

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

PAMELA REDDEN, MD

1955 E. 82nd Street
Cleveland, OH 44103

Plaintiff

vs.

**ALPHA KAPPA ALPHA
SORORITY, INC.**

5656 South Stony Island Avenue
Chicago, Illinois 60637

and

**SCHYLBEA J. HOPKINS, Great Lakes
Regional Director, Alpha Kappa Alpha
Sorority, Inc.**

5640 Oakman Blvd.
Detroit, MI 48204-3011

and

**Barbara A. McKinzie, President
(Supreme Basileus) Alpha Kappa
Alpha Sorority, Inc.**

301 Wysteria Dr.
Olympia Fields, IL 60461

and

**Carolyn House Stewart
First Supreme Anti-Basileus**

P.O. Box 1531
Tampa, FL 33601

and

**Melanie C. Jones
Second Supreme Anti-Basileus**

HU West Plaza Towers
2251 Sherman Ave Apt. 525
Washington, DC 2001

} Case No.

} Judge

} VERIFIED COMPLAINT for DECLARATORY
} JUDGMENT, INJUNCTIVE and EQUITABLE
} RELIEF, ACTS OF NEGLIGENCE,
} DEFAMATION , BREACH OF CONTRACT
} and DAMAGES

} **JURY DEMAND**

Dorothy Buckhanan Wilson }
Supreme Grammateus }
5432 Burning Bush Ln }
Mequon, WI 53092 }

and }

Glenda Glover }
Surpreme Tamiouchos }
1031 Whitsett Walk }
Jackson, MS 39206 }

and }

Noel Marie Niles }
Undergraduate Member-at-Large }
1713 Fleetwood Dr }
Troy, MI 48098 }

and }

Shayla M. Johnson }
Undergraduate Member-at-Large }
2251 Sherman Ave. NW }
Washington, DC 20001 }

and }

Evelyn Sample-Oates }
North Atlantic Regional Director }
501 Monticello Ln }
Plymouth Meeting, PA 19462 }

and }

Ruby Batts Archie }
Mid-Atlantic Regional Director }
145 Westwood Dr. }
Danville, VA 24541-5222 }

and }

Juanita Sims Doty }
South Eastern Regional Director }
1532 Lakeside Dr }
Jackson, MS 39216-4807 }

and }
} }
Vicki Miles-LaGrange }
Mid-Western Regional Director }
P.O. Box 742 }
Oklahoma City, OK 73101 }

and }
} }
Ella Springs Jones }
South Atlantic Regional Director }
2370 Courtney Circle }
Augusta, GA 30906 }

and }
} }
Gwendolyn Brinkley }
South Central Regional Director }
4035 Fernwood }
Houston, TX 77021 }

and }
} }
Pamela Bates Porch }
Central Regional Director }
1407 W. 73rd St. }
Chicago, IL 60638 }

and }
} }
Lavern Tarkington }
Far Western Regional Director }
1616 Moody Trail }
Phoenix, AZ 85041 }

and }
} }
Norma Tucker }
International Regional Director }
1516 Holman Road }
Oakland, CA 94610 }

and }
} }
Freddie Groomes-McLendon }
Supreme Parliamentarian }
3306 Wheatley Rd }

STATEMENT OF FACTS

3. Plaintiff is a thirty year member of the Defendant sorority, is a former local chapter president, former International Committee Chairman, former Regional Director of said Sorority and a candidate for its highest elected office, First Vice President, (constitutionally known as First Supreme Anti-Basileus) in 2006. Plaintiff is also a Life member of the defendant organization pursuant to Article IV, Section 9 of the Constitution and ByLaws and should have been afforded the rights and courtesies therein set forth.

4. Defendant, Alpha Kappa Alpha Sorority, Inc. is an organization, incorporated as a nonprofit corporation in Washington, D.C. on January 30, 1913 with its principal headquarters located in Chicago, IL. Defendant adopted a Constitution and By Laws, and operates pursuant to said documents, pertinent parts of which are attached hereto as Exhibit "A" and is also governed by rules set forth in its Manual of Standard Procedure, attached hereto as Exhibit "B". In various communications from the defendant Hopkins, references are made to the sorority's Anti-Hazing Handbook, Say "No" to Hazing which is attached hereto as Exhibit "C" and its "So You Want to Run For Office" document which is attached hereto as Exhibit "D".

5. Defendant Schylbea J. Hopkins is the Great Lakes Regional Director of said defendant Sorority, having succeeded Plaintiff in that office and is the controlling official over all Chapter activities and Chapter members in the Great Lakes Region; she is also the official who suspended Plaintiff and is the official to whom all appeals from suspension must first be submitted as required by the Alpha Kappa Alpha 's governing documents. The Defendant Barbara A. McKinzie is the current President,

(constitutionally known as Supreme Basileus) of Alpha Kappa Alpha who, pursuant to the organization's governing documents, is required to hear Plaintiff's appeal and if relief is not granted is required pursuant to said governing documents to schedule a hearing before the Board of Directors upon further appeal by Plaintiff. The defendants Carolyn House Stewart, Vice-President (hereinafter known as First Supreme Anti-Basileus), Melanie C. Jones, Second Vice President (hereinafter, Second Supreme Anti-Basileus), Dorothy Buckhanan Wilson, Secretary (hereinafter, Supreme Grammateus), Glenda Glover, National Treasurer (hereinafter, Supreme Tamiouchos), Noel Marie Niles, Undergraduate Member-at-Large, Shayla M. Johnson, Undergraduate Member-at-Large, Evelyn Sample-Oates, North Atlantic Regional Director, Ruby Batts Archie, Mid-Atlantic Regional Director, Juanita Sims Doty, South Eastern Regional Director, Vicki Miles-LaGrange, Mid-Western Regional Director, Ella Springs Jones, South Atlantic Regional Director, Gwendolyn Brinkley, South Central Regional Director, Pamela Bates Porch, Central Regional Director, Lavern Tarkington, Far Western Regional Director, Norma Tucker, International Regional Director, and Freddie Groomes-McLendon, National Parliamentarian (hereinafter, Supreme Parliamentarian), together with defendants Hopkins and McKinzie constitute the Board of Directors (hereinafter known as Directorate) which was and is able to afford relief to plaintiff.

6. During the course of Plaintiff's 2006 campaign for First Vice President (First Supreme Anti-Basileus) and subsequent thereto, rumors regarding financial matters including payouts of Sorority funds, and issues of self dealing and conflicts of interest as to Barbara A. McKinzie who had served as Treasurer and is currently Supreme Basileus had circulated. Numerous members of the sorority were concerned with these and other

financial concerns at that critical time.

7. Plaintiff states that she was among members who were concerned with the unusual nature of the financial matters in question and responded to individual concerns on these issues during the course of Plaintiff's campaign for national office and subsequent thereto.

8. Plaintiff contends that the Defendant McKinzie and others viewed the legitimate discussion of these financial issues as a personal attack on Defendant's integrity, which it was not, and undertook an active effort to stifle such discussions, including acts of retribution against Plaintiff and others who were identifiably vocal.

9. Plaintiff states that, on or about April 20, 2007, Defendant Hopkins who had been advised of plaintiff's intent to run for the office of First Vice President in 2010 and/or McKinzie in their official capacities as Corporate officers of Defendant Sorority, Alpha Kappa Alpha Sorority, Inc., initiated an investigation into operational matters concerning Alpha Omega Chapter of Alpha Kappa Alpha of which Plaintiff was a member. The investigation concerned matters not under the control of the Plaintiff. According to defendant Hopkins, the Great Lakes Heritage Committee issued a report concluding that plaintiff had committed acts that constituted a violation of the Anti-Hazing Handbook, following which the defendant Hopkins withdrew plaintiff's membership privileges and recommended plaintiff's suspension. Plaintiff was never given a copy of this report.

10. Plaintiff alleges that the method of said investigation of operational and financial matters of Alpha Omega Chapter was arbitrary, capricious and without merit and conducted with a purpose of carrying out acts of retribution against said Plaintiff as alleged in paragraphs 7 and 8 herein and to provide opportunity for fabrication of

evidence to sustain false charges that would result in suspension. Said defendants acted to prevent plaintiff from raising alarm about financial improprieties on the part of the National President and the Directorate and to preclude plaintiff's run for the highest elected office in 2010.

11. Plaintiff states that she was never advised or identified as a target of the investigation by the Defendant Alpha Kappa Alpha's investigative teams, but as a member of the chapter she was aware of a chapter evaluation. On or about September 4th Plaintiff was contacted by the Alpha Omega Chapter of the AKA president, Jacqueline Comeaux, with notice to appear for an interview on September 8, 2007. Plaintiff was not advised of the nature of the investigation and Plaintiff was unable to attend due to a previous speaking commitment on that date as the keynote speaker at a Breast Cancer awareness luncheon of which Plaintiff advised the Alpha Omega Chapter president on September 5th of the conflict. At no time was Plaintiff made aware that she was personally under suspicion or the object of any investigation nor was Plaintiff given an opportunity to reschedule nor given notice of the critical nature of the request to appear nor given notice of any proposed charges against her.

12. Plaintiff states that she first learned the results of the investigation on October 14, 2007 in Cleveland, Ohio at an Alpha Omega Chapter meeting attended by approx 100 members during which meeting, it was publicly announced by Defendant Schylbea Hopkins, Great Lakes Regional Director that Plaintiff's membership privileges were withdrawn pending a recommendation for a 1 year suspension based on charges of alleged financial hazing. Plaintiff was also publicly accused by Defendant Schylbea Hopkins of willfully failing to appear at a hearing to defend against findings of the

Investigative Team. To plaintiff's knowledge, no such hearing ever occurred.

13. Plaintiff states that prior to the public announcement of withdrawal of her privileges she had not been advised of any charges against her nor afforded any opportunity to be heard on said charges. Indeed, pursuant to the AKA Anti-Hazing Handbook, the defendants are required to give plaintiff, and others similarly situated, some notice of any complaint filed or issued as to alleged financial hazing.

14. Plaintiff states that before leaving the October 14, 2007 meeting, Plaintiff received a written communication dated October 14, 2007, which is attached hereto as Exhibit "E", stating that Plaintiff's sorority privileges were withdrawn "pending the approval from the Directorate". Defendant Hopkin's recommendation to the Directorate was for a one year suspension based upon her misguided conclusion that plaintiff had "knowingly violated the Constitution and ByLaws, Manual of Standard Procedure and the AntiHazing Handbook of Alpha Kappa Alpha Sorority, Inc.". (No specifics of how or what violations were alleged to occur have been provided).

15. In response to pleas of Alpha Omega Chapter members to Defendant Schylbea Hopkins to reconsider the decision to withdraw Plaintiff's privileges prior to a meeting of the Directorate, the Defendant, Great Lakes Regional Director, Schylbea Hopkins at the October 14, 2007 advised that plaintiff could make a written request for such a reconsideration. Accordingly plaintiff, on or about October 25, 2007 submitted to Defendant Hopkins a request for reconsideration and provided such documents as Plaintiff was able to discover in the brief period available refuting the allegation.

16. Rather than a response to the request for reconsideration, on November 5, 2007, Plaintiff received a further communication from Defendant Schylbea J. Hopkins, Great

Lakes Regional Director, advising that the Directorate had voted to suspend plaintiff for one year and requiring plaintiff to pay some \$9,500 in order to obtain reinstatement. (A copy of the November 5, 2007 letter is attached hereto as Exhibit F). However, in this notice there is no reference to violating the Anti-Hazing Manual but a reference, for the first time, to a violation of the “So Now You Want to Run for Office” document.

Predictably under the circumstances of this case, the communication fails to state what or how plaintiff was supposed to have violated this document, but it is sufficient to say that there don't appear to be any provisions of that document which plaintiff has violated.

Defendant Hopkins' letter claims the Directorate reviewed certain “documents and information presented to them” in consideration of the suspension, although no documents had been presented to plaintiff and plaintiff was not present for the presentation. Once again, Hopkins' communication claims that plaintiff is entitled to appeal the decision in accordance with the Constitution and By-Laws, the Manual of Standard Procedure and the Anti-Hazing Manual.

17. Within thirty (30) days of the suspension letter, on or about December 5, 2007, Plaintiff timely initiated an appeal for reconsideration to Defendant Schylbea Hopkins pursuant to the appropriate bylaws and standards manual provisions and even in accordance with the instructions contained in the Defendant Schylbea Hopkins Nov. 5, 2007 suspension letter. (See Manual of Standard Procedure-APPEALS PROCESS, STAGE 1 at page 44).

18. Plaintiff states that after Defendant Schylbea Hopkins declined Plaintiff's appeal in a communication dated December 29, 2007, Plaintiff initiated a further appeal pursuant to Article VI, Section 15a (page 45) within the required 60 day period. Said appeal was

required to be made to Barbara McKinzie, by then the Supreme Basileus. There is no evidence that defendant Hopkins had forwarded the entire investigatory file to the Supreme Basileus as to the October, 2007 suspension, at that time, as required by the Manual of Standard Procedure. (at page 44 thereof).

19. Plaintiff has yet to receive a response to Plaintiff's appeal to the Supreme Basileus. Failing to get relief, Plaintiff initiated a further appeal to the Alpha Kappa Alpha Directorate as provided by Article VI, Section 15b (page 46) of the Constitution and Bylaws and the Manual of Standard Procedure (APPEALS PROCESS-STAGE II-HEARING at page 45) which should have resulted in a hearing for Plaintiff at the next regularly scheduled meeting of the Directorate with 30 days notice to the Plaintiff.

Plaintiff has yet to receive a response on the request for appeal to the Supreme Basileus or her request for a hearing before the Directorate.

20. Notwithstanding the clear authority of the governing documents of Defendant Alpha Kappa Alpha Sorority, Inc. in the matters aforesaid, the Defendants and each of them have continued to deprive Plaintiff of a hearing and/or consider the Plaintiff's appeal and further deprived Plaintiff of due process.

COUNT I – Declaratory Judgment

21. Plaintiff incorporates fully herein all the allegations of paragraphs 1-20 of the complaint.

22. The Constitution and ByLaws (Exhibit A) of the Defendant provide for an appeal procedure at Article VI, Section 15 thereof.

23. The Manual of Standard Operating Procedures (Exhibit B) of the Defendant Alpha Kappa Alpha Sorority provides for an Appeals procedure at pages 44-45 thereof.

24. The Anti-Hazing Handbook (Exhibit C) as set forth in paragraph G therein requires: “[a] party to the alleged violation is entitled to the following rights and responsibilities during the fact-finding process:

- 1 To be advised by the fact finder of the specific allegation made against her;
- 2 To be advised of the process for conducting the fact finding and of her responsibilities during the course of the fact finding;
- 3 To be interviewed by the fact finder;
- 4 To be honest and truthful in responding to all inquiries during the course of the fact-finding process;
- 5 To submit a contemporaneous written statement of her position concerning the
- 6 To refrain from any action that may interfere with the fact-finding process including any action that may intimidate, threaten, or harass any person who has or may provide information to the fact finders;
- 7 To be notified, in writing, at the conclusion of the fact finding of the action taken; and
- 8 Members or prospective members who are no longer at their college or university shall be notified at their last known home address.”

Instead of complying to any of the foregoing, plaintiff was unceremoniously given notice of the withdrawal of her privileges and her planned suspension at a public meeting of the local chapter and without any prior notice of what and why she was accused of anything.

25. Despite the appeals procedures provided by the aforesaid Constitution and Bylaws and/or Standard Operating Procedures and/or Anti-Hazing Manual, and without any meaningful opportunity to receive notice of alleged violations on her part or any meaningful opportunity to respond, plaintiff had, according to defendant Hopkins, already received an order of the Directorate suspending her, said notice coming, not from the Directorate, but from her accuser, Hopkins. Nonetheless, plaintiff within thirty (30) days of the suspension on or about December 5, 2007, timely initiated an appeal to Defendant Schylbea Hopkins pursuant to the aforesaid Bylaws and Manual and even in

accordance with the instructions contained in the Defendant Schylbea Hopkins November 5, 2007 suspension letter.

26. Plaintiff states that after Defendant Schylbea Hopkins declined Plaintiff's appeal for reconsideration in a December 29, 2007 letter decision, Plaintiff initiated further appeal pursuant to Article VI, Section 15 and pursuant to Manual of Standard Procedure, pages 44-45 within the required 60 day period as alleged in paragraphs 17-19 of the complaint. Ironically, said appeal was required to be made to Barbara McKinzie, then the Supreme Basileus.

27. Plaintiff has yet to receive a response to Plaintiff's appeal to the Supreme Basileus. Failing to get relief from the Supreme Basileus, the defendant McKinzie, plaintiff initiated a further appeal to the Alpha Kappa Alpha Directorate as set forth in paragraphs 17-19 of the complaint.

28. Notwithstanding the clear authority of the governing documents of Defendant Alpha Kappa Alpha Sorority, Inc. in the matters aforesaid, the Defendants and each of them have continued to deprive Plaintiff of a hearing and/or a consideration of the Plaintiff's appeal and further deprived Plaintiff of due process. As a result of Defendant's failure to act in accordance with the defendants' governing documents, plaintiff has suffered serious harm to wit; deprivation of fellowship of its members, opportunity to participate in community service and every benefit afforded by said sorority. Further as a result of Defendants' failure to act in a timely way, defendants have promulgated triple punishment from which Plaintiff can not recover to wit: exclusion from member activities at the once in a lifetime 100th anniversary convention at which Plaintiff's, mother, a 50 year member, was memorialized; disenfranchisement and deprivation of representation

and potential influence preventing Plaintiff from discussions of Sorority business at Regional and National meetings; deprivation of opportunity to qualify to run for office because of meeting attendance and workshop requirements precluded by the suspensions.

29. Plaintiff respectfully submits that, under the circumstances of this case, she is entitled to the Court's entry of declaratory judgment in her favor, including this Court's declaration that:

- a. The Constitution and ByLaws of the defendant Alpha Kappa Alpha Sorority, Inc. require it to provide an appeal to the Supreme Basileus and thereafter, to the Directorate upon the timely demand of an aggrieved member; and
- b. The Manual of Standard Procedure of the defendant Alpha Kappa Alpha Sorority, Inc. require it to provide an appeal to the Supreme Basileus and thereafter, to the Directorate upon the demand of an aggrieved member; and
- c. That the Constitution and ByLaws and the Manual of Standard Procedure of the defendant Alpha Kappa Alpha Sorority, Inc. require it to provide a hearing before the Directorate upon the demand of an aggrieved member; and
- d. That the Constitution and ByLaws and Manual of Standard Procedure of the defendant Alpha Kappa Alpha Sorority, Inc. require it to provide an accused member of with a statement of the charges against her and the opportunity to oppose same; and
- e. The Anti-Hazing Manual require a statement of charges to be presented to the accused, the opportunity for the accused to respond to such charges and the right to a hearing and appeal with respect to such charges; and
- f. That the plaintiff to date has been denied the protection of all of such rights

provided in the governing documents; and

- g. That Article XIII of the Constitution and ByLaws govern the amendment of said document and requires the vote of 2/3s of the Boule for any such amendment; and
- h. That neither a Regional Director nor the Supreme Basileus nor the Directorate itself may amend the Constitution or ByLaws by fiat to establish a direct appeal to the Directorate to deny a member's right of appeal or hearing by a Regional Directorate wanting to expedite the confirmation of a suspension.

COUNT II – INJUNCTIVE RELIEF

30. Plaintiff incorporates fully herein all the allegations of paragraphs 1-29 of Count I of the complaint.

31. Members of the sorority have watched the actions of the Defendants towards Plaintiff and been duly discouraged, restrained and deterred in any perceived rights to confrontation and dialogue in areas of controversy with organization leadership.

32. The above acts of the Defendants have created uncertainty, fear and anxiety among the membership of the organization, severely undermined the rule of law in the governance of its affairs, including the rights of members, officers and committees, not to subject members to act or not act at their peril.

33. The Plaintiff states that the violations of the governing documents of Defendant Alpha Kappa Alpha and each of the officers and directors participating therein have interfered with the proper and legitimate functioning of Alpha Kappa Alpha Sorority, Inc., severely undermining the rule of law so critical in maintaining a democratic institution; and subjected sorority members to intimidation and harassment. Further such intimidation and harassment have hampered Plaintiff's effort to obtain evidence to defend

herself and deprived Plaintiff of support from the organization's members fearful of similar retaliation.

34. Instead of continuity, consistency or basic due process, plaintiff was unceremoniously given notice of the withdrawal of her privileges and her planned suspension at a public meeting of the local chapter and without any prior notice of what and why she was being accused of anything.

35. Continuation of said unlawful activity on the part of Defendant has caused and will continue to cause irreparable harm to Plaintiff and others similarly situated.

36. As a result of said conduct, plaintiff is entitled to injunctive relief as prayed for herein.

COUNT III – Breach of Contract

37. Plaintiff re-pleads and re-alleges paragraphs 1 through 36 as if set forth separately and at length herein.

38. Defendants Schylbea Hopkins, Barbara McKinzie, the Directorate of Alpha Kappa Alpha suspended Plaintiff without providing Plaintiff with notice of the charges on which she was being investigated or without being given an opportunity to refute said charges by way of appeal or hearing.

39. Defendants Schylbea Hopkins, Barbara Mc Kinzie and the Directorate of Alpha Kappa Alpha suspended Plaintiff, in part or arguably, for financial hazing without due process of the policies and procedures outlined in the Alpha Kappa Alpha Constitution, ByLaws and other governing documents.

40. The Alpha Kappa Alpha Constitution and ByLaws, Manual of Standard Procedures and/or Anti-Hazing Manual constitute a contract or contracts between Alpha

Kappa Alpha and its members, including Plaintiff.

41. Regardless, Alpha Kappa Alpha suspended Plaintiff without regard for its own policies, procedures, rules, regulations, and/or guidelines and in violation of Plaintiff's rights afforded to all members of the Alpha Kappa Alpha Sorority, Inc.

42. As such, Defendants Alpha Kappa Alpha, Schylbea Hopkins, Barbara McKinzie and the Directorate, both past and present, breached the contract or contracts with Plaintiff by its failures to abide by the terms of such contract or contracts.

43. Plaintiff suffered the loss of enjoyment of Alpha Kappa Alpha's, goods, services, facilities, privileges, advantages and accommodations, as well as severe mental anguish as a result of the actions of the Defendants Alpha Kappa Alpha, Schylbea Hopkins, Barbara McKinzie and the Directorate.

44. Plaintiff states that the Defendants' actions were timed so that Plaintiff was deprived of participation in the historic, once in a lifetime 100th anniversary convention at which Plaintiff's mother, a 50 year member, who sponsored Plaintiff for membership was memorialized as an "Ivy Beyond the Wall".

COUNT IV- Defamation

45. Plaintiffs re-pleads and re-alleges paragraphs 1 through 44 as if set forth separately and at length herein.

46. In suspending Plaintiff in an announcement in a public setting on October 14, 2007 and requiring Plaintiff to refund some \$9,500 she was alleged to have taken, the Defendants knowingly and willingly published false and defamatory statements when Defendants knew or should have known that these statements were untrue. Defendants also defamed plaintiff by publicly stating and printing that plaintiff failed to appear for a

hearing concerning charges against her as no charges have ever been presented to her in advance of her suspension.

47. As such, Alpha Kappa Alpha further defamed Plaintiff by knowingly spreading false and defamatory statements about Plaintiff.

48. Defendants knew the act of suspending Plaintiff for allegedly engaging in financial improprieties would have a more damaging impact on Plaintiff's credibility and reputation and further the chilling impact on other criticism of financial matters members of the defendant sorority might offer or inquire concerning the Defendant McKinzie.

49. Defendants also amplified the defamatory impact of its suspension by publishing Plaintiff's name in a public spectacle before more than 20,000 attendees at the once in a lifetime 100th Anniversary convention and publishing Plaintiff's name on Defendant Alpha Kappa Alpha's website accessible to every active member throughout the world.

50. Plaintiff suffered irreparable damage to Plaintiff's character, repute and standing in the community, the loss of the respect of her peers, the loss of enjoyment of Alpha Kappa Alpha's sisterhood, facilities, privileges, advantages, and accommodations, as well as severe mental anguish as a result of the defendants' actions.

COUNT V - Breach of Fiduciary Duty

51. Plaintiff re-pleads and re-alleges paragraphs 1 through 50 as if set forth separately and at length herein.

52. Plaintiff contends that the efforts of Defendant Hopkins and the investigative team under her jurisdiction and Defendant Barbara McKinzie and the Evaluation team(s) under her jurisdiction were grossly negligent, applied faulty investigative procedures, made baseless conclusory statements, and failed to comply with Alpha Kappa Alpha

policies and/or requirements throughout the entire investigative and disciplinary process as applied to Plaintiff.

53. Alpha Kappa Alpha permitted the suspension of Plaintiff on charges of financial hazing which did not meet Alpha Kappa Alpha 's own definition of financial hazing as set forth in the Alpha Kappa Alpha Constitution and the Alpha Kappa Alpha Anti-Hazing Handbook.

54. Alpha Kappa Alpha permitted the suspension of Plaintiff for financial hazing without the due process required in the policies and procedures outlined in the Alpha Kappa Alpha Constitution and the Alpha Kappa Alpha Anti-Hazing Handbook, Say "No" to Hazing!

55. The defendants Hopkins, McKinzie and the Alpha Kappa Alpha Directorate had a duty to Plaintiff to abide by its Constitution and ByLaws, its Manual of Standard Procedures and Anti-Hazing Manual and other governing documents which all defendants had a duty to embrace and protect. Such relations, as established the governing documents are much more than contracts. They establish fiduciary relations to an among the Alpha Kappa Alpha Sorority, Inc. community.

56. As officers and directors of the defendant Alpha Kappa Alpha Sorority, Inc. such, defendants breached the fiduciary duty towards this Plaintiff.

57. As a result of said breach, plaintiff suffered damage to plaintiff's reputation and standing in the Alpha Kappa Alpha community and the community at large, the loss of enjoyment of Alpha Kappa Alpha 's goods, services, facilities, privileges, advantages, and accommodations, deprived Plaintiff of the opportunity to qualify to run for office because of attendance and workshop requirements precluded by the suspensions, as well

as severe mental anguish as a result of Alpha Kappa Alpha's actions.

COUNT VI-Negligence

58. Plaintiff re-pleads and re-alleges paragraphs 1 through 57 as if set forth separately and at length herein.

59. Plaintiff states that the governing documents of defendant Alpha Kappa Alpha Sorority, Inc. imposed upon the defendants Hopkins and McKinzie a mandatory duty to assure plaintiff's appeal of her suspension as a member of Alpha Kappa Alpha.

60. Plaintiff states that the governing documents of defendant Alpha Kappa Alpha Sorority, Inc. imposed upon the individual defendant members of the Directorate, past and present, to assure plaintiff's appeal of her suspension to the Directorate.

61. Plaintiff states that to the extent that the individual defendants and all of them contend that she was granted a right of appeal, then said right of appeal was not in conformity with the requirements of the governing documents, nor in accordance with the traditions and precedents of the organization, and, as applied to plaintiff, failed to meet the common law concepts of fundamental "procedural fairness."

62. Plaintiff, therefore, contends that defendants, jointly and individually, breached a duty to plaintiff and constituted negligent conduct.

63. Plaintiff has been damaged by the negligent conduct of defendants.

COUNT VII - Conspiracy

64. Plaintiff re-pleads and re-alleges paragraphs 1 through 63 as if set forth separately and at length herein.

65. Plaintiff states that during the summer of 2007, the defendant Alpha Kappa Alpha convened a once in a lifetime event, its Centennial Boule.

66. Plaintiff states that the defendants Hopkins and McKinzie were motivated in stifling any discussion regards financial transactions involving hundreds of thousands of dollars of payouts to the defendant McKinzie in advance of or at the Centennial Boule. Indeed, the defendant Alpha Kappa Alpha had its legal counsel send out a preemptive communication concerning and defending what it described as anonymous comments regarding payouts to defendant McKinzie.

67. Plaintiff states that the defendants Hopkins and McKinzie, together and in concert with others, acted to deprive plaintiff of her identity and reputation and to silence her and others who might have sought to address financial issues concerning the defendant McKinzie, especially at the Centennial Boule.

68. As a result of Defendant's devotion to precluding plaintiff's participation at the Centennial Boule and curtailing any effort on her part for future national office, the defendants Hopkins and McKinzie implemented a scheme which sought to and succeeded in expediting the silencing of plaintiff by withdrawing plaintiff's privileges and suspending her in defiance of and without regard to the governing documents of the defendant Alpha Kappa Alpha.

69. Plaintiff asserts that the defendants Hopkins and McKinzie initially sought to suspend plaintiff on the basis, at best, of perceived violations of the Anti-Hazing Handbook, specifically financial hazing, as set forth in Exhibit E. Also they sought to eliminate the time, effort and due process to plaintiff by taking the concocted financial hazing suspension directly to the Directorate, without notification of charges to plaintiff and seeking to cut-off all rights of appeal.

70. Plaintiff states and alleges that the defendants Hopkins and McKinzie, with advice

from others, recognized that an adherence to the guidelines for the processing of a suspension based upon the Anti-Hazing provisions would require them to afford plaintiff the protections of said procedure as described herein in paragraph 24 of this complaint.

71. Thereafter, the defendants Hopkins and McKinzie, changed course and elected instead to suspend plaintiff on the basis of violations of “So You Want to Run for Office”. Said defendants recognized that the provisions of that document were less well-defined and provided a more moving target on which to sustain a suspension less free of the impediments of notice, opportunity to defend and fundamental fairness.

72. Regrettably for defendants Hopkins and McKinzie, the remaining governing documents of Alpha Kappa Alpha do provide for a right of appeal which plaintiff continues to seek enforcement.

73. Plaintiff contends that the acts of defendants Hopkins and McKinzie constitute a conspiracy by said defendants, in concert with others, to deprive plaintiff of her rights of membership.

74. Plaintiff alleges that the acts of defendants Hopkins and McKinzie have caused plaintiff damage, financial, emotional and medical.

RELIEF SOUGHT

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, as follows:

(1) Issue a preliminary injunction:

A. Ordering Defendant Alpha Kappa Alpha, Inc. to re-instate Plaintiff to active membership in the Defendant sorority with appropriate removal of all conditions and sanctions;

B. Restraining defendants and any of them from initiating further retaliatory actions against this plaintiff as a punishment for initiating this action to protect rights, privileges and protections afforded by the governing documents of Alpha Kappa Alpha Sorority, Inc.;

C. Issue a permanent injunction making the preliminary relief granted permanent or, if no preliminary relief has been granted:

1. Ordering Defendants Hopkins and McKinzie to re-instate Plaintiff to active membership in the Defendant sorority with appropriate removal of all conditions and sanctions;

2. Ordering Defendants to publish in the Ivy Leaf (the official sorority magazine) and on the website, notice of reinstatement and retraction of charges and sanction.

3. Enjoining Defendant, its agents, successors, officers, employees, attorneys and those acting in concert with them from retaliating in any way against Plaintiff for exercising Plaintiff's rights hereunder.

D. Enter a declaratory judgment that the acts and practices of Defendant complained of herein are in violation of the Constitution, Bylaws and Manual of Standard Procedures and the Anti-Hazing Handbook of Alpha Kappa Alpha Sorority, Inc.;

E. Declaring that Plaintiff has a right to a decision on Plaintiff's appeal, after review, from the Supreme Basileus;

F. Declaring that Plaintiff has a right to a decision on Plaintiff's appeal, after hearing, from the Directorate;

G. Award Plaintiff actual, compensatory and punitive damages.

H. Award Plaintiff an amount to be determined at trial as compensation for humiliation, embarrassment, loss of reputation, and loss of self-esteem;

I. That this Court award Plaintiff punitive damages;

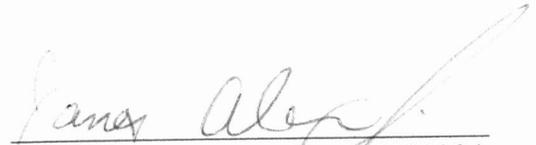
J. That this Court award Plaintiff reasonable attorneys' fees and the costs of this action;

K. That this court order Public Reinstatement and expungement and such other relief as may be fair, just and equitable.

JURY DEMAND

Plaintiff demands a trial by jury.

Respectfully submitted,



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jamesalexanderjr@core.com
Attorney for Plaintiff

VERIFICATION

I, Pamela Redden, M.D., Plaintiff, after being duly sworn and cautioned according to law, do depose and state, that I have read the verified complaint asserted herein and do hereby verify and affirm that I have personal knowledge of the facts asserted therein and do verify and affirm that the allegations and averments are true and accurate to the best of my knowledge and belief.


Pamela Redden