

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**GRAND BOULE OF SIGMA PI  
PHI FRATERNITY,**  
a Pennsylvania Non-Profit  
Corporation,

Plaintiff,

v.

**LOREN R. DOUGLASS,** an  
individual,

Defendant.

**Civil Action No.**

**COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES**

Plaintiff, the Grand Boule of Sigma Pi Phi Fraternity (“Plaintiff” or “the Fraternity”), by and through its undersigned counsel, brings this action against Defendant, Loren R. Douglass (“Defendant” or “Douglass”), and alleges as follows:

**NATURE OF THE ACTION**

1. This is an action for temporary, preliminary, and permanent injunctive relief and damages arising from Defendant Loren R. Douglass’s unlawful conduct following his removal from the office of Grand Sire Archon (President) of the Fraternity.

2. Despite his removal effective April 9, 2025, Douglass has embarked on a campaign detrimental to the Fraternity, including operating unauthorized

websites, engaging in the unauthorized use of the Fraternity's name, trademarks, and letterhead, disseminating false and defamatory information, misrepresenting his authority, misappropriating confidential Fraternity information, and violating his duties under the Fraternity's Constitution, Bylaws, and Code of Conduct.

3. Douglass's wrongful actions, conducted largely via the internet and mailings originating from outside Georgia but intentionally directed at and causing harm within Georgia where the Fraternity maintains its principal executive offices, have caused and continue to cause confusion, deception, and irreparable harm to the Fraternity's reputation, goodwill, membership relations, and operations.

4. Plaintiff seeks immediate and permanent injunctive relief to compel Douglass to cease his unlawful activities, as well as compensatory damages, punitive damages, attorneys' fees, and costs resulting from his misconduct.

### **THE PARTIES**

5. Plaintiff, the Grand Boule of Sigma Pi Phi Fraternity, is a non-profit corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania, with a foreign registration in Georgia and its principal place of business and executive offices located at 260 Peachtree St NW, Suite 1604, Atlanta, GA 30303. Plaintiff is therefore a citizen of Pennsylvania and Georgia for diversity jurisdiction purposes.

6. Upon information and belief, Defendant, Loren R. Douglass, is an individual residing at [REDACTED] Orlando, Florida 32819. Defendant is therefore a citizen of Florida for diversity jurisdiction purposes. Defendant is the former Grand Sire Archon of the Fraternity.

### **JURISDICTION AND VENUE**

7. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Plaintiff's claims for trademark infringement arise under the Lanham Act, 15 U.S.C. § 1051 *et seq.*

8. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship between Plaintiff (citizen of PA/GA) and Defendant (citizen of FL), and the amount in controversy exceeds \$75,000, exclusive of interest and costs.

9. This Court has supplemental jurisdiction over Plaintiff's state law claims pursuant to 28 U.S.C. § 1367 because these claims (including defamation, misrepresentation, breach of duty, and appropriation of name and/or likeness under Georgia law) are so related to the federal trademark claims that they form part of the same case or controversy, arising from a common nucleus of operative facts concerning Douglass's post-removal conduct.

10. This Court has personal jurisdiction over Defendant Douglass. Douglass has established sufficient minimum contacts with the State of Georgia such

that the exercise of jurisdiction here is constitutional and comports with fair play and substantial justice. Douglass's contacts include, but are not limited to: (a) regularly traveling to the Fraternity's principal place of business in Atlanta, Georgia on multiple occasions in his capacity as Grand Sire Archon; (b) directing, instructing and managing the Fraternity's Georgia staff and operations; (c) regularly communicating the Fraternity's Atlanta-based staff via telephone and other while serving as Grand Sire Archon; (d) purposefully availing himself of this forum by submitting requests for reimbursement and conducting other financial and operational transactions involving the Atlanta office; and, most critically; (e) committing intentional torts (including trademark infringement, defamation, and misrepresentation) through websites, emails, and mailings knowingly and intentionally directed at the Fraternity, an organization headquartered in Georgia, with the knowledge and intent that the injurious effects of his conduct would be suffered by the Fraternity primarily in Georgia where its executive leadership, operations, and reputational center are located. *See Calder v. Jones*, 465 U.S. 783 (1984). The claims asserted herein arise directly from or relate to these contacts and Douglass's breach of duties owed to the Georgia-based entity.

11. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims occurred in this District. This includes the location of Plaintiff's principal place of

business where the primary harm from Defendant's tortious conduct (trademark infringement, defamation, misrepresentation, appropriation) is directed and suffered, the location of key witnesses and evidence related to the Fraternity's operations and governance, and the receipt of Defendant's infringing and defamatory communications by members and stakeholders within this District. Defendant's management activities, directed at and communicated with the Atlanta office, also contribute to establishing this District as a locus of substantial events related to the claims.

### **FACTUAL BACKGROUND**

12. Plaintiff, the Grand Boule of Sigma Pi Phi Fraternity, founded in 1904, is the oldest Greek-letter organization composed primarily of African American men. It is a prestigious non-profit organization with members (Archons) across the United States and internationally, dedicated to cultivating and developing among their members the best qualities inherent in one another, and to giving aid and comfort to each other when needed. By concerted action, they seek and establish those goals that will promote the greatest good for the entire membership and for their communities. The Fraternity operates through its governing body, the Grand Boule.

13. Plaintiff owns and uses distinctive trademarks, service marks, logos, and trade names associated with the Fraternity, including, but not limited to, "Sigma

Pi Phi,” “The Boule,” the Fraternity crest/shield, and other related indicia (collectively, the “Fraternity Marks”). The Fraternity Marks are valuable assets that represent substantial goodwill and are exclusively identifying of the Fraternity and its authorized activities. The Fraternity Marks are registered with the U.S. Patent and Trademark Office, including Reg. Nos. 3,039,503 (**Exhibit A**) and 3,689,057 (**Exhibit B**).

14. Defendant Loren R. Douglass served as the Grand Sire Archon (the Fraternity’s highest elected office, equivalent to President) from June 2024 until April 9, 2025.

15. By official action of the Fraternity’s Grand Boulé Board of Directors (the “Board”) during a duly convened meeting on April 9, 2025, taken pursuant to the Fraternity’s Bylaws (including Bylaw 5, Section 5C and Bylaw 2, Section 4G), Douglass was formally removed from the office of Grand Sire Archon, effective immediately. (**Exhibit C** – Minutes April 9, 2025).

16. Formal notification of this removal was provided to Douglass by letter dated April 22, 2025, from the succeeding Grand Sire Archon, Jesse J. Tyson. The letter confirmed the removal, stating that it was based on findings after investigation and deliberation by the Board, and explicitly instructed Douglass not to refer to himself as Grand Sire Archon or Immediate Past Grand Sire Archon, and to cease

activities that interfere with Fraternity governance. (A true and correct copy of the April 22, 2025, Removal Notification is attached hereto as **Exhibit D.**)

17. As Grand Sire Archon and as a Fraternity member, Douglass owed fiduciary duties and duties under the Fraternity's Constitution & Bylaws (**Exhibit E**) and Code of Conduct (**Exhibit F**) to act in the best interests of the Fraternity, maintain confidentiality, and refrain from conduct detrimental to the organization. These duties continued post-removal concerning confidential information and refraining from harmful actions.

18. Despite his formal removal and clear instructions, Douglass has refused to accept the Board's decision and has undertaken a series of unauthorized and harmful actions against the Fraternity, including but not limited to: (a) operating, or causing to be operated, at least two websites ("Infringing Websites") that prominently display and utilize the Fraternity Marks and name without authorization, creating the false impression that these sites are official or endorsed by the Fraternity (**Exhibit G – Website Screenshots**); (b) utilizing official Fraternity letterhead, or colorable imitations thereof, without authorization in connection with emails and potentially other communications, further contributing to the misrepresentation of his status and authority (**Exhibit H – Letterhead**); c) disseminating communications via email, the Infringing Websites, and potentially mailings that contain false and defamatory statements about the Fraternity, its

leadership (including the Board and the current Grand Sire Archon), the circumstances of his removal, and the Fraternity's governance and operations; (d) misrepresenting his authority by, among other things, purporting to possess the authority to call meetings of the Grand Boulé or other Fraternity bodies, actions he is no longer empowered to take (**Exhibit I** – Notice of Meeting); and (e) misappropriating and potentially disseminating confidential Fraternity information, including internal documents and potentially member lists or contact information, obtained during his tenure as Grand Sire Archon, in violation of his duties of confidentiality.

19. Douglass's unauthorized use of the Fraternity Marks on the Infringing Websites, letterhead, and in other communications for his own financial and personal benefit is likely to cause, and has caused, confusion, mistake, and deception among Fraternity members, prospective members, donors, partner organizations, and the public as to Douglass's affiliation with or endorsement by the Fraternity, and as to the source or legitimacy of his communications and activities.

20. Douglass's unauthorized use of the Fraternity Marks on the Infringing Websites, letterhead, and in other communications resulted in financial and reputational gain for Defendant. In particular, Defendant's use of the Fraternity Marks allowed Defendant to continue falsely representing that Defendant serves as



the Fraternity's Grand Sire Archon, sparing him from reputational and financial harm.

21. Douglass's conduct described herein constitutes intentional and material violations of the Fraternity's Constitution, Bylaws, Code of Conduct, and the duties he owed to the organization.

22. On or about April 29, 2025, legal counsel for the Fraternity sent Douglass a formal Cease and Desist letter via certified mail and email, demanding that he immediately cease his unauthorized use of Fraternity Marks, operation of the Infringing Websites, dissemination of false information and confidential materials, and misrepresentation of authority. (**Exhibit D** – April 29, 2025, Cease and Desist Letter).

23. Despite receipt of the Cease and Desist letter, upon information and belief, Douglass has failed and refused to comply fully with its demands and continues his unlawful and harmful conduct.

24. Douglass's actions were and are intentional, willful, malicious, and undertaken with reckless disregard for the truth and the substantial and irreparable harm caused to the Fraternity.

25. As a direct result of Douglass's ongoing conduct, the Fraternity suffers irreparable harm, including significant damage to its esteemed reputation and goodwill built over 121 years, erosion of member trust and cohesion, disruption of

legitimate governance and operations, diversion of resources to counteract misinformation, and confusion regarding official Fraternity communications and leadership. Monetary damages alone are inadequate to remedy this harm.

**COUNT I**  
**FEDERAL TRADEMARK INFRINGEMENT (LANHAM ACT, 15 U.S.C. § 1114)**

26. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 25 as if fully set forth herein.

27. Plaintiff is the owner of valid and protectable rights in the Fraternity Marks, which are distinctive and identify Plaintiff as the source of its services and activities in commerce.

28. Defendant Douglass, subsequent to his removal and without Plaintiff's authorization, has used and continues to use the Fraternity Marks, or confusingly similar variations thereof, in commerce in connection with his Infringing Websites, email communications, letterhead, and other activities visible within this District and nationally.

29. Defendant's use of the Fraternity Marks is likely to cause confusion, mistake, or deception among Fraternity members, the public, and other relevant consumers as to the affiliation, connection, or association of Defendant with Plaintiff, or as to the origin, sponsorship, or approval of Defendant's websites, communications, and activities by Plaintiff. *See, e.g., Sigma Phi Society, Inc. v.*

*Michigan Sigma Phi, Inc.*, No. 2:20-CV-12817, 2024 WL 1862411 (E.D. Mich. Apr. 29, 2024); *Kappa Sigma Fraternity v. Kappa Sigma Gamma Fraternity*, 654 F. Supp. 1095 (D.N.H. 1987) (confirming likelihood of confusion in similar fraternity context).

30. Defendant's infringing use of the Fraternity Marks has caused and, unless enjoined, will continue to cause Plaintiff irreparable harm to its invaluable goodwill and reputation.

31. Defendant's actions constitute trademark infringement in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

## **COUNT II DEFAMATION (GEORGIA LAW)**

32. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 31 as if fully set forth herein.

33. Defendant has published, and continues to publish, false statements concerning Plaintiff, its leadership, and its operations to third parties (including Fraternity members and potentially the public) via the internet (Infringing Websites, emails) and potentially mailings, accessible nationwide, including within Georgia.

34. These statements, including assertions challenging the legitimacy of the Board's actions, misrepresenting the circumstances of his removal, and potentially impugning the integrity of current leadership, are false and tend to injure Plaintiff's reputation and expose it to public hatred, contempt, or ridicule, thereby constituting

defamation *per se* or defamation *per quod* under Georgia law, including O.C.G.A. § 51-5-1 *et seq.*

35. Defendant published these statements with knowledge of their falsity or with reckless disregard for their truth or falsity (actual malice), particularly given his direct knowledge of the circumstances of his removal and the Board's authority.

36. As a direct and proximate result of Defendant's defamatory publications, Plaintiff has suffered damages, including significant harm to its reputation and goodwill, loss of member confidence, disruption to its governance, and other pecuniary and non-pecuniary losses, and faces ongoing irreparable harm if the conduct is not enjoined.

### **COUNT III FRAUDULENT MISREPRESENTATION (GEORGIA LAW)**

37. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 36 as if fully set forth herein.

38. Defendant made, and continues to make, representations of material fact concerning his status and authority within the Fraternity, including implying he retains Grand Sire Archon (President) authority (e.g., by purporting to call meetings) and operating websites using Fraternity Marks suggesting official status.

39. These representations were false, and Defendant knew they were false at the time he made them, having received formal notification of his removal (Exhibit A).

40. Defendant made these false representations with the intent to induce Plaintiff's members and potentially the public to rely upon them (e.g., to believe he still held authority, to question the legitimate leadership, to visit his unauthorized websites).

41. Plaintiff's members and the public may justifiably rely on Defendant's representations due to his former high-profile position and use of Fraternity Marks, unless corrected.

42. As a direct and proximate result of Defendant's fraudulent misrepresentations, Plaintiff has suffered damages, including confusion among members, disruption to governance, costs to correct misinformation, damage to its reputation, and faces ongoing irreparable harm. Defendant's conduct constitutes fraudulent misrepresentation under Georgia law, including O.C.G.A. § 23-2-52.

**COUNT IV  
BREACH OF DUTY (GEORGIA LAW)  
VIOLATION OF GOVERNANCE LAWS AND RULES**

43. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 42 as if fully set forth herein.

44. As Grand Sire Archon, and as a member of the Fraternity, Defendant was bound by the Fraternity's Constitution, Bylaws, Code of Conduct, and Oath which established contractual and/or fiduciary duties owed to the Organization, including duties of loyalty, confidentiality, adherence to governance procedures,

proper use of organizational assets (including trademarks and confidential information), and refraining from conduct detrimental to the Fraternity. These duties persist post-removal regarding confidential information and detrimental conduct.

45. Defendant materially breached his duties through the conduct described herein, including, *inter alia*, disseminating confidential information, making false and defamatory statements against the Fraternity and its leadership, misusing Fraternity Marks and letterhead, misrepresenting his authority, and generally engaging in conduct undermining the Fraternity's legitimate governance and reputation subsequent to his removal.

46. As a direct and proximate result of Defendant's breaches, Plaintiff has suffered damages, including costs incurred to mitigate the harm, investigate the conduct, counteract misinformation, damage to reputation and member relations, loss of resources, and other pecuniary losses, and faces ongoing irreparable harm.

**COUNT V**  
**APPROPRIATION OF NAME AND/OR LIKENESS (GEORGIA LAW)**

47. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 46 as if fully set forth herein.

48. Defendant appropriated the name and likeness of Plaintiff through Defendant's unauthorized use of the Fraternity Marks on the Infringing Websites, letterhead, and in other communications.

49. Plaintiff did not consent to Defendant's use of the Fraternity Marks as alleged herein.

50. Plaintiff has enjoyed financial and reputational gain from Defendant's unauthorized use of the Fraternity Marks.

51. As a direct and proximate result of Defendant's appropriation of Plaintiff's name and likeness, Plaintiff has suffered damages, including confusion among members, disruption to governance, costs to correct misinformation, damage to its reputation, and faces ongoing irreparable harm.

**COUNT VI**  
**COSTS OF LITIGATION AND ATTORNEYS' FEES (O.C.G.A. § 13-6-11)**

52. Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 51 as if fully set forth herein.

53. As described herein, Defendant has acted in bad faith, been stubbornly litigious, and/or cause Plaintiff unnecessary trouble and expense.

54. As a result of the conduct of Defendant's described above, Plaintiff has found it necessary to retain the undersigned attorneys to prosecute this action.

55. Plaintiff is, accordingly, entitled to an award of expenses of this litigation, including reasonably incurred attorneys' fees, pursuant to O.C.G.A. § 13-6-11.

## **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, the Grand Boule of Sigma Pi Phi Fraternity, respectfully requests that this Court enter judgment in its favor and against Defendant Loren R. Douglass as follows:

A. Enter a Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction enjoining and restraining Defendant Douglass, and his agents, servants, employees, attorneys, and all persons in active concert or participation with him, from directly or indirectly: (i) using the Fraternity Marks (including “Sigma Pi Phi,” “The Boule,” the Fraternity crest/shield) or any confusingly similar variations thereof in any manner, including but not limited to on any websites, domain names, social media accounts, email addresses, correspondence, letterhead, or any other materials; (ii) operating or maintaining the Infringing Websites, or any other website purporting to represent or be affiliated with the Fraternity without its express written authorization; (iii) making, publishing, disseminating, or causing to be published or disseminated any false, misleading, or defamatory statements about the Fraternity, its officers, directors, employees, members, operations, finances, or governance; (iv) making any representations that falsely state, suggest, or imply any current affiliation, connection, endorsement, sponsorship, or authority on behalf of the Fraternity; (v) holding himself out as Grand Sire Archon, Immediate Past Grand Sire Archon, or any other officer or authorized representative of the Fraternity; (vi) using, disclosing,



or disseminating any confidential or proprietary information of the Fraternity, including member lists, internal documents, financial data, or strategic plans; (vii) purporting to call or schedule any meetings of the Grand Boulé, any committee thereof, or any other body of the Fraternity; and (viii) engaging in any other act that infringes the Fraternity Marks, defames the Fraternity, constitutes fraudulent misrepresentation concerning the Fraternity, or violates Defendant's duties owed to the Fraternity;

B. Requiring Defendant to file with the Court and serve on Plaintiff's counsel within thirty (30) days after issuance of an injunction, a report in writing under oath setting forth in detail the manner and form in which Defendant has complied with the injunction;

C. Awarding Plaintiff compensatory damages in an amount to be determined at trial, sufficient to compensate Plaintiff for the harm caused by Defendant's unlawful conduct;

D. Awarding Plaintiff punitive damages in an amount sufficient to punish Defendant for his willful, malicious, and reckless conduct and to deter similar conduct in the future, as permitted under Georgia law;

E. Awarding Plaintiff its costs and reasonable attorneys' fees incurred in this action pursuant to the Lanham Act, 15 U.S.C. § 1117, and any other applicable law; and

F. Awarding Plaintiff such other and further relief as the Court deems just and proper.

**JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

Dated: August 4, 2025.

Respectfully submitted,

/s/ Tate Gray

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*Attorneys for Grand Boule of Sigma Pi Phi  
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**CERTIFICATE OF COMPLIANCE**

The undersigned counsel certifies that the foregoing has been prepared in Times New Roman (14 point) font, as required by the Court in Local Rule 5.1 (C).

Respectfully submitted this 4th day of August 2025.

/s/ K. Tate Gray

K. Tate Gray

Georgia Bar No. 919123