

TAU GAMMA PHI GLOBAL & TGPG (WESTERN CLUSTER)

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BRO. HECTOR CONCEPCION, ET AL.,

Plaintiff,

-against-

COMPLAINT

NEW YORK TRISKELION LEAGUE OF LEADERS (NYT LOL),

Defendant.

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ATTENTION TO BRO. GGT JEWELLORD PERALTA
TAU GAMMA PHI GLOBAL- GRAND TRISKELION

Brother GGT Jewellord,

We are filing our formal complaints against all identified officers/ members of the NYT League of Leaders including the violated Articles and Sections of our NYT Ratified By-Laws and Tenets and Code of Conduct.

The complaint of the plaintiff, Bro. Hector Concepcion and members of the class, respectfully shows and alleges the New York Triskelion League of Leaders (NYT LOL) as follows:

1. NYT event during the visitation of Congressman Bro. Bong Teves (June 16, 2023, at 9:15 P.M.).
2. Several brothers have inquired about who invited the suspended Brother to the event. Bro. Richard Delarmente and Bro. GT Baltazar Evangelista responded to the inquiry by saying that Sister Sachi asked the suspended Brother (Geuel Royce Penalosa).
3. Because she was also celebrating her birthday. Bro Hector Concepcion & Past GT Bro. Raphael Lauchengco (current member of the Grand Council as ex-officio) clarified the claims from Sister Sachiko.
4. Still, she denied it, saying that she was not the one who invited the suspended Brother. See Annex 1 (Photo of text message).

Violations:

- i. *Capital O- Obey all fraternity rules and regulations and be governed and guided by the Tenets and Code of Conduct.*
 - ii. According to the approved and ratified Constitution and Bylaws of New York Triskelion, Sec. 3. Disciplinary Action – Disciplinary action may be imposed upon a good faith determination of NYT that the member has failed in a material and serious degree to observe the rules of conduct of NYT or has engaged in conduct materially and seriously prejudicial to NYT's purposes and interests. *A person who is under disciplinary action and whose membership is suspended shall not be a member during the period of suspension and, as such, shall not be entitled to any of the rights and privileges of membership. **He shall not be allowed to be present nor participate in any official fraternity meetings, functions, or events.***
 - iii. Article VIII, Sec. 2, Note. 3 To issue guidelines, rules, and regulations for the ratification and fulfillment of the purposes set forth in this Bylaws, *for the exercise by the members of their rights and the performance of their responsibilities, and, generally, to decide on all matters affecting NYT.*
5. The disciplinary action enforced by the NYT Grand Council under the administration of Past GT Bro. Raphael Lauchengco was lifted by the current Grand Council led by Bro. GT Baltazar Evangelista thru election via Zoom meeting without coordinating the past administration whom implemented the penalty particularly Past GT Bro. Raphael Lauchengco MDG and a member of the Grand Council, according to Article VIII Section 2.

Article VIII Section 2. *Powers and Duties of the **Grand Council.** **It shall be composed of all MDGs,** the current elected officers, GT, DGT, MKS, MKC and the Master Triskelions. Once elected and upon assumption of office, the new GT shall automatically assume his position and his duties as a Member of the Grand Council. The former Members of the Grand Council shall be considered automatically resigned except for the outgoing GT who shall remain as ex officio*

member of the Grand Council and shall orient the incoming Members and shall assure an orderly transition.

Violations:

i. *Tenet No. 5 Brothers, I shall love and respect their counsel I shall heed.*

ii. Violation: Article X, Sections 1 & 2.

Sec.1. The Order of MDGs is the consultative and advisory body of NYT. It may be called upon as the final arbiter and adjudicator of all cases that may require its final decision.

Sec. 2. Composition of the Order of MDGs. It shall be composed of all the past Grand Triskelions as Voting members, Alumni Association Presidents, and past MDGs of the Tau Gamma Phi/Tau Gamma Sigma as ex-officio, non-voting members. By a majority vote, the Order of MDGs may veto a policy, a program, a project, a budget, or an activity that is approved by the Grand Council for implementation if found by the Order of the MDGs to be inimical to the best interest of NYT and the Tau Gamma Phi/Tau Gamma Sigma. When called upon as the final arbiter and adjudicator, the Order of the MDGs may overturn, reverse, annul, invalidate, or abolish a decision, verdict, judgment, or resolution of the Grand Council, and its decision shall be deemed final and immediately executory.

6. The current administration led by Bro GT Baltazar Evangelista called upon an emergency meeting and made a letter less than 24Hrs. On (June 17, 2023). GT Val Baltazar Evangelista.
7. Lifting the Persona-Non-Grata penalty of Bro. Geuel Penalosa, without due process of re-opening the case and re-investigation and by relying on the suspended Brother's letter and video on (July 14, 2023, at 4:09 P.M.).
8. The current officers at the said event signed and received an apology letter from Bro. Geuel Peñalosa but was never dispensed to the other members and past officers.
9. It was only dispensed after we reacted and found out that Bro. Geuel Peñalosa was already there celebrating with everyone.

10. A conditional letter was also made by NYT leadership after the fact stating that the Bro. Geuel Penalosa is not allowed to hold/ assign to any position in NYT within 365 days from date of letter.
11. We strongly believed that the NYT leadership made the said emergency meeting, video, conditional letter as their justification to cover their gross negligence of not abiding on the NYT Ratified By-Laws, which we also believe as an admission of guilt because they knowingly violated the Tenets and Code of Conduct.

Violations:

- i. *The Grand Triskelion is righteous, just, and strong. He shall be obeyed. The letter was made to justify the suspended Brother's presence during the event. Bro. GT Val's (Baltazar Evangelista) actions did not behave to what is morally right and fair with the previous administration, particularly the complainants.*
- ii. *1st I- Inform & orient your fellow brothers on everyday matters which you consider vital to the Fraternity.*

Prayer for Relief:

WHEREFORE, plaintiff and class members demands judgment against defendants New York Triskelion League of Leaders the following remedies:

- i. Immediate resignation of all officers present at the said event dated June 16, 2023.
- ii. Indefinite suspension from holding any positions in NYT.

Dated: August 4, 2023



Digitally signed by:
Hector Concepcion
Reason: I am the author
of this document
Date: 2023.08.04 9:31:16

Bro. Hector Concepcion
Lead Plaintiff
New York

Cc: Class Members LG, AE, RL, IG