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New Member Educator Faces Felony Charge

Timothy M. Burke, Fraternal Law Partners, tburke@manleyburke.com

The March 2026 issue of the Fraternal Law Newsletter reported on the alleged hazing death of Colin Daniel Martenez.[1] Martenez had been a freshman student at Northern Arizona University and a pledge of Delta Tau Delta.

A Coconino County grand jury indicted Carter Thomas Eslick who was the New Member Educator of the Chapter. In Arizona, hazing is a class one misdemeanor "except that if the hazing results in a person's death, it is a class four felony."[2] 1. He faces a potential penalty of between one and three and 3/4 years in prison. While both the Vice President and Treasurer of the Chapter were also initially arrested for suspicion of hazing, thus far, Eslick is the only one to be indicted.

Eslick pled not guilty in early April. At that time, the judge ordered that he cannot leave the state of Arizona, may not use illegal drugs or alcohol, and may not contact the family of Colin Martenez.

The Coconino County Attorney, Ammon Barker, is quoted as saying "[t]he loss of a young person is always a tragedy. Our hearts are with Colin Martenez's family, and we will diligently pursue this case toward a just resolution."[3]

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[1] Timothy M. Burke, *Possible Criminal Liability Takes Center Stage After NAU Hazing Death*, 193 Fraternal L. 1 (March 2026).
[2] A.R.S. 13-1315.
[3] https://azfreenews.com/2026/04/nau-pledge-master-indicted-for-hazing

Wilberforce University Undergraduate Dies from Ritual Alcohol Laden Hazing

Timothy M. Burke, Fraternal Law Partners, tburke@manleyburke.com

Savanna Jones, an 18-year-old freshmen student at Wilberforce University, died under somewhat mysterious circumstances in April of this year. At that time, University President Vann R. Newkirk issued a letter indicating appropriate authorities were investigating.

Now, a lawsuit filed on June 23, 2026, in the Court of Common Pleas in Greene County, Ohio[1], may provide an explanation. The suit, brought by the parents of Jones, alleges that she died as a result of alcohol abuse related to a campus hazing event.

Jones was a member of the university band known as the "Hounds of Sound." She sought to join an organization known as the Turtle Club composed of members of the band and others who qualified for membership by engaging in a "Turtle Crossing." The Crossing apparently involved drinking copious amounts of alcohol while answering questions or riddles. According to the lawsuit, Jones consumed a great deal of alcohol, was carried across campus and left in her dorm room.

The lawsuit names as defendants Wilberforce University, university staff member Keigan Evans, and student Donovan Callahan. According to the complaint, Evan is the University's Director of Housing & Residence Life and Callahan allegedly led the hazing ritual which led to Jones' death. Thirty unnamed individuals, half alleged to be university staff and half students, are also included as defendants whose identities will presumably be learned as a part of the discovery

[1] *Estate of Jones v. Wilberforce University*, Case No. 2026CV0595 (Greene County Ohio Common Pleas Court filed June 23, 2026).

process in the litigation. Civil charges brought by Jones' estate include violations of Ohio's Anti-Hazing Law 2307.44, negligence on the part of the University, neglect of student housing, and vicarious liability.

No results of a police or university investigation or a coroner's report have been released.

Ohio's Anti-Hazing Law allows a person subject to hazing under the state's criminal statute to commence a civil action for injury as a result of such hazing.[2] At this time, no criminal charges have been filed in Green County against any of the named or unnamed individuals. Ohio's criminal hazing statute makes any person who recklessly participates in the hazing of another "when the hazing includes coerced consumption of alcohol or drugs of abuse resulting in serious physical harm to the other person" or any administrator of an educational institution who recklessly permits the hazing of any person "when the hazing includes coerced consumption of alcohol or drugs of abuse resulting in serious physical harm to that person" commits a felony of the third degree.[3] Conviction of a third degree felony carries a variety of potential prison sentences ranging from 9 to 36 months and a fine of up to $10,000.[4]

[2] ORC § 2307.44.
[3] ORC § 2903.31.
[4] ORC § 2929.14.

Louisiana's Caleb Wilson Anti-Hazing Law Expands Reporting Duties for Student Organizations and Institutions

Megan Suckow,[1] Fraternal Law Partners, megan.suckow@manleyburke.com

On May 30, 2026, Louisiana Governor Jeff Landry signed the Caleb Wilson Hazing Prevention Act (the "Act"), a significant amendment to the state's hazing framework for postsecondary institutions and student organizations. The Act, which passed unanimously in both chambers of the Louisiana legislature, amends and reenacts La. R.S. 17:1801 and repeals La. R.S. 17:1801.1. The legislation was enacted following the death of Caleb Wilson, a Southern University undergraduate student who died in connection with an alleged off-campus hazing incident involving members of Southern University's Omega Psi Phi chapter.[2] The Act takes effect August 1, 2026.[3]

While the Act includes several prevention-focused provisions – including education, training, online reporting, and public disclosure requirements – its most immediate significance for fraternities, sororities, and their national organizations is the expansion and clarification of hazing reporting obligations under Louisiana state law.

The Act defines "organization" broadly. The term includes fraternities, sororities, associations, athletic teams, bands, clubs, service groups, social groups, spirit groups, and similar organizations whose members are primarily students or former students of a postsecondary

[1] Megan is a second-year student at the University of Cincinnati College of Law and is a law clerk at Manley Burke, LPA.
[2] FOX 8 Staff, *Gov. Landry signs Caleb Wilson Hazing Prevention Act into law*, WAFB 9 (May 30, 2026 at 3:35 PM EDT), https://www.wafb.com/2026/05/30/gov-landry-signs-caleb-wilson-hazing-prevention-act-into-law/.
[3] 2026 Act No. 309 was originally introduced to the Louisiana House of Representatives as House Bill No. 636 during the 2026 Regular Session.

institution.[4] Importantly, the definition also includes any national, regional, or parent organization of which the campus organization is a sanctioned, recognized, or affiliated member at the time of the hazing incident.[5] This language makes the reporting framework relevant not only to local chapters but also to national fraternity headquarter. Other affiliated organizations may also be subject to these reporting requirements.

The Act creates a direct reporting obligation for organizations. If an organization has taken disciplinary action against one of its members, representatives, or officers for hazing, or if the organization has reason to believe any member participated in a hazing incident, the organization must report the incident to law enforcement, in accordance with the state's criminal hazing statute, and to the institution with which it is affiliated.[6] This provision is significant because it does not require a final adjudication before reporting is required; the trigger is either disciplinary action or reason to believe a member participated in hazing.

The Act also addresses discipline imposed by a parent organization. If an organization – or any of its members, representatives, or officers – has been disciplined by a parent organization for hazing, the organization must report the hazing for which it was disciplined to the affiliated institution.[7] Notably, a "parent organization" is not explicitly synonymous with "national organization" as defined within the section. "Parent" or "national" affiliations and distinctions aside, the legislation clearly intends to create an institutional reporting requirement for national fraternities and sororities to report chapter disciplinary actions to the college or university.

[4] LA. R.S. 17:1801.A(3)(a). All statutory referenced contained herein shall be effective August 1, 2027.
[5] LA. R.S. 17:1801.A(3)(b).
[6] LA. R.S. 17:1801.C(1).
[7] LA. R.S. 17:1801.C(2).

The criminal hazing statute, La. R.S. 14:40.8, remains unaltered. It provides that if a representative or officer of an organization – including a representative, director, trustee, or officer of a national or parent organization – know and fails to report to law enforcement that one or more members were hazing another person, the organization may face penalties.[8] The report must be made "as soon as practicable under the circumstances."[9] The information reported to law enforcement must include all details received by the organization concerning the alleged incident, with no information redacted, including the names of all individuals alleged to have committed the hazing.[10]

Institutions also have independent reporting obligations. When an institution receives a report of alleged hazing from an organization, the institution must report the matter to law enforcement as required by the criminal hazing statute.[11] The institution's law enforcement report must include all information and details received by the institution, with no information redacted, including the names of all individuals alleged to have committed the hazing.[12] The institution must also document in writing all actions taken regarding the report, including the date the report was received; reports made to law enforcement; and information regarding the institution's investigation, processing, and resolution of the incident.[13]

The Act further requires institutions to maintain an online reporting system that allows third-party, confidential, or anonymous reports of witnessed or known hazing, regardless of whether the reporting person was directly affected.[14] The Act also requires good-faith reporting

[8] LA. R.S. 14:40.8.B(1)(a).
[9] *Id.*
[10] LA. R.S. 14:40.8,B(1)(b).
[11] LA. R.S. 17:1801.C(4)(a).
[12] *Id.*
[13] LA. R.S. 17:1801.C(4)(b).
[14] LA. R.S. 17:1801.D(2)(a).

protections and student amnesty for certain nonviolent conduct violations revealed through a good-faith hazing report.[15]

Together, these provisions create parallel reporting duties: organizations must report certain hazing information to law enforcement and the affiliated institution, while institutions must separately report received hazing allegations to law enforcement and document their response. Educational institutions must also implement educational programs and provide new student and annual educational information on the dangers and prohibitions of hazing beginning in Fall 2027.[16]

Noncompliance can carry serious consequences. Criminal charges for aside, an organization that violates the Act may face institutional discipline, including suspension, expulsion, deactivation, loss of recognition, or other sanctions.[17] If an organization's violation results in a death, the institution must banish the organization and prohibit it from re-chartering, re-establishing, or operating under any name, alias, or affiliated organization.[18] Institutions also face consequences for noncompliance, including a two-year prohibition on State Bond Commission authorization for the institution to incur debt subject to commission approval.[19]

For fraternities and sororities, the practical takeaway is clear: hazing reports cannot be treated as only internal conduct issues. Chapters and national organizations should ensure their policies clearly identify who is responsible for reporting disciplinary action and knowledge of hazing, when law enforcement must be contacted, what information must be included, and how reports to the institution will be documented. The Act also reinforces the need for coordination between chapter leadership, advisors, institutional officials, and national headquarters so that

[15] LA. R.S. 17:1801.D(2)(d).
[16] LA. R.S. 17:1801.B(3).
[17] LA. R.S. 17:1801(2)(E)(1)(b)(i).
[18] LA. R.S. 17:1801(2)(E)(1)(b)(ii).
[19] LA. R.S. 17:1801(2)(E)(1)(a).

reporting obligations are met promptly and without improper redaction or delay. The safest practice is to treat any credible hazing allegation as triggering immediate review for law enforcement reporting, institutional reporting, preservation of records, and national headquarters escalation.

Local House Corporation, Foundation Allege National Fraternity, Officers, Insurance Broker Engaged In "Conspiracy" Against Chapter

Alison C. Trianfo, Fraternal Law Partners, ali.trianfo@fraternallaw.com

A local fraternity house corporation and education foundation filed suit earlier this month against the national fraternity, three national officers, and its insurance broker alleging tortious interference with business expectancy, business conspiracy, and civil conspiracy in relation to the leasing practices.[1]

The plaintiffs, Alpha Kappa Housing Corporation (the "House Corporation") and Alpha Kappa Alumni Foundation (the "Foundation"), are two nonprofit corporations formed to support the Alpha Kappa Chapter of the Alpha Chi Sigma fraternity (the "Chapter") at the University of Virginia. According to court filings, the Foundation is the "parent" of the House Corporation. The Chapter is not party to the lawsuit.

Plaintiffs allege that the Alpha Chi Sigma Fraternity, a national professional chemistry fraternity (the "Fraternity"), its officers, and insurance broker conspired to deny the Chapter's

[1] Compl. *Alpha Kappa Housing Corporation and Alpha Kappa Alumni Foundation v. Alpha Chi Sigma Fraternity, Merryn Cole, Jason Ellis, Matthew Schnippert, and Holmes Murphy & Associates, LLC*, Case No. 3:26-cv-00060 (W.D. Virginia 10 June 2026).

insurance, placed the Chapter on probation as a result of an unsubstantiated and false hazing report, and intentionally provide unclear and ambiguous guidance to the Chapter which resulted in a "chilling effort on tenants" and "made the House an unattractive place to rent."[2] Plaintiffs further allege that defendants conspired with one another to make the Chapter's activities, and thus the House Corporation's rental operations, impossible.

The case has been filed in the U.S. District Court of the Western District of Virginia.

"Foreign Sources of Concern" and Florida's Charitable Solicitation Restrictions

Alison C. Trianfo, Fraternal Law Partners, ali.trianfo@fraternallaw.com

Recently, Florida enacted legislation prohibiting charitable organizations from soliciting or receiving contributions from certain "foreign sources of concern."[1] Florida Senate Bill 700, codified in Florida Statutes Chapter 496, applies to all charitable organizations and professional fundraising consultants and solicitors registered with the Florida Department of Agriculture and Consumer Services (the "Department').[2]

A "foreign source of concern" requires a connection to a "foreign country of concern."[3] Countries considered foreign countries of concern under Florida law include: the People's Republic

[2] Compl. at ¶ 54.

[1] Florida Senate Bill No. 700 (Chapter 2025-22, May 2025).

[2] If your charitable organization solicits in the state of Florida and is not registered with the Florida Department of Agriculture and Consumer Services, reach out to Manley Burke Compliance, LLC to discuss your organization's potential reporting requirements.

[3] Fla. Stat. §§ 286.101(1)(b), 496.404(13).

of China, the Russian Federation, the Islamic Republic of Iran, the Democratic People's Republic of Korea, the Republic of Cuba, the Venezuelan regime of Nicolás Maduro, and the Syrian Arab Republic.[4] Persons and entities associated, domiciled, or acting on behalf of any of these seven countries in conflict with the United States may be considered a "foreign source of concern" and thus prohibited from contributing to a charitable organization registered with the Department.[27]

A "foreign source of concern" specifically includes "any of the following:

(a) The government or any official of the government of a foreign country of concern;

(b) A political party or member of a political party or any subdivision of a political party in a foreign country of concern;

(c) A partnership, an association, a corporation, an organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country of concern, or a subsidiary of such entity;

(d) Any person who is domiciled in a foreign country of concern and is not a citizen or lawful permanent citizen of the United States;

(e) An agent, including a subsidiary or an affiliate of a foreign legal entity, acting on behalf of a foreign source of concern; or

(f) An entity in which a person, entity, or collection of persons or entities described in paragraphs (a)-(e) has a controlling interest. As used in this paragraph, the term "controlling interest"

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[4] *Id*. It is unclear whether Venezuela, now under the leadership of Acting President Delcy Rodríguez, former Vice President during the "regime of Nicolás Maduro," is still considered a "foreign country of concern."

[27] Fla. Stat. § 496.415(20).

means the possession of the power to direct or cause the direction of the management or policies of an entity, whether through ownership of securities, by contract, or otherwise. A person or an entity that directly or indirectly has the right to vote 25 percent or more of the voting interest of the company or is entitled to 25 percent or more of its profits is presumed to possess a controlling interest."[5]

Importantly, a foreign source of concern does not include U.S. citizens living or traveling abroad, persons from a country of foreign concern who are citizens or lawful permanent residents of the United States, or persons and entities described above who may be a foreign source but not connected with a foreign country of concern. It also does not include membership dues from an international student paid to fraternity or sorority.

The legislation also directs Florida to establish an "Honest Services Registry", an optional annual certification for registered charitable organization to attest that the organization complies with the new legislation and does not solicit or accept contributions, funding, support, or services from a foreign source of concern, and that the organization's message and content are not directly or indirectly produced or influenced by such foreign sources of such. Charitable organizations should not submit this optional attestation statement unless and until they review their records and practices to confirm that the organization complies with the requirements.[6]

[5] Fla. Stat. § 496.404(14).

[6] Florida Form FDACS-10123 is available on the Department's website and the attestation statement may be electronically signed by any officer and uploaded with the organization's annual charitable registration statement filed with the Department. https://forms.fdacs.gov/10123.pdf. (accessed June 29, 2026).

Fraternal Law Partners recommends organizations consider the following actions to analyze their risk and ensure compliance:

1. Review contact lists to identify potential foreign sources of concern for further investigation. If an individual or entity the organization is soliciting is found to be a foreign source of concern, remove from the contact list. If the organization has received contributions from this foreign source of concern, contact legal counsel.
2. Add a donor attestation or certification to the organization's online donation page and collect the donor's attestation that they are a U.S. citizens, lawful permanent U.S. resident, or not a foreign source of concern prior to making a contribution.
3. In coordination with an IT or electronic processing vendor, automatically reject online contributions from contributors who input billing addresses from a "foreign country of concern" until such contributor can be vetted and the organization may determine whether the contribution is allowable under law.
4. Request ownership information for corporate contributions not domiciled in the United States to confirm that not more than 25% of the entity's owners with a controlling interest are persons deemed a "foreign source of concern" and the entity is not formed under the laws of one of the above listed countries.

The state provides a "safe harbor" for the charitable organization's first violation of the statute if the charitable organization provides an attestation that a contribution solicited or accepted by the charitable organization was made by a foreign source of concern that falsely certified it was not a foreign country or source of concern, refunds the contribution within 30 days of notification and provides a receipt of such refund to the Department, and provides the Department with a "plan of action to prevent the acceptance of contributions for a foreign country or source of concern" in the

future.[7] Subsequent violations will result in penalties made at the discretion of the Department, which include, but are not limited to, Notice of Noncompliance, cancellation or suspension of registration, and administrative fine of up to $5,000 per violation (up to $10,000 per violation if fraud or deception is involved).[8]

Contact legal counsel for further guidance and questions related to these solicitation prohibitions and the Honest Services Registry.

Group Exemption Update: IRS Releases SGRI Form

Amy Hebbeler, Fraternal Law Partners, amy.hebbeler@manleyburke.com

In our March 2026 newsletter, we discussed the issuance of Revenue Procedure 2026-8 ("Rev. Proc. 2026-8"), which comprehensively updated the rules and procedures regarding group exemptions, and more specifically, the impact of Rev. Proc. 2026-8 on national organizations who currently hold a group exemption letter for their subordinate chapters and alumni associations.

Integral to that update were the revised Supplemental Group Ruling Information ("SGRI") annual reporting requirements which mandate that central organizations report changes to the Internal Revenue Service ("IRS") with respect to their subordinate organizations. Such reportable changes include: change in purpose, character, or method of operation; name and address changes; autorevocation of a subordinate organization; and additions or removal of subordinate organizations from the group exemption.

[7] Fla. Stat. § 496.415(20)(a).

[8] Fla. Stat. § 496.415(20)(b) (second or subsequent violation results in penalty); Fla. Stat. § 496.419(5).

In April 2026, the IRS released **Form 15644 Supplemental Group Ruling Information**, which was posted on the IRS website on May 29, 2026. This two-page form is now the required method to report group exemption annual reporting information to fulfill the SGRI reporting obligation under Rev. Proc 2026-8.

Importantly, Form 15644 not only requires that central organizations provide the change to subordinate information enumerated above, but other attestations related to the central organization's relationship with ALL subordinate organizations currently included on the group exemption. These attestations include: (a) each subordinate is under the general supervision or control of a central organization; (b) all subordinates are described under the same paragraph of section 501(c); (c) no subordinate is ineligible for inclusion, such as private foundations or foreign entities (see Form instructions for a comprehensive enumeration of ineligible categories); and (d) all subordinates included in the group exemption have adopted a uniform purpose statement.

Only central organizations should prepare and file Form 15644. Subordinated organizations, even which are affected by changes reported on Form 15644, should not submit this form to the IRS. Central organizations may note the following:

1. **Who:** A central organizations holding a group exemption must file an SGRI.
2. **When:** The Form must be submitted annually at least 30 days but no more than 90 days before the close of the central organization's annual accounting period.
3. **How:** At present, the Form must be submitted by FAX to the number set forth in the instructions. Note, organizations should confirm submission method before filing, as it is subject to change. Additionally, Rev. Proc. 2026-8 requires the SGRI be submitted electronically once the IRS publishes procedures for electronic submission.

4. **Frequency:** A central organization must submit this Form annually but may provide additional interim updates at any time.

Leadership of national organizations holding group exemptions should ensure that appropriate administrative protocols are established to meet these obligations in a timely and complete manner, given the potential consequences of noncompliance for the tax-exempt status of all subordinate organizations covered under the group exemption letter.

The purpose of Fraternal Law is to provide a discussion of fraternity law and legal issues impacting Greek organizations. Its contents are not intended to provide legal advice or address individual legal matters. Contact an attorney for legal advice regarding your organization's individual questions or concerns.

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