Lansing (Michigan) Branch, Unit 3145
Article X Complaint against President and Vice President

To: NAACP President and CEO Derrick Johnson

NAACP Michigan State Conference President Yvonne White

From: Members of Lansing Branch, Unit 3145-B

Date: February 19, 2021

Subject: Article X complaint against President and Vice President of Lansing Branch NAACP

Dear President and CEO Derrick Johnson and State Conference President Yvonne White-

The Bylaws for Units of the NAACP, Article VII, Duties of Officers of Units, 1. President, the duties of the President shall be (p.33):

- a. To Preside at meetings of the NAACP Unit and act as the Chair of the Executive Committee.
- b. To appoint the Chair and members of all Committees not otherwise elected by the General Membership or the Executive Committee of the NAACP Unit, except the Chair of the Youth Work Committee of a Branch or State Area Conference.
- g. To encourage and assist all Committees in the development of their programs and the performance of their duties.

Our unit President, Dale Copedge,

outlined in our Bylaws for Units of the NAACP. It is with heavy hearts that Pursuant to Article X, Sections 2 and 3 (p.80), We, the undersigned, request an investigation into the conduct of the Lansing Branch president. In addition, the duties of the Vice President (p. 34) shall be:

To perform all the duties of the President in his/her absence or disability.

The Vice President, Randy Watkins, fails to fulfill his duties as Vice President as outlined in our Bylaws for Units of the NAACP.

There have been ongoing issues that began to intensify beginning in the summer of 2020. In this complaint, we outline, in chronological order, the actions of the President and Vice President inimical to the best interests of the National Association for the Advancement of Colored People, as set forth in its Constitution, and as defined by the Board or Convention. As we outline the chronological order, information will be given dating back to the summer of 2020. We request the immediate suspension and removal of said officers pending investigation due to acts that have harmed this Branch's ability to effectively operate in accordance with Unit Bylaws and parliamentary procedure.

For example, at the time of this writing, what was the Lansing Unit's means of communication with the public and between members is shut down. We are unable to communicate through what was our Lansing Chapter NAACP's website, including our Unit Secretaries' emails, and databases which allowed our Unit to communicate with each other, donors and interested parties. Shutting down our primary means of communication hinders and, in this case, has stopped our ability to serve our citizens in our community and continue to address several ongoing issues. For example:

- a. The Coronavirus-19 and its disparate impact on people of color and where vaccinations are administered.
- b. Racial injustice including several lawsuits against the city of Lansing by members of our Unit and community from brown and black people.
- c. Unfair housing and homelessness.
- d. Killings of black men, a woman and disparity that our black youth are arrested 4.5 times more than their white counterparts, at the hands of our Lansing Police Department.

In this complaint, information is provided that led to our Branch's website, emails and database being abruptly shut down with full knowledge of President Copedge and at the direction of Vice President Watkins who owns Sigma Consulting, LCC, our paid IT company.

Concerns about President Copedge and Vice President Watkins' inability to understand the NAACP Charge

President Dale Copedge and Vice President Randy Watkins sit on the city of Lansing Mayor's Diversity and Inclusion Advisory Council but say they are not representing the NAACP. As mentioned above, there are several lawsuits against the city of Lansing's Fire Department and other city of Lansing Departments from brown and black people as well as ongoing practices of the Lansing police arresting black youth 4.5 times more than white youth. The Mayor has been identified as one who allows racist behavior to exist and thrive in city government. We do not convict the mayor without investigation but are concerned that the presence of the NAACP President and Vice President, often sitting in silence, gives the illusion that the NAACP supports the mayor unconditionally. Our desire is to work with the Mayor but not at the expense of destroying the personhood of brown and black people. Considering the controversies about the firings of brown and black people under our Mayor's purview, we asked both men to resign from the Mayor's Council so we will not be working against each other.

In addition, one of our members publicly addressed the racists tendencies of the Mayor with his council member. During their communication breakdown, in response, the council member texted bullying threats and insults to the member. While whites throughout the city of Lansing publicly addressed the council member's threatening and demeaning behavior and are demanding his resignation, President Copedge and Vice President Watkins remain silent. This was the same member, who in May 2020, escorted our African American young woman Representative to her office after armed white nationalists/supremacists stormed the Lansing Capitol with no resistance from either the state police or city of Lansing police. She was fearful for her life. Neither President Copedge or Vice President Copedge reached out to this young man who is a NAACP member and present in the Executive Committee meeting and the General Membership meeting. President Copedge and Vice President Watkins continue to defend their behavior.

We know there are many aspects to the same experience. Our concern is neither men seem to understand the NAACP charge. Our mayor and other city officials are comfortable in their stances against brown and black people and in the presence of the President and Vice President of the NAACP. Both men are experienced as roadblocks in the efforts of the Branch Executive Committee and General Membership to address the racist practices in Lansing, MI.

Complaints against President Dale Copedge

July - October 2020

Lack of Support for Committee Chairs and Timeliness of Social Media Posts

During the summer of 2020, the Lansing Branch was active in voter registration and providing platforms for citizens to know the issues from local, state, and national candidates. Seldom did President Copedge speak with committee chairs or support their efforts if social media was not going to be present. For example, after a presentation by the city clerk President Copedge made a motion at a general membership meeting obligating Political Action Committee to participate in a city clerk function without checking with the chair for conflicts or the availability of committee members. Actions such as this have a chilling effect because of not wanting to embarrass the president. The Chair and his committee have a standing day and time, email notices about their meetings and supported President Copedge's directives. However, President Copedge's actions hindered the Chair and his committee from carrying out the work he directs them to do.

President Copedge empowered the Sigma IT representative to delay or decline access to announce Political Action Committee events to the public on social media posts even after the content was approved by the Political Action Committee chair. To compensate for the delay in announcing events to the public, the General Membership approved the creation of social media coordinator position. President Copedge requested volunteers. A member of the Branch immediately expressed her interest in the position.

President Copedge allowed Sigma IT representative to deny access to our Branch-approved social media coordinator. She volunteered; her task was the to post information to Branch social media accounts. Unlike Sigma Consulting, under the direction of President Copedge and Vice President Watkins, the Branch required from her, a signed contract. The IT company is owned by the vice president. Even though Sigma IT company did not have a contract they insisted the social media coordinator should have one. Sigma IT is paid, the social media coordinator volunteered her time. The contractual duties ended December 31 without her fulfilling her assigned duties.

President Copedge empowered Sigma IT company to have authority over officers and committees when responding to requests for services. (i.e.) posting to social media, use of Facebook live for scheduled 10/22 townhall meeting with a US congresswoman.

President Copedge denied a request by the Political Action Committee (PAC) to hold a Youth Forum to engage younger voters as part of GOTV activities. President Copedge told the PAC that another organization was addressing this issue but could not name the organization.

President Copedge delayed addressing the Sigma IT claim that PAC chair created a separate social media account, Zoom, and email to represent Branch's activities. The Branch Facebook page was shut down two days before an GOTV event after the Sigma IT vendor reported it was hacked.

Delay addressing issues pertaining to Financial Records

President Copedge delayed addressing allegations made by Sigma Consulting, our IT provider, against the Treasurer when access to a financial record (PayPal) was terminated. Our First Vice President, Randy Watkins, owns Sigma Consulting, LCC. Sigma Consulting IT representatives provided no proof of wrongdoing and none was ever provided. Treasurer access was terminated end of September 2020 after attempting to provide an invoice to a prospective member. (See email Attachment 1).

Treasurer submitted motion on October 4 at General Membership meeting to reactivate access to PayPal. Membership questioned why access was terminated. The explanation provided by First Vice President Watkins was "she was in an area she wasn't supposed to be in." A member asked, "what area would the Treasurer not have access?" Vice President Watkins did not provide a response.

Most members of the Lansing Branch were unaware President Copedge created a sub-committee known as the IT/Technology committee. Members learned of this sub-committee when he asked one of the subcommittee's member to investigate the Treasurer regarding issues with one of the Branch's financial records. It would be at the January 10, 2021 General Membership meeting that the same sub-committee member would present a verbal, defamatory report about his findings related to the Treasurer. The subcommittee member did not interview the Treasurer, only representatives of Sigma Consulting. To this date, the subcommittee member has not provided a written report to be included in the January 2021 Branch meeting's minutes or provided documentation to support his allegations about the Treasurer.

President Copedge ignored ongoing Sigma IT issues brought to his attention on several occasions by different members. As previously mentioned, issues include reporting the PayPal automatically refunding member payments, lack of a Sigma IT vendor contract, and the president's request for a report with no deadline from the Sigma IT sub-committee that had not been active since its creation in 2019 until President Copedge directed a member to investigate the Treasurer.

Ongoing problems with Sigma IT and the financial concerns of the Branch became more intense in October 2020 and continued through 2021.

November 2020 – Election Concerns

President Copedge decided he would not run for reelection as President. He changed his mind and accepted nomination as candidate for president during the petition process. He took this action after submitting a candidate consent form and after being vetted by the Branch's nominating committee. He was not recommended for the slate of candidates presented by the committee.

December 2020

Violation of Unit Bylaws, Robert Rules of Order and Financial Guidelines

President Copedge made motions during the December 3, 2020 Executive Committee meeting and December 6, 2020 General Membership meeting appointing at-large members to the 2021 Executive Committee. The election process for those wanting to become Executive Committee members was transparent and in accordance with Bylaws for Units of the NAACP, Election of Officers and Executive Committees for Branches, page 62. Transparency included each interested member making their desires known in writing, to the general membership and their reasons they felt they could lead and contribute to the mission and purpose of the NAACP prior to the election.

President Copedge's attempt to add Executive Members immediately after election was experienced as an attempt to undermine the election process. Prior to the 2021 Executive Committee, the Lansing Branch was at a standstill. Usually, there were not enough executive committee members for a quorum (See December 19, 2020 Executive Committee meeting Minutes), We asked President Copedge to at least let us meet the people he wanted to appoint and the reasons they thought they could help further the cause and purpose of the Lansing NAACP.

During the December 19 Executive Committee meeting, the Treasurer again, raised ongoing PayPal issues and discontinuing its use. President Copedge's response was "there were allegations made on both sides (referring to Treasurer and Sigma IT) and that "it wouldn't be right to take a side before the IT committee provided a written report".

During the December 19, 2020 Executive Committee meeting – President Copedge falsely asserted that the general membership voted to allow the IT technology committee to provide a written report. The falsehood was confirmed when the November 1 general membership meeting minutes were read to the Executive Committee.

During the December 19, 2020 Executive Committee meeting – President Copedge attempted to block a motion made by Treasurer to discontinue the use of PayPal. Parliamentarian and Area Director had to intervene regarding the President Copedge's improper action. The motion was carried 9-2 with President Copedge voting against the motion.

During the December 19, 2020 Executive Committee meeting, President Copedge asked that the Executive Committee members chair at least one Standing Committee and be on at least two other standing committees. President Copedge instructed Executive Committees to email him with their desire to chair or serve on Standing Committees by Wednesday, December 16, 2020. Many Executive Committee members emailed President Copedge. President Copedge did not acknowledge emails. Those who had not received an acknowledgement from President Copedge followed up with another email. President Copedge did not acknowledge emails from those he instructed to email him with their desires to Chair a standing committee.

When the Treasurer asked for a detailed invoice for the requested \$2,000 from Sigma Consulting, the Sigma IT representative decided to donate the \$2,000 in turn for documentation of the donation. President Copedge intended to accept \$2,000 invoice from Sigma IT vendor as a donation without vetting it with the Executive Committee or providing an account of services. Ultimately, in February 2021, the Branch paid Sigma Consulting the requested \$2,000 with an additional \$7.00.

Prior to closing a second bank account, President Copedge intended to appoint a second treasurer to the Freedom Fund Committee's second bank account.

January 2021

President Copedge would not allow information to be given to General Members regarding the local Poor People's Campaign car caravan to bring awareness to substandard housing, a homeless encampment, and the death of a local citizen who died in police lockup one month before George Floyd's murder. Although an event flyer and contact information were provided, President Copedge required "more information to ensure the organization didn't violate the principles of the NAACP". Although the request was to send to members for their own decision President Copedge still refused to allow information to go out to the membership stating the event needed to be vetted through National.

In the January 10, 2021 General Membership meeting, after the installation of officers, President Copedge had the assistant secretary manage Zoom to disable Chat function in Zoom. This action resulted in suppression of conversation/discussion among the membership and ability to ask him questions.

At the beginning of the January 10, 2021 General Membership meeting, President Copedge presented meeting rules to the General Membership. The rules had not been vetted by executive committee. Nor were they provided to the membership to prepare prior to the meeting. Despite comments to the president that the rules were being handled inappropriately, he proceeded to move forward with the meeting using rules he created for that session. No motion was made to approve these new rules by the general membership.

During the same January 10, 2021 General Membership meeting, President Copedge sanctioned a member from the now defunct IT subcommittee created in 2019, to investigate the Treasurer regarding reported concerns with PayPal. The sub-committee member interviewed the Sigma IT vendor/owner. Although it was previously decided that verbal reports would not be accepted, President Copedge allowed the sub-committee member to provide a verbal report to the General Membership that was defamatory in nature. We experienced President Copedge's actions as intending to harm the credibility of the Treasurer. A written report was never submitted to the Secretary for inclusion with other meeting documents.

During the January 10, 2021 General Membership meeting it was learned that the IT subcommittee was created by the President Copedge in 2019 for the purpose of discussing an online payment method. The subcommittee had not met since its creation yet was frequently referenced by President Copedge and Vice President Watkins. No information was provided to the executive committee or general membership regarding the subcommittee's existence and

their duties. A representative from this subcommittee never reported to the executive committee or general membership until President Copedge authorized the investigation of the Treasurer.

January 28, 2021 – We learned President Copedge, prior to the Executive Committee being sworn it for the new year, appointed First Vice President Randy Watkins to chair Economic Development committee. Vice President Watkins added a member to the committee and a committee meeting was held. A committee report was submitted to the Executive Committee at its January 28 meeting.

January 28, 2021 – President Copedge refused to respond to questions from a new executive committee member who wanted to understand the actions of the president. The president stated she was out of order. Another executive member stepped in to provide the needed clarification to the new executive committee member. Another Executive Committee member asked President Copedge if he intended to respond to the emails he requested of the Executive Committee about their desires to chair Standing Committees. President Copedge would not answer the Executive Member's question. Instead, he moved on without further acknowledgment.

To offer a process which might lead to better communication and process to secure chairs for Standing Committees, one of the newly elected Executive Committee members developed a transparent process where President Copedge and the Executive Committee members could work together and secure chairs for Standing Committees. Following bylaws for special Executive Committee meetings, on February 4, 2021, she offered a transparent process. The process she presented was approved (See email Attachment 2 from President Copedge).

This transparent process invited President Copedge to submit names of those he tried to appoint in the December 2020 meetings. President Copedge would not work within the transparent structure and refused to submit names. He delegated chairmanship of the process to the 3rd Vice President and two Executive Committee members.

February 2021

At the Sunday, February 7, 2021 general membership meeting, President Copedge told the General Membership about the newly approved process to find chairs for Standing Committees. He instructed all who wished to serve as Chair of a Standing Committee or be on a Standing Committee, to email the Branch secretary and the Executive Committee members who were coordinating the process, including the 3rd vice president. (see email Attachment 2) Vice President Randy Watkins was present in this general meeting. The general membership meeting was four hours, ending approximately 8:00 p.m.

On February 8, 2021, less than 24 hours later, Sigma Consulting representative, Paul Johns emailed Branch Secretary advising her that communication would be shut down at midnight (see email Attachment 3) Less than 24 hours after the general membership were instructed to contact the Branch Secretary with their desires to chair or be on a Standing Committee, President Copedge supported Vice President Watkins who own Sigma Consulting, to shut down

all communication between the Lansing Branch and the public. Considerable data is lost as well as members not being able to communicate with each other. President Copedge instructed members to email the Branch Secretary and helped Vice President Watkins sabotage the newly approved process to help the Branch work as a team. President Copedge could have helped us maintain communication but instead he enabled Vice President Watkins to shut down our Lansing Branch communication among ourselves and the public.

The 3rd Vice President and the two Executive Committee members whom President Copedge appointed to the new process created a work around. The Branch Secretary had to create another email and were successful securing chairs for most of the standing committees (See Attachment 3).

At the beginning of the February 7, 2021 general meeting, President Copedge refused to acknowledge motion on the floor by a member, who is also the Area Director, pertaining to enabling the Chat feature on Zoom. Several members brought up the active motion. He told assistant secretary to enable Chat. He never addressed the active motion on the floor. Continued with rest of the meeting.

President Copedge continued the meeting, requiring the use of raised hand feature on Zoom only to selectively disregard certain members. Oftentimes members' hands were raised for over 15 minutes.

Usually, duration of Executive Committee meetings is at least two and half hours. The February 7, 2021 General Meeting was four hours. President Copedge regularly places items of discussion on the General Membership agenda; but often requires others to have their items vetted prior to General Meetings.

President Copedge regularly goes against the meeting agenda he creates to include new motions after the agenda is approved. This action has occurred at nearly every Executive Committee and General Membership meeting.

President Copedge bypasses Executive Committee by bringing issues directly to the General Membership. In this Feb 7, 2021 meeting, it appeared that he wanted to avoid questions about the Lansing Police chief's aggression towards one of our newest members and get support for the Lansing Police Chief in securing de-escalation training for police. President Copedge continues to avoid or refuse to address the documented disparity that police aggression was used against African Americans while remaining more composed with whites in their custody.

During the February 7, 2021 general meeting, President Copedge falsely asserted he had permission from State Conference Director to disable Chat function for Executive Committee and General Membership meetings.

Misogynistic, sexist comments and actions made towards female officers, executive committee members and members

At the February 7, 2021 General Membership meeting told Treasurer to "relax" when she asked to be recognized to comment on the meeting agenda. Various members and guests who were present commented on the disrespectful remarks.

As the result of the president's sexists' remarks, a new Executive Committee member submitted her resignation (See email Attachment 4). She was the former social media coordinator referenced in Timeliness of Social Media Posts, page 4 of this document.

Another Executive Committee member, also a woman and veteran, and (former) Chair of Veterans Affairs, presented her work at the January 28, 2021 Executive Committee meeting. President Copedge repeatedly told her he had no idea what she was talking about. He dismissed the work she was doing for veterans. She remains on the Executive Committee but no longer chairs the Veterans Affairs Committee (See email Attachment 4).

President Copedge consistently shuts down discussion or is dismissive when women are speaking, responding to questions, or requesting to be recognized. This has occurred in every general and executive committee meeting where he presides.

President Copedge is dismissive of questions regarding Branch procedures. Response is usually "thank you for your comment".

When responding to women, President Copedge uses phrases "sorry if this upsets you and "not now, not now" and then calls the woman's name. These phrases used in context lessen the importance of the contribution's women make to the Branch. Some women members of this Branch feel less valued and invisible when attempting to get further clarification on an issue.

Complaint against Vice President Randy Watkins

Vice President, Randy Watkins owns Sigma Consulting, LCC, the IT company that provided services to the Branch. There is no written contract between the Branch and Sigma Consulting. However, between the date the services began and were to end, were initially December 31, 2020 (See email Attachment 5 for December 31, 2020) and February 12, 2021 (See email Attachment 5 for February 12, 2021).

Vice President Randy Watkins' IT Company representative terminated Treasurer's access to PayPal in September 2020 after Treasurer attempted to assist prospective member. (See email Attachment 1).

Treasurer submitted motion at October 4 General membership meeting to reactivate access to PayPal. Membership questioned why access was terminated. The explanation provided by Vice President Randy Watkins was "she was in an area she wasn't supposed to be in." Membership questioned what area the Treasurer would not have access. No response was given.

The Assistant Secretary, through email, advised that Vice President Randy Watkin's representative was warning he would shut our site down the evening of January 20, 2021 unless

we gave him \$2000 for four months of work. We requested an invoice about the work which was paid February 4, 2021 plus an additional \$7.00 (see Attachment 6). He carried out his threat on February 8, 2021.

After months of Executive Committee members trying to get information about Sigma's actual work for which they were invoicing the Branch, and an agreed end date of when Sigma would turn over passwords as we transitioned to another IT provider, Vice President Randy Watkins abruptly ended communication for the Lansing Branch on February 8, 2021. Some of this information is provided in the complaint against President Copedge (See email Attachment 3).

On January 25, 2021 the Branch Secretary and Treasurer could not log into Branch email account due to two-factor authentication being added to Branch email accounts. The Sigma Consulting representative/IT person did not give notice to the Secretary and Treasurer, both women. However, the assistant secretary, a male, was notified prior to the implementation.

On January 27 – Sigma Consulting representative provided a letter dated January 27, 2021 (see email Attachment 5) to President Copedge indicating services would continue through February 12.

One of the newly elected Executive Committee members developed a transparent process where President Copedge and the Executive Committee members could work together and find chairs for Standing Committees. Following bylaws for special Executive Committee meetings, on February 4, 2021, she offered a transparent process. The process she presented was approved (See email Attachment 2).

At the Sunday, February 7, 2021 general membership meeting, President Copedge told the general membership about the newly approved process to find chairs for Standing Committees. He instructed all who wished to serve as Chair of a Standing Committee or be on a Standing Committee to email the Branch secretary and the Executive Committee members who were coordinating the process, including the 3rd vice president. Vice President Randy Watkins was present in this general meeting. The general membership meeting was four hours, ending approximately 8:00 p.m.

On February 8, 2021, less than 24 hours later, Sigma Consulting representative, Paul Johns emailed Branch Secretary advising her that communication would be shut down at midnight. Less than 24 hours after the general membership were instructed to contact the Branch Secretary with their desires to chair or be on a Standing Committee, Vice President Watkins who own Sigma Consulting, shut down all communication between the Lansing Branch and the public. Considerable data is lost. The Branch Secretary had to create another email address and attempt to recover what she could to reinvent the Branch's membership list.

Sigma Consulting, LLC, owned by Vice President Randy Watkins was paid \$3,464.95 between February 2020 and February 2021. Upon receipt of their last request for payment (\$2007.24), it was agreed they would give the Branch access to the web domain and social media account passwords. Vice President Watkins reneged on the terms of his January 27, 2021 letter advising the Branch it had IT services until February 12, 2021.

Even though the Executive Committee approved payments of \$2007.24 to Sigma Consulting, as of the date of this writing, Vice President Randy Watkins did not provide passwords or access to domain and social media accounts to Treasurer as provided in a motion made at January 28 meeting. Branch website shut down on February 8, 2021.

On Tuesday, February 9, 2021 – the Treasurer received request from Vice President Watkins to issue check in the amount of \$969 for officers/director's liability insurance. Vice President did not provide an invoice to the Treasurer. Treasurer responded that the check needed authorization by executive committee. Vice president stated he will explain to the committee why we had to act quickly. Later, Vice president indicated the insurance had lapsed. This lapse occurred one day after requesting the check. President Copedge requested insurance quote from Vice President. Vice President provided the quote at the president's request.

Requested Relief and General Comments

We, the undersigned, request an immediate suspension from serving as president and vice president pending an investigation into this complaint.

We, the undersigned, are concerned about the direction of continued leadership of this Branch's president and vice president. There is a culture of covert, oppressive, and manipulative practices. Current members stop engaging and new members leave frustrated because they are not utilized to help grow the organization.

We, the undersigned, declare that this Branch's reputation in this community leaves much to be desired. A former member commented, "I will give you four months before you leave frustrated. [The president] will not change." The president requires all communications go through him. Membership is aware of other organizations declining to partner with this Branch NAACP on various projects. The Political Action Committee attempted to change that perception during GOTV activities. Unfortunately, efforts to engage with the community were hindered by the Branch's IT company.

We, the undersigned, submit a vote of no confidence in this leadership based on tactics used to undermine officers, executive committee members, and the general membership. The president and vice president uses NAACP to advance their own political interests instead of being a voice for the community. This pattern of behavior will not change in the next two years.

We, the undersigned, believe the Branch will be revitalized with the removal of the Branch president and vice-president. We believe removal will result in an actively engaged membership, strong partnerships, and a collaborative community.