of meetings, ensuring a fair process for all participants.

G. Grand Rhetoricos;

H. Regional Sire Archons, who shall be the official representatives of the Regional Boulés;

I. A representative from the Boulé Foundation Board of Directors who is an Archon in active status with a member boulé that is in good standing with the Grand Boulé; and

J. Immediate Past Grand Sire Archon.

22. Pursuant to the Grand Boulé Governance Laws, all Grand Boulé Board meetings shall/must be conducted in accordance with the most recent edition (12th Edition) of Robert's Rules.

23. Under the Bylaws and Robert's Rules, when a vote of a fraction (such as two-thirds) is required, the minimum number required to adopt the motion is the next higher whole number above the exact fraction, unless the result is a whole number.

24. Bylaw 5, Section 4G, Section states that each Grand Officer shall be subject to the removal provisions set forth in Bylaw2, Section 4F-4G.

25. Pursuant to Bylaw 2, Section 5J, all actions taken by the Grand Boulé Board shall be by majority present vote unless otherwise stipulated in the Grand Boulé Bylaws.

26. Bylaw 2, Section 4G provides for such stipulation and alters the voting procedures, by adding the phrase, "the *entire* Grand Board." The Grand Boulé Bylaws purposefully italicized the word "entire" in Section 4G given it special and heightened meaning.

27. Section 4G states: "the Grand Board may, upon a two-thirds affirmative vote of the *entire* Grand Board present and voting at any meeting, remove a Grand Board member..." The phrase "entire grand Board" means the total number of actual seats.

28. The Grand Boulé's Code of Conduct Policy and Grievances and Disciplinary Manual provides the accused member of a right to counsel, right to a formal hearing, a right to the

investigation report prepared by select committee, and right to confront witnesses, with all other attendant due process rights.

29. The Grand Boulé's Code of Conduct Policy and Grievances and Disciplinary Manual does not provide for a specific procedure for the removal of a Grand Boulé Officer.

30. Pursuant to Bylaw1, Chapter 62 and 63 of Robert's Rules provides procedures and guidelines for the removal of Grand Boulé Officers by the Grand Boulé.

31. Section 62.16 of Robert's Rules provides that a trial shall be held in accordance with Chapter 63 of Robert's Rules for any action that contemplates the removal of Grand Boulé Officer.

32. Chapter 63 of Robert's Rules requires reasonable notice, the right to legal counsel, the right to present witnesses, the right to confront witnesses, the right to present witnesses and evidence, and a right to a trial.

33. The Grand Boulé failed to follow its established voting procedures, its code of conduct, and failed to provide Mr. Douglass with all attendant due process rights provided for by the Grand Boulé's Governance Laws and Robert's Rules.

The Unlawful Removal of Mr. Douglass as the Grand Sire Archon

34. Certain Members of the Grand Boulé's Board openly, through conversation and emails, expressed and displayed personal animus regarding the ascent of Mr. Douglass to the position of Grand Sire Archon.

35. In early 2025, individuals, acting in their capacity as Grand Boulé Board Members, accused Mr. Douglass of exceeding his authority as Grand Sire Archon.

36. The pretext for the unlawful removal of Mr. Douglass was the appointment of Dentons law firm to function as General Counsel for the Grand Boulé.

37. Mr. Douglass, as Grand Sire Archon-Elect, led the transparent national search for General Counsel. At Mr. Douglas' direction, distinguished members of the Grand Boulé, including a United States Appeals Court Judge, were the panelists that decided which law firm would be approved as General Counsel. After presentations by multiple law firms, the panel decided that Dentons met the established criteria.

38. On May 21, 2024, Mr. Douglass reported to Grand Sire Archon Giribaldi that Dentons was selected as General Counsel. The current General Counsel told Grand Sire Archon Giribaldi that Mr. Douglass "made an outstanding choice to succeed me as general counsel of our beloved fraternity...I look forward to working with him during our transition period and serving as a resource for him." In January 2025, Mr. Douglass announced the Denton's selection along with an explanation of the national search process.

39. Thus, there was no dispute that Dentons was approved General Counsel as the Grand Board ratified the decision over the ensuing months as Dentons functioned as counsel to the fraternity.

40. After the Dentons Firm was approved as General Counsel, but before the retainer agreement was executed, the organization was hit with a crippling cyberattack that required immediate action. Thus, Grand Sire Archon Douglass immediately contacted approved General Counsel to provide legal advice to protect the integrity of the data and personal information of Grand Boulé members, affiliates, families, and those with any connection to the Grand Boulé.

41. Mr. Douglass acted in the best interest of the Grand Boulé by taking immediate steps, within his authority, to contact approved General Counsel, and to prevent further harm. The legal fees charged for services rendered became the pretext for Mr. Douglass' critics to act and attempt to remove him from Office.

42. The critics, some of whom were members of the Grand Boulé Board, embarked on a smear campaign against Mr. Douglass. These critics targeted Mr. Douglass' travel expenses as unjustified. Each one of these travel expenses were reviewed and approved by members of the board and the fraternity's Executive Director. Those that were requested to be modified, or in need of further documentation, were modified and approved.

43. There are no outstanding reimbursable and submitted travel expenditures that have been rejected.

44. Mr. Douglass' never converted Grand Boulé's funds for his own personal use and each expenditure was made in the course and scope of his duties as Grand Sire Archon.

45. Sometime in March 2025, the Grand Boulé's Board commenced an alleged investigation into the allegations concerning Mr. Douglass' use of Dentons, and his use of funds in his role as Grand Sire Archon.

46. The investigation has remained secret and has never been disclosed to Mr. Douglass.

47. On April 8, 2025, an Executive Session of Grand Boulé's Board met in Orlando, Florida. Grand Sire Archon Douglass was present at the meeting and served as the facilitator.

48. On April 9, 2025, a Grand Board Meeting was convened for a second day. During this meeting, a motion was made to remove Mr. Douglass' from the position of Grand Sire Archon. Mr. Douglass was not granted the opportunity to vote on the motion.

49. Prior to the April 9, 2025 vote, Mr. Douglass was not provided with a copy of the investigation, a statement of charges, or any proof of misconduct.

50. Mr. Douglass was not provided with a reasonable opportunity to confront his accusers, seek private legal counsel, request a trial, and other processes that are dictated by the applicable Governance Laws and Robert’s Rules.

51. On April 9, 2025, all fourteen (14) members of the Grand Board were present in person or virtually.

52. Bylaw2, Section 4G states: “the Grand Board may, upon a two-thirds affirmative vote of the *entire* Grand Board present and voting at any meeting, remove a Grand Board member...”

53. The phrase “entire Grand Board” means the total number of actual seats.

54. Under the Bylaws and under Robert’s Rules, a two-thirds vote “means at least two-thirds of the votes casts by person entitled to vote.” Robert, Henry M. et al. Robert’s Rules of Order (RONR) Newly Revised, 12th ed., §44:3.

55. Thus, in order to remove Mr. Douglass as Grand Sire Archon, the motion would fail unless the vote count equaled **at least** ten.

Members Present	2/3 of Majority Board Present	Votes Needed to Remove	Actual Number of “YES” Votes
14	9.33	10	8

56. The Minutes from the April 9, 2025 meeting unequivocally state that eight (8) members of the Grand Board voted “yes” to approve the motion.

57. Because there were insufficient votes to approve the motion to remove, the motion failed as a matter of Pennsylvania law, Grand Boulé Bylaws, and Robert’s Rules.

58. Despite the failed vote, the Grand Board falsely claimed that the motion was approved and comported with Bylaw2, Section 4G.

59. On April 10, 2025, the Grand Boulé Executive Director issued a nationwide statement to all Archons that there were sufficient votes to remove Mr. Douglass as the Grand Sire Archon, pursuant to Bylaw 2, Section 4G. Each Board member committed ultra vires acts by ratifying the unlawful actions.

60. The Grand Boulé Executive Director failed to inform the Archons that there were 8 out of 14 Grand Board members that voted “yes.” Thus, all Archons were left with the impression that at least 10 Grand Board members voted, “yes.” This impression was false.

61. After the vote, and upon information and belief, General Counsel (Dentons) informed the members of the Grand Board that 10 votes were needed to remove a Grand Board member.

62. The Grand Boulé Board purposefully failed to inform the Archons and all members that General Counsel, upon information and belief, opined that at least 10 votes were needed to remove a Grand Board member.

63. On April 12, 2025, the Grand Grammateus issued a false nationwide statement to all Archons that “Mr. Douglass was given formal notice, access to findings, and an opportunity to respond. The vote occurred only after a comprehensive process.”

64. Perpetuating the false narrative, the Grand Grammateus purposefully failed to inform the Archons that there were 8 out of 14 Grand Board members that voted “yes.”

65. On April 21, 2025, Mr. Douglass informed the Grand Boulé Board that Bylaw 2, Section 4G, required 10 votes to remove a Grand Board member. Mr. Douglass requested the Grand Boulé Board to acknowledge that the motion to remove failed. The Grand Board, in retaliation, took further unjustified action against Mr. Douglass.

66. After Mr. Douglass’ protested the procedures employed and the unlawful action taken on April 9, 2025, and thereafter, the improperly installed successor Grand Sire Archon, Jesse Tyson, issued a statement on April 28, 2025 making brand new allegations against Mr. Douglass, which included damaging remarks. The statements included, knowingly providing false or misleading information inside and outside of the Fraternity, conversion of Fraternity property for personal use, knowingly conducting unauthorized activities, public disclosure of confidential Fraternity information, failure to abide by conflict-of-interest policies.

67. These untruthful statements made by the Defendant, through its Grand Sire Archon, were intended to prejudice any member of the Grand Boulé Board who sought to remedy the injustice that took place on April 9, 2025 and which continues to take place.

68. These false statements were with the intent to destroy Mr. Douglass’ reputation, in the community, knowing that it would be heard by Mr. Douglass’ business contacts throughout the United States, including Philadelphia, Pennsylvania.

COUNT I

Plaintiff v. Defendant Grand Boulé of Sigma Pi Phi Fraternity Declaratory Judgment

69. Plaintiff hereby incorporates paragraphs 1-67 as though fully set forth at length.

70. On September 6, 2024, the Grand Boulé adopted its Constitution and Bylaws (“Grand Boulé Governance Laws”).

71. Article IV of the Grand Boulé Governance Laws states that members of the Grand Board shall function as fiduciaries for the benefit of the member boulés and their members, and the Regional Boulés. They shall be jointly and severally accountable for their actions to the members of the Grand Boulé.

72. Pursuant to the Grand Boulé Governance Laws, all Grand Boulé Board meetings shall/must be conducted in accordance with the most recent edition (12th Edition) of Robert’s Rules.

73. Bylaw 5, Section 4G, Section states that each Grand Officer shall be subject to the removal provisions set forth in Bylaw2, Section 4F-4G.

74. Bylaw 2, Section 4G states: “the Grand Board may, upon a two-thirds affirmative vote of the *entire* Grand Board present and voting at any meeting, remove a Grand Board member...” The phrase “entire grand Board” means the total number of actual seats.

75. On April 9, 2025, a Grand Board Meeting took place in Orlando, Florida.

76. During this meeting, a motion was made to remove Mr. Douglass’ from the position of Grand Sire Archon. Mr. Douglass was not granted the opportunity to vote on the motion.

77. Prior to the April 9th vote, Mr. Douglas was not provided with a copy of the investigation, a statement of charges, or any proof of misconduct.

78. Mr. Douglass was not provided with a reasonable opportunity to confront his accusers, seek private legal counsel, request a trial, and other processes that are dictated by the applicable Governance Laws and Robert’s Rules.

79. On April 9, 2025, all fourteen (14) members of the Grand Board were present in person or virtually.

80. Thus, in order to remove Mr. Douglass as Grand Sire Archon, the motion would fail unless the vote count equaled **at least** ten.

Members Present	2/3 of Majority Board Present	Votes Needed to Remove	Actual Number of “YES” Votes
14	9.33	10	8

81. The Minutes from the April 9, 2025 meeting unequivocally state that eight (8) members of the Grand Board voted “yes” to approve the motion.

82. Because there were insufficient votes to approve the motion to remove, the motion failed as a matter of Pennsylvania law, Grand Boulé Bylaws, and Robert’s Rules.

83. Because there were insufficient votes to approve the motion to remove, the motion failed as a matter of Pennsylvania law, Grand Boulé Bylaws, and Robert’s Rules.

84. Despite the failed vote, the Grand Board falsely claimed that the motion was approved and comported with Bylaw2, Section 4G.

85. Mr. Douglass was unlawfully replaced by the Grand Sire Archon-Elect and has been precluded from his fulfilling his duties as the duly elected Grand Sire Archon.

86. Despite repeated requests by Mr. Douglass to stop this unlawful action, the Grand Board members, in violation of their fiduciary duty, continue to violate the plain meaning of the Governance Laws, Robert’s Rules, specifically, Bylaw2, Section 4G which requires at least 10 votes to remove a Grand Officer.

WHEREFORE, Plaintiff requests this Court to enter a declaratory judgment finding that Grand Board’s decision to remove Mr. Douglass as Grand Sire Archon violated Bylaw 2, Section 4G, and find that the April 9, 2025 vote to remove Mr. Douglass as Grand Sire Archon is null and void. Mr. Douglass requests the following equitable relief:

- a. Enter an Order placing the parties back in their position before the April 9, 2025 Board Meeting;
- b. Order that Mr. Douglass shall be recognized as the duly elected Grand Sire Archon;

- c. Order that any and all matters related to the allegations that resulted in the April 9, 2025 vote are hereby deemed closed and shall not be raised against Mr. Douglass now or in the future; and
- d. any other equitable relief that this Court deems necessary, including attorney's fees and costs.

COUNT II

Plaintiff v. Defendant Grand Boulé of Sigma Pi Phi Fraternity Defamation

87. Plaintiff hereby incorporates paragraphs 1-85 as though fully set forth at length.

88. All Grand Board Members were acting in the course and scope of their duties and therefore the Defendant is vicariously liable for its employees, agents, and servants' actions.

89. In or about March and April 2025, Defendant, through its Board Members, and other high level officials of Defendant, including but not limited to, Jesse Tyson (a Board Member of the Williams Companies) Darrell Searcy (principal of Chandler & Campbelle Investment Group DBA Chandler Campbelle & Daschle, a DBE/MBE Management Consulting Firm that provides professional management consulting and value-added reseller services to the U.S. Department of Defense, Federal civilian, municipal, and commercial organizations), and David Tapscott, falsely alleged that Plaintiff knowingly provided false or misleading information inside and outside of the Fraternity; converted Fraternity property for personal use, knowingly conducted unauthorized activities, made public disclosure of confidential Fraternity information, failed to abide by conflict-of-interest policies.

90. The aforementioned statements were of or concerning Plaintiffs.

91. The aforementioned statements were published to individuals who were not members of the Grand Board.

92. These statements on their face were designed to harm the Plaintiff's reputation and subject the Plaintiff to contempt, ridicule, and among members of the Grand Boulé and the public at large, and damage Mr. Douglass' reputation in the community.

93. Defendant, through its agents, made these false and defamatory statements negligently, knowing they were false, and/or with reckless disregard for their truth or falsity.

94. As a proximate result of Defendant's malicious, intentional, and reckless conduct as set forth above and herein, Plaintiff has suffered harm and seeks all available damages that will compensate him, including compensatory and punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendant in an as yet unliquidated sum in excess of \$100,000, and such other relief, including attorney's fees and costs, as this Court deems just and for a trial by jury on all issues so triable.

COUNT III

Plaintiff v. Defendant Grand Boulé of Sigma Pi Phi Fraternity False Light

95. Plaintiff hereby incorporates paragraphs 1-93 as though fully set forth at length.

96. All Grand Board Members were acting in the course and scope of their duties and therefore the Defendant is vicariously liable for its employees, agents, and servants' actions.

97. In or about March and April 2025, Defendant, through its Board Members, and other high level officials of Defendant, including but not limited to, Jesse Tyson (a Board Member of the Williams Companies), Darrell Searcy (principal of Chandler & Campbelle Investment Group DBA Chandler Campbelle & Daschle, a DBE/MBE Management Consulting Firm that provides professional management consulting and value-added reseller services to the U.S. Department of Defense, Federal civilian, municipal, and commercial organizations), and David Tapscott, falsely alleged that Plaintiff knowingly provided false or misleading information

inside and outside of the Fraternity; misrepresented his employment history, converted Fraternity property for personal use, knowingly conducted unauthorized activities, made public disclosure of confidential Fraternity information, failed to abide by conflict-of-interest policies.

98. The aforementioned statements were of or concerning Plaintiffs.

99. These statements on their face were designed to harm the Plaintiff's reputation and subject the Plaintiff to contempt, ridicule, and among members of the Grand Boulé and the public at large, and damage Mr. Douglass' reputation in the community.

100. Defendant, through its agents, made these false and defamatory statements negligently, knowing they were false, and/or with reckless disregard for their truth or falsity.

101. Defendant statements, through its agents, placed Plaintiff in a false light that would be highly offensive to a reasonable person.

102. Defendant made his false and offensive statements, through its agents, with ill will and spite, and with wanton, reckless or willful disregard for their injurious effects on Plaintiffs.

103. As a proximate result of Defendant's malicious, intentional, and reckless conduct as set forth above and herein, Plaintiff has suffered harm and seeks all available damages that will compensate him, including compensatory and punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendant in an as yet unliquidated sum in excess of \$100,000, and such other relief, including attorney's fees and costs, as this Court deems just and for a trial by jury on all issues so triable.

Date: May 20, 2025

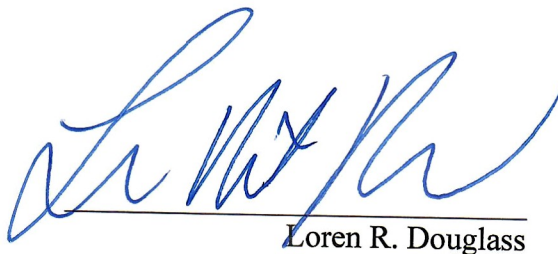
A handwritten signature in black ink, appearing to read "Jeffrey M. Scott". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeffrey M. Scott
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(215) 279-9692 (Direct)
Attorney for Plaintiff

VERIFICATION

I, Loren R. Douglass verify that facts contained in this Complaint are true and correct to the best of my knowledge, information, and belief. I understand that the statements made therein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: May 20, 2025


Loren R. Douglass