

June 7, 2013

Mr. Pere Miro,  
Director N.O.C. Relations,  
International Olympic Committee,  
Villa Mon-Repos,  
Case Postale 1374,  
1001 Lausanne,  
Switzerland

Dear Sir,

Attached are the signatures of Fourteen (14) of the Eighteen (18) Affiliated Member Associations of the Dominica Olympic Committee, (herein after referred to as D.O.C.) who are aggrieved at the manner of Governance that is being displayed by the Executive and more particularly the President and the Secretary General of the D.O.C.

The matter really escalated into total chaos during and after the meeting which was called for the elections of officers to the D.O.C. Executive on January 24, 2013.

There were many irregularities relating to this meeting which we are all convinced were illegal and unconstitutional.

The most blatant are listed for your consideration and for which we solicit your advice and intervention;

1. The Athletes Commission since it was constituted in 2003 has never been legitimately functional and has never had an election since its formation. The D.O.C's constitution clearly states the manner in which the process for the nominations for elections and functioning of Commissions are to be conducted.

13.1. The Executive, in the year of elections, will request in writing nominations from the general membership for positions on the Commissions. The nomination process shall follow the same format as nominations for the Executive as stipulated in Articles 18.2.4, 18.2.5 and 18.2.6 below.

- 13.2. The Executive will ensure that elections for Commission members on all established Commissions for the ensuing quadrennial are held during the year of elections as stipulated in Article 18.2 below.

This has never been adhered to and to compound this matter, the Commission has had only **TWO** members from its inception, in the persons of Cedric Harris and Woodrow Lawrence both of whom last competed at the 1996 Atlanta Olympic Games. The D.O.C.'s Constitution (Section 13.3) specifically states that "**each Commission will have a membership of five (5) and three (3) members will constitute a quorum**". This Commission has never submitted a single report to the General Assembly at any Annual General Meeting as required by the Constitution (Section 13.6), also a serious breach of the Constitution.

At the 2013 Election (referred to above) of officers to the executive of the D.O.C. that very same Illegitimate Commission wrongfully **APPOINTED** two athletes to vote under section 7.1.1.3 and 7.1.1.4. of the D.O.C. Constitution which read as follows:

- 7.1.1.3 Active and retired athletes who have taken part in the Olympic Games, provided that these members shall retire from membership at the end of the third Olympiad after the end of the Olympic Games in which they took part.
- 7.1.1.4 In matters of voting these members, at 7.1.1.3 above, shall be represented by two representatives, one male and one female, elected by the Athletes' Commission. This representation shall have two votes."

However, neither of them was qualified to vote under this section. The Chairman of the Commission has since admitted that he was influenced and wrongly advised by the Secretary General. Those two Athlete Reps, instead of being **appointed**, should have been **elected** by the Athletes Commission. (D.O.C. Constitution, 7.1.1.4.)

One of the Athletes who voted, (Mr. Woodrow Lawrence) took part in the 1996 Atlanta Olympics and therefore should have retired from membership at the end of the third Olympiad after the end of the Olympics Games in which he took part, making him ineligible to vote in 2013. (D.O.C. Constitution, Section 7.1.1.3. above) The other athlete (Mr. Brendon Williams) has never participated in an Olympics Games, again disqualifying him as an Athletes Rep. (D.O.C. Constitution, 7.1.1.3.) To compound these illegalities, Woodrow Lawrence and Brendan Williams are both **MALES** when section 7.1.1.4 of the Constitution categorically makes provision that the Reps be **ONE MALE** and **ONE FEMALE**. The D.O.C. made no effort to invite the one eligible female Olympian (Ms Luan Gabriel - London 2012) who was on island at the time to partake in those elections.

These irregularities were brought to the attention of the meeting but were rejected by the President and Secretary General.

**Under no circumstances does the D.O.C. Constitution make provisions for unqualified persons to vote.**

2. The Dominica Squash Association and the Dominica Cycling Association were both debarred from voting at the elections citing non affiliation to their International Federations, arrears of subscription to the D.O.C. and are inactive.

While we admit that the Cycling Association is not affiliated to its International Federation, it has always fully participated in all previous D.O.C. activities including elections.

The D.O.C. Constitution (7.2.2) States "The recognized and active members must hold elections once every four (4) years and a copy of these minutes, certified by the President and General Secretary, must be submitted to the Executive of the Committee".

7.2.3 of the D.O.C. Constitution goes on to state "All National Sports Associations, as recognized and active members must be obliged to hold Annual National Championships barring major disasters and Annual General Meetings in order to present to their membership the Annual General Report and compilation of financial Statements, copies of which must be submitted to the D.O.C. The Annual General Report and Compilation of Financial Statements must be duly signed by the President and General Secretary of the Associations".

We ask, how many of the National Associations have met these requirements and are of Full Compliance of the Constitution, which would have allowed them to vote? Even the legendary Hand Ball Association which is led by the President of the D.O.C. would have stood no chance to vote if the Constitution was adhered to.

The D.O.C. Constitution, (8.1.and 8.1.3) under Termination of Membership, states "Membership shall be automatically terminated, if a member fails to uphold ANY of the member obligations listed in article 7.2."

Again we ask why are some Associations allowed to flout the Constitution and others are penalized under the same articles of the Constitution?

Why the discriminatory treatment of some Associations?

The Cycling Association was invited in writing (letter dated December 13, 2013) to be represented at the election meeting as is customary. They replied accepting the invitation and also submitted their nomination documents to the D.O.C. Including in their nominations was a challenge to the position of President.

Is it by coincidence that in letter dated January 10, 2013, their letter of invitation to the Election meeting was miraculously withdrawn?

Did the status of the Dominica Cycling Association change over a period of less than a month?

The Dominica Squash Association is a member of the Organization of Eastern Caribbean States (OECS) Squash Association which is a member of the Regional Body, The Caribbean Area Squash Association (CASA). The International Squash Federation's regulation clearly states that once you are a member of your regional body you automatically become an affiliated member of the International body, The World Squash Federation. The Dominica Squash Association was not in arrears of subscription to the D.O.C. yet they were barred from taking part in the elections. The D.S.A. have always historically taken part in all D.O.C. activities, including elections and its President was the current Assistant Secretary of the D.O.C. until he left Dominica in September 2012 to further his studies.

In 2010, The Dominica Squash Association participated in the O.E.C.S. Jr. Championships held in St. Vincent, which was financially supported by the D.O.C.

In 2011 they hosted the O.E.C.S Jr. Championships right here in Dominica. At that Tournament, in which the D.O.C. contributed financial assistance to the Dominica Squash Association, Mr. Samson Viville of Dominica won the O.E.C.S U-13 Jr. Championship and also represented Dominica and the O.E.C.S. at the Caribbean Area Squash Association Championship in Guyana.

In 2012, they again participated in the O.E.C.S Jr. Championships in St Lucia.

Does the above fit the profile of an inactive Association?

What makes the election results even more intriguing, disturbing and shambolic is the fact that the President won the election over his opponent, Mr. Loren Challenger of the Dominica Cycling Association by two (2) votes. When you consider that there were two illegitimate votes from the Athletes' Reps and that two Associations who had made nominations to challenge the President were denied voting rights, ( Mr. Challenger, a nominee of the Cycling Association was also denied the opportunity to vote) it stands to reason that the results would have been significantly different if Democracy and Fair

reason that the results would have been significantly different if Democracy and Fair Play were allowed to have prevailed at the elections of the D.O.C. held on January 24, 2013. What makes those election results even more hurtful is that taking part in those elections and voting were some Associations which have had absolutely NO sporting activity for at least, the last 5 years.

Contrary to the D.O.C.'s Press Release which stated that 13 member Associations were signatories to the letter sent to the D.O.C. requesting the convening of the Special Meeting 15 out of the 18 affiliated members actually signed their support as can be seen on the document attached.

The D.O.C.'s count clearly indicates that the Dominica Cycling Association and the Dominica Squash Association are not recognized as members of the D.O.C., a status they have enjoyed since their formation but one which they surprisingly and unceremoniously lost immediately preceding the elections. Is the D.O.C.'s stance due to the audacity of these two Associations nominating persons to challenge the President and the Secretary General at the last elections? Is that what we mean by Olympism?

The Press Release further states that "whereas the Executive meets all these obligations (referring to membership Obligations) few but two (2) meet these obligations". Is that an open admission that even the two Associations lead by the President and Secretary General respectively, namely the Hand Ball Association and Lawn Tennis Association do not meet member obligations of the D.O.C.? Further, does that mean they are not legitimate members of the D.O.C.? This indeed is a shocking admission of guilt. Again this brings to the fore the discriminatory action of denying member Associations their legal right to participate in the voting process while others are denied that right .

The Release also stated, "Attendees at the Special General Meeting resisted in going on to discuss the other items because they feared that their arguments would have been contradictory". While the members were indeed happy that the resolution was passed, many of them were quite disappointed that the meeting did not discuss the financial matter as stated on the agenda, as it would have been interesting to hear how the Executive would have responded and reacted to the financial irregularities that we had discovered and were prepared to reveal at that meeting.

We the Undersigned Affiliated Members of the D.O.C. have met on several occasions to discuss this grave situation. We have undertaken some in-depth investigations into the management of the D.O.C. and our findings have been disconcerting. After much deliberation among the Member Associations and in an attempt to get things done constitutionally, the associations (Fifteen ( 15) out of the eighteen ( 18) affiliated members

of the D.O.C. ) wrote to the executive calling for a Special General Meeting as provided for in the D.O.C. Constitution ( Section 18.1) ( Letter attached).

That meeting which was duly held on May 16, 2013, was called to order at 5:45pm. After enduring a Twenty-five (25) minute opening remark by the President, he informed the meeting that whatever we do, the meeting would end at 8 pm sharp. Members expressed the opinion that a meeting of such importance should not be rushed but the President insisted that the meeting would not go beyond 8 pm.

At that meeting only the first two items on the agenda were dealt with, when a resolution was passed **UNANIMOUSLY** that, based on the illegality of the previous elections, new elections be called within 21 days of the meeting, with specific time frames stipulated for the election process to be completed (Resolution Attached).

The resolution was passed as a direct result of the discussions which were held at that Special General Meeting. Our call for new elections is a legitimate one and is based on the illegitimacy and illegality of the election process held in January.

Section 30.1 of the DOC constitution "**The Executive shall have exclusive right to interpret these rules or any by-laws that may be enacted from time to time. The interpretation of any rule or by-laws by a two-thirds majority of the Committee shall be final.**"

**Therefore the call for and passing of the resolution was constitutional, having been supported by 13 out of 18 members. So we in fact had more than the two thirds majority required by the Constitution to interpret any rule or by-law and make that decision final. Not one member association present, voted against the resolution.**

Speaking to the press immediately after that meeting of May 16, 2013, the Secretary General openly admitted that there were irregularities at the elections and confirmed the membership was correct with their claim that certain matters relating to the conduct of the elections were **UNCONSTITUTIONAL**.

To date, there has been no Executive meeting and nothing has been done to adhere to the instructions of the resolution. Some Executive members are at a loss for words to describe this blatant refusal by the President and Secretary General to execute the instructions of the General membership to conduct fresh elections.

Any effectively functioning and responsible Executive, would have immediately convened a meeting to address the concerns of the General Membership recognizing the severe

implications for the D.O.C.'s Constitution. However, in this case the President and Secretary General decided that they would, as has become customary, take the matter in their own hands.

This disregard of the authority of the General Membership undermines the very principles of Olympism that the "two Man" Executive makes much reference to .

The situation has become untenable for the membership, as the D.O.C.'s public image is being ripped to shreds and the sporting public looks on with a feeling of desperation and hopelessness. The D.O.C.'s Executive went as far as to arbitrarily dismiss the three members of staff at the D.O.C. office and kept that facility locked, denying the Affiliated Members and the general public access to that facility for several weeks. This snub by the Executive is a clear display of total disrespect to its General Membership.

**We the General Membership of the D.O.C. are calling on the International Olympic Committee through its Ethics Commission to appoint an Independent Commission to conduct a full time enquiry into the conduct and operations (including the Financial Management) of the D.O.C. from immediately preceding the 2012 Olympic Games to the present, and this includes the entire process of the 2013 Election of Officers.**

There is documented evidence that can prove **Severe Financial Mismanagement** of the D.O.C. and instances of **Widespread Unethical Abuse of Privileges**, including persons being paid for carrying out their duties as Executive members, e.g. claiming and being paid for coordinating Sports Administrators Workshops and a Press Conference, an unprecedented occurrence in the history of sports in Dominica and practices contrary to the D.O.C. Constitution and that of the Olympic Charter.

The D.O.C. Constitution states in article 11.7 " **Officers shall perform their duties on a voluntary basis as provided by the Executive. They may however be reimbursed for travelling, subsistence and any other justified expenses incurred by them in connection with their duties**".

In addition, The Olympic Charter , which every N.O.C. has to abide by, states in Bye Law to Rule 27 and 28 Section 1.6, "**The members of an NOC, except for Professional Sports Administrators, shall not accept any compensation or bonus of any kind in consideration for their services or for the performance of their duties. They may be reimbursed for their travelling, accommodation and other justified expenses incurred in the carrying out of their functions**".

No one in the D.O.C. by any stretch of the imagination, is so qualified and functions as Professional Sports Administrator and therefore **no executive member of the DOC is**

**entitled to receive any payment or remuneration in lieu of services rendered to the organization.**

It is interesting to note that the Press Release sent out by the D.O.C. (dated June 7, 2013) has been signed by the President and Secretary. As noted earlier, at the time of this Press Release, an Executive meeting had not yet been held since the Special General Meeting, so whose views does the Press Release reflect? Is it that of the "Two Man" Executive? Should two members be allowed to hold a large majority of a National Olympic Committee to ransom in an effort to protect their own interest?

One Executive member, on leaving the state to attend to his Association's business, submitted his nomination at that time, knowing that he would have been out of state on the deadline for nominations, clearly indicating that it was his belief, based on the resolution which was passed **UNANIMOUSLY** at the Special General Meeting that the machinery would have been put in place to facilitate the elections .

We know that a large majority of members of the Executive are not in agreement with the Governance of the D.O.C. and are in total support of our call for new elections based on the terms of the constitution and facts presented.

**We the undersigned, in an expression of disgust and dissatisfaction in the mismanagement and total disrespect displayed by the D.O.C., have with immediate effect, totally withdrawn our support of all activity of the D.O.C. to ensure that our call for Justice and Fair Play be heard.**

It is clear to the average bystander that members of the D.O.C. are not conducting the affairs of that Institution in a transparent manner and if this issue is not remedied at the earliest, the Integrity and Credibility of not only the D.O.C., but that of the International Olympic Committee stands to be questioned along with the superior principles for which it stands.

**To ensure that Good Governance and true Democracy prevail, and become the watch words of the D.O.C. we the Affiliated Members of the D.O.C. whose signatures are affixed to this document, reiterate our request for the urgent intervention of the I.O.C. in this impasse. We share the opinion of the large majority of the public, that for total transparency to be acknowledged, the I.O.C.'s Ethical Commission should at the earliest possible time, install an Independent Committee to investigate the management and activities of the D.O.C. over the last year including that infamous election held in January 2013.**

We are confident your august and noble Organization will make a ruling based on the principles of Fair Play and your interjection will send a strong signal to all concerned, that when elected to lead a National Olympic Committee, one must do so with, Humility, Honesty and Integrity, and in respect of the ideals and values of the Olympic Movement enshrined in the Olympic Charter.



In the mean time we will again be writing to the D.O.C. under section 18.1 calling on the D.O.C. to convene a Special General Meeting under the guidance of the constitution to discuss the calling of fresh elections and other important related matters.

We await your learned guidance.

Sincerely

Dominica Amateur Athletics Association

Cedric Harris - President

NAME/POSITION

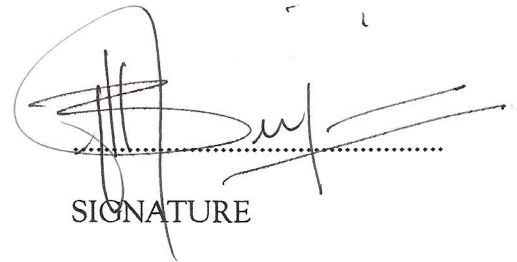


SIGNATURE

Dominica Archery Association

Julian Lloyd Benjamin

NAME/POSITION



SIGNATURE

Dominica Amateur Basketball Association

Mickey Joseph

NAME/POSITION President



SIGNATURE

Dominica Amateur Boxing Association

Michael Peters (General Secretary)

NAME/POSITION



SIGNATURE

Dominica Bridge Association

HENRY A VOLNEY - PRESIDENT

NAME/POSITION

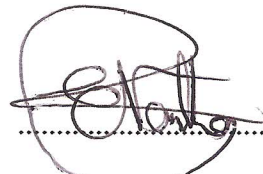


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Dominica Cricket Association

Emmanuel Nathan

NAME/POSITION - President



SIGNATURE

Dominica Netball Association

Alice Ino Jules / President

NAME/POSITION



SIGNATURE

Dominica Football Association

Dominica Football Association

*Emission Algoman Segalleni*  
Secretary

NAME/POSITION

*[Signature]*

SIGNATURE

Dominica Squash & Racket Association

*Beverly LeBlanc* President

NAME/POSITION

*[Signature]*

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Dominica Cycling Association

*Joel Challenor* - Secretary

NAME/POSITION

*[Signature]*

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Dominica Amateur Swimming Association

JENNY L. ALLPORT-WILLIAMS  
PRESIDENT

NAME/POSITION

*[Signature]*

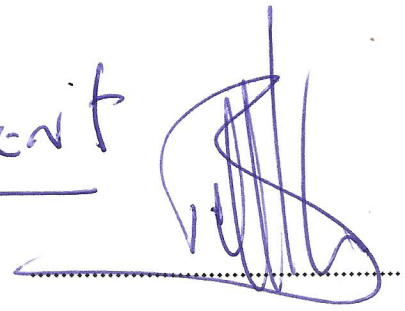
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Dominica Table Tennis Association

Brian A. Althea

NAME/POSITION

President



SIGNATURE

Dominica Taekwondo Association

Timothy Lewiner

NAME/POSITION

President



SIGNATURE

Dominica Bodybuilding Association

EMANUEL LOBLACK President Ag

NAME/POSITION



SIGNATURE

cc

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