

# THE GRIEVANCES FILED AND PENDING

## *Summary Cover Memos*

The summaries below identify each formal grievance and complaint filed with the Grand Boulé Grievance and Complaints Committee since February 2026, the conduct alleged, the documentary foundation, the relief requested, and the status of each matter. The full grievance documents and their exhibits are on file with counsel and with the Committee.

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### **Grievance — Grand Grammateus Darrell B. Searcy**

*Filed May 1, 2026 · Pending before the Grand Boulé Grievance and Complaints Committee*

#### **Subject Archon**

Archon Darrell B. Searcy, Grand Grammateus.

#### **Conduct Alleged**

On May 27, 2025, the Subject Archon transmitted a mass communication to the entire membership of the Fraternity, signed in his capacity as Grand Grammateus and using official Fraternity communications channels, announcing the “administrative suspension” of the Grand Sire Archon (elected). The notice cited the Complainant’s “initiation of litigation against the Fraternity” as a basis for sanction — three days before the Complainant in fact commenced litigation. The Subject Archon subsequently submitted sworn declarations in federal court that contradict his own prior sworn testimony in the Pennsylvania proceedings, mischaracterized the Pennsylvania Court’s findings, and represented to the federal court that the Complainant had not challenged the action of May 21, 2025, while having received documented notice of the formal challenge through the Fraternity’s own grievance machinery.

#### **Counts**

1. Ultra Vires Action; Exceeding the Authority of Office
2. Issuance of an Unauthorized and Procedurally Void Disciplinary Determination
3. Procedural Violations of the Code of Conduct
4. False and Misleading Statements; Defamation
5. Retaliation for Anticipated Exercise of Legal Rights
6. Breach of Fiduciary Duty
7. Specific Violations of the Code of Conduct’s Prohibited Activities
8. Sworn False Statements in Federal Court Proceedings

#### **Documentary Foundation**

- Notice of Suspension transmitted by the Subject Archon to the membership, May 27, 2025
- Sworn testimony of the Subject Archon before the Court of Common Pleas of Philadelphia County, July 2, 2025
- Sworn Supplemental Declaration of the Subject Archon submitted in Civil Action No. 1:25-cv-02975-SDG (N.D. Ga.), April 24, 2026
- Findings of Fact and Conclusions of Law of the Honorable Stella M. Tsai, J., September 16, 2025
- Confidential Memorandum of Archon John R. Gray, Chair of the Grand Boulé Grievance and Complaints Committee, March 16, 2026

### **Sanctions Requested**

Expulsion from the Fraternity, or in the alternative, suspension from membership; removal from the office of Grand Grammateus; formal censure entered upon the permanent record; and an institutional retraction of the May 27, 2025 notice transmitted to the same membership through the same channels.

### **Status**

Filed May 1, 2026. Served upon the Northeast Regional Sire Archon as procedural intake, the Chair of the Grand Boulé Grievance and Complaints Committee, and the Grand Board. No formal response has been issued.

*Full grievance, with exhibits, is on file with counsel and with the Grand Boulé Grievance and Complaints Committee. Made available upon written request to the Office of the Grand Sire Archon (elected).*

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## **Challenge to the Administrative Suspension**

*Filed February 27, 2026 · Pending before the Grand Boulé Grievance and Complaints Committee*

### **Subject of Complaint**

The “Administrative Suspension” imposed by the Grand Board on May 21, 2025.

### **Conduct Alleged**

On or about May 21, 2025, the Grand Board imposed what was characterized as an “administrative suspension” upon the Complainant. The stated basis was the Complainant’s initiation of civil litigation in the Philadelphia Court of Common Pleas challenging the procedural validity of the April 9, 2025 removal vote. No formal complaint preceded the suspension, no notice was served, no investigation was conducted, and no opportunity to respond was provided. The

Code of Conduct Policy and Grievances and Disciplinary Manual (2024) does not authorize “administrative suspension” anywhere in its text, and the procedural pathway the Manual prescribes for any form of discipline was bypassed in its entirety. The suspension has remained in effect for approximately ten months.

### **Counts**

1. No Authority for “Administrative Suspension” Exists in the Code of Conduct
2. Filing Litigation Is Not a Prohibited Activity Under the Code
3. The Suspension Preceded Any Formal Complaint by Two Days
4. The Suspension Lacks Any Procedural Foundation in the Governing Documents

### **Documentary Foundation**

- Code of Conduct Policy and Grievances and Disciplinary Manual (2024)
- Formal complaint of Archon Alvin R. Johnson, dated May 23, 2025 — filed two days after the suspension was imposed
- Grand Boulé Grievance and Complaints Committee Report on Investigation, dated August 7, 2025 (“The Committee sees no useful purpose to be served by recommending further action”)
- Decree of the Pennsylvania Court of Common Pleas, Orphans’ Court Division (No. 600 NP of 2025), dated September 16, 2025, containing preliminary findings that the Complainant is likely to prevail on the merits

### **Relief Requested**

A finding that the May 21, 2025 administrative suspension is procedurally void for failure to comply with the mandatory procedures of the Code of Conduct; a recommendation to the Grand Board that the suspension be lifted immediately; and a clarifying determination that no provision of the Constitution, Bylaws, or Code of Conduct authorizes suspension of a member outside the procedures established in the Grievances and Disciplinary Manual.

### **Status**

Filed February 27, 2026 with the Grand Boulé Grievance and Complaints Committee. No formal response has been issued.

*Full complaint is on file with counsel and with the Grand Boulé Grievance and Complaints Committee. Made available upon written request to the Office of the Grand Sire Archon (elected).*

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## **Grievance Against Tapscott and Jordan**

*Filed March 31, 2026 · Pending before the Grand Boulé Grievance and Complaints Committee*

## **Subject Archons**

- Archon David Tapscott, Regional Sire Archon, Northeast Region
- Archon Lloyd Jordan, Grand General Counsel

## **Conduct Alleged**

This grievance addresses the dissemination of materially misleading and incomplete information to the membership at two official fraternity events and through one written communication distributed fraternity-wide. The first event was a regional virtual session hosted by Respondent Tapscott on April 15, 2025, addressing the Northeast Region regarding the removal of the Grand Sire Archon. The second was the Northeast Region meeting at Foxwoods Resort on September 26–27, 2025, hosted by Respondent Tapscott, at which Respondent Jordan addressed the membership in his capacity as Grand General Counsel regarding the pending litigation. The third was a written communication issued under Respondent Jordan’s signature to the entire fraternity membership, titled “Important Information Regarding Recent Communications” — a communication of a kind without precedent in the fraternity’s history. The grievance does not ask the Committee to adjudicate any legal question. It asks the Committee to determine whether Respondents, in their official capacities, presented to the membership a materially accurate and complete account of the documentary record.

## **Counts — Tapscott**

1. Mischaracterization of the Basis for Removal (April 15, 2025)
2. Dentons Legal Fees — Material Omissions (April 15, 2025)
3. Denial of Conflicts of Interest (April 15, 2025)
4. Misrepresentation of the Impartiality of the Investigation (April 15, 2025)
5. Unsupported Account of a Private Exchange (Foxwoods)
6. Unsupported Account of Board Meeting Conduct (Foxwoods)
7. Reduction of the Legal Case to “Technicalities” and Presumption of Guilt (Foxwoods)
8. Ridicule of Members and Suppression of Independent Evaluation (Foxwoods)

## **Counts — Jordan**

1. Misleading Characterization of the Court’s Ruling (Foxwoods)
2. Mischaracterizing What the Litigation Is About (Foxwoods)
3. Mischaracterizing the Judge and the Court’s Posture (Foxwoods)
4. Misquoting the Bylaw and Adopting a Defeated Interpretation (Foxwoods)
5. Conflating the Original Vote with the Ratification (Foxwoods)
6. Misapplication of the Camenisch Citation (Foxwoods)
7. Advocacy Disguised as Institutional Briefing (Foxwoods)
8. Presumption of Guilt and Character Impeachment (Foxwoods)

9. Public Expression of Contempt for Complainant's Legal Rights (Foxwoods)
10. Instruction to the Membership to Delete Communications (Foxwoods)
11. Implied Threats to the Membership (Foxwoods)
12. Refusal to Disclose Legal Costs While Mischaracterizing Them (Foxwoods)
13. Unprecedented Written Communication to the Entire Fraternity Membership
14. Bypass of Internal Process and Suppression of Its Findings

### **Documentary Foundation**

- Email chain — FW: Dentons Memo Regarding Legal Fees, February 10–12, 2025 (Exhibit A)
- Dentons Fee Proposal Memo, February 12, 2025, documenting actual outstanding amount of \$580,423 and negotiated settlement cap of \$269,660 (Exhibit B)
- Grand Boulé Conflict of Interest Policy (Exhibit C)
- Court-stamped minutes of the April 2025 meeting (Exhibit D)
- Decree of the Pennsylvania Court of Common Pleas, dated September 16, 2025 (Exhibit E)
- Record of statements from the April 15, 2025 virtual session (Exhibit F)
- Transcript of the Foxwoods Northeast Region meeting, September 26–27, 2025 (Exhibit G)
- Written communication of Respondent Jordan to the entire fraternity membership, “Important Information Regarding Recent Communications” (Exhibit H)
- Grand Boulé Grievance and Complaints Committee Report on Investigation, dated August 7, 2025 (Exhibit I)
- Federal complaint, U.S. District Court for the Northern District of Georgia (No. 1:25-cv-02975-SDG), dated May 29, 2025 (Exhibit J)
- Preliminary injunction hearing transcript, Court of Common Pleas, Philadelphia County, July 2–3, 2025 (Exhibit K)

### **Relief Requested**

Acceptance of the grievance for investigation and adjudication; written response from each Respondent to the specific allegations; findings of fact regarding whether Respondents disseminated materially misleading and incomplete information to the membership through official channels; specific findings regarding Respondent Jordan's conduct as the fraternity's chief legal officer (oral instructions, implied threats, expressed contempt for Complainant's legal rights, and the unprecedented fraternity-wide written communication); appropriate remedial action; and preservation of recordings, transcripts, audiovisual files, meeting notes, scripts, slide decks, chat logs, and emails relating to the two events and the written communication.

### **Status**

Filed March 31, 2026 with the Grand Boulé Grievance and Complaints Committee with eleven exhibits attached. The Foxwoods transcript (Exhibit G) was inadvertently omitted at filing and submitted by belated cover letter. No formal response has been issued.

*Full grievance, with exhibits, is on file with counsel and with the Grand Boulé Grievance and Complaints Committee. Made available upon written request to the Office of the Grand Sire Archon (elected).*

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## **Grievance Against Tyson and Roman**

*Filed March 23, 2026 · Pending before the Grand Boulé Grievance and Complaints Committee*

### **Subject Archons**

- Archon Jesse J. Tyson — at the time of the conduct alleged, Grand Sire Archon-Elect
- Archon Derrick A. Roman, Grand Thesauristes

### **Conduct Alleged**

This grievance addresses the personal conduct of two individual Archons during the Grand Board proceedings of April 8–9, 2025. It does not seek to relitigate any board action, and it does not ask the Committee to rule on the validity of the removal vote — those matters are before the courts and the Grand Board respectively. It addresses only whether the personal conduct of the named Respondents — conduct that preceded any institutional action against the Complainant — violated the Code of Conduct and the Grand Boulé Conflict of Interest Policy. As Grand Thesauristes, Respondent Roman served as the final approver in the documented multi-level expense reimbursement chain that processed every expenditure later cited as the basis for removal; he then served on the Special Committee that investigated those same expenditures, made the formal motion to remove the Grand Sire Archon, and voted in favor of his own motion — without disclosure, without conflict determination, and without recusal at any stage. As Grand Sire Archon-Elect, Respondent Tyson presided over the removal proceedings, characterized to the board an unwritten Special Committee recommendation as the predicate for removal, voted “Yes” on the motion to remove, and immediately assumed the office vacated by that vote — without disclosure, without conflict determination, and without recusal at any stage. Respondent Tyson’s vote, cast in violation of the mandatory recusal provisions of the Conflict of Interest Policy he had executed, was outcome-determinative: with proper recusal, the affirmative count would have fallen below the constitutional threshold required for removal.

### **Counts — Roman**

1. Constitutional Role of Grand Thesauristes

2. Final Approval of the Expenditures at Issue Through the Multi-Level Reimbursement Chain
3. Service on the Investigating Special Committee
4. Motion to Remove the Grand Sire Archon for the Same Expenditures Previously Approved
5. Structural Contradiction Between Approver and Prosecutor Roles
6. Violation of the Grand Boulé Conflict of Interest Policy — Preamble, Sections 4, 5, and 6
7. Failure to Disclose Conflict on the Annual Disclosure Statement

### **Counts — Tyson**

1. Departure from the Neutrality Required of the Presiding Officer
2. Characterization to the Board of an Unwritten and Unadopted Recommendation as the Predicate for Removal
3. Outcome-Determinative Vote Cast Despite a Direct Personal Interest in the Result
4. Approval of the Same Expenditures at Step 2 of the Reimbursement Chain
5. Violation of the Grand Boulé Conflict of Interest Policy — Preamble, Sections 4, 5, and 6
6. Failure to Disclose Conflict on the Annual Disclosure Statement

### **Documentary Foundation**

- Official minutes of the Grand Board meetings of April 8–9, 2025
- Transcript of the April 8–9, 2025 proceedings
- Financial records documenting the multi-level approval chain for the expenditures at issue
- Constitution and Bylaws of Sigma Pi Phi Fraternity
- Grand Boulé of Sigma Pi Phi Fraternity Conflict of Interest Policy (2022–2024)
- Annual Disclosure Statements executed by Respondents
- Grand Boulé Grievance and Complaints Committee Report on Investigation, dated August 7, 2025
- Decree of the Pennsylvania Court of Common Pleas, dated September 16, 2025
- Addendum A — Policy Mapping (Conflict of Interest Policy provisions to documented conduct)

### **Relief Requested**

Acceptance of the complaint for investigation pursuant to the Formal Complaint Process; written Notice of Complaint to each Respondent under Step 2; formal investigation and, if appropriate, a hearing; a Report and Recommendation to the Grand Board addressing whether the conduct violated the Code of Conduct and the Conflict of Interest Policy; and remedial measures consistent with the Code, including but not limited to censure.

**Status**

Filed March 23, 2026 with the Grand Boulé Grievance and Complaints Committee; accepted and routed by the Chairman without standing objection. No formal response from either Respondent has been issued.

*Full grievance, with the policy-mapping addendum and supporting documents, is on file with counsel and with the Grand Boulé Grievance and Complaints Committee. Made available upon written request to the Office of the Grand Sire Archon (elected).*