



July 8, 2010

Grievance Against Coastal Bend Youth Soccer Association, Rio Valley Youth Soccer Association, Laredo Area Youth Soccer Association, Patrick Kasperitis, President CBYSA, Joe Bazan, President RVYSA, JJ Vela, General Manager LAYSA, Brian Branch, Third VP CBYSA, and Pam Kasperitis, Western District VP STYSA

Now comes Western District Division One Association (WDDOA) grievously complaining of the above captioned associations in STYSA and their related officers.

Facts

1, On or about July 8, 2010, Pat Kasperitis, President of CBYSA circulated an email (attached hereto as Exhibit A) soliciting individuals and teams to play in an alliance or league purported to be a Division 1 league, club, or association called South Texas Alliance located somewhere in the Western District of STYSA under the RVYSA Division 1 competition.

The email purports that teams playing in this new league, club or association will have or be able to do the following:

- A. "...register with their own clubs in their own Associations"
- B. "...will follow the STYSA and Western District rules"
- C. "Teams in the Alliance will possess the same options and opportunities for advancement into National Cup, State Classic League, and Premier League play that are presently enjoyed by other Division 1 teams."
- D. "Over the past 5 years the Rio Valley YSA has operated an alternative Division 1 league. In forming the Alliance, we are opening up participation in this league to other Associations..."



2, Mr. Kasperitis used an email address through a domain called sotxalliance.org. By accessing this domain on the internet, additional information can be obtained of this purported new league, club or association.

The home page of sotxalliance.org purports that teams playing in this new league, club or association will have or be able to do the following:

- A. "If a Pre-Qualified team chooses to participate in the WDDOA D1 Qualifying Tournament (QT) or in the Super II QT, but wants to "secure" a spot in the Alliance in case they don't qualify, the team MUST register for participation in the Alliance by the deadline but note on the application that they have registered for both competitions. Thereafter, if the team chooses an alternate competition, they must notify the Alliance administrator by August 1, or risk forfeiting their competition fee."
- B. "If you have questions you can contact Patrick Kasperitis OR Joe Bazan OR J.J. Vela. For answers to administrative questions contact our administrator, Brian Branch."

3. There is a link on the home page (Screen Shot Attached hereto as Exhibit B) of this website that has a link called "Registration Link."

By following the registration link on the home page of sotxalliance.org you are taken to an Affinity registration screen (Screen Shot attached hereto as Exhibit C).

The registration page of sotxalliance.org purports that teams playing in this new league, club or association will have or be able to do the following:

"if your team was registered for the Fall 2010 season with South Texas Youth Soccer Association you can register (for this purported Division 1 league, club or association) through the online registration system."

The registration webpage lists Brian Branch, Third VP CBYSA as the administrator of this purported new league, club or association.

4. On June 8, 2010, the STYSA EC met to consider a similar proposal to this purported new league, club or association tendered and to be administered by Pam Kasperitis, STYSA WDVP. The STYSA EC voted not to allow her proposal stating that inter-associational play such as that purported by this new league, club or



association called South Texas Alliance, would be administered by STYSA in its sole discretion and power to do so. Ms. Kasperitis therefore had constructive notice that this purported new league, club or association was in direct conflict with STYSA Constitution, By-Laws, precedents, policies and procedures.

5. RVYSA is a specific use corporation. The RVYSA Constitution states the following: "Article 2. Purpose. The purpose of RVYSA is to develop, promote, and administer the game of soccer at the youth level through its affiliated member organizations within RVYSA territory."

6. WDDOA is a specific use corporation. The WDDOA Constitution states the following: "Article 2. Purpose. To promote soccer at the highest level of competition for all teams in Western District competing at the Premier League and Division 1 level."

7. STYSA Constitution Article IV Boundaries Section 1.5 Member Boundaries states: "An association applying for membership in STYSA may not infringe on territory within the boundaries of a previously admitted member association without written permission of the affected member association or by a vote of the Governing Board as provided in Article IX of this Constitution."

8. STYSA Constitution Article IV Boundaries Section 1.6 Amending Boundaries states: "Amendments to a member association's territory may be made at any meeting of the STYSA Governing Board by 2/3 majority vote of the voting power of Governing Board members in good standing, present and voting. Each governing board member shall be given 30 days notice in writing of the purpose of amendments. Any proposals or motions to amend a member association's territory must be made in writing to the STYSA Secretary at least forty-five (45) days before any regular meeting."

9. STYSA Constitution Article V STYSA Jurisdiction Section 1.7 states: "STYSA shall have jurisdiction over all member associations, their leagues, clubs, teams, administrators, referees, coaches, players and supporters."

10. STYSA Constitution Article VI Membership Section 1.9 Application and Approval for Membership states: "Each youth soccer association applying for membership in STYSA shall be furnished a copy of the STYSA Constitution, By-Laws



and Rules and a copy of the By-Laws and Rules of USYS. An association applying for membership must submit to the STYSA President and to the STYSA Secretary an application for membership, which shall include copies of i) the applicant's Constitution, By-Laws and Rules, ii) the applicant's annual budget for the first year of operation as a member demonstrating that funds are appropriated to attend STYSA Governing Board meetings, and iii) evidence of payment to the STYSA State Office of any application fee then prescribed. The application must be reviewed by the STYSA Executive Committee. Approval for membership in STYSA shall be by the STYSA Governing Board."

11. STYSA Constitution Article VI Membership Section 1.10 Requirements of Association Members states: Each member association shall retain its own autonomy, but will adhere to the Constitution, By-Laws, and Rules, Regulations and Procedures of STYSA, USYS and USSF in all matters pertaining to intra-state competition, or in other competitions sponsored by STYSA.

12. STYSA Constitution Article VI Membership Section 1.12 Good Standing states: "Any member association that: iii) fails or refuses to comply with the authority of STYSA, shall be considered to lose good standing and shall have its voting rights automatically suspended until such rights are reinstated by a simple majority vote of the Governing Board. Such business shall be the second item on the agenda. No club, team or individual registered with a member association not in good standing as a result of ii) or iii) above shall be allowed to participate in any competition sponsored by STYSA."

13. STYSA Constitution Article VII Individual Membership Section 1.13 Individual Membership states: "An individual who is a player, coach, trainer, manager, administrator or official, not subject to suspension under Section 4 of USSF By-law 241, is a member of STYSA:

- a. through that individual's membership or association with a Member Association;
- b. as an elected officer;
- c. as a committee member of STYSA;
- d. as a Life Member; and
- e. when the individual, whether coach, trainer, manager, administrator or official, is duly registered with STYSA as per the current registration procedures."



Construct

WDDOA is a duly approved Association within STYSA whose purpose is to promote, develop and administer the highest level of competition for all teams in Western District competing at the Premier League and Division 1 level. RVYSA is a duly approved Association within STYSA whose purpose is to develop, promote, and administer the game of soccer at the youth level through its affiliated member organizations within RVYSA territory.

RVYSA asked WDDOA approximately five years ago to have its own Division 1 boys competition. WDDOA agreed to RVYSA's request pursuant to Paragraph 7 above. RVYSA has not asked WDDOA to extend that to any and all age groups and genders within Western District that would ordinarily register with WDDOA. Clearly, RVYSA would be infringing on the territory of WDDOA and duly approved purpose of WDDOA by not seeking written permission from WDDOA or receiving approval from the STYSA Governing Body for such infringement as provided in this STYSA article. RVYSA has therefore violated the requisite of STYSA Constitution Article IV Boundaries Section 1.5 Member Boundaries. Pursuant to STYSA Constitution Article VI Membership Section 1.12 subpart iii Good Standing. RVYSA should automatically be suspended until next the STYSA GBM where its good standing could be restored.

South Texas Alliance is not an admitted club, league or association and as such has no standing with STYSA because it has not met the admission requirements of STYSA Constitution Article VI Membership Section 1.9 Application and Approval for Membership but yet is soliciting and purporting its existence as though it is admitted. Pursuant to STYSA Constitution Article VI Membership Section 1.12 subpart iii Good Standing. The participating and organizing Associations of CBYSA, RVYSA and LAYSA should automatically be suspended until next the STYSA GBM where its good standing could be restored by vote of the Governing Board.

There is long standing precedent within STYSA that Inter-Associational play, whether league or competition is administered by STYSA. Examples include Western District Super II gaming league, Eastern District Super II gaming league and the all of the Spring Cups. The South Texas Alliance is merely an attempt to create and administer an inter-associational league with no standing to do so whatsoever.



Pam Kasperitis proposed a similar, if not identical proposal to the STYSA EC on June 8, 2010. The STYSA EC denied the request. Ms. Kasperitis had constructive notice of such. As the Western District VP, Ms. Kasperitis has a fundamental responsibility to inform all associations of decisions of the STYSA EC.

On belief and action, WDDOA asserts the Ms. Kasperitis blatantly ignored the STYSA EC decision and advised the Associations to break and/or violate a significant number of STYSA Constitutional Articles, policies and procedures to the detriment of the duly approved purpose of WDDOA. Ms. Kasperitis essentially thumbed her nose at the authority of STYSA and those granted to its Member Associations.

Ms. Kasperitis by action and inaction gave sanction to a plan and entity that had previously been denied by the STYSA EC and is completely against STYSA rule and previous precedent. Accordingly and in accordance with the Good Standing provisions, Ms. Kasperitis should be automatically suspended. Ms. Kasperitis has a higher responsibility to all Associations in Western District as the elected representative of all Associations. As such, she must have a higher degree of accountability. She has failed not only WDDOA, but has failed all of the other associations in Western District by suborning and supporting refusal to comply with STYSA Constitution, By-Laws, precedents, policies and procedures.

Relief Sought

1. STYSA immediately enforce the Good Standing automatic suspension according to STYSA Constitution Article VI Membership Section 1.12 subpart iii on CBYSA, LAYSA, and RVYSA for the failure and refusal to follow STYSA Constitution, By-Laws, precedents, policies and procedures until such time that a vote may be taken at the next STYSA GBM to restore the association's good standing.
2. STYSA immediately enforce the Good Standing automatic suspension on Pat Kasperitis, Pam Kasperitis, Joe Bazan, JJ Vela and Brian Batch for the



failure and refusal to follow STYSA Constitution, By-Laws, precedents, policies and procedures until such time that a vote may be taken at the next STYSA GBM to restore the individual's good standing.

3. Issue a clear and concise determination letter to be sent to each Association and it's president within Western District stating South Texas Alliance is not a member club, league or association, without any standing in STYSA and that any of its promotions, claims of benefit, or operational abilities are in violation STYSA Constitution, By-Laws, precedents, policies and procedures.
4. Issue a clear and concise determination letter to be sent to each Association and it's president within Western District stating that WDDOA is the duly approved Division 1 association in Western District pursuant to the duly approved purpose of WDDOA, as approved by the STYSA Governing Board.
5. Suspend Pat Kasperitis, Joe Bazan, JJ Vela and Brian Batch for a minimum of three months as Association Officers and organizers of the South Texas Alliance for reasons stated above and in concert with their elevated responsibilities and thus, accountability as Association Officers.
6. Suspend Pam Kasperitis for a minimum of six months as the WD VP and for reasons stated above and in concert with her elevated responsibility and thus, accountability to all Western District Associations.

Respectfully submitted on behalf of the WDDOA Board of Directors

Reeves Moore, EVP WDDOA