



The University of Chicago
Undergraduate Student Government

In the matter of Nevin Hall, Aiden Long,
Ayla Eichler, and Evan Spear,
Respondents.

Articles of Impeachment Against
**NEVIN HALL, AIDEN LONG, AYLA
EICHLER, and EVAN SPEAR**

RESOLUTION

WHEREAS, Article VIII, § 6 of the Undergraduate Student Government (USG) Constitution notes that “[m]embers of the Undergraduate Student Government may be removed from office for violation of public trust, neglect of duty, or malfeasance of office by . . . a two-thirds vote of the College Council”;

WHEREAS, impeachment and removal from office is a drastic remedy, is not to be taken lightly, and should only be available in the severest of cases;

WHEREAS, **NEVIN HALL** has engaged in a consistent pattern of violation of public trust, neglect of duty, and malfeasance of office during the 2023-2024 academic year and the 2024-2025 academic year at the University of Chicago;

WHEREAS, in the past two academic years, **NEVIN HALL** has (1) abused the power that he has (2) concentrated in his own hands by (3) making materially misleading statements to College Council;

WHEREAS, in the past two academic years, **NEVIN HALL** has proposed—at a minimum—three sets of changes to the Bylaws;

WHEREAS, on at least thirty-one (31) separate occasions, these changes to the Bylaws, as further detailed *infra*, have granted **NEVIN HALL**—either directly or indirectly—substantially more power within Undergraduate Student Government;

WHEREAS, as just one example, **NEVIN HALL** added a provision to the Bylaws on November 13, 2023, preventing members of the Elections and Rules Committee (E&R) from being impeached while simultaneously giving the Elections and Rules Committee the power

to interpret the Bylaws;

WHEREAS, NEVIN HALL styled these changes rewrite that eliminated redundant and outdated portions of the then-Bylaws while neglecting to mention *any* of the changes that gave the Elections and Rules Committee or himself, as Chair, more power;

WHEREAS, the College Council has received three anonymous complaints from members of the Program Coordinating Council (PCC) and Committee on Academic Teams (CAT) detailing **NEVIN HALL's** continuous abuses of power;

WHEREAS, according to one complainant ("CAT Member #1") from the Committee on Academic Teams, **NEVIN HALL** "frequently reference[s] the amount of power he holds" and "how he could make any executive decision by himself" (Ex. A);

WHEREAS, according to CAT Member #1, **NEVIN HALL** "demonstrated a general disregard for due process, often dominating discussions and steering them to align with his own views" (Ex. A);

WHEREAS, according to one complainant ("PCC Member #1") from the Program Coordinating Council, **NEVIN HALL** "has repeatedly imposed his personal beliefs upon the deliberations of the Program Coordinating Council (PCC), disregarding the procedural neutrality required of his office" (Ex. B);

WHEREAS, according to PCC Member #1, "the appeals process under **Mr. Hall's** oversight has become unclear and increasingly concentrated in his own hands" and that "[s]uch centralization of power in the absence of clarity is both dangerous and antithetical to the principles of transparent student governance" (Ex. B);

WHEREAS, NEVIN HALL has similarly bragged about the amount of power he holds on USG to at least one member of College Council ("CC Member #1");

WHEREAS, NEVIN HALL, during a conversation with CC Member #1, bragged that he had the power to single-handedly determine the winner of elections by disqualifying all but one candidate or slate;

WHEREAS, NEVIN HALL, during a conversation with CC Member #1, bragged that the Elections and Rules Committee was comprised primarily of his personal friends, leading to him being able to personally exercise significant authority over the elections process;

WHEREAS, upon information and belief, these friends are **AIDEN LONG, AYL A EICHLER,** and **EVAN SPEAR;**

WHEREAS, upon information and belief, **AIDEN LONG, AYL A EICHLER,** and **EVAN SPEAR** filed a complaint with the Elections and Rules Committee seeking to nullify the Spring 2025 election results at the direction of **NEVIN HALL;**

WHEREAS, upon information and belief, such a complaint was filed after College Council

voted to request that **NEVIN HALL** resign his position as Chair of the Elections of Rules Committee;

WHEREAS, upon information and belief, **AIDEN LONG**, **AYLA EICHLER**, and **EVAN SPEAR**, at the direction of **NEVIN HALL**, intended to vote to nullify the Spring 2025 election results on May 8, 2025;

WHEREAS, because of the urgency of this situation, the College Council Chair—exercising his authority under Title III, § 4 of the USG Bylaws—has convened an extraordinary session of College Council to take place on May 7, 2025, during which this impeachment motion will be heard;

WHEREAS, **NEVIN HALL** has stated that “I enjoy being a USG bureaucrat because I can do what I want without getting impeached” (Ex. B); and

WHEREAS, it is the solemn duty of College Council to impeach those who consistently and publicly abuse their power on Undergraduate Student Government;

NOW, THEREFORE, BE IT RESOLVED by the College Council of the University of Chicago Undergraduate Student Government, that **NEVIN HALL** is impeached from any and all positions he holds or is scheduled to hold on the Undergraduate Student Government for a violation of public trust, neglect of duty, and malfeasance of office;

BE IT FURTHER RESOLVED that these positions include, but are not limited to, (1) Chair of the Elections and Rules Committee, (2) Secretary of the Elections and Rules Committee,¹ (3) Chair of the Program Coordinating Council, (4) Chair of the Committee on Academic Teams, (5) Acting Vice President of Student Organizations for the 2024-2025 academic year, and (6) Incoming Vice President of Student Organizations for the 2025-2026 academic year;

BE IT FURTHER RESOLVED that **AIDEN LONG**, **AYLA EICHLER**, and **EVAN SPEAR** are impeached from any and all positions they hold or are scheduled to hold on the Undergraduate Student Government for a violation of public trust and malfeasance of office;

BE IT FURTHER RESOLVED that these positions include, but are not limited to, their membership on the Elections and Rules Committee; and

BE IT FINALLY RESOLVED that the specific reasons for impeachment are laid out in the counts below, each of which constitutes a separate and independent ground for removal.

¹ **NEVIN HALL** has seemingly assumed this position after being asked to resign as Chair of the Elections and Rules Committee by College Council. **NEVIN HALL** had previously told the President of USG that he would resign as Chair of the Elections and Rules Committee if asked to do so by College Council, but made no mention of assuming a new role on the same committee.

GROUNDS FOR IMPEACHMENT

COUNT I:

Consolidation of Power Through Knowingly Making Materially Misleading Statements to College Council on November 13, 2023 – Violation of Public Trust and Malfeasance of Office (Against NEVIN HALL)

1. The General Allegations of this resolution are re-alleged and fully incorporated here by reference.
2. Over the course of two academic years, **NEVIN HALL** has consolidated power on USG through a series of changes to the USG Bylaws. The first such change occurred on November, 13, 2023, when **NEVIN HALL** came to College Council with a resolution to modify the existing Bylaws.
3. During the College Council meeting where **NEVIN HALL's** Bylaws rewrite was discussed, **NEVIN HALL** portrayed his resolution as a “rewrite” that eliminated redundant and outdated portions of the then-Bylaws. In an example portrayed as representative of his changes to the Bylaws, **NEVIN HALL** described how he removed a section on College Council memoranda, as such a section was never used in practice.
4. In reality, however, **NEVIN HALL's** changes to the USG Bylaws contained no fewer than twelve (12) undisclosed, substantive changes that either gave **NEVIN HALL** more power on USG or otherwise directly cemented his position on USG.
5. A non-exhaustive list of such changes made by **NEVIN HALL** are as follows (Ex. D):
 - a. Perhaps most egregiously, **NEVIN HALL** added a provision to the Bylaws that prevents him—and other members of E&R—from being impeached altogether. *This bears repeating: NEVIN HALL edited the Bylaws to prevent himself from ever being removed from office, all while hiding from College Council the fact that he did so.*
 - i. Specifically, **NEVIN HALL** added a section stating that “[m]otions of impeachment . . . shall not run against bodies whose adjudicatory jurisdiction in their particular sphere is final and officially delegated by the Constitution, Bylaws, or by Resolution under this title.” E&R is the only committee with this status; one does not even have to speculate as to **NEVIN HALL's** intent, as—in another change **NEVIN HALL** made to the same document—**NEVIN HALL** added a provision stating that “E&R and its subcommittees are the only committees with final adjudicatory jurisdiction over its chosen subject area and officially delegated by the Constitution, Bylaws, or Resolution, as noted in Article VI §8 of the USG Constitution.”
 - b. **NEVIN HALL** removed the power of CORSO to “review[] complaints against

RSOs” and “mediat[e] disputes between RSOs” and gave such authority to E&R.

- c. **NEVIN HALL** added a provision giving E&R the power to (1) ascertain “[c]ontradictions between these By-Laws and the Constitution” and (2) giving E&R the power to interpret the Bylaws altogether.
 - d. **NEVIN HALL** added a section stating that “[n]o member of E&R may be appointed without the advice and consent of the chair of E&R.”
 - e. **NEVIN HALL** added a section stating that “[w]aivers of the By-Laws or other Undergraduate Student Government governing documents by special rules determination may not be made *unless consented to by the chair of E&R*”—i.e., himself.
 - f. **NEVIN HALL** added a provision giving E&R the power to “determine whether a subcommittee has a purpose within the charge of the relevant committee,” as “[s]ubcommittees . . . may only be created for a purpose that the committee’s charge covers.”
 - g. **NEVIN HALL** added a provision giving E&R the power to “determine whether a USG member is a member or on the board of the RSO in question” for the purposes of ascertaining conflicts of interest.
 - h. **NEVIN HALL** added a provision stating that “the Executive Vice President shall consult and *obtain the approval* for the Chair of E&R regarding” the appointment of new members. (emphasis added)
 - i. **NEVIN HALL** replaced a provision stating that “[m]embers of E&R shall be nominated by the College Council via instant runoff voting” and replaced the provision with “[m]embers of E&R shall be nominated by Cabinet and confirmed by College Council.
 - j. **NEVIN HALL** changed the process for replacing vacancies on E&R. Previously, the Bylaws stated that “the President, with the advice and consent of the Cabinet, shall designate a fourth year member of Undergraduate Student Government to fill any remaining vacancies.” Mr. Hall replaced this language with “E&R shall designate members of Undergraduate Student Government to fill any remaining vacancies.”
 - k. **NEVIN HALL** codified provisions in the Bylaws allowing E&R to, “under its own procedures as it shall determine, be closed and confidential” for its meetings. Previously, the Bylaws stated only that “[a]ll E&R meetings will be open to the public.”
 - l. **NEVIN HALL** added a provision giving the Chair of E&R (i.e., himself) the ability to chair any College Council votes between tiebreaking candidates.
6. To reiterate, none of the twelve (12) changes above were disclosed to College Council by **NEVIN HALL**.

7. College Council ultimately passed **NEVIN HALL's** proposed changes on November 13, 2025. In doing so, however, College Council relied on **NEVIN HALL's** material misrepresentations to the body.
8. At the time **NEVIN HALL's** proposed changes passed, **NEVIN HALL's** only position on Undergraduate Student Government was Chair of E&R.
9. When concerns about **NEVIN HALL's** changes were raised to him on a May 5, 2025 College Council meeting, **NEVIN HALL** defended himself by stating (1) that he met with Jefferson Lind, President of Undergraduate Student Government for the 2023-2024 academic year at a diner in Texas to discuss changes to the Bylaws, (2) that, as a part of some agreement **NEVIN HALL** made with Mr. Lind, Mr. Lind agreed to exempting E&R from impeachment in exchange for E&R taking on "certain responsibilities that [Mr. Lind] did not want to take on," and (3) that Mr. Lind either requested or was otherwise in favor of him not disclosing these—and other changes increasing the power of E&R—to College Council.
 - a. When Mr. Lind was contacted for comment, though he confirmed that he and **NEVIN HALL** did meet at a diner in Texas, Mr. Lind stated the following (Ex. G):

"I don't remember for certain any element of that meeting since it was almost two years ago now and I don't have any notes, but I would be very surprised if a hard agreement was made. I probably said that sounded like a reasonable idea in theory. I certainly didn't 'sign' anything, nor do I feel I would have the singular authority to. At the time, I think I recall us both being interested in finding a way for E&R to function as more of a rules interpretation body than it currently does. But that's different from a promised safeguard or anything. And that would be pending drawing up the particulars of such a plan."

"If he said 'I don't think I wanna bring this to College Council yet,' I might have agreed. I would be in favor of him preparing change proposals in depth before bringing them to CC. I certainly would not have supported keeping CC in the dark about it once it's time to consider those actual changes. Basically, any expression of not wanting to bring it to College Council would be an expression of me either feeling that it's not time to make such a change yet or we need to get our ducks in a row before we propose such a change. It would not be to obfuscate any changes to the system anyone was trying to put into action. And I don't think I was entirely in favor of whatever these changes would have been anyway, I just was open to him developing proposals and probably had some favorable interest in the principles behind many of them."
10. In making material misrepresentations to College Council, **NEVIN HALL** violated

the public trust and engaged in official misfeasance, thereby committing an impeachable offense.²

COUNT II:

Consolidation of Power Through Knowingly Making Materially Misleading Statements to College Council on March 7, 2025 – Violation of Public Trust and Malfeasance of Office (Against NEVIN HALL)

11. The General Allegations of this resolution are re-alleged and fully incorporated here by reference.
12. In Winter 2025, **NEVIN HALL** was appointed as the Acting Vice President of Student Organizations (VPSO).
 - a. In Autumn 2024, **NEVIN HALL** was appointed Chair of the Program Coordinating Council and Committee on Academic Teams.
 - i. **NEVIN HALL** held these positions in addition to his existing appointment as the Chair of E&R.
13. On March 3, 2025, **NEVIN HALL** appeared before College Council to present another set of changes he proposed to the USG Bylaws. As outlined in the meeting minutes, **NEVIN HALL** described his changes to College Council as follows:

“This will require the VPSO to create a calendar before Spring quarter. It also standardizes how the Sports Club Finance Committee and fund operate. Additionally, it mandates that I report to CC on various issues in the spring. My thought process is that by putting the relevant information in front of you now, it will make it easier for you to make decisions later.”

² Cf., e.g., *Swan Creek Communications, Inc. v. Federal Communications Commission*, 39 F.3d 1217, 1222 (D.C. Cir. 1994) (holding that a lack of candor exists when one breaches the duty “to be fully forthcoming as to all facts and information relevant to a matter . . . whether or not such information is particularly elicited.”); *Ludlum v. Dep’t of Justice*, 87 M.S.P.R. 56, 68 (2000) (finding that the government “has a right to expect its workers to be honest, trustworthy, and candid” and that a lack of candor “strikes at the very heart of the employer-employee relationship”); *United States v. Shaffer Equipment Co.*, 11 F.3d 450, 457 (4th Cir. 1993) (noting that “[e]ven the slightest accommodation of deceit or a lack of candor in any material respect quickly erodes the validity of the process” and that “[a]s soon as the process falters in that respect, the people are then justified in abandoning support for the system in favor of one where honesty is preeminent.”); *In re Reed*, No. 14-43751-705, 2016 WL 11780171, at *116 (Bankr. E.D. Mo. Apr. 20, 2016), *aff’d*, No. 4:16CV633 RLW, 2017 WL 44645 (E.D. Mo. Jan. 3, 2017), *aff’d*, 888 F.3d 930 (8th Cir. 2018) (holding that “[c]andor is not the state of simply not lying; candor is the quality of being open and honest in expression,” and that one “cannot excuse his lack of candor by pointing to that he did not technically lie.”); *Raymo v. Sec’y of Health & Hum. Servs.*, 2014 WL 1092274, at *16 (Fed. Cl. Feb. 24, 2014) (holding that the failure to “tell the whole truth . . . demonstrate[s] a lack of candor”); *In re SoCal Sleep Centers, LLC*, 2016 WL 4198534, at *9 n.13 (B.A.P. 9th Cir. Aug. 8, 2016) (noting that the court was “particularly dismayed by [counsel’s] argument that, despite her ethical duty of candor to the tribunal, . . . she was free to use her ‘discretion’ to decide when to tell the bankruptcy court the whole truth, rather than just part of the story. A half-truth is a half-lie”).

“This modification also changes how the Department of Athletics operates in this process. The department is in favor of these changes. If you look at the comments against it, most come from people who don’t fully understand how annual allocations work, and less than a third of sports clubs even responded. The pushback from the RSOs that do care isn’t particularly strong.”

14. In reality, however, **NEVIN HALL**’s changes to the USG Bylaws contained no fewer than seven (7) undisclosed, substantive changes that either gave **NEVIN HALL** more power on USG or otherwise directly cemented his position on USG.
15. A non-exhaustive list of such changes made by **NEVIN HALL** are as follows (Ex. E):
 - a. Perhaps most egregiously, **NEVIN HALL** added a section giving E&R the ability to “exercise all powers within Article VIII § 6 of the USG Constitution not exercised by College Council.” Article VIII, § 6, in turn, states that “Members of the Undergraduate Student Government may be removed from office . . . by decision of the Judicial Council or a two-thirds vote of the College Council” and that “[t]he Chair of the Judicial Council shall have the authority to suspend for up to seven days an appointee to the Undergraduate Student Government.”
 - i. Cutting through the legalese: this means that **NEVIN HALL** directly gave himself—as Chair of E&R—the power to suspend any and all members of the Undergraduate Student Government, and that E&R can directly impeach members of the Undergraduate Student Government without going through College Council.
 - b. In a close second, **NEVIN HALL**—for the first time—gave “[t]he Chair of E&R [the power to] determine what legislation is licit,” essentially giving himself a super-veto over any acts of legislation. **NEVIN HALL** attempted to expand this power on April 28, 2025, as described *infra*.
 - c. In a close third, **NEVIN HALL** added a provision in the Bylaws—in direct contravention of the USG Constitution, which states that “[t]he College Council shall have the power . . . to establish all rules and procedures for all elections”—stating that College Council can only modify E&R’s Elections Code and House Rules *if it were to approve a change for five non-consecutive academic quarters*.
 - d. **NEVIN HALL** added a section giving E&R the power to “determine conflicts of interest and relevant mitigation procedures for all of USG, which it shall codify in directives as needed.” **NEVIN HALL** exercised this power for the first time earlier this quarter, and directed College Council members to submit to E&R statements concerning potential conflicts of interest.
 - e. **NEVIN HALL** effectively gave himself the power of acting parliamentarian, writing in Title III, § 1 and Title IV, § 1 that “in the event a parliamentarian is not employed, the Chair of E&R” shall decide matters of College Council procedure.

- f. **NEVIN HALL** added a section providing that USG’s internal “[s]taff services *shall* be available to E&R.” (emphasis added).
 - g. **NEVIN HALL** added a section giving E&R the power to sole interpret the USG Bylaws.³ Further, in direct contravention of Article XI, § 2 of the USG Constitution, Mr. Hall added a section giving E&R the power to interpret Article III, § 4 of the USG Constitution.
16. To reiterate, none of the seven (7) changes above were disclosed to College Council by **NEVIN HALL**.
17. College Council ultimately passed **NEVIN HALL**’s proposed changes on March 7, 2025. In doing so, however, College Council relied on **NEVIN HALL**’s material misrepresentations to the body.
18. In making material misrepresentations to College Council, **NEVIN HALL** violated the public trust and engaged in official misfeasance, thereby committing an impeachable offense.⁴

COUNT III:

Attempted Consolidation of Power Through Knowingly Making Materially Misleading Statements to College Council on April 28, 2025 – Violation of Public Trust and Malfeasance of Office (Against NEVIN HALL)

19. The General Allegations of this resolution are re-alleged and fully incorporated here by reference.
20. In Spring 2025, **NEVIN HALL** was appointed as the Vice President of Student Organizations (VPSO).
21. On April 28, 2025, **NEVIN HALL** appeared before College Council to present another set of changes he proposed to the USG Bylaws. Though the Bylaws resolution was nominally sponsored by Elijah Jenkins, the President of USG, **NEVIN HALL** was largely behind the content of the resolution itself: **NEVIN HALL** is the owner of the underlying document introduced to College Council, while Mr. Jenkins has since withdrawn his sponsorship of the Bylaws resolution, citing the fact that he “naively agreed without fully reading it and thought only my requested changes were there, but that’s not the case.”
22. As outlined in the meeting minutes, **NEVIN HALL** described his changes to College Council as follows:

³ Though **NEVIN HALL** first made this change in his November 13, 2023 resolution, College Council undid this change in May 2024. It seems to have found its way back into the Bylaws with this revision.

⁴ See *supra* note 2.

“I’m proposing a bylaws change. First, it delivers my draft recommendations [involving, presumably, the draft memorandum of understanding concluded between **NEVIN HALL** and the University of Chicago Library]. Second, it shifts the responsibility of making recommendations. And third, E&R will take over election turnout efforts. That’s a major change to how elections are run. I was on the phone with two former E&R chairs brainstorming this because, honestly, none of us wanted this job [of managing election turnout] as it stands.”

“Let’s at least hit the major changes. For example, in Title 4, Budget, it outlines when I have to notify you all about planned spending or allocation proposals. The timeline also includes all the things I need to report. If SGFC gets split in the future, this section outlines how that transition would work. But Section 22, which talks about rollover funds, was missing, so I rewrote the introduction to include confidentiality and records control. Basically, USG members will continue to respect confidentiality. Right now, there are thousands of shared documents with questionable usefulness. CC still retains the authority to approve an alternate if there’s no E&R Chair or Secretary.”

23. In reality, however, **NEVIN HALL**’s changes to the USG Bylaws contained no fewer than twelve (12) undisclosed, substantive changes that either gave **NEVIN HALL** more power on USG or otherwise directly cemented his position on USG.
24. A non-exhaustive list of such changes made by **NEVIN HALL** are as follows (Ex. F):
 - a. Perhaps most egregiously, **NEVIN HALL**—the current and incoming VPSO—changed the Bylaws so that the VPSO is (1) now a voting member of every finance committee, and (2) the default vice chair unless the committee determines otherwise.
 - b. In a close second, **NEVIN HALL** essentially gave the Chair of E&R (i.e., himself) a super-veto power over any acts of legislation that he does not like.
 - i. Specifically, while there is an existing section within the Bylaws that states that “[t]he College Council may not enact any legislation that contradicts the Constitution or these By-Laws, unless the legislation intends to amend, add onto, or otherwise alter the governing documents,” **NEVIN HALL** added a provision that gives “[t]he Chair of E&R [the power to] determine what legislation is licit under this section.”
 1. **NEVIN HALL**, as discussed *supra*, already expanded the powers of the Chair of E&R in March 2025, as there was no section referencing the power of the Chair of E&R to determine whether any legislation is licit before then.
 - c. **NEVIN HALL** added provisions in the Bylaws giving the VPSO (i.e., himself) the default power to (1) draft the budget, (2) compile and approve some sort of

binding USG-wide finance committee cost guideline, and (3) “maintain[] overall USG budget oversight and tracking.”

- d. **NEVIN HALL** added a provision stating that College Council Representatives “shall adhere to . . . E&R’s directives regarding conflicts.” In other words, he is now directly subjecting members of College Council to the whims of E&R even after elections season.
 - e. **NEVIN HALL** gave E&R—and removed from College Council—the power to remove College Council members with two or more absences, in direct contravention of the USG Constitutional provisions governing impeachment.
 - f. **NEVIN HALL** added a provision binding Cabinet meetings to Robert’s Rules.
 - g. **NEVIN HALL** added a provision giving the VPSO the ability to define when finance committee and CORSO members “no longer holds the qualifications of membership.”
 - h. **NEVIN HALL** added a section requiring Finance Committees to publish a series of documents covering (1) “the procedures and protocols for funding RSOs,” (2) “overall gunding [sic] philosophy,” (3) “SGFC committee-specific by-laws,” and (4) “SGFC cost guide.” These documents can only be published, however, with the “advice and consent of the VPSO.”
 - i. **NEVIN HALL** gave VPSO the sole authority to appoint CORSO members; previously, it was a decision of both the CORSO chair and VPSO.
 - j. **NEVIN HALL** gave the VPSO the sole authority to determine whether summer SGFC may depart from the SGFC guidelines; previously, it was a decision of both the SGFC chair and VPSO.
 - k. **NEVIN HALL** gave a section stating that “[v]otes on motions of impeachment or constitutional interpretation must be announced in a published agenda at least three weeks prior to the vote taking place.” This change, however, is less egregious than a change on March 7, 2025, discussed *supra*, that prevents E&R members from being impeached altogether.
 - l. Amusingly, **NEVIN HALL** transferred the power of adjudicating conflicts of interest—a power that, as discussed *supra*, he gave to himself—from E&R (himself) to the VPSO (himself).
25. To reiterate, none of the seven (7) changes above were disclosed to College Council by **NEVIN HALL**.
26. Apart from simply not providing College Council with a redlined version of his changes, **NEVIN HALL** disabled all downloading and copying from the document containing his proposed Bylaws changes. Upon information and belief, this was done to make it difficult for College Council members to compare the existing Bylaws to his new, “revised” version.
27. In making material misrepresentations to College Council, **NEVIN HALL** violated

the public trust and engaged in official misfeasance, thereby committing an impeachable offense.⁵

COUNT IV:

Knowingly Making Materially False Statements to College Council – Violation of Public Trust and Malfeasance of Office (Against NEVIN HALL)

28. The General Allegations of this resolution are re-alleged and fully incorporated here by reference.
29. When concerns about **NEVIN HALL's** November 13, 2023 Bylaws changes were raised to him on a May 5, 2025 College Council meeting, **NEVIN HALL** defended himself by stating (1) that he met with Jefferson Lind, President of Undergraduate Student Government for the 2023-2024 academic year at a diner in Texas to discuss changes to the Bylaws, (2) that, as a part of some agreement **NEVIN HALL** made with Mr. Lind, Mr. Lind agreed to exempting E&R from impeachment in exchange for E&R taking on “certain responsibilities that [Mr. Lind] did not want to take on,” and (3) that Mr. Lind either requested or was otherwise in favor of him not disclosing these—and other changes increasing the power of E&R—to College Council.
- a. When Mr. Lind was contacted for comment, though he confirmed that he and **NEVIN HALL** did meet at a diner in Texas, Mr. Lind stated the following (Ex. G):
- “I don’t remember for certain any element of that meeting since it was almost two years ago now and I don’t have any notes, but I would be very surprised if a hard agreement was made. *I probably said that sounded like a reasonable idea in theory. I certainly didn’t ‘sign’ anything, nor do I feel I would have the singular authority to. At the time, I think I recall us both being interested in finding a way for E&R to function as more of a rules interpretation body than it currently does. But that’s different from a promised safeguard or anything. And that would be pending drawing up the particulars of such a plan.*”
- “If he said ‘I don’t think I wanna bring this to College Council yet,’ I might have agreed. I would be in favor of him preparing change proposals in depth before bringing them to CC. *I certainly would not have supported keeping CC in the dark about it once it’s time to consider those actual changes. Basically, any expression of not wanting to bring it to College Council would be an expression of me either feeling that it’s not time to make such a change yet or we need to get our ducks in a row before we propose such a change. It would not be to obfuscate any changes to the system anyone was trying to put into action. And I don’t*

⁵ See *supra* note 2.

think I was entirely in favor of whatever these changes would have been anyway, I just was open to him developing proposals and probably had some favorable interest in the principles behind many of them.”

30. When concerns about **NEVIN HALL**’s March 7, 2025 and April 28, 2025 Bylaws changes were raised to him on a May 5, 2025 College Council meeting, **NEVIN HALL** claimed that a number of the Bylaws changes came under recommendation by Jian Park, Nevin’s immediate predecessor.
 - a. When Jian Park was contacted for comment, he stated the following: “I don’t really remember recommending any changes, the only one I remember is Nevin asked me to do some sports club fund changes that I brought up during fall quarter in cabinet” (Ex. H).
31. In knowingly making materially false statements to College Council, **NEVIN HALL** violated the public trust and engaged in official misfeasance, thereby committing an impeachable offense.⁶

COUNT V:

Abuse of Power on the Program Coordinating Council (PCC) – Violation of Public Trust and Malfeasance of Office (Against NEVIN HALL)

32. The General Allegations of this resolution are re-alleged and fully incorporated here by reference.
33. In or around May 2025, two separate complaints from members of PCC were received by the President of USG and forwarded to College Council for review.
34. In the first complaint, a member of PCC (“PCC Member #1”) wrote to College Council to “express grave concern and firm support for the immediate impeachment of **Nevin Hall** from his current positions within the Undergraduate Student Government.”
 - a. Continuing, PCC Member #1 writes that “The grounds for this action are not abstract nor ideological. They are practical, urgent, and reflective of a troubling pattern of conduct that undermines the foundational principles of student governance: accountability, professionalism, and stewardship of student resources” (Ex. B).
35. PCC Member #1 notes how “**Mr. Hall** has instead wielded discretionary authority in a manner that is selective, opaque, and chillingly indifferent to the standards of fairness. RSOs have reported the withholding of funds without adequate explanation or engagement, despite the clarity of their budgets and timelines” (Ex. B).
36. PCC Member #1 further notes how “the appeals process under **Mr. Hall’s** oversight

⁶ See *supra* note 2.

has become unclear and increasingly concentrated in his own hands. Such centralization of power in the absence of clarity is both dangerous and antithetical to the principles of transparent student governance. Rather than empowering RSOs with clear recourse or equitable redress, **Mr. Hall** has created an atmosphere in which grievances are buried, and authority is hoarded” (Ex. B).

37. PCC Member #1 further notes that “**Mr. Hall** has demonstrated a consistent disregard for timely procedure and professional standards. Communications delayed, and critical meetings have been conducted in a tone more befitting contempt than collegial governance. His own words betray an alarming attitude: ‘I enjoy being a USG bureaucrat because I can do what I want without getting impeached.’ This is not the language of a servant-leader. It is the admission of someone who views institutional power as a personal shield rather than a public trust” (Ex. B).
38. PCC Member #1 finally notes that **NEVIN HALL’s** “failure to engage constructively with summer budgets, for instance, is not an isolated lapse. It is emblematic of a broader pattern of neglect that directly harms student initiatives across campus and erodes the presence of arts at UChicago” (Ex. B).
39. In the second complaint, another member of PCC (“PCC Member #2”) notes that “During our meetings, conversations were frequently sidetracked, and there was a noticeable lack of structure. At times, side comments detracted from the professionalism of the space” (Ex. C).
40. PCC Member #2 further notes that “While I understand that this is a student-led space, the combination of minimal onboarding, inconsistent professionalism, and a lack of discussion structure made for a disorienting first experience in student government” (Ex. C).
41. By “wield[ing] discretionary authority in a manner that is selective, opaque, and chillingly indifferent to the standards of fairness” and by “creat[ing] an atmosphere in which grievances are buried, and authority is hoarded,” **NEVIN HALL** engaged in abuses of power. Because these abuses of power violated the public trust and constitutes malfeasance of office, **NEVIN HALL** committed an impeachable offense.

COUNT VI:

Abuse of Power on the Committee on Academic Teams (CAT) – Violation of Public Trust and Malfeasance of Office (Against NEVIN HALL)

42. The General Allegations of this resolution are re-alleged and fully incorporated here by reference.
43. In or around May 2025, a complaint from a member of CAT was received by the President of USG and forwarded to College Council for review.
44. In the complaint, the member of CAT (“CAT Member #1”) notes that:

Nevin frequently referenced the amount of power he holds, in ways that served to undermine the authority and contributions of others. During a preparatory meeting before we began meeting with RSOs, **Nevin** mentioned that he holds two positions in USG: VPSO and Head of Elections(?). Throughout the week of RSO meetings, he repeatedly referenced these roles in discussions when RSOs were not present, implying that his positions gave him outsized influence. He mentioned his power of the final vote frequently, how he gets bonus votes because of his two positions, and how he could make any executive decision by himself. He also stated that the absentee ballots, the votes of members unable to attend meetings, were essentially “his,” suggesting he could control the outcomes regardless of discussion. It was clear from these comments that he believed, and intended to communicate, that his opinion would ultimately determine the results.

45. CAT Member #1 further noted that:

Nevin expressed clear personal biases about various RSOs prior to our meetings with them. For example, he spoke positively about Robotics, saying he was a “big fan” of their budget proposal from the previous year, and indicated that if he chose to use the “equipment fund,” it would likely go to them, even before we had met with any RSOs. In contrast, he expressed strong negative opinions about CHOMUN, Mock Trial, and Debate, describing them as “annoying” and overly large in terms of presenters (CHOMUN). Prior to CHOMUN’s presentation, he warned the committee about them and, during the meeting, aggressively questioned their fundraising and budgeting practices. Afterward, he commented that he was surprised they “folded so quickly” to his aggression. These remarks appeared to influence the perspectives of the two first-year committee members, who consistently echoed his positions and attitudes on these organizations.

46. CAT Member #1 further noted that:

Nevin demonstrated a general disregard for due process, often dominating discussions and steering them to align with his own views. During one deliberation following an RSO presentation, the committee member responsible for taking minutes raised a legitimate concern about how the RSO had calculated their fundraising, noting that it differed from the standard approach used by others and could affect their allocation. **Nevin** did not care about his difference and dismissed the point, eventually cutting off the conversation and initiating a vote mid-discussion. As a result, the budget passed in the manner **Nevin** preferred, without full debate or understanding. After the discussion, it was clear that the two freshmen members of the committee did not understand what the opposing argument was. In another instance, **Nevin** made a strongly negative comment about an RSO, then explicitly asked for it to be excluded from the meeting minutes.

47. By “frequently referenced the amount of power he holds[] in ways that served to

undermine the authority and contributions of others” and by “demonstrate[ing] a general disregard for due process,” **NEVIN HALL** engaged in abuses of power. Because these abuses of power violated the public trust and constitutes malfeasance of office, **NEVIN HALL** committed an impeachable offense.

COUNT VII:

Abuse of Power on the Elections and Rules Committee (E&R) – Violation of Public Trust and Malfeasance of Office

(Against NEVIN HALL, AIDEN LONG, AYL A EICHLER, and EVAN SPEAR)

48. The General Allegations of this resolution are re-alleged and fully incorporated here by reference.
49. In or around March 2024, a member of College Council (“CC Member #1”) sought to consult **NEVIN HALL** on a potential USG Constitutional referendum he wanted to propose. This referendum, in relevant part, would have removed certain powers from E&R and transferred such powers to a newly established body within USG. However, **NEVIN HALL** had introduced a similar resolution a month earlier, in February 2024.
50. During these consultations, which took place over the course of approximately three months, **NEVIN HALL**—in his official capacity as Chair of E&R—strenuously objected to many of the changes proposed by CC Member #1 and recommended that CC Member #1 introduce to College Council the version of the resolution **NEVIN HALL** previously drafted.
51. Though both **NEVIN HALL** and CC Member #1’s drafts would have formally established a Judicial Council within USG, CC Member #1 believed that **NEVIN HALL’s** version of the referendum was irreconcilably different from the version of the Judicial Council he envisioned.
 - a. Specifically, **NEVIN HALL’s** proposal, to the best of CC Member #1’s recollection, created a body that would—much like E&R—lack meaningful democratic safeguards and substantial transparency.
52. Thus, CC Member #1 refused to introduce **NEVIN HALL’s** version of the Judicial Council referendum to College Council.
53. In a subsequent meeting with CC Member #1, **NEVIN HALL** continued his attempt to strongarm CC Member #1 into either introducing **NEVIN HALL’s** version of the resolution or dropping the idea of creating a Judicial Council altogether.
54. In attempting to intimidate CC Member #1, **NEVIN HALL**, much like with CAT Member #1, bragged about how much power he had on USG. Specifically, **NEVIN HALL** described how—should he want to—he had the power to effectively “fix” elections by disqualifying all but one candidate or slate. **NEVIN HALL** further bragged to CC Member #1 that the Elections and Rules Committee was comprised almost exclusively of his personal friends, leading to him being able to personally exercise significant authority over the elections process.

55. Upon information and belief, these friends are **AIDEN LONG**, **AYLA EICHLER**, and **EVAN SPEAR**.
56. In attempting to intimidate CC Member #1, **NEVIN HALL** advised CC Member #1 that the Elections and Rules Committee would “throw a wrench” into the referendum process should CC Member #1’s Judicial Council resolution be introduced unmodified.
57. CC Member #1, after hearing **NEVIN HALL**’s comments, immediately conveyed these comments to College Council and introduced a series of resolutions that limited the ability of the Elections and Rules Committee to remove referenda items from the ballot. These resolutions, alongside CC Member #1’s proposed Judicial Council resolution, passed College Council unanimously. CC Member #1, however, overlooked the power of the Elections and Rules Committee to invalidate referenda after the fact. As a result, **NEVIN HALL** threw his wrench successfully.
58. After **NEVIN HALL**’s attempts to convince College Council to remove the referendum from the ballot itself was unsuccessful, **EVAN SPEAR**, acting at the direction of **NEVIN HALL** upon information and belief, filed a complaint in E&R seeking the invalidation of the Judicial Council referendum.
59. Under the *Elections Code* promulgated by the Elections and Rules Committee, the Elections and Rules Committee is required to notify the student body of a proposed constitutional referendum three weeks before voting starts. It is the responsibility of the Elections and Rules Committee to ensure that such an email is timely sent. Voting was scheduled to start on October 28, 2024, and the notification email was sent on October 7, 2024—21 days, or three weeks, before voting starts.
60. **EVAN SPEAR**’s complaint—which, upon information and belief, was filed at the direction of **NEVIN HALL**—alleged that because the email was sent at 4:57pm instead of 8:00am, the entire act of referendum had to be invalidated.
61. CC Member #1’s act of referendum passed, with 85.6% of students voting in favor.
62. After CC Member #1’s act of referendum passed, **AIDEN LONG**, **AYLA EICHLER**, and **EVAN SPEAR**—personal friends of **NEVIN HALL** and, upon information and belief, acting at the informal direction of **NEVIN HALL**—voted to invalidate the referendum in its entirety, despite the sending of a timely notification being the responsibility of E&R.
63. Fast-forwarding to 2025, after College Council voted to request **NEVIN HALL**’s resignation as the Chair of E&R—upon information and belief—**AIDEN LONG**, **AYLA EICHLER**, and **EVAN SPEAR** filed a complaint with the Elections and Rules Committee seeking to nullify the Spring 2025 election results at the direction of **NEVIN HALL**.
64. Upon information and belief, **AIDEN LONG**, **AYLA EICHLER**, and **EVAN SPEAR**, at the direction of **NEVIN HALL**, intended to vote to nullify the Spring 2025 election results on May 8, 2025 in direct response to College Council requesting **NEVIN HALL**’s resignation.

65. By exercising their power on the Elections and Rules committee in an arbitrary, capricious, and vindictive fashion, **NEVIN HALL, AIDEN LONG, AYL A EICHLER,** and **EVAN SPEAR** engaged in abuses of power. Because these abuses of power violated the public trust and constitutes malfeasance of office, **NEVIN HALL, AIDEN LONG, AYL A EICHLER,** and **EVAN SPEAR** committed impeachable offenses.

COUNT VIII:

Denying Members of Undergraduate Student Government Access to Essential Documents – Violation of Public Trust and Neglect of Office

(Against NEVIN HALL)

66. The General Allegations of this resolution are re-alleged and fully incorporated here by reference.
67. On Monday, May 5, 2025, College Council voted to request that **NEVIN HALL** resign from his position as Chair of the Elections and Rules Committee.
68. Almost immediately, **NEVIN HALL** began removing the access of Undergraduate Student Government members to essential documents.
69. Upon information and belief, **NEVIN HALL** removed the access of a PCC member (“PCC Member #3”) to the PCC 2024-2025 Google Drive shortly after College Council requested **NEVIN HALL’s** resignation. PCC Member #3, upon noticing the loss of access, emailed **NEVIN HALL** at 9:56am on Tuesday, May 6, 2025, requesting that he again be granted access to the shared Google Drive (Ex. I).
70. In his email, PCC Member #3 stated that he “cannot make a decision on appeals without” access to the PCC drive, and that, “[a]s a sitting member of the PCC, [he] believe[s] [he is] entitled to access the relevant minutes and internal documents associated with our committee’s deliberations” (Ex. I).
71. In his response, **NEVIN HALL** invoked his power as chair to unilaterally “come to this determination,” adding that the committee member was “welcome to appeal to the Vice President of Student Organizations if you don’t agree with my interpretation.” In other words, **NEVIN HALL** recommended that PCC Member #3 appeal a decision from **NEVIN HALL** to **NEVIN HALL**.
72. Upon information and belief, apart from simply removing the access of PCC Member #3 to the shared PCC drive, **NEVIN HALL** has made private the entirety of the shared PCC and CAT drives.
73. Upon information and belief, **NEVIN HALL** has removed the access of every individual of Undergraduate Student Government to the USG Finance Report he submitted for College Council review on April 20, 2025 (Ex. J).
74. Upon information and belief, **NEVIN HALL** has removed the access of every individual of Undergraduate Student Government to the CAT Budget he submitted for College Council review on May 3, 2025 (Ex. J).

75. Upon information and belief, **NEVIN HALL** has removed the access of every member of the public from (1) the Elections Code, (2) the House Rules, (3) the Candidates' Packets, and (4) past elections results and E&R rulings (Ex. J).
76. By denying members of Undergraduate Student Government and the public access documents essential to the functioning of USG, **NEVIN HALL** has neglected his office and committed a violation of public trust, thereby committing an impeachable offence (Ex. J).