

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

Ms. Joy Elaine Daley)
37 Ramona Road)
Newburgh, New York 12550)

and)

Ms. Kezirah Means Vaughters)
8470 Limekiln Pike)
Apt. 605-2)
Wyncote, Pennsylvania 19095)

and)

Ms. Carol P. Ray)
7932 Lowber Avenue)
Philadelphia, Pennsylvania 19150)

and)

Ms. Elizabeth Berry Holmes)
7720 Valley Green Road)
Wyncote, Pennsylvania 19095)

and)

Catherine Alicia Georges, Ed. D)
836 Tilden Street, #4D)
Bronx, New York)

and)

Ms. Marie L. Cameron)
4453 Northside Parkway)
Atlanta, Georgia 30327)

and)

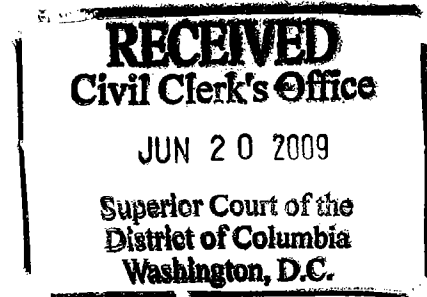
Ms. Brenda Georges)
4021 Castle Way)
Fairburn, Georgia 30213)

and)

0004456-09

Civil Action No.

Jury Trial Demanded



Ms. Frances Tyus
19412 Mayfair Lane
Warrensville Heights, Ohio 44128

Plaintiffs

v.

Alpha Kappa Alpha Sorority, Inc.
5656 South Stony Island Avenue
Chicago, Illinois 60637,

and

AKA Educational Advancement
Foundation, Inc.
5656 South Stony Island Avenue
Chicago, Illinois 60637,

and

Barbara A. McKinzie, CPA
President
Alpha Kappa Alpha Sorority, Inc.
301 Wysteria Dr.
Olympia Fields, Illinois 60461

and

Carolyn House Stewart, Esq.
First Vice President
1719 Tom Folsom Rd
Thonotosassa, Florida 33592

and

Ms. Melanie C. Jones
Second Vice President
HU West Plaza Towers
2251 Sherman Ave Apt. 525
Washington, District of Columbia 20001

and

Ms. Dorothy Buckhanan Wilson
Secretary
5432 Burning Bush Ln
Mequon, Wisconsin 53092

and

Ms. Freddie Groomes-McLendon
Parliamentarian
3306 Wheatley Rd
Tallahassee, Florida 32305

and

Glenda Glover, CPA, JD
Treasurer
1031 Whitsett Walk
Jackson, MS 39206

and

Ms. Shayla M. Johnson
Undergraduate Member-at-Large
2251 Sherman Ave. NW
Washington, District of Columbia 20001

and

Ms. Noel Marie Niles
Undergraduate Member-at-Large
1713 Fleetwood Dr
Troy, Michigan 48098

and

Ms. Pamela Bates Porch
Central Regional Director
1407 W. 73rd St.
Chicago, Illinois 60638

and

Ms. Lavern Tarkington
Far Western Regional Director
1616 Moody Trail,
Phoenix, Arizona 85041

and)

Ms. Schylbea J. Hopkins)
Great Lakes Regional Director)
5640 Oakman Blvd.,)
Detroit, Michigan 48204-3011)

and)

Ms. Norma Tucker)
International Regional Director)
1516 Holman Road,)
Oakland, California 94610)

and)

Ms. Ruby Batts Archie)
Mid-Atlantic Regional Director)
145 Westwood Dr.)
Danville, Virginia 24541-5222)

and)

Hon. Vicki Miles-LaGrange)
Mid-Western Regional Director)
200 NW Fourth Street,)
Oklahoma City, Oklahoma 73101)

and)

Ms. Evelyn Sample-Oates)
North Atlantic Regional Director)
501 Monticello Lane)
Plymouth Meeting, Pennsylvania 19462)

and)

Ms. Ella Springs Jones)
South Atlantic Regional Director)
2370 Courtney Circle,)
Augusta, Georgia 30906)

and)

Ms. Gwendolyn Brinkley
South Central Regional Director
4035 Fernwood
Houston, Texas 77021

and

Ms. Juanita Sims Doty
South Eastern Regional Director
1532 Lakeside Dr
Jackson, Mississippi 39216-4807

and

Ms. Tari Bradford
Former South Central Regional Director
3634 Crestview Dr
Shreveport, LA 71119

and

Betty Nolan James, Ed. D.
Executive Director
1642 East 56th Street
Chicago, Illinois 60637

and

Ms. E LaVonne Lewis
Former Far Western Regional Director
202 Spring Rd
Las Vegas, Nevada 89134

and

Ms. Ranika Sanchez
Former Second Vice President
4738 Friendship Ave
Pittsburgh, Pennsylvania 15224

and

Ms. Adria Robinson)
 Former Undergraduate)
 Member At Large)
 14292 East 28th Ave.)
 Aurora, Colorado 80011)
)
 and)
)
 Ms. Shaylyn Cochran)
 Former Undergraduate Member At Large)
 641 Arlington Ave)
 Mansfield, Ohio 44903,)
)
 Defendants.)
)

COMPLAINT

1. This action is brought by geographically diverse members of Alpha Kappa Alpha Sorority, Incorporated (“AKA” or the “sorority”), Ms. Daley, Ms. Vaughters, Ms. Ray, Ms. Holmes, Dr. Georges, Ms. Cameron, Ms. Georges and Ms. Tyus (collectively, the “Plaintiffs”), who bring this action to restore their beloved sorority to its former high standards of governance, corporate transparency and active member communication including compliance with its corporate articles, Constitution and Bylaws with respect to the approval of sorority expenditures and other matters. The Defendants have failed to abide by the rules and procedures set forth in AKA’s Constitution and Bylaws, resulting in several large expenditures without the appropriate approval and the improper silencing of dissenting members under the guise of “discipline.” Defendants have made clear that they will not voluntarily redress the concerns of Plaintiffs. This dispute arises to enforce Plaintiffs claims against Defendants’ breaches of fiduciary duty, breaches of contract,

corporate waste, and unjust enrichment. Plaintiffs seek monetary recovery for the sorority and injunctive relief.

JURISDICTION AND VENUE

2. Jurisdiction of this court exists under DC ST § 11-921 because the amount in controversy in this civil action exceeds \$50,000.

3. Venue is properly in the District of Columbia, in that Defendants are current and former members of the board of directors of the sorority. The sorority's Board of Directors is known as the Directorate, and is vested pursuant to AKA Constitution and Bylaws with the responsibility to govern the sorority and AKA Educational Advancement Foundation, Inc. (the "foundation"), a wholly-owned affiliate of the sorority. The sorority is a non-profit organization incorporated under the laws of the District of Columbia, and the foundation is a non-profit organization incorporated under the laws of the State of Illinois. The sorority and the foundation operate in the District of Columbia through their member chapters.

THE PARTIES

4. Plaintiff, Ms. Joy Elaine Daley, is an individual residing in Newburgh, New York and since 1985, a member of AKA. Plaintiff Daley served as local chapter president based in New York, Chairman of the defendant's regional and national Nominating committees, and North Atlantic Regional Director.

5. Plaintiff, Ms. Kezilah Means Vaughters, is an individual residing in Wyncote, Pennsylvania. Ms. Vaughters is a founding member and first Treasurer of a local chapter based in Philadelphia, is the third President of said local chapter, was the Chairman of the 2004 North Atlantic Regional Conference, was the President of said local chapter's Ivy

Legacy Foundation, is a member of the said local chapter's Financial Oversight Committee, is a member of the Advisory Council (Past Presidents) of said local chapter, is an active member of said local chapter, and since 1958, a member of AKA.

6. Plaintiff, Ms. Carol P. Ray, is an individual residing in Philadelphia, Pennsylvania. Ms. Ray is a founding member and first President of a local chapter based in Philadelphia, was Co-chairman of the 1986 North Atlantic Regional Conference, was the Corporate Sponsor Chairman for said local chapter's major fundraiser, is Co-chairman of said local chapter's Financial Oversight Committee, is a member of the Advisory Council (Past Presidents) of said local chapter, is an active member of said local chapter and served four years on the Former Regional Director Advisory Council, and since 1961, a member of AKA.

7. Plaintiff, Ms. Elizabeth Berry Holmes, is an individual residing in Wyncote, PA. Ms. Holmes is a founding member and first Assistant Treasurer of a local chapter based in Philadelphia, was a Corporate Sponsor Chairman for major fundraiser of said local chapter, was Co-chairman of Black Family initiative in said local chapter, was Chairman of 2004 North Atlantic Regional Conference Awards Banquet, is an active member of said local chapter, and since 1957, a member of AKA.

8. Plaintiff, Catherine Alicia Georges, PhD, is an individual residing in Bronx, New York. Dr. Georges is a Faculty Advisor and Chairman of the local chapter Audit Committee based in New York, and since 1984, a member of AKA.

9. Plaintiff, Ms. Marie L. Cameron is an individual residing in Atlanta, Georgia. Ms. Cameron was initiated into membership of defendant AKA Sorority in 1986, and is

an Executive in Residence and Instructor of the Institute of Health Administration in the Robinson College of Business, Georgia State University.

10. Plaintiff, Ms. Brenda Georges, is an individual residing in Fairburn, GA. Ms. Georges is an educator in the Atlanta, Georgia school system. Ms. Georges is, since 1999 an active member of AKA.

11. Plaintiff, Ms. Frances Tyus is an individual residing in Warrensville Heights, Ohio Ms. Tyus is, since 1983, a member of AKA. Plaintiff Tyus served as a local chapter president based in Ohio.

12. Defendant AKA was incorporated on January 20, 1913 as a private, nonprofit corporation organized under the laws of the District of Columbia. It has been designated by the Internal Revenue Service as a tax exempt organization under I.R.C. § 501 (c) (7). AKA maintains its corporate office at 5656 South Stony Island Avenue, Chicago, Illinois 60637. Defendant AKA adopted a Constitution and Bylaws, and operates pursuant to these documents, pertinent parts of which are attached as Exhibit A. Defendant AKA is further governed by rules set forth in its Manual of Standard Procedure, pertinent parts of which are attached as Exhibit B.

13. Defendant, AKA Educational Advancement Foundation, Inc. is a private Illinois non-profit corporation. The foundation was designated by the Internal Revenue Service as a tax exempt organization under I.R. C. § 501 (c) (3). The foundation was organized by AKA leadership and is a wholly-owned affiliate of the Defendant sorority.

14. Defendant, Ms. Barbara McKinzie is an individual residing at 301 Wysteria Drive, Olympia Fields, Illinois 60461. McKinzie is, and was at all times referred to herein, the current International President (“President”), and member of AKA.
15. Defendant, Ms. Carolyn House Stewart is an individual residing at 1719 Tom Folsom Road, Thonotosassa, Florida 33592. Ms. Stewart is, and was at all times referred to herein, the current First Vice President and a member of the Directorate of AKA.
16. Defendant, Ms. Melanie C. Jones is an individual residing at HU West Plaza Towers, 2251 Sherman Avenue, Apt. 525, Washington, District of Columbia 20001. Ms. Jones is, and was at all times referred to herein, the current Second Vice President and a member of the Directorate of AKA.
17. Defendant, Ms. Dorothy Buckhanan Wilson is an individual residing at 5432 Burning Bush Lane, Mequon, Wisconsin 53092. Ms. Wilson is, and was at all times referred to herein, the current Secretary and a member of the Directorate of AKA.
18. Defendant, Ms. Freddie Groomes-McLendon is an individual residing at 3306 Wheatley Road, Tallahassee, Florida 32305. Ms. Groomes-McLendon is, and was at all times referred to herein, the current Parliamentarian and a member of the Directorate of AKA.
19. Defendant, Ms. Shayla M. Johnson is an individual residing at 2251 Sherman Avenue, Washington, District of Columbia 20001. Ms. Johnson is, and was at all times referred to herein, a current Undergraduate Member at Large and a member of the Directorate of AKA.

20. Defendant, Ms. Noel M. Niles is an individual residing at 1713 Fleetwood Drive, Troy, Michigan 48098. Ms. Niles is, and was at all times referred to herein, a current Undergraduate Member at Large and a member of the Directorate of AKA.
21. Defendant, Ms. Pamela Bates Porch is an individual residing at 1407 W. 73rd Street, Chicago, Illinois 60638. Ms. Porch is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
22. Defendant, Ms. LaVern M. Tarkington is an individual residing at 1616 Moody Trial, Phoenix, Arizona 85041. Ms. Tarkington is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
23. Defendant, Ms. Schylbea J. Hopkins is an individual residing at 5640 Oakman Boulevard, Detroit, Michigan 48204. Ms. Hopkins is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
24. Defendant, Ms. Norma Jean Tucker is an individual residing at 1516 Holman Road, Oakland, California 94610. Ms. Tucker is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
25. Defendant, Ms. Ruby Batts Archie is an individual residing at 145 Westwood Drive, Danville, Virginia 24541. Ms. Archie is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
26. Defendant, Ms. Vicki Miles-LaGrange is an individual residing in Oklahoma City, OK. Ms. Miles-LaGrange is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.

27. Defendant, Ms. Evelyn Sample-Oates is an individual residing at 501 Monticello Lane, Plymouth Meeting, Pennsylvania 19462. Ms. Sample-Oates is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
28. Defendant, Ms. Ella Spring Jones is an individual residing at 2370 Courtney Circle, Augusta, Georgia 30906. Ms. Jones is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
29. Defendant, Ms. Gwendolyn J. Brinkley is an individual residing at 4035 Fernwood, Houston, Texas 77021. Ms. Brinkley is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
30. Defendant, Ms. Juanita Sims Doty is an individual residing at 1532 Lakeside Drive, Jackson, Mississippi 39216. Ms. Doty is, and was at all times referred to herein, a current Regional Director and a member of the Directorate of AKA.
31. Defendant, Ms. Tari Bradford is an individual residing at 3634 Crestview Dr., Shreveport, LA 71119. Ms. Bradford was a Regional Director from 2004 -2008, and a member of the Directorate of AKA.
32. Defendant, Betty N. James, Ed.D. is an individual residing at 1642 East 56th Street, Chicago, IL 60637. Dr. James is, and was at all times referred to herein, the Executive Director responsible for the administration of AKA corporate office and management of its staff.
33. Defendant, Ms. E Lavonne Lewis is an individual residing at 202 Spring Road, Las Vegas, Nevada 89134. Ms. Lewis was a Regional Director from 2004 to 2008, and a member of the Directorate of AKA.

34. Defendant, Ms. Ranika Sanchez is an individual residing at 4738 Friendship Avenue, Pittsburgh, Pennsylvania 15224. Ms. Sanchez was the Second Vice President from 2006 to 2008 and a member of the Directorate of AKA.
35. Defendant, Ms. Adria Robinson is an individual residing at 14292 East 28th Avenue, Aurora, Colorado 80011. Ms. Robinson was an Undergraduate Member at Large from 2006 to 2008, and a member of the Directorate of AKA.
36. Defendant, Ms. Shaylyn Cochran is an individual residing at 641 Arlington Avenue, Mansfield, Ohio 44903. Ms. Cochran was an Undergraduate Member at Large from 2006 to 2008, and a member of the Directorate of AKA.

FACTUAL ALLEGATIONS

37. AKA is America's first Greek-letter sorority established by Black women. AKA was founded in 1908 by 16 women on the campus of Howard University, Washington, D.C. The AKA founding principles include promoting unity and friendship, improving the social and economic condition of college women, cultivating and encouraging high ethical standards. Today, that tradition continues locally, nationally and internationally. (See Exhibit A, Preamble of AKA's Constitution and Bylaws.)
38. AKA has over 950 chapters in cities, colleges and universities throughout the world, a global membership of over 200,000 and a financially active membership in excess of 50,000.
39. AKA enjoys a global reputation for service and excellence. The sorority includes among its members such renowned Black women as the poet, Maya Angelou, the

astronaut and physician, Mae Jamison, the author, Toni Morrison, and actress Phylicia Rashād.

40. The principal governance and policy making body of AKA is known as the Boulé. All financially active members of AKA are members of the Boulé. The Boulé meets biennially in even calendar years at a convention which is also called the Boulé.
41. The board of directors of AKA is known as the Directorate. With exception of the President and the first Vice President of the sorority who are elected for a four year term, the other Directorate members are elected for a two year term at the biennial meeting of the Boulé by Boulé delegates.
42. The Directorate is authorized to conduct the business of AKA when the Boulé is not in session. The Directorate is comprised of eighteen (18) officers: President, First Vice President, Second Vice President, Secretary, Treasurer, two Undergraduate Members at Large, and ten Regional Directors. The Executive Director is a non-voting member of the Directorate.
43. The operation of AKA's headquarters in Chicago, Illinois is managed by a professional staff led by the Executive Director. The current Executive Director is Defendant, Dr. Betty N. James.
44. The Executive Director is responsible for administration of the AKA corporate office and management of its staff, and is a non-voting member of the Directorate, but is a voting member of all committees except the Nominating Committee.
45. Pursuant to Article IV of the AKA Constitution and Bylaws, the duties of the members of AKA include meeting all financial requirements of their chapters and the Boulé. (*See* AKA Constitution and Bylaws, Exhibit A.)

