

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS—HARVARD FACULTY
CHAPTER, and AMERICAN ASSOCIATION
OF UNIVERSITY PROFESSORS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, et al.

Defendants.

Case No. 25-10910

**DECLARATION OF DANIEL SILVERMAN IN SUPPORT OF PLAINTIFFS' MOTION
FOR A TEMPORARY RESTRAINING ORDER**

I, Daniel H. Silverman, declare as follows:

1. I am a Partner at the law firm Cohen Milstein Sellers & Toll PLLC, and am duly licensed to practice in the State of Massachusetts (BBO# 704387).
2. I am counsel for Plaintiffs American Association of University Professors (“AAUP”) and American Association of University Professors—Harvard Faculty Chapter (“AAUP—Harvard”) in the above-captioned litigation.
3. I submit this declaration in support of Plaintiffs’ Motion for a Temporary Restraining Order, filed herewith.
4. Attached hereto as Exhibit 1 is a true and correct copy of a webpage from the 2025 presidential campaign website for Donald Trump, titled “Agenda47: Protecting Students from the Radical Left and Marxist Maniacs Infecting Educational Institutions” and dated July 17, 2023.

5. Attached hereto as Exhibit 2 is a true and correct copy of Executive Order 14188, titled “Additional Measures to Combat Anti-Semitism” and signed January 29, 2025.

6. Attached hereto as Exhibit 3 is a true and correct copy of a press release by the Department of Justice’s Office of Public Affairs, titled “Justice Department Announces Formation of Task Force to Combat Anti-Semitism” and dated February 3, 2025.

7. Attached hereto as Exhibit 4 is a true and correct copy of a press release by the Department of Education, titled “U.S. Department of Education's Office for Civil Rights Sends Letters to 60 Universities Under Investigation for Antisemitic Discrimination and Harassment” and dated March 10, 2025.

8. Attached hereto as Exhibit 5 is a true and correct copy of a press release by the Department of Education, titled “ED, HHS, and GSA Initiate Federal Contract and Grant Review of Harvard University” and dated March 31, 2025.

9. Attached hereto as Exhibit 6 is a true and correct copy of a letter from Alan M. Graber to the Members of the Harvard Community, titled “Our Resolve” and published March 31, 2025.

10. Attached hereto as Exhibit 7 is a true and correct copy of a letter from Josh Gruenbaum, Sean R. Keveney, and Thomas E. Wheeler to Alan M. Garber and dated April 3, 2025.

11. Attached hereto as Exhibit 8 is a true and correct copy of Harvard University’s financial overview for fiscal year 2024 and dated October 2024.

12. Attached hereto as Exhibit 9 is a true and correct copy of an article in the Harvard Crimson by Avani Rai and Saketh Sundar, titled “Harvard’s Federal Funding is Under Fire. Here’s What’s at Risk” and dated January 31, 2025.

13. Attached hereto as Exhibit 10 is a true and correct copy of a news article from the Harvard University Library website, titled “Pfister and Bradshaw receive NSF grant” and dated July 10, 2023.

14. Attached hereto as Exhibit 11 is a true and correct copy of an article by the Harvard University Graduate School of Design, titled “Holly Samuelson Awarded Started Grant Funding from the National Science Foundation” and dated March 22, 2024.

15. Attached hereto as Exhibit 12 is a true and correct copy of an article published on the FAS Research Computing page of Harvard University’s website, titled “Research Computing Part of \$5.3M NSF award for Advanced Cyberinfrastructure” and dated 2014.

16. Attached hereto as Exhibit 13 is a true and correct copy of an article published by the U.S. National Science Foundation, titled “Award Abstract No. 2421461 for Trailblazer: Biodegradable Living Materials” and dated 2024.

17. Attached hereto as Exhibit 14 is a true and correct copy of an article in The Boston Globe by Mike Damiano and Liz Kowalczyk, titled “Trump administration did not say which research projects were targeted in Harvard review. A government memo has answers” and dated April 4, 2025.

18. Attached hereto as Exhibit 15 is a true and correct copy of an article in the Harvard Crimson by Saketh Sundar, titled “Trump Admin’s \$9 Billion Review of Harvard’s Grants Could Hit Boston’s Hospitals Hardest” and dated April 4, 2025.

19. Attached hereto as Exhibit 16 is a true and correct copy of an article in the Harvard Gazette, titled “With federal funds, Harvard helps drive local economy” and dated March 1, 2020.

20. Attached hereto as Exhibit 17 is a true and correct copy of the declaration of Kirsten Weld, executed on April 11, 2025.

21. Attached hereto as Exhibit 18 is a true and correct copy of the declaration of Todd Wolfson, executed on April 11, 2025.

22. Attached hereto as Exhibit 19 is a true and correct copy of a press release by the U.S. General Services Administration, titled “DOJ, HHS, ED, and GSA announce initial cancellation of grants and contracts to Columbia University worth \$400 million” and dated March 7, 2025.

23. Attached hereto as Exhibit 20 is a true and correct copy of an article in The New York Times by Michael C. Bender and Sheryl Gay Stolberg, titled “Trump Administration Freezes \$1 Billion for Cornell and \$790 Million for Northwestern, Officials Say,” and dated April 8, 2025.

24. Attached hereto as Exhibit 21 is a true and correct copy of a letter from Josh Gruenbaum, Sean R. Keveney, and Thomas E. Wheeler to Dr. Katrina Armstrong, David Greenwald, and Claire Shipman dated March 13, 2025.

25. Attached hereto as Exhibit 22 is a true and correct copy of a post on Truth Social by Donald Trump dated March 4, 2025.

26. Attached hereto as Exhibit 23 is a true and correct copy of a transcript published on Hugh Hewitt and Duane Patterson’s website, titled “Leo Terrell, Senior Counsel to the Attorney General for Civil Rights, on Crushing Anti-Semitism on Campus” and dated March 19, 2025.

27. Attached hereto as Exhibit 24 is a true and correct copy of a webpage from the 2025 presidential campaign website for Donald Trump, titled “Agenda47: The American Academy” and dated November 1, 2023.

28. Attached hereto as Exhibit 25 is a true and correct copy of a press release by the Department of Justice, Office of Public Affairs, titled “Federal Task Force to Combat Antisemitism Announces Visits to 10 College Campuses that Experienced Incidents of Antisemitism” and dated February 28, 2025.

29. Attached hereto as Exhibit 26 is a true and correct copy of the declaration of Caroline Light, executed April 11, 2025.

30. Exhibit 27 is filed under seal pursuant to the contemporaneously filed Motion to Seal.

31. Attached hereto as Exhibit 28 is a true and correct copy of the declaration of Meredith Rosenthal, executed April 11, 2025.

32. Exhibit 29 is filed under seal pursuant to the contemporaneously filed Motion to Seal.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 11th day of April, 2025, in Boston, Massachusetts.

/s/ Daniel h. Silverman
Daniel H. Silverman (BBO# 704387)
COHEN MILSTEIN SELLERS & TOLL PLLC
769 Centre Street
Suite 207
Boston, MA 02130
(617) 858-1990

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent by certified mail on April 14, 2025 to the United States attorney for Massachusetts, the civil-process clerk at the United States attorney's office, and to the Attorney General of the United States at Washington, D.C, pursuant to Federal Rule of Civil Procedure 4(i).

/s/ Daniel Silverman

Daniel Silverman

EXHIBIT 1

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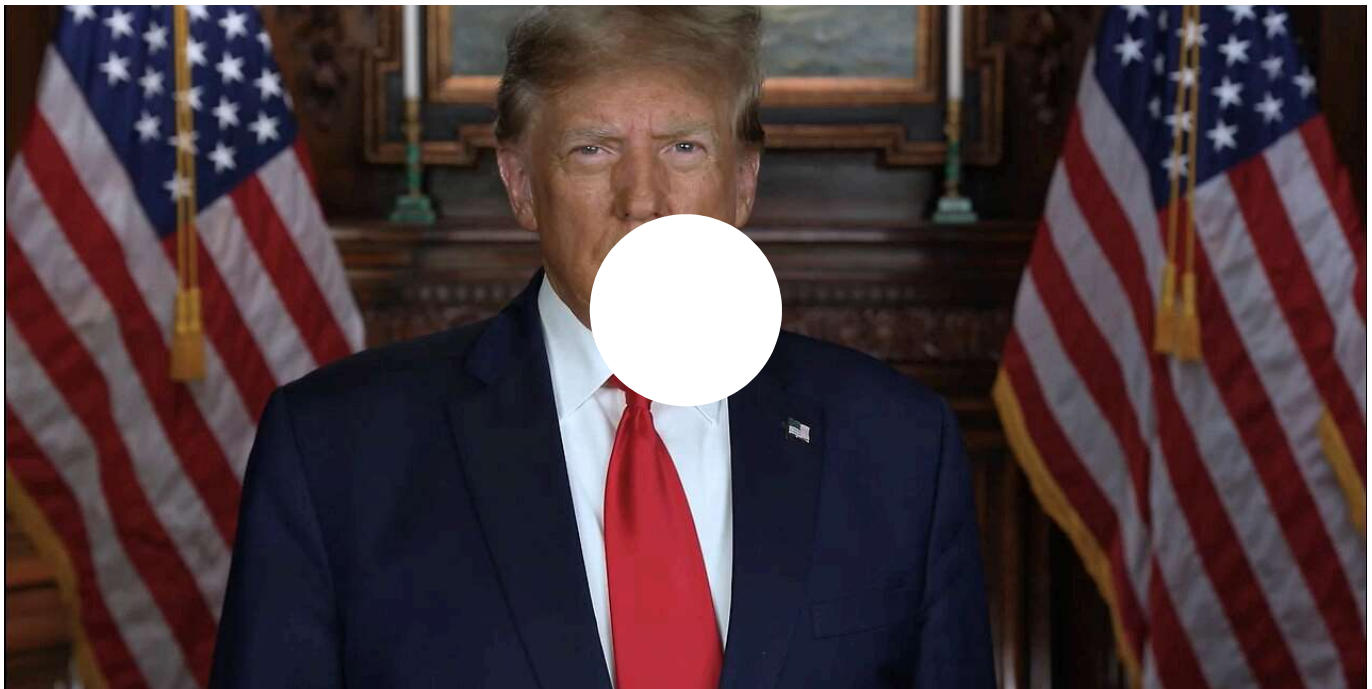
BACK TO VIDEOS

Agenda47: Protecting Students from the Radical Left and Marxist Maniacs Infecting Educational Institutions

July 17, 2023



Agenda47: Protecting Students from the Radical Left and Marxist Maniacs



Mar-a-Lago, FL— In an Agenda47 policy video, President Donald J. Trump announced his plan to reclaim our once great educational institutions from the

radical Left and Marxist maniacs.

President Trump will protect American students, impose real standards on higher education, and hold colleges and universities accountable.

"For many years, tuition costs at colleges and universities have been exploding, and I mean absolutely exploding while academics have been obsessed with indoctrinating America's youth," President Trump said. "The time has come to reclaim our once great educational institutions from the radical Left, and we will do that."

President Trump has pledged to fire the radical Left accreditors that have allowed our colleges to become dominated by Marxist Maniacs and Lunatics.

He will impose real standards on American colleges and universities, to include defending the American tradition and Western civilization, protecting free speech, eliminating wasteful administrative positions that drive up costs, removing all DEI bureaucrats, offering options for accelerated and low-cost degrees, providing meaningful job placement and career services, and implementing college entrance and exit exams to prove that students are getting their money's worth.

Once back in the White House, President Trump will direct the Department of Justice to pursue federal civil rights cases against schools that continue to engage in racial discrimination and will advance a measure to have schools that continue these illegal and unjust policies fined up to the entire amount of their endowment.

TRANSCRIPT

For many years, tuition costs at colleges and universities have been exploding, and I mean absolutely exploding while academics have been obsessed with indoctrinating America's youth. The time has come to reclaim our once great educational institutions from the radical Left, and we will do that.

Our secret weapon will be the college accreditation system. It's called accreditation for a reason.

The accreditors are supposed to ensure that schools are not ripping off students and taxpayers, but they have failed totally. When I return to the White House, I will fire the

radical Left accreditors that have allowed our colleges to become dominated by Marxist Maniacs and Lunatics.

We will then accept applications for new accreditors who will impose real standards on colleges once again and once and for all.

These standards will include defending the American tradition and Western civilization, protecting free speech, eliminating wasteful administrative positions that drive up costs incredibly, removing all Marxist diversity, equity, and inclusion bureaucrats, offering options for accelerated and low-cost degrees, providing meaningful job placement and career services, and implementing college entrance and exit exams to prove that students are actually learning and getting their money's worth.

Furthermore, I will direct the Department of Justice to pursue federal civil rights cases against schools that continue to engage in racial discrimination. And schools that persist in explicit unlawful discrimination under the guise of equity will not only have their endowment taxed, but through budget reconciliation, I will advance a measure to have them fined up to the entire amount of their endowment.

A portion of the seized funds will then be used as restitution for victims of these illegal and unjust policies, policies that hurt our country so badly. Colleges have gotten hundreds of billions of dollars from hard-working taxpayers and now we are going to get this anti-American insanity out of our institutions once and for all.

We are going to have real education in America.

Thank you.



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EXHIBIT 2

Federal Register

Vol. 90, No. 21

Monday, February 3, 2025

Presidential Documents

Title 3—

Executive Order 14188 of January 29, 2025

The President

Additional Measures To Combat Anti-Semitism

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered:

Section 1. *Purpose.* My Administration has fought and will continue to fight anti-Semitism in the United States and around the world. On December 11, 2019, I issued Executive Order 13899, my first Executive Order on Combating Anti-Semitism, finding that students, in particular, faced anti-Semitic harassment in schools and on university and college campuses. Executive Order 13899 provided interpretive assistance on the enforcement of the Nation's civil rights laws to ensure that they would protect American Jews to the same extent to which all other American citizens are protected. The prior administration effectively nullified Executive Order 13899 by failing to give the terms of the order full force and effect throughout the Government. This order reaffirms Executive Order 13899 and directs additional measures to advance the policy thereof in the wake of the Hamas terrorist attacks of October 7, 2023, against the people of Israel. These attacks unleashed an unprecedented wave of vile anti-Semitic discrimination, vandalism, and violence against our citizens, especially in our schools and on our campuses. Jewish students have faced an unrelenting barrage of discrimination; denial of access to campus common areas and facilities, including libraries and classrooms; and intimidation, harassment, and physical threats and assault. A joint report by the House Committees on Education and the Workforce, Energy and Commerce, Judiciary, Oversight and Accountability, Veterans' Affairs, and Ways and Means calls the Federal Government's failure to fight anti-Semitism and protect Jewish students "astounding." This failure is unacceptable and ends today.

Sec. 2. *Policy.* It shall be the policy of the United States to combat anti-Semitism vigorously, using all available and appropriate legal tools, to prosecute, remove, or otherwise hold to account the perpetrators of unlawful anti-Semitic harassment and violence.

Sec. 3. *Additional Measures to Combat Campus Anti-Semitism.* (a) Within 60 days of the date of this order, the head of each executive department or agency (agency) shall submit a report to the President, through the Assistant to the President for Domestic Policy, identifying all civil and criminal authorities or actions within the jurisdiction of that agency, beyond those already implemented under Executive Order 13899, that might be used to curb or combat anti-Semitism, and containing an inventory and analysis of all pending administrative complaints, as of the date of the report, against or involving institutions of higher education alleging civil-rights violations related to or arising from post-October 7, 2023, campus anti-Semitism.

(b) The report submitted by the Attorney General under this section shall additionally include an inventory and an analysis of all court cases, as of the date of the report, against or involving institutions of higher education alleging civil-rights violations related to or arising from post-October 7, 2023, campus anti-Semitism and indicate whether the Attorney General intends to or has taken any action with respect to such matters, including filing statements of interest or intervention.

(c) The Attorney General is encouraged to employ appropriate civil-rights enforcement authorities, such as 18 U.S.C. 241, to combat anti-Semitism.

(d) The report submitted by the Secretary of Education under this section shall additionally include an inventory and an analysis of all Title VI complaints and administrative actions, including in K–12 education, related to anti-Semitism—pending or resolved after October 7, 2023—within the Department’s Office for Civil Rights.

(e) In addition to identifying relevant authorities to curb or combat anti-Semitism generally required by this section, the Secretary of State, the Secretary of Education, and the Secretary of Homeland Security, in consultation with each other, shall include in their reports recommendations for familiarizing institutions of higher education with the grounds for inadmissibility under 8 U.S.C. 1182(a)(3) so that such institutions may monitor for and report activities by alien students and staff relevant to those grounds and for ensuring that such reports about aliens lead, as appropriate and consistent with applicable law, to investigations and, if warranted, actions to remove such aliens.

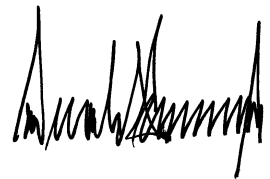
Sec. 4. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

A handwritten signature in black ink, appearing to be a stylized representation of a name, located in the lower right quadrant of the page.

THE WHITE HOUSE,
January 29, 2025.

EXHIBIT 3



PRESS RELEASE

Justice Department Announces Formation of Task Force to Combat Anti-Semitism

Monday, February 3, 2025

For Immediate Release

Office of Public Affairs

Pursuant to President Trump's Executive Order on Additional Measures to Combat Anti-Semitism, the Justice Department announced today the formation of a multi-agency Task Force to Combat Anti-Semitism. The Task Force's first priority will be to root out anti-Semitic harassment in schools and on college campuses.

In addition to the Department of Justice, the Task Force will include representatives from the U.S. Department of Education, U.S. Department of Health and Human Services, and other agencies as it develops. The Task Force will be coordinated through the Department's Civil Rights Division.

"Anti-Semitism in any environment is repugnant to this Nation's ideals," said Senior Counsel to the Assistant Attorney General for Civil Rights Leo Terrell, who will be heading the Task Force. "The Department takes seriously our responsibility to eradicate this hatred wherever it is found. The Task Force to Combat Anti-Semitism is the first step in giving life to President Trump's renewed commitment to ending anti-Semitism in our schools."

If you have been discriminated against, you can file a complaint with the Civil Rights Division, at [Contact the Civil Rights Division | Department of Justice \(https://civilrights.justice.gov\)](https://civilrights.justice.gov).

President Trump's Executive Order can be found here: [Additional Measures to Combat Anti-Semitism – The White House](#).

Updated February 3, 2025

Topic

CIVIL RIGHTS

Component

[Civil Rights Division](#)

Press Release Number: 25-132

Related Content

PRESS RELEASE

Justice Department Files a Proposed Statement of Interest Supporting Equal Access to Southwest Airlines Travel Program

The Justice Department filed a proposed [statement of interest](#) today in the U.S. District Court for the Northern District of Texas to make clear that federal law protects the equal...

April 10, 2025

PRESS RELEASE

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April 4, 2025

PRESS RELEASE

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Protecting the Second Amendment rights of ordinary, law-abiding Americans is a high priority for this Administration.

March 27, 2025



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EXHIBIT 4

U.S. Department of Education

[HOME](#) / [ABOUT US](#) / [NEWSROOM](#) / [PRESS RELEASES](#)**PRESS RELEASE**

U.S. Department of Education's Office for Civil Rights Sends Letters to 60 Universities Under Investigation for Antisemitic Discrimination and Harassment

Letters warn of potential enforcement actions if institutions do not fulfill their obligations under Title VI of the Civil Rights Act to protect Jewish students on campus.

MARCH 10, 2025

WASHINGTON – Today, the U.S. Department of Education's Office for Civil Rights (OCR) sent letters to 60 institutions of higher education warning them of potential enforcement actions if they do not fulfill their obligations under Title VI of the Civil Rights Act to protect Jewish students on campus, including uninterrupted access to campus facilities and educational opportunities. The letters are addressed to all U.S. universities that are presently under investigation for Title VI violations relating to antisemitic harassment and discrimination.

"The Department is deeply disappointed that Jewish students studying on elite U.S. campuses continue to fear for their safety amid the relentless antisemitic eruptions that have severely disrupted campus life for more than a year. University leaders must do better," said **Secretary of Education Linda McMahon**. "U.S. colleges and universities benefit from enormous public investments funded by U.S. taxpayers. That support is a privilege and it is contingent on scrupulous adherence to federal antidiscrimination laws."

The schools that received letters from the Office for Civil Rights include:

1. American University
2. Arizona State University
3. Boston University
4. Brown University
5. California State University, Sacramento
6. Chapman University
7. Columbia University
8. Cornell University
9. Drexel University
10. Eastern Washington University
11. Emerson College
12. George Mason University
13. Harvard University
14. Illinois Wesleyan University
15. Indiana University, Bloomington
16. Johns Hopkins University
17. Lafayette College
18. Lehigh University
19. Middlebury College
20. Muhlenberg College
21. Northwestern University
22. Ohio State University
23. Pacific Lutheran University
24. Pomona College
25. Portland State University
26. Princeton University
27. Rutgers University
28. Rutgers University-Newark
29. Santa Monica College
30. Sarah Lawrence College
31. Stanford University
32. State University of New York Binghamton
33. State University of New York Rockland
34. State University of New York, Purchase
35. Swarthmore College

36. Temple University
37. The New School
38. Tufts University
39. Tulane University
40. Union College
41. University of California Davis
42. University of California San Diego
43. University of California Santa Barbara
44. University of California, Berkeley
45. University of Cincinnati
46. University of Hawaii at Manoa
47. University of Massachusetts Amherst
48. University of Michigan
49. University of Minnesota, Twin Cities
50. University of North Carolina
51. University of South Florida
52. University of Southern California
53. University of Tampa
54. University of Tennessee
55. University of Virginia
56. University of Washington-Seattle
57. University of Wisconsin, Madison
58. Wellesley College
59. Whitman College
60. Yale University

Background:

The Department's OCR sent these letters under its authority to enforce Title VI of the Civil Rights Act (1964), which prohibits any institution that receives federal funds from discriminating on the basis of race, color, and national origin. National origin includes shared (Jewish) ancestry.

Pursuant to Title VI and in furtherance of President Trump's [Executive Order](#) "Additional Measures to Combat Antisemitism," the Department [launched directed investigations](#) into five universities where widespread antisemitic harassment has been reported. The 55 additional universities are under

investigation or monitoring in response to complaints filed with OCR. Last week, the Department, alongside fellow members of the Joint Task Force to Combat Antisemitism including the Department of Justice, the Department of Health and Human Services, and the U.S. General Services Administration, [announced the immediate cancelation](#) of \$400 million in federal grants and contracts to Columbia University due to the school's continued inaction to protect Jewish students from discrimination. Last Friday, OCR [directed its enforcement staff](#) to make resolving the backlog of complaints alleging antisemitic violence and harassment, many which were allowed to languish unresolved under the previous administration, an immediate priority.

CONTACT

Press Office | press@ed.gov | (202) 401-1576 | Office of Communications and Outreach (OCO)

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EXHIBIT 5

U.S. Department of Education

[HOME](#) / [ABOUT US](#) / [NEWSROOM](#) / [PRESS RELEASES](#)**PRESS RELEASE**

ED, HHS, and GSA Initiate Federal Contract and Grant Review of Harvard University

Measures include a comprehensive review of federal contracts and grants as part of an investigation aimed at eliminating anti-Semitic harassment on college campuses

MARCH 31, 2025

Today, the Departments of Education (ED), Health and Human Services (HHS), and the U.S. General Services Administration (GSA) announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. This review is part of the ongoing efforts of the Joint Task Force to Combat Anti-Semitism.

The Task Force will review the more than \$255.6 million in contracts between Harvard University, its affiliates and the Federal Government. The review also includes the more than \$8.7 billion in multi-year grant commitments to Harvard University and its affiliates to ensure the university is in compliance with federal regulations, including its civil rights responsibilities.

“Harvard has served as a symbol of the American Dream for generations – the pinnacle aspiration for students all over the world to work hard and earn admission to the storied institution,” **said Secretary of Education Linda McMahon.** “Harvard’s failure to protect students on campus from anti-Semitic discrimination – all while promoting divisive ideologies over free inquiry – has put

its reputation in serious jeopardy. Harvard can right these wrongs and restore itself to a campus dedicated to academic excellence and truth-seeking, where all students feel safe on its campus.”

Today’s actions by the Task Force follow a similar ongoing review of Columbia University. That review led to [Columbia agreeing to comply with 9 preconditions](#) for further negotiations regarding a return of canceled federal funds. This initiative strengthens enforcement of President Trump’s Executive Order titled [“Additional Measures to Combat Anti-Semitism.”](#) The Task Force ensures that federally funded institutions uphold their legal and ethical responsibilities to prevent anti-Semitic harassment.

The federal government will collaborate with relevant contracting agencies to assess whether Stop Work Orders should be issued for any identified contracts. Additionally, Harvard has been directed to submit a comprehensive list of all contracts—both direct and through affiliates—between their institution and the federal government that were not included in the initial review.

“The Task Force will continue its efforts to root out anti-Semitism and to refocus our institutions of higher learning on the core values that undergird a liberal education,” **said HHS Acting General Counsel and Task Force member, Sean Keveney**. “We are pleased that Harvard is willing to engage with us on these goals.”

Any institution found to be in violation of federal compliance standards may face administrative actions, including contract termination.

The Task Force remains committed to awarding federal funds responsibly and holding institutions accountable for taking decisive action against anti-Semitic harassment. GSA has been asked to facilitate the review of federal funding received by Harvard including grant and contract reviews across the Federal Government.

“Hate in any form goes against the foundational principles of America. While Harvard's recent actions to curb institutionalized anti-Semitism - though long overdue - are welcome, there is much more that the university must do to retain

the privilege of receiving federal taxpayer's hard earned dollars," **said FAS Commissioner and Task Force Member, Josh Gruenbaum**. "This administration has proven that we will take swift action to hold institutions accountable if they allow anti-Semitism to fester. We will not hesitate to act if Harvard fails to do so."

For more information, visit the announcement on the [formation of the Task Force to Combat Anti-Semitism](#) and read the [HHS, ED, and GSA joint press release](#) from Monday, March 3rd.

CONTACT

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EXHIBIT 6



HARVARD

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Our Resolve

Dear Members of the Harvard Community,

Earlier today, the federal government's task force to combat antisemitism issued a letter putting at risk almost \$9 billion in support of research at Harvard and other institutions, including hospitals in our community. If this funding is stopped, it will halt life-saving research and imperil important scientific research and innovation.

The government has informed us that they are considering this action because they are concerned that the University has not fulfilled its obligations to curb and combat antisemitic harassment. We fully embrace the important goal of combatting antisemitism, one of the most insidious forms of bigotry. Urgent action and deep resolve are needed to address this serious problem that is growing across America and around the world. It is present on our campus. I have experienced antisemitism directly, even while serving as president, and I know how damaging it can be to a student who has come to learn and make friends at a college or university.

For the past fifteen months, we have devoted considerable effort to addressing antisemitism. We have strengthened our rules and our approach to disciplining those who violate them. We have enhanced training and education on antisemitism across our campus and introduced measures to support our Jewish community and ensure student safety and security. We have launched programs to promote civil dialogue and respectful disagreement inside and outside the classroom. We have adopted many other reforms, and we will continue to combat antisemitism and to foster a campus culture that includes and supports every member of our community.

We still have much work to do. We will engage with members of the federal government's task force to combat antisemitism to ensure that they have a full account of the work we have done and the actions we will take going forward to combat antisemitism. We resolve to take the measures that will move Harvard and its vital mission forward while protecting our community and its academic freedom. By doing so, we combat bias and intolerance as we create the conditions that foster the excellence in teaching and research that is at the core of our mission.

Much is at stake here. In longstanding partnership with the federal government, we have launched and nurtured pathbreaking research that has made countless people healthier and safer, more curious and more knowledgeable, improving their lives, their communities, and our world. But we are not perfect. Antisemitism is a critical problem that we must and will continue to address. As an institution and as a community, we acknowledge our shortcomings, pursue needed change, and build stronger bonds that enable all to thrive. Our commitment to these ends—and to the teaching and research at the heart of our University—will not waver.

Sincerely,
Alan M. Garber

Published on March 31, 2025

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EXHIBIT 7



April 03, 2025

Dr. Alan M. Garber
President
Harvard University
Office of the President
Massachusetts Hall
Cambridge, MA 02138

Penny Pritzker
Lead Member, Harvard Corporation
Harvard Corporation
Massachusetts Hall
Cambridge, MA 02138

Dear Dr. Garber:

Please consider this a formal communication with respect to the current situation on the campus of Harvard University and a follow up to the March 31, 2025, letter from Commissioner Gruenbaum informing you that the United States Government would be reviewing Harvard's federal funding. Harvard has asked for a dialogue with the Task Force to discuss this ongoing review. Below, you will find several broad, non-exhaustive areas of reform that the government views as necessary for Harvard to implement to remain a responsible recipient of federal taxpayer dollars. We look forward to a meaningful dialogue focused on lasting, structural reforms at Harvard.

U.S. taxpayers invest enormously in U.S. colleges and universities, including Harvard University. These funds are an investment and, like any investment, are based on the recipient's performance, not owed as a matter of custom or right. It is the responsibility of the federal government to ensure that all recipients are responsible stewards of taxpayer funds. Harvard University, however, has fundamentally failed to protect American students and faculty from antisemitic violence and harassment in addition to other alleged violations of Title VI and Title VII of the Civil Rights Act of 1964. This letter outlines immediate next steps that we regard as necessary for Harvard University's continued financial relationship with the United States government.

- **Oversight and accountability for biased programs that fuel antisemitism.** Programs and departments that fuel antisemitic harassment must be reviewed and necessary changes made to address bias, improve viewpoint diversity, and end ideological capture.
- **Disciplinary reform and consistent accountability.** Harvard has an obligation to consistently and proactively enforce its existing disciplinary policies, ensuring that senior administrative leaders are responsible for final decisions. Reforms must include a

comprehensive mask ban (with medical and religious exemptions, given identification is always displayed) and a clarified time, place, and manner policy. Harvard must review and report on disciplinary actions for antisemitic rule violations since October 7, 2023.

- **Student group accountability.** Recognized and unrecognized student groups, and their leadership, must be held accountable for violations of Harvard policy.
- **Governance and leadership reforms.** Harvard must make meaningful governance reforms to improve its organizational structure to foster clear lines of authority and accountability, and to empower faculty and administrative leaders who are committed to implementing the changes indicated in this letter.
- **Merit-based admissions reform.** Harvard must adopt and implement merit-based admissions policies; cease all preferences based on race, color, or national origin in admissions throughout its undergraduate, graduate, and other programs; and demonstrate through structural and personnel action that these changes are durable.
- **Merit-based hiring reform.** Harvard must adopt and implement merit-based hiring policies; cease all preferences based on race, color, religion, sex, or national origin in hiring throughout its teaching and research faculty, staff, and leadership; and demonstrate through structural and personnel action that these changes are durable.
- **Diversity, Equity, and Inclusion (DEI) programs.** DEI programs teach students, faculty, staff, and leadership to make snap judgments about each other based on crude race and identity stereotypes, which fuels division and hatred based on race, color, national origin, and other protected identity characteristics. All efforts should be made to shutter such programs.
- **Cooperation with law enforcement.** Harvard must cooperate with law enforcement to ensure student safety.
- **Transparency and reporting to ED, DHS, and other federal regulators.** Harvard must comply fully with existing statutory reporting requirements under Section 117 of the Higher Education Act, commit to full cooperation with DHS and other federal regulators, and make organizational changes as necessary to enable full compliance.

We expect your immediate cooperation in implementing these critical reforms that will enable Harvard to return to its original mission of providing a high-quality education in a safe environment for *all* students through a focus on truth-seeking, innovative research, and academic excellence.

Sincerely,



Josh Gruenbaum
Comm'r of the Fed. Acquisition Serv.
General Services Administration



Thomas E. Wheeler
Acting General Counsel
U.S. Dept. of Education



Sean R. Keveney
Acting General Counsel
U.S. Dep't Health & Human Servs.

EXHIBIT 8

Financial Overview

From the Vice President for Finance and the Treasurer

This year's financial report for Harvard University offers much to unpack. While fiscal year 2024 brought its share of challenges, it was also a year of tireless efforts and initiatives, less in the spotlight, that continued to drive Harvard forward. This report reflects those efforts, which have strengthened the University's financial position and lay a robust foundation for progress.

The University generated an operating surplus of \$45 million on a revenue base of \$6.5 billion, which increased a robust 6% in fiscal year 2024. Demand for a Harvard education was evident in the strength of the undergraduate applicant pool (the fourth largest in Harvard's history) with the highest matriculation rate in five decades, along with an 8% growth in executive and continuing education programs, also referred to as Professional and Lifelong Learning (PLL). These programs—which span across all of Harvard's Schools and disciplines—offer expanded access to a world-class education, both on campus and virtually around the globe.

About 8% of fiscal year 2024 operating revenue came from gifts for current use, primarily payments on prior pledges. At over \$525 million, current use giving reached the second highest level in Harvard's history. While still surpassing \$1 billion of fundraising, such levels may not be sustainable looking forward. We are grateful to those who have continued to direct their philanthropy to the University as a reflection of their commitment to Harvard's academic mission.

Distributions from the endowment provided \$2.4 billion or 37% of total revenue for the year, a vital source of support. Seeded by 388 years of University supporters and stewarded by Harvard Management Company (HMC), Harvard's endowment funds propel the University's ability to advance its academic priorities. This year, Narv Narvekar and his colleagues at HMC generated a healthy 9.6% return.

These contributions made possible the University's ongoing commitment to affordability, as reflected in the more than \$749 million in financial aid across the University, including \$250 million for undergraduates enrolled in Harvard College—a 6% increase over fiscal year 2023. For families with annual incomes below \$85,000, the cost to attend Harvard College, including tuition, housing, and food, is free.

This year also saw significant investments in the University's technology infrastructure, both underground and in the cloud. Harvard expanded access to artificial intelligence capabilities across the University and launched digital initiatives to make our vast library collections accessible to scholars and students worldwide. On terra firma, development of the Allston campus continues in full force: the construction of the new home for the American Repertory Theater (A.R.T.) at the David E. and Stacey L. Goel Center for Creativity & Performance, adjacent affiliated student housing at 100 South Campus Drive, and the David Rubenstein Treehouse Conference Center are all underway.

To support long-term capital projects, the University issued \$1.6 billion in debt in fiscal year 2024 through a two-part bond issuance: \$750 million taxable and \$855 million tax-exempt, including a tender to refinance outstanding bonds for interest savings. Harvard secured favorable borrowing costs with historically low credit spreads, a reflection of confidence in the University's long-term stability.

We do not take that confidence for granted. We live in a world of persistent uncertainty, underpinned by economic volatility and geopolitical unrest. Increasing pressures on our operating performance demand that we take seriously the need to improve our financial capacity.

For a second consecutive year, expense growth (9%) outpaced revenue growth (6%), leading to a smaller surplus than had been budgeted and a substantially lower operating margin, at under 1% of revenue, than has been characteristic of recent years.

Fiscal year 2024 expense increase was driven primarily by our investments in people. Our commitment to attracting and retaining top talent through competitive salaries accounted for just over half of the increase in compensation, with the balance from new faculty and staff to support University activities. Benefits expenses increased in line with higher compensation and an expanded workforce, further fueled by higher healthcare and pharmaceutical costs. These dynamics are not unique to Harvard; research universities across the country face similar challenges, with rising labor costs, increased operational expenses, and heavier burdens from regulatory and oversight demands.

In such a rapidly evolving landscape, safeguarding the University's financial resilience is vital. With an endowment of \$53.2 billion, Harvard's resources are significant. Equally important is why those resources matter. Harvard's financial capital acts as both a catalyst to accelerate learning and discovery today, and as a stabilizing force to ensure that future generations of scholars have the same opportunities. The principle of intergenerational equity is foundational: Harvard's endowment funds—of which 80% are restricted to particular purposes, including financial aid, professorships, and specific fields of scholarships within specific schools—exist to support the University's teaching and research in perpetuity. Our financial resources, built over years through disciplined planning and sound financial management, allow Harvard's schools and units to withstand shocks. They also provide the capacity to invest in new programs and pedagogies, fostering the academic excellence that is both Harvard's hallmark and its aim.

We thank each member of the community—faculty, students, staff, donors and alumni—for their dedication and steadfast commitment to the University through a difficult and trying year. We remain energized by the prospects for progress, as the University is a community of remarkable resilience that strives continuously and with humility to deliver on its extraordinary promise.



Ritu Kalra
VICE PRESIDENT FOR FINANCE



Timothy R. Barakett
TREASURER

October 2024

Harvard University's stewardship of its financial resources is aimed at advancing teaching, learning, and research priorities to make a positive impact in the world. This includes expanding access to education across the globe, supporting students with our strong financial aid program, fulfilling our ongoing dedication to public service, and transforming how problems are understood and addressed through research. The key financial highlights for fiscal year 2024 included in this report demonstrate the University's continued commitment to advancing these priorities.

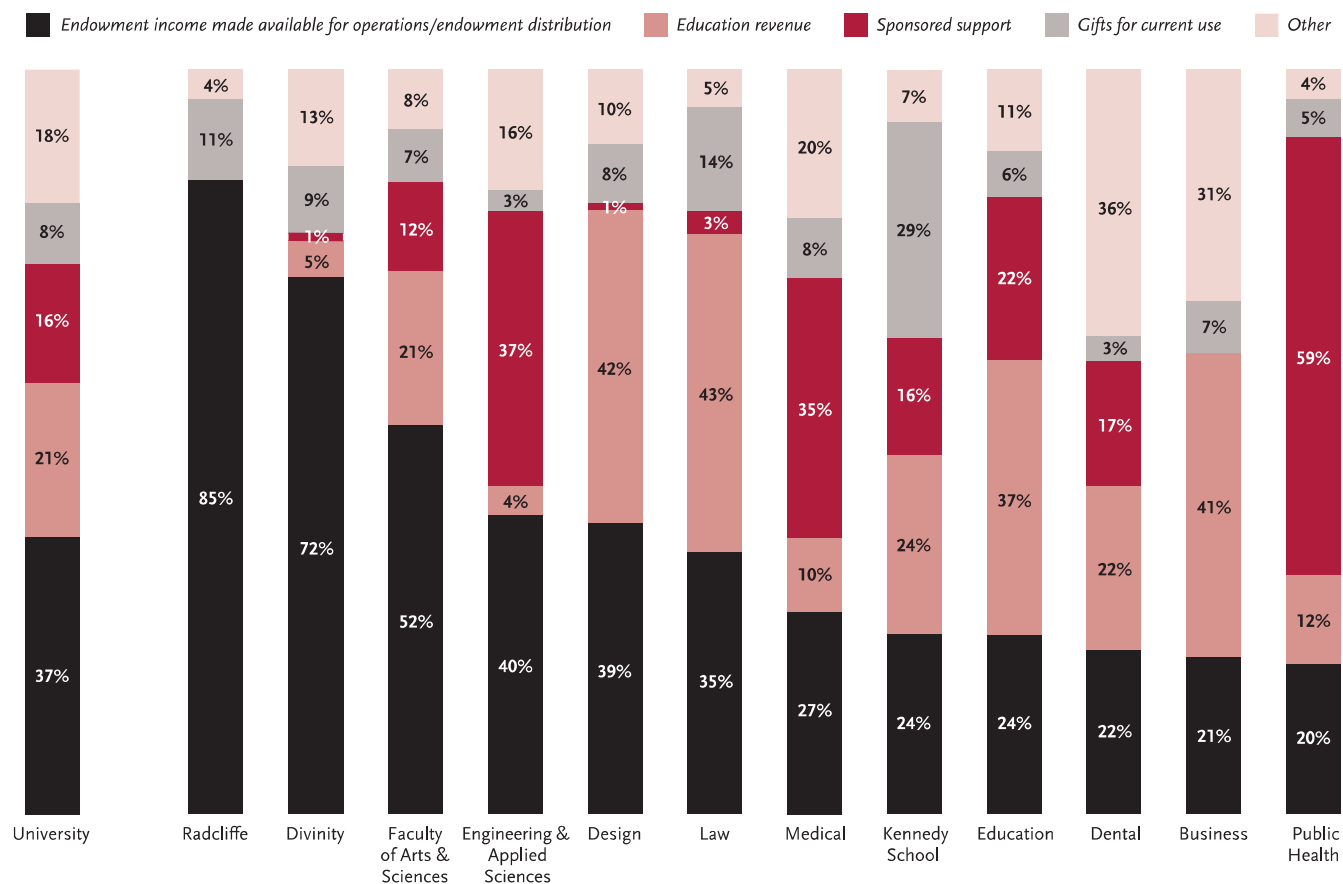
FINANCIAL OVERVIEW

The University ended fiscal year 2024 with an operating surplus of \$45 million compared to \$186 million in fiscal year 2023, on an operating revenue base of \$6.5 billion. Revenue grew an impressive 6% or \$375 million but was outpaced by expense growth of 9% or \$515 million, reflecting continued investments in the University's workforce and rising overall costs.

OPERATING REVENUES

The revenue profiles of Harvard's many schools and units vary widely, as each draws a different proportion of its budget from the primary sources as depicted in the following table:

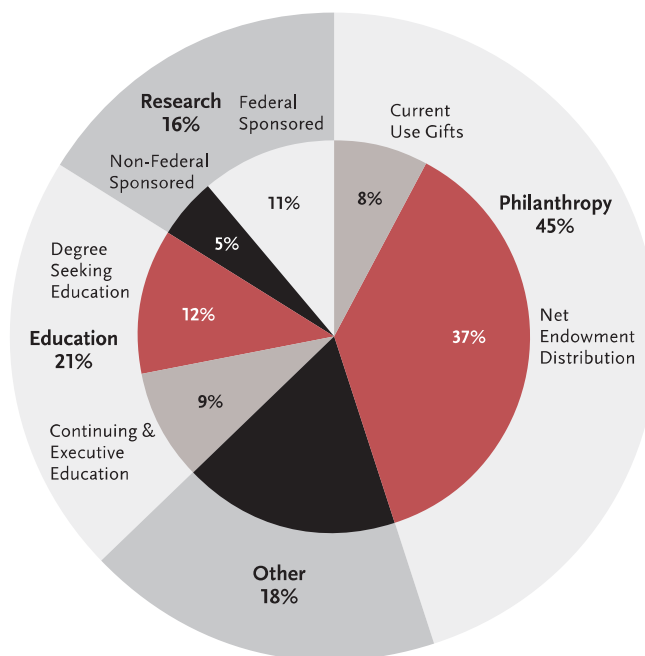
FISCAL YEAR 2024 SOURCES OF OPERATING REVENUE BY SCHOOL



Harvard's diversified, mission-driven activities rely on three main sources of revenue: education or tuition, sponsored research, and philanthropy, both past and present.

Total **education** revenue comprised 21% of revenue. This includes tuition, housing and food income, net of financial aid, from both traditional degree seeking students (undergraduate, graduate, and professional), as well as professional and lifelong learners. In support of **research**, our faculty are awarded external grants by governmental and private partners to advance new academic knowledge; this sponsored funding made up 16% of revenue. Revenues generated each year from our educational programs and research endeavors are not sufficient to fund operations and as such, the University relies on **philanthropy** to fill in the gap. In fiscal year 2024, support from past and present donors provided 45% of revenue through current use gifts and endowment income, reflecting their generosity and belief in the broad impact of education and research at Harvard.

FISCAL YEAR 2024 OPERATING REVENUES

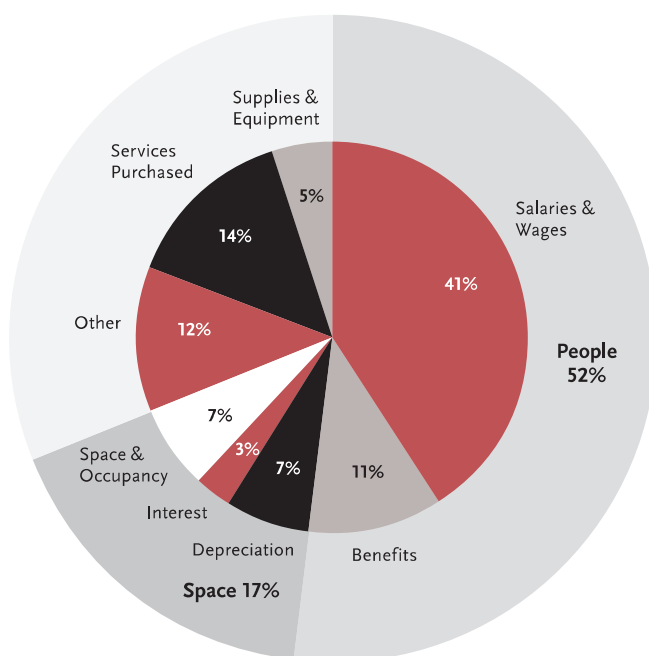


OPERATING EXPENSES

Harvard's spending encompasses three primary categories, related to the faculty, staff and other **people** who make Harvard's work come alive; the classrooms, labs and other **spaces** in which their work is done; and the **supplies and services** they use to advance the work.

The University's operating expenses rose by \$515 million or 9% to \$6.4 billion for fiscal year 2024.

FISCAL YEAR 2024 OPERATING EXPENSES



The growth was driven primarily by higher compensation costs, increased spending on information technology services, and the ongoing maintenance of our campus. Compensation, or **people**, expenses—including salaries, wages, and benefits—accounted for over half of the University's total operating costs in fiscal year 2024, with salaries and wages increasing by 9%, or \$211 million, to \$2.6 billion. This growth stemmed from wage increases and investments in new faculty and staff across campus along with targeted expansion in key initiatives. Employee growth has been robust following the pandemic, though we anticipate this pace of growth to moderate in fiscal year 2025 and beyond, as the University filled many prior vacancies. Employee benefit expenses grew 10% or \$62 million resulting from growth in headcount and increased healthcare costs.

Space-related expenses grew by 8% or \$78 million, driven by a focus on addressing deferred maintenance projects. **Supplies and Services** grew by 13% or \$136 million as the University made significant investments in information technology, with a focus on enhancing security, integrating artificial intelligence, and developing advanced cross-campus learning platforms such as the Learning Experience Platform to expand access and enable more students to benefit from a Harvard education.

BALANCE SHEET

Investments and endowment

The return on the endowment in fiscal year 2024 was 9.6%. Its value (after the impact of distributions from the endowment for operations, and the addition of new gifts to the endowment during the year) stood at \$53.2 billion, an increase of \$2.5 billion from \$50.7 billion at the end of fiscal year 2023. Additional information is available in the *Message from the CEO of Harvard Management Company*, found later in this report.

The University has a policy of maintaining liquidity outside of the endowment for operating purposes. These liquid, short-term investments totaled \$2.0 billion at June 30, 2024 compared to \$1.4 billion at June 30, 2023 (see *Note 2*), well above our minimum policy requirement.

Debt

Bonds and notes payable increased from \$6.2 billion at June 30, 2023 to \$7.1 billion at June 30, 2024. The increase was driven by the issuance of \$750 million in taxable bonds (Series 2024A) and \$855 million in tax-exempt bonds (Series 2024B) in Spring 2024 to

fund capital spending as well as to refinance a portion of the University's outstanding tax-exempt Series 2016A bonds. The University maintained its AAA rating by S&P Global Ratings and Aaa by Moody's Investor Services.

Fixed assets

The University invested \$639 million in capital for fiscal year 2024 compared to \$512 million in fiscal year 2023. The increase in capital expenditure is due to a combined increase in the number of active projects and the average cost of each project. Construction market escalation stabilized at an average of 4% in fiscal year 2024, while supply chain availability for electrical and major mechanical continued to see long lead times. The construction market in Cambridge and Boston continues to be strong, driving up contractor and material costs. The permitting process in both cities is lengthy and will continue to add time and expense to project schedules. Elevated construction costs are not anticipated to abate in coming years.

EDUCATION

In fiscal year 2024, across its 12 schools, Harvard enrolled 24,596 students from around the globe, including 7,063 undergraduates at Harvard College.

Total education revenue

Student income increased 4% or \$51 million to \$1.4 billion in fiscal year 2024. Revenue from traditional student programs (undergraduate and graduate) grew by 2% or \$25 million. Food and housing revenue of \$231 million grew 4%. Executive and continuing education revenue totaled \$587 million, growing 8% or \$43 million. Financial aid applied to student income increased 5% or \$26 million to \$557 million in fiscal year 2024.

Undergraduate and graduate programs and financial aid

Harvard is committed to cultivating a diverse community of bright and talented students regardless of their ability to pay. In fiscal year 2024, net undergraduate tuition, food and housing decreased \$3 million as a result of a 6% or \$14 million increase in financial aid outpacing the 2% or \$11 million increase in tuition, food and housing costs. Thanks to our robust financial aid program, approximately 55% of Harvard College students receive need-based

scholarships and pay an average of \$15,700 for tuition, fees, housing and food. Since launching the Harvard Financial Aid Initiative in 2004, the College has awarded more than \$3 billion in grant aid, and the undergraduate financial aid budget has more than tripled from \$80 million in 2005 to \$260 million in 2024. The average net cost of attendance for all Harvard College students is \$42,943.

Harvard College has continued its ongoing efforts to expand financial aid by raising the family income threshold for full assistance by \$10,000 in 2023-2024 to \$85,000. This change means that nearly 25% of families do not have to contribute anything to tuition, fees, housing or food. In addition, to ensure that students can participate fully in the Harvard experience, Harvard provides the most highly aided students with funding for health insurance, emergency expenses, event fees, and other activities. First-year students from families making under \$85,000 also receive a \$2,000 Start-up Grant to help with the costs of starting at Harvard. New this year, juniors from the same highly aided category receive a \$2,000 Launch Grant to help with the costs of getting ready for life post-graduation.

ADVANCING THE PUBLIC GOOD

Every day, Harvard students, faculty, staff, and alumni all across the globe use their time and talents to serve the public good. They are at the forefront of their scholarly disciplines, experts in their professional domains, and leaders in their communities. Each one is united by the University's commitment to making the world a better place through the extension of knowledge.



Harvard's Global Day of Service brings together community members worldwide to foster civic engagement through **public service** projects. Over 1,000 volunteers each year partner with local governments, nonprofit organizations, and advocacy groups to serve their local communities. Many of these experiences motivate students to continue exploring civic engagement opportunities at Harvard and inspire lifelong commitments to public service.



Through the Office of Technology Development, the University advances science, fosters **innovation**, and translates new inventions into useful products that are beneficial to society. There were 402 innovations reported by Harvard researchers, 155 U.S. patents issued, and 14 startups launched from Harvard labs in fiscal year 2024. Their impact spans society—addressing health care, climate change, energy, sustainability, high-tech goods, and much more.



In addition to the nearly \$500 million Harvard invested to advance **research** and support early-stage ideas, our faculty were awarded \$1 billion in external grants by government and private partners in fiscal year 2024. This funding fuels Massachusetts's knowledge economy supporting local jobs, businesses, and organizations.



For more than 200 years, Harvard Medical School (HMS) affiliates have been key partners in the School's education, research, and patient care endeavors. Unlike many medical schools, HMS relies on **collaboration** agreements with 15 clinical affiliates and research institutes that employ many physicians and scientists with faculty appointments. The Faculty of Medicine includes more than 12,000 individuals working in classrooms, clinics, and laboratories across Boston and Cambridge.



To help close the gap in executive development in the public sector, the University's Bloomberg Harvard City Leadership Initiative—a program of the Bloomberg Center for Cities—equips global mayors and senior city officials with research-backed management and **leadership** training to tackle complex city challenges and improve residents' the quality of life. This yearlong, high-impact program has provided training to 314 mayors and over 550 senior city leaders across 47 U.S. states, 34 countries, and six continents since its launch in 2017.



The Harvard Ed Portal is a dynamic hub that connects the Allston-Brighton community to **education** resources across Harvard's campus. Over the past decade, the Ed Portal has reached over 45,000 participants, hosted, more than 2,400 events, awarded over 800 scholarships, and collaborated with 68 Harvard departments and units and 96 partners throughout Allston-Brighton and the Boston community to provide responsive programs and local benefits.

RESEARCH

Harvard scholars conduct research across a vast array of fields, striving to expand human knowledge through analysis, innovation, and insight. In 2024, this research was supported by \$1 billion of sponsored funds, alongside an additional \$489 million funded directly by the University, as reported in the 2023 National Science Foundation Higher Education and Research Development (HERD) Survey. Research efforts are carried out across the departments of the schools and at more than 100 research centers, both on campus and globally. Researchers include faculty members, visiting scholars, post-doctoral fellows, and graduate and undergraduate students, who collaborate with colleagues across the University, affiliated institutions, and other research institutions.

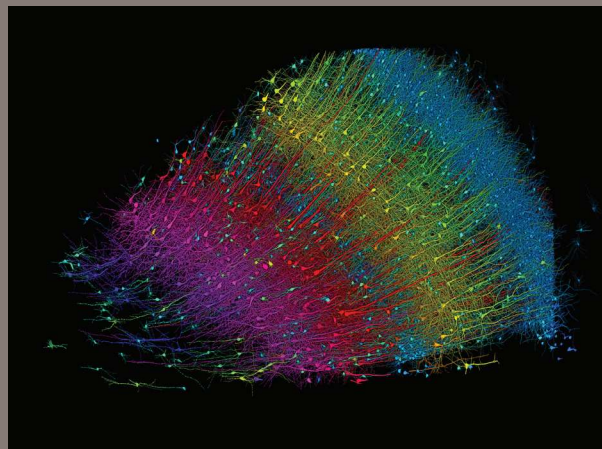
Federal funding plays a pivotal role in these endeavors, supporting groundbreaking scientific discoveries that fuel innovation and economic growth in our local community and around the world. During fiscal year 2024, federal funding of \$686 million made up approximately 68% of total sponsored revenue and increased by 1% or \$10 million. Federal funding is the University's largest source of support for research, playing a pivotal role in enabling studies that deliver widespread societal benefits.

In addition to federal support, the University received \$326 million in non-federal sponsored revenue in fiscal year 2024, which includes funding from corporations, foundations, and other non-federal sponsors. This represents a decrease of 7% or \$23 million, as certain large projects wound down in fiscal year 2024. Non-federal sponsored revenue fluctuates from year to year due to the variable nature of private grants and contracts, which are often project-specific and time-limited.

Harvard allocates substantial institutional resources to amplify these federal and non-federal investments. The University's nearly \$500 million of internal funding provides vital incubation for early-stage research ideas, seeds new initiatives, subsidizes projects with insufficient external funding, and empowers faculty to explore new areas of scientific inquiry. These efforts ensure a robust ecosystem for innovation and discovery that not only advances Harvard's research mission but also drives progress to address society's most significant challenges.

MAPPING NEURAL CONNECTIONS IN THE BRAIN

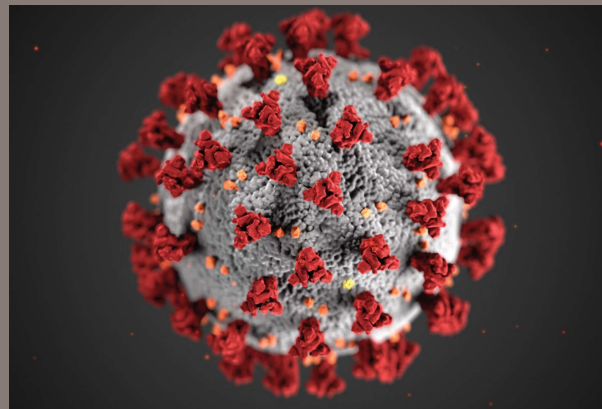
A Harvard team of researchers helped create the largest 3D brain reconstruction to date, showing in vivid detail each cell and its web of connections in a piece of temporal cortex about half the size of a rice grain. It is the latest development in a collaboration with scientists in the field of connectomics to construct the first comprehensive diagram of every neural connection inside a mouse brain, which could lead to new approaches in diagnosing and treating disorders of the brain, from autism to schizophrenia.



Six layers of excitatory neurons color-coded by depth.
Credit: Google Research and Lichtman Lab

STAYING AHEAD OF VIRUS MUTATIONS WITH AI

A new artificial intelligence tool named EVEscape, developed by researchers at Harvard Medical School and the University of Oxford, can predict the variants most likely to occur as a virus evolves. The tool uses evolutionary sequences and structural information about the virus to make predictions about new viral variants before they emerge. This information could help scientists develop more effective vaccines and therapies that are future-proof.



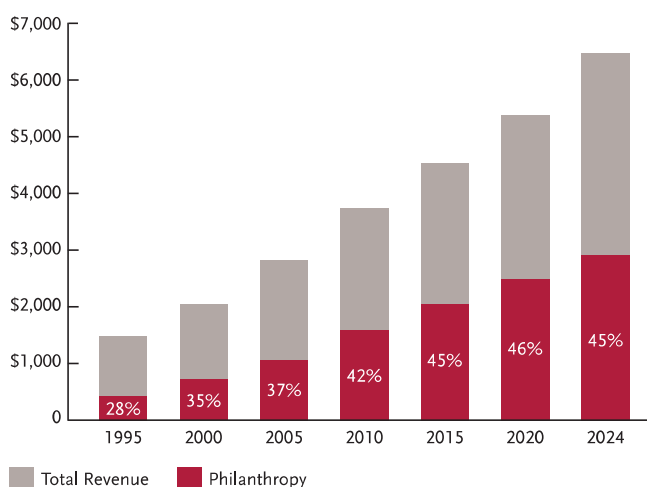
An illustration of the ultrastructural morphology exhibited by coronaviruses created by the Centers for Disease Control and Prevention (CDC).

Credit: Alissa Eckert, MSMI; Dan Higgins, MAMS

PHILANTHROPY

Combining gifts for current use and the endowment distribution, philanthropy accounted for 45% of Harvard's revenue in fiscal year 2024. Today, excellence and affordability in higher education rely heavily on philanthropy to support nearly every aspect of university life. Every gift helps Harvard to support excellence in our teaching and research, recruit and retain our world class faculty, help students thrive, and provide greater access through financial aid.

PHILANTHROPY AS A PERCENTAGE OF TOTAL REVENUE OVER TIME



Gifts for current use

In fiscal year 2024, Harvard received current use gifts from alumni, foundations, and others totaling \$528 million, representing approximately 8% of operating revenues and an increase of 9% or \$42 million. Support for the University comes from donations of all sizes; more than 75% of the number of gifts in fiscal year 2024 averaged \$150 per donor.

The Harvard endowment

Harvard's endowment has existed for nearly four centuries and serves as a crucial resource for current and future generations of Harvard students, faculty, and researchers. Comprising over 14,000 individual funds, the endowment supports nearly every facet of the University's mission—from student financial aid to neighborhood programs, from museum and library preservation to campus activities, from faculty and fellow positions to scientific advancement.

Donor contributions to the endowment have enabled leading financial aid programs, groundbreaking scientific discoveries, and the establishment of

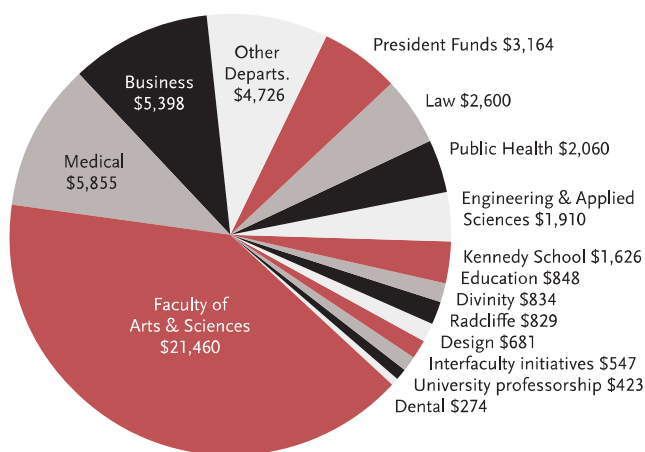
hundreds of professorships across a wide range of academic fields. Each year, a portion of the endowment is paid out as an annual distribution to support the University's operations. The University strives to maximize its responsible draw each year, while balancing both present and future needs.

Guided by the principle of intergenerational equity, Harvard's endowment is meticulously managed to ensure that future generations benefit just as much as the current one.

Gifts for the endowment were \$368 million in fiscal year 2024; over the past ten years, gifts to the endowment have ranged from a high of \$646 million to a low of \$338 million.

MARKET VALUE OF THE ENDOWMENT AS OF JUNE 30, 2024

In millions of dollars



TOTAL MARKET VALUE \$53,235

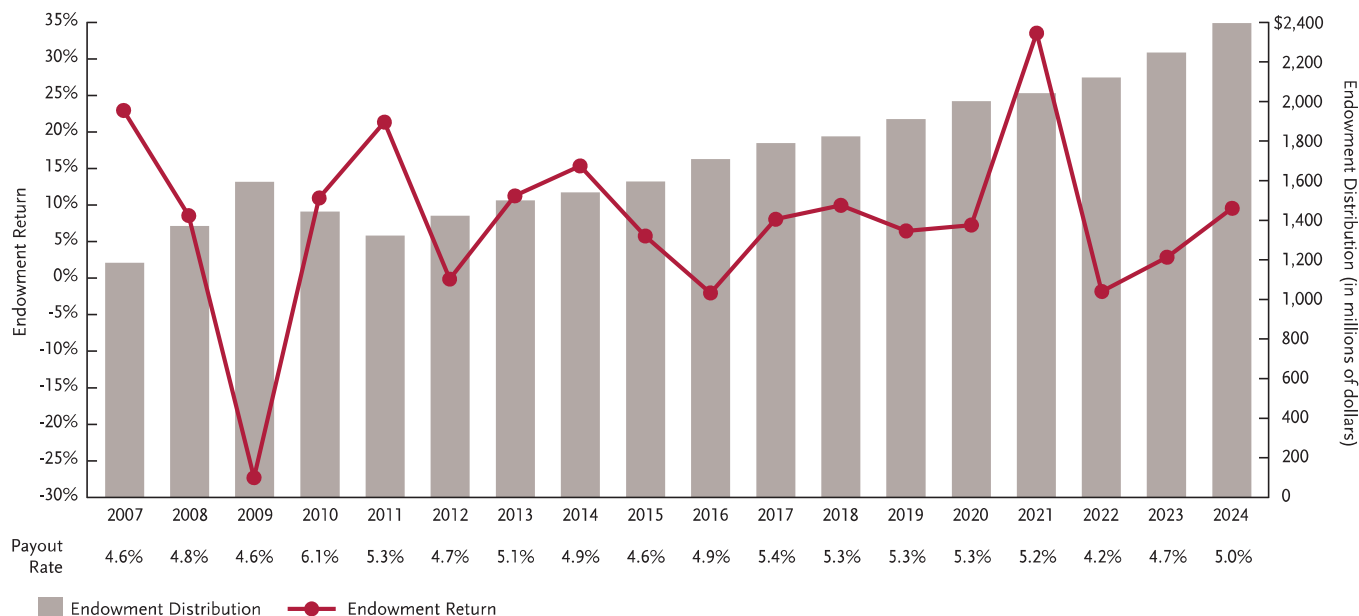
Endowment returns made available for operations

The University's endowment spending practices balance two competing goals: the need to provide a stable and sufficient distribution to fund the operating budget, and the obligation both legally and to our donors to maintain the long-term value of the endowment. There is a common misconception that endowments, including Harvard's, can be easily accessed like checking accounts, available for any purpose at any time as long as funds exist. In reality, Harvard's flexibility in spending from the endowment is limited by donor conditions and the principle that endowed funds are designed to last forever, crucial for serving future generations of students and advancing new knowledge.

Harvard is obligated to preserve the endowment's purchasing power by spending only a sustainable portion of its value each year. Spending significantly more than that over time would favor the present at the expense of future generations, undermining the endowment's fundamental purpose of maintaining intergenerational equity. Generally, the annual

endowment payout range is 5.0 to 5.5% of its market value, though the actual payout rate can vary each year based on endowment returns. This critical source of funding distributed \$2.4 billion in the fiscal year ending June 30, 2024—representing 37% of Harvard's total operating revenue—and is the single largest source of revenue supporting the University.

ENDOWMENT RETURNS MADE AVAILABLE FOR OPERATIONS BY YEAR



Endowment payout

While the endowment is a critical source of funding, 70% of the annual distribution is directed by donor terms to specific programs, departments, or purposes. Funds without donor restriction offer more flexibility, although they are often restricted at a high level such as to a particular school. These less restricted funds are essential for general mission support and transformative, strategic initiatives. In this way, the endowment bridges the gap between revenue from tuition and research grants and the critical costs associated with the University's teaching and research activities.

ENDOWMENT SPENDING FLEXIBILITY

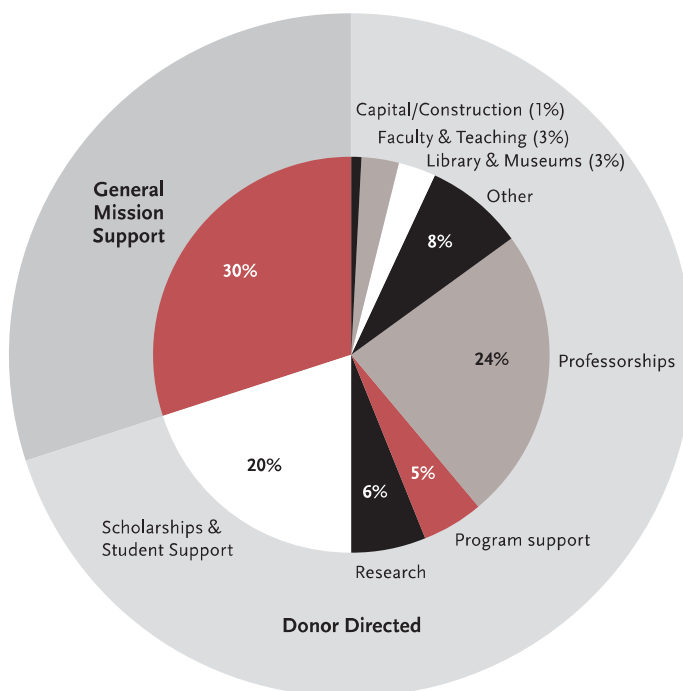
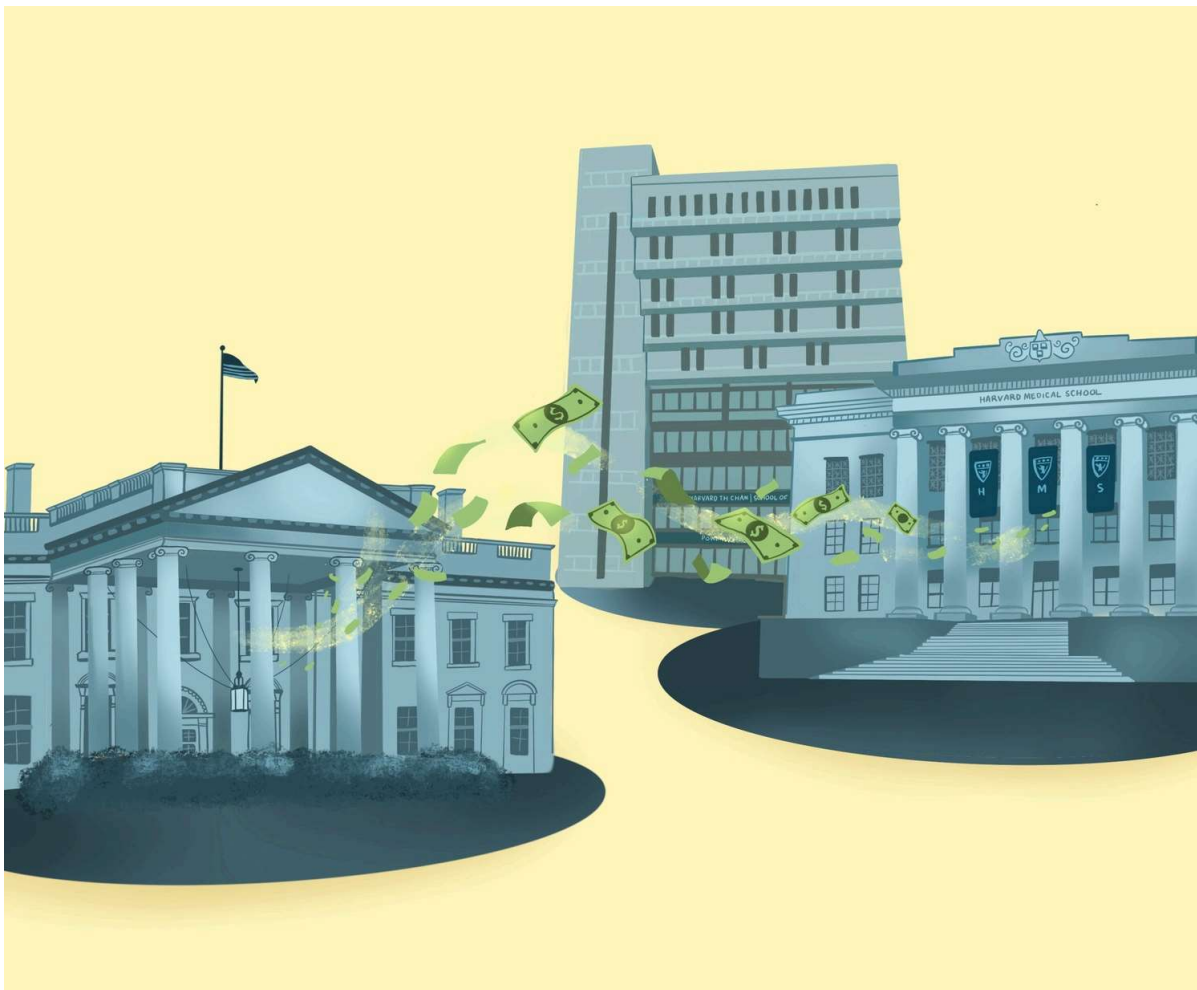


EXHIBIT 9



In fiscal year 2024, Harvard received \$686 million from federal agencies. As the Trump administration targets federal grants in executive orders, much of that could be at risk.

Harvard's Federal Funding Is Under Fire. Here's What's at Risk.

President Donald Trump's wave of executive orders targeting funding for education sent shockwaves through Harvard this week, jeopardizing thousands of research jobs and more than 10 percent of the University's operating revenue.

BY AVANI B. RAI AND SAKETH SUNDAR

January 31, 2025

President Donald Trump's wave of executive orders targeting funding for education sent shockwaves through Harvard this week, briefly jeopardizing thousands of research jobs and more than 10 percent of the University's operating revenue.

Though the most sweeping order — a temporary freeze on all federal funding to universities — was blocked by a judge and later rescinded by the Trump administration, future funding from the National Institutes of Health and National Science Foundation remains temporarily frozen and stop work orders for diversity-related projects are still in effect.

The saga exposed Harvard's deep reliance on federal support and clarified the impact of proposed funding cuts that have been looming over the University for more than a year.

In fiscal year 2024, the University received \$686 million from federal agencies, accounting for two-thirds of its total sponsored research expenditures and 11 percent of the University's operating revenue.

"We could not carry out our mission the way we do now without substantial federal research support, nor could we provide the benefits to the nation that we do now without that support," Harvard President Alan M. Garber '76 said in a December interview with The Crimson.

Despite the Trump administration's decision to rescind the memo announcing the freeze, many of the new executive orders that restrict federal funding are still enforceable, as are the department-level stop work orders.

Neal F. Lane, who served as the Director of the National Science Foundation under President Bill Clinton, said the freeze was unprecedented and will be difficult to reverse.

"The freeze was sort of in part a surprise because it was such a blunt instrument that it had really never been used before, not in that way," Lane said. "Once you start something like that, it's very hard to unwind it immediately. So a lot of damage has already been done."

'If the Money Doesn't Come'

Harvard's research machine runs on federal dollars, and even a partial cut to funding from the NIH or NSF would be immediately felt by Harvard's scientists.

Most of the \$686 million in funding goes to four of Harvard's nine faculties – Harvard Medical School, the School of Public Health, the Faculty of Arts and Sciences, and the School of Engineering and Applied Sciences. These four faculties, in addition to the Wyss Institute for Biologically Inspired Engineering, make up 88 percent of sponsored expenditures.

The School of Public Health is the most reliant on sponsored support, which makes up 59 percent of its operating budget. Sponsored support, which includes both government funding and private grants, also makes up 35 percent and 37 percent of the HMS and SEAS operating budgets, respectively.

Most of Harvard's federal research funding comes from the Department of Health and Human Services, which gave Harvard \$520 million in fiscal year 2024. The NIH alone accounted for \$488 million, making it the University's most important funding source.

Harvard's Federal Funding Breakdown by Source

* A Flourish chart

Many of the NIH's institutes, including the National Cancer Institute, National Institute of Mental Health, and the National Institute of Allergy and Infectious Diseases, each fund dozens of Harvard research centers.

Some of the largest Harvard-affiliated recipients of NIH funding include the Harvard University Center for AIDS Research, the **M.D.-Ph.D. physician-scientist program** jointly hosted by Harvard and MIT, and a large clinical research center focused on diagnosing rare conditions.

Future NIH funding is still paused, as are grants awarded by the NSF, which awarded Harvard researchers \$56 million last year.

Over a third of sponsored expenditures go toward salaries, and the loss of federal funding could endanger entire research labs. More than 6,200 Harvard employees, including 1,673 faculty members, relied on sponsored expenditures for at least part of their pay in fiscal year 2024.

"The researchers are paying salaries for their students, postdocs, they're buying reagents, they're buying equipment, they're turning on the lights in the laboratories," Lane said. "If the money doesn't come, then it's all on the University's back, and they have no choice but to find the money or shut down the activity."

Finding the money, despite the size of **Harvard's \$53.2 billion endowment**, will be a challenge should the freezes become permanent. The majority of the endowment has already been spoken for, earmarked for specific programs, departments and professorships.

Only 20 percent of Harvard's endowment is not set aside for a specific purpose. Pierre Azoulay, a professor at the MIT Sloan School of Management, said Harvard could temporarily sustain research programs without federal support in the short term.

"Harvard has the wherewithal to kind of float its investigators," Azoulay said. "Use a little bit of endowment money to make sure that we don't fire people, we don't stop projects."

But that strategy, which would gradually shrink University investments, would also trade off with Harvard's long-term financial health.

A University spokesperson declined to comment on whether Harvard would use endowment money as a substitute for federal grant funding.

Financial Aid

While the Department of Education carved out an exception for Pell Grants and federal student loans in the rescinded Wednesday freeze, Federal Work Study Program funds were not exempted and could affect graduate student financial aid if the freeze is reinstated.

In his message addressing the order, Garber **wrote directly to students** who receive federal funding to attend the University.

“If you are a student, you should continue to register for and attend classes unimpeded,” Garber wrote on Wednesday.

Garber’s emergency message highlighted the stakes of future executive orders that are not accompanied by specific financial aid carve-outs.

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“It’s a little bit dicier there because you’re dealing with a lot of relatively young, inexperienced people, 18-, 19-year-olds, even those who are still in high school, thinking about applying for financial aid, and they read the headlines and they may be a little bit more dissuaded,” said Donald E. Heller, former University of San Francisco provost.



Harvard College's admissions and financial aid office is located at 86 Brattle St. By **Kathryn S. Kuhar**

At least at Harvard College, federal funding plays a relatively small role in financial aid.

The University’s need-based grant program covers most financial aid, with 80.8 percent of undergraduate assistance coming from Harvard grants. Pell Grants

and federal loans make up less than a fifth of the aid awarded to undergraduates.

Graduate and professional students depend slightly more on federal aid. At Harvard Law School and HMS, where Harvard grant funding is less common, federal loans make up a significant portion of financial aid packages — 23.7 percent and 26.2 percent, respectively.

Harvard's financial aid model, which blends institutional grants and federal assistance, remains threatened by future orders, including a policy proposal by House Republicans that would require graduate students to pay taxes on their scholarships and fellowships.

Financial aid expert Mark Kantrowitz said both scholarship taxes and a proposed end to student loan forgiveness to graduate students pursuing public service careers would hurt Harvard's graduate programs.

At HMS, 67.8 percent of aid is grant-based, but loans still account for 32.2 percent, meaning medical students pursuing public service careers — who often graduate with significant debt — are especially vulnerable to an end to student loan forgiveness.

'Illegal DEI'

Trump's attempted funding freeze is only an escalation of his directive to eradicate **federally funded diversity, equity, and inclusion initiatives** — an order that is still in place and could hurt any number of Harvard initiatives depending on how DEI is defined.

The order, signed on Jan. 21, requires Harvard and other federally funded educational institutions to remove any “illegal DEI” policies and race or gender-based diversity programs. It also asks federal agencies to “enforce our longstanding civil-rights laws and to combat illegal private-sector DEI preferences, mandates, policies, programs, and activities.”

Research policy experts say it is unclear what Trump’s directive means.

Anna M. Quider, Director of the Quider Group — a STEM research development consulting firm — said that because DEI has yet to be explicitly defined by the federal government, its relatively amorphous designation is sowing greater confusion amongst researchers.

“Diversity, equity, inclusion and access is about ensuring that all people have the opportunity to participate in and lend their talents to and thrive in the American research enterprise,” Quider said. “So of course, race and ethnicity and gender are ways that we can measure the diversity of individual characteristics of the researchers and participants in the research enterprise.”

“What about programs for low income students of all races and genders and geographies?” Quider added. “What about programs for first generation college students, which are also underrepresented in the research enterprise?”

NSF and NIH grants are required to have a public impact statement explaining how the proposal will contribute to “desired societal outcomes,” listing inclusion as an example. Many Harvard-associated research proposals mention diversity, equity, inclusion or similar language in their statements.

“Some of them will have said it’s going to enable underrepresented minorities or low income first generation college students to benefit them in some way,” Kantrowitz said. “You don’t know whether the Trump administration is going to say, ‘Oh, these are DEI. We shouldn’t fund them.’”

With tens of thousands of grant proposals, Lane said it would be particularly difficult for the Trump administration to even enforce these policies.

“You would have to go out somehow into the tens of thousands of budget lines in different agencies and try to find those you think might have these kinds of activities that the president doesn’t like,” Lane said.

Regardless of the funding freeze’s legal merit or implementation, Lane said the “damage has been done.”

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“You don’t want to be constantly clutching at pearls and claiming the sky is falling down. It gets old,” Azoulay said. “But maybe this time, the sky is falling down.”

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EXHIBIT 10



Appointments are required to use the Herbaria; please email huh-requests@oeb.harvard.edu to make arrangements.

For the Botany Libraries, see our [hours](#) and [policies](#), or email botref@oeb.harvard.edu for assistance.



Harvard University Herbaria & Libraries



Menu

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Pfister and Bradshaw receive NSF grant

Mon, 07/10/2023

[News](#)

Dr. Donald Pfister, Asa Gray Research Professor of Systematic Botany and Emeritus Curator of the Farlow Library and Herbarium, and Dr. Michael Bradshaw, Harvard University Herbaria Research Fellow, were recently awarded a \$1 million grant from the National Science Foundation to dive further into the world of powdery mildews. “We believe this grant is extremely important not only for the powdery mildews, but for fungi in general and will be a blueprint for future monographs focusing on plant pathogenic fungi” states Bradshaw. One of the most exciting aspects of the grant, Bradshaw says, is the inclusion of developing a glass model of a fungal fruiting body.

Congratulations Don and Michael!

Award Abstract # 2315953

ARTS: A North American monograph of the powdery mildews (Erysiphaceae)https://www.nsf.gov/awardsearch/showAward?AWD_ID=2315953

Abstract: Of all organisms, fungi are among the least studied in terms of diversity with a projected 10% of the existing fungi known. This is especially true for powdery mildews; these are one of the world's most common and least studied fungal plant pathogens. Powdery mildews are particularly important because they cause serious damage to economically important agricultural crops, such as blueberries, hops, peas, strawberries, wheat, and wine grapes. Powdery mildews are often host specific, but it is unclear which powdery mildew species are the causal agents of disease on even some of the most important agricultural crops. Additionally, for non-specialists it is difficult to ascertain which sequences, identifications, and species names are reliable on publicly available databases. Accurate identification of plant pathogens is important because particular species often require different control methods and applications. In this work, we will develop a publicly available online powdery mildew identification manual allowing accurate identification for scientists, farmers, and horticulturalists around the world. This will contribute to practical applications as well as research in a wide range of disciplines, including plant pathology, evolutionary biology, mycology, and systematics. By obtaining sequence data for particularly virulent, invasive, species this work will contribute to a better understanding of how pathogens invade new environments. To accomplish this project, we will assemble a team of undergraduate, graduate, and postdoctoral researchers. Fungal biology has historically failed to recruit diverse researchers. With this in mind, we will highlight diversity and inclusion in our personnel selection process

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EXHIBIT 11

Holly Samuelson Awarded Starter Grant Funding from the National Science Foundation

March 22, 2024

By **GSD News** (<https://www.gsd.harvard.edu/contributor/gsd-news/>).

Departments

Department of Architecture (<https://www.gsd.harvard.edu/architecture/>).

Holly Samuelson (<https://www.gsd.harvard.edu/person/holly-samuelson/>), Associate Professor of Architecture at the Harvard Graduate School of Design, is part of a multidisciplinary team that has been awarded a major grant by the United States National Science Foundation (NSF). The team's project, titled "Intelligent Nature-inspired Olfactory Sensors Engineered to Sniff (iNOSES)," addresses the urgent need to "acquire real-time information about the air we breathe," according to their proposal. The portable chemical gas sensor they are developing relies on artificial intelligence (AI) to accurately identify volatile compounds in the air.

Samuelson is a Co-Principal Investigator alongside Alexander Tropsha, Professor of Chemical Biology and Medicinal Chemistry at the University of North Carolina at Chapel Hill. The Principal Investigator is Joanna Aizenberg, Amy Smith Berylson Professor of Material Sciences at the Harvard John A. Paulson School of Engineering and Applied Sciences and associate faculty at Harvard's Wyss Institute.

The NSF recently announced investing \$10.4 million to "develop innovative technologies and solutions to address a wide range of challenges related to chemical and biological sensing." The Phase 1 grant that Samuelson's team received is worth approximately \$650,000.

According to the team's proposal: "The real-time chemical sensing data will pave the way to standardization in detection and reporting across sectors, a documented challenge leading to poor accountability in emission monitoring, inefficiently timed ventilation and air purification processes, and unnecessary food waste, all of which are responsible for immense climate, health, and socio-economic impacts."

The team is working toward the Phase 2 grant submission, which is focused on bridging basic science and market deployment. Six teams be funded in Phase 2 for up to \$5,000,000 each.

The grant is part of the NSF "Convergence Accelerator Track" program. According to an NSF press release, the program "builds upon a wealth of foundational knowledge and recent advances in chemical sensing, sensor technology, robotics, biomanufacturing, computational modeling and olfaction to address challenges related to environmental quality, industrial agriculture, food safety, disease detection and diagnostics, personal care, substance use or misuse and possible adversarial threats."

The NSF is an independent federal agency that supports science and engineering in all 50 states and US territories. Established in 1950 by Congress, the agency's investments account for 25 percent of federal support to America's colleges and universities for basic research.

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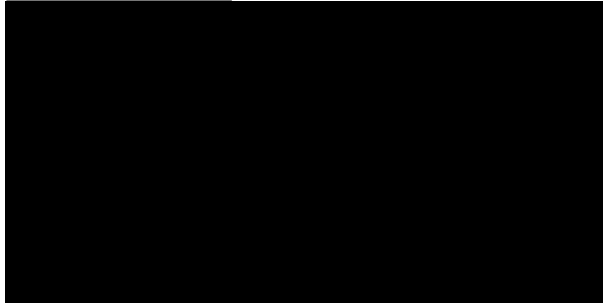


EXHIBIT 12

Monthly Maintenance - Monday April 7th 9am - 1pm

All systems operational

Research Computing part of \$5.3M NSF award for Advanced Cyberinfrastructure

CAMBRIDGE, M.A. – The National Science Foundation has awarded a consortium of six universities a \$5.3 million grant to support a national network of Advanced Cyberinfrastructure Research and Education Facilitators (ACI-REFs). Harvard University's FAS Research Computing group is one of the collaborating institutions. The project, called Advanced Cyberinfrastructure - Research and Educational Facilitation: Campus-based Computational Research Support (<http://www.aciref.org/>), will broaden the impact of advanced computing resources at campuses across the country.

"This consortium and the addition of ACI-REFs are a core component of Harvard's next generation research computing strategy and will enable further academic excellence at both local and national levels," said James Cuff, Assistant Dean for Research Computing at Harvard University and co-principal investigator.

ACI-REFs will work together to adopt models and strategies that leverage the expertise and experiences of its members to maximize the impact of investment in research computing. In addition to Harvard, the project's partners include Clemson University, the University of Hawai'i, the University of Southern California, the University of Utah, and the University of Wisconsin.

The project will be based on a condominium model of computing. Condominium computing provides users with shares of large cluster-based computer resources. Instead of users buying and maintaining their own personal clusters, users buy computing nodes, which are committed to a larger shared cluster, managed and supported by their IT organizations. Users then have access to their nodes plus the idle nodes of other condominium members. The project will expand this model by focusing on support for the steadily increasing "long tail" of ACI users—researchers who belong to disciplines that have not traditionally required access to ACI resources but who recognize that their research requires compute power beyond their desktop machines.

“With universities facing a growing data tsunami in virtually all disciplines, we've realized that now is the time to build a more cloud-like research infrastructure and support model across campuses to help faculty and students meet their data challenges,” said Jim Bottum, the Chief Information Officer at Clemson University and principal investigator on the project. “We appreciate NSF’s investment in our collaborative effort to prototype a new model to further enable faculty and students to accomplish their research goals in this challenging environment.”

Each partner university will have dedicated ACI-REFs who will work directly with faculty, students, and local campus IT to advance scientific discovery through a national network of Advanced Cyberinfrastructure. ACI-REFs will extend the reach and impact of campus and national research computing infrastructure with the goal of fostering research projects that span multiple campuses. The project will thereby create a community that shares knowledge, experience, and expertise and bridges research communities to facilitate the formation of extended local and national collaborations.

“Harvard’s condominium computing model has been effective at providing our faculty and researchers with a scalable environment capable of meeting a vast array of computational needs. We know the model can be successful and we are excited to be a part of this project,” said Cuff. “By building a national ACI-REF network that engages other national initiatives such as XSEDE and the Open Science Grid, we hope to transform how universities and researchers access, use, and manage computation.”

The project team is led by Clemson University CIO Jim Bottum who is the principal investigator on the grant, Barr von Oehsen of Clemson University will serve as the science and outreach lead, Jim Pepin of Clemson University will act as the technical integration lead and Simon Appleford and Dustin Atkins will also serve on the project team at Clemson University.

In addition to the project team, the project’s steering committee includes Glenn Ricart, Chief Technology Officer of the US Ignite Project, Greg Monaco from the Great Plains Network, and John Towns, the principal investigator of the NSF-funded XSEDE program. Miron Livny of the University of Wisconsin and principal investigator of the NSF-funded Open Science Grid will also serve on the project’s steering committee as well as the Chief Scientist for the project.

Co-principal investigators from the partner universities are Gwen Jacobs of the University of Hawai'i, James Cuff of Harvard University, Maureen Dougherty of the University of Southern California, Steven Corbato of the University of Utah, and Paul Wilson of the University of Wisconsin.

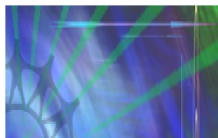
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EXHIBIT 13



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Award Abstract # 2421461

TRAILBLAZER: Biodegradable Living Materials

NSF Org: [EFMA](#)
[Office of Emerging Frontiers in Research
and Innovation \(EFRI\)](#)

Recipient: PRESIDENT AND FELLOWS OF HARVARD
COLLEGE

**Initial Amendment
Date:** July 22, 2024

**Latest Amendment
Date:** July 22, 2024

Award Number: 2421461

Award Instrument: Standard Grant

Program Manager: Alias Smith
alismith@nsf.gov (703)292-8367
EFMA Office of Emerging Frontiers in
Research and Innovation (EFRI)
ENG Directorate for Engineering

Start Date: November 1, 2024

End Date: October 31, 2027 (Estimated)

**Total Intended Award
Amount:** \$2,972,873.00

**Total Awarded Amount
to Date:** \$2,972,873.00

**Funds Obligated to
Date:** FY 2024 = \$2,972,873.00

History of Investigator: Robert Wood (Principal Investigator)
rjwood@eecs.harvard.edu

**Recipient Sponsored
Research Office:** Harvard University
1033 MASSACHUSETTS AVE STE 3
CAMBRIDGE
MA US 02138-5366
(617)495-5501

Feedback

Sponsor Congressional District: 05

Primary Place of Performance: Harvard University
150 Western Avenue
Allston
MA US 02134-1037

Primary Place of Performance Congressional District: 07

Unique Entity Identifier (UEI): LN53LCFJFL45

Parent UEI:

NSF Program(s): EFRI Research Projects

Primary Program Source: 01002425DB NSF RESEARCH & RELATED ACTIVIT

Program Reference Code(s):

Program Element Code(s): 763300

Award Agency Code: 4900

Fund Agency Code: 4900

Assistance Listing Number(s): 47.041

ABSTRACT

There are numerous examples of biologically inspired robots that mimic features of animals and plants, and many can operate in natural environments. However, the overwhelming majority of these devices are rigid, inorganic, and created from toxic and/or non-biodegradable materials; they are in many ways the antithesis of the organisms that they mimic. Roboticists often cite tasks in natural environments ? forests, oceans, farms ? as quintessential examples of the broad utility and future of robotics. However, operation in any of these environments is impossible or highly impractical if the robots performing these tasks cannot autonomously return ?home?. Furthermore, failure of any individual robot would require human intervention or result in environmental contamination by a ?dead? robot left behind. This project will develop ?living materials? that can be composed to create biodegradable robots that operate autonomously in natural environments. At the end of a task, the

devices remain in place and degrade into harmless or useful substances. The development of biodegradable living materials represents the next phase in robotics, ushering in new capabilities for environmental monitoring and remediation; infrastructure inspection, long-term monitoring, and repair; environmental exploration, including locations otherwise difficult to access such as deep ocean and remote ecosystems; and biomedical robots for internal medicine and wearable assistive devices. The materials and experimental focus of this project will also facilitate structured hands-on learning experiences for K-12, undergraduate, and graduate students.

The current reliance on a classical pallet of engineering materials is more of a hindrance than an enabler for the future of robotics, in particular for fulfilling the promise of autonomy in natural environments. More traditional robot architectures are fragile and expensive, leading to conservative design, control, and deployment strategies, highly limiting the scope of use and impeding the achievement of science-fiction-like tasks in natural terrestrial or aquatic environments. Furthermore, all such devices must be collected at the end of their operational lifetime, raising additional challenges for full autonomy. This program focuses on robots created from ?living? materials that embody function in soft biodegradable composites. These materials will perform a desired task and, at the end of the mission, simply remain in place and degrade into benign or potentially beneficial substances. This concept represents a paradigm shift for how we can think about autonomous devices operating in unstructured environments, relaxing more typical control goals and guarantees since device failure would be inconsequential or potentially even useful. This vision motivates research into materials chemistry of new artificial muscles, new architectures for electrical and chemical energy storage and conversion, materials-based methods for controlling the distribution of energy and sequencing of actuation in a programmed manner, and multi-scale multi-material fabrication strategies for creating biodegradable composites that embody these functions. This project will conclude with demonstrations of heterogeneous collectives of biodegradable synthetic ?living? robots autonomously performing tasks including assisted agriculture and environmental remediation, and subsequently degrading in place.

This award reflects NSF's statutory mission and has been deemed worthy of support through evaluation using the Foundation's intellectual merit and broader impacts review criteria.

Please report errors in award information by writing to:
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EXHIBIT 14

Trump administration did not say which research projects were targeted in Harvard review. A government memo has answers.

By [Mike Damiano](#) and [Liz Kowalczyk](#) Globe Staff, Updated April 4, 2025, 7:11 p.m.



The Widener Library at Harvard University in Cambridge, MA on April 3. CRAIG F. WALKER/GLOBE STAFF

When the Trump administration [announced a review](#) of \$9 billion of [federal funding](#) for Harvard and its affiliated institutions this week, it did not specify which research projects might be targeted.

But a Monday memo from the government's [antisemitism task force](#) obtained by the Globe contains some answers.

It lists more than \$255 million of contracts included in the review, most of them for health and medicine research projects. One contract with the Harvard T.H. Chan School of Public Health is worth nearly \$60 million and provides funding for research on tuberculosis at 14 labs across the country. Another, with Boston Children's Hospital, provides nearly \$36 million for what public records describe as an online vaccination site locator.

That contract is just one of many on the list for Boston Children's Hospital. In total, the hospital's contracts now under review are valued at more than \$122 million. The list, which was not previously reported, also includes \$98 million of contracts with Harvard University itself, including the School of Public Health contract.

The memo was sent to Harvard's leaders on March 31 by the US General Services Administration, one of the agencies participating in the antisemitism task force.

It put Harvard on notice that nearly \$9 billion of funding would be placed under review.

The vast majority of the funding, \$8.7 billion, was in the form of "multi-year grant commitments," but no other details were provided. By contrast, the memo provided a specific list of federal research contracts, and said the government was prepared to issue "Stop Work Orders" for all of them.

It also invoked a broad authority to cancel any contract "for convenience." Many federal contracts include clauses that grant the government broad discretion to cancel them.

Federal research contracts targeted in the Harvard antisemitism review

Total values are as listed in a government memo to Harvard obtained by the Globe

Page 1 of 8



Funding agency	Recipient	Description	▼ Total
National Institutes of Health	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	HEALTH R&D SERVICES; HEALTH CARE SERVICES; APPLIED RESEARCH	\$59.8M
Centers for Disease Control and Prevention	CHILDREN'S HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: OTHER	\$36M
Centers for Disease Control and Prevention	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE - OTHER; BASIC RESEARCH	\$24.9M
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; APPLIED RESEARCH	\$24.8M
Office of Assistant Secretary for Preparedness and Response	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	HEALTH R&D SERVICES; HEALTH CARE SERVICES; EXPERIMENTAL DEVELOPMENT	\$15.2M
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; BASIC RESEARCH	\$13.6M
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; BASIC RESEARCH	\$10.9M
National Institutes of Health	THE GENERAL	SUPPORT- PROFESSIONAL: PROGRAM	

The contract for tuberculosis funding with the Harvard School of Public Health supports labs across the country working on vaccine development, according to publicly available data on federal research contracts. Another contract with Boston Children's Hospital funds studies on whether the Covid vaccine reduces Multisystem Inflammatory Syndrome in children, according to publicly available records. There is also a contract with Boston Children's funding development for a vaccine to prevent opioid addiction.

One contract with Mass General Brigham worth \$8 million, according to the memo, came from the US Special Operations Command, which hired the hospital to provide research and technical services related to traumatic brain injuries, according to publicly available records.

On Thursday, the Trump administration sent Harvard a list of demands detailing what the school's leaders must do to avoid cancellation of federal funding. The list included: shuttering diversity offices, implementing "merit-based" admissions and hiring practices, cooperating with federal immigration authorities, and altering student disciplinary procedures.

The Trump administration contends those measures will help combat antisemitism and reduce what officials have described as illegal race-based discrimination.

In a [message to the campus community](#) Monday after the funding review was announced, Harvard president Alan Garber, said, "If this funding is stopped, it will halt life-saving research and imperil important scientific research and innovation."

He also said: "We fully embrace the important goal of combatting [SIC] antisemitism, one of the most insidious forms of bigotry" and that Harvard would "engage with members of the federal government's task force to combat antisemitism to ensure that they have a full account of the work we have done and the actions we will take going forward to combat antisemitism."

The institutions targeted in the review include Harvard University itself and its affiliated teaching hospitals and research institutions, such as Mass General Brigham, Beth Israel Deaconess Medical Center, Boston Children's Hospital, and the Broad Institute, according to the list of contracts included in the memo.

The memo describes the \$255 million as a "ceiling value." That may be a reference to the fact that some of the contracts have already been partially paid out and at least one has already been canceled in a separate round of federal research funding cuts, according to a Globe review of federal contract data.

The antisemitism task force says its goal is to investigate universities that have violated civil rights laws by allegedly failing to protect Jewish students from antisemitic harassment related to the campus protest movement over the Israel-Hamas war.

At Columbia University last month, the task force used threats to federal funding to compel the school's leaders to accept a list of demands related to antisemitism and campus protest.

Some have questioned the legality of the task force's methods. Although the government may legally withhold federal funding for civil rights violations, there was no public process to adjudicate the the accusations against Columbia before the task force paused \$400 million of funding for the school last month.

Tyler Coward, a lawyer with the Foundation for Individual Rights and Expression, a free speech advocacy group, said the Trump administration's reliance on the convenience clause in federal contracts may be a way for the task force to bypass the formal process that would require the government to present evidence for its claims.

"Using federal contract law to bypass federal anti-discrimination law is a massive concern because these ad-hoc determinations from these agencies are ripe for abuse," Coward said.

Spokespeople for the Department of Education, the Department of Health and Human Services, and the US General Services Administration, three agencies participating in the antisemitism task force, did not respond to requests for comment Friday.

Neena Hagen of the Globe staff contributed to this report.

Mike Damiano can be reached at mike.damiano@globe.com. Liz Kowalczyk can be reached at lizabeth.kowalczyk@globe.com.

When the Trump administration announced a review of \$9 billion of federal funding for Harvard and its affiliated institutions this week, it did not specify which research projects might be targeted.

But a Monday memo from the government's antisemitism task force obtained by the Globe contains some answers.

It lists more than \$255 million of contracts included in the review, most of them for health and medicine research projects. One contract with the Harvard T.H. Chan School of Public Health is worth nearly \$60 million and provides funding for research on tuberculosis at 14 labs across the country. Another, with Boston Children's Hospital, provides nearly \$36 million for what public records describe as an online vaccination site locator.

That contract is just one of many on the list for Boston Children's Hospital. In total, the hospital's contracts now under review are valued at more than \$122 million. The list, which was not previously reported, also includes \$98 million of contracts with Harvard University itself, including the School of Public Health contract.

The memo was sent to Harvard's leaders on March 31 by the US General Services Administration, one of the agencies participating in the antisemitism task force.

Related

Trump administration sends Harvard list of demands to avoid cancellation of billions in federal funding
What's in that \$9 billion the Trump administration is reviewing at Harvard?
University presidents aren't capitulating to Trump, they say. They're 'adapting.'

It put Harvard on notice that nearly \$9 billion of funding would be placed under review.

The vast majority of the funding, \$8.7 billion, was in the form of "multi-year grant commitments," but no other details were provided. By contrast, the memo provided a specific list of federal research contracts, and said the government was prepared to issue "Stop Work Orders" for all of them.

It also invoked a broad authority to cancel any contract "for convenience." Many federal contracts include clauses that grant the government broad discretion to cancel them.

Federal research contracts targeted in the Harvard antisemitism review

Total values are as listed in a government memo to Harvard obtained by the Globe

A data table showing a list of federal contracts for Harvard University under review as part of an presidential executive order

Table with 4 columns and 61 rows. Sorted descending by column "Total"

National Institutes of Health	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	HEALTH R&D SERVICES; HEALTH CARE SERVICES; APPLIED RESEARCH	\$59.8M
Centers for Disease Control and Prevention	CHILDREN'S HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: OTHER	\$36M
Centers for Disease Control and Prevention	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE - OTHER; BASIC RESEARCH	\$24.9M
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; APPLIED RESEARCH	\$24.8M
Office of Assistant Secretary for Preparedness and Response	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	HEALTH R&D SERVICES; HEALTH CARE SERVICES; EXPERIMENTAL DEVELOPMENT	\$15.2M
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; BASIC RESEARCH	\$13.6M
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; BASIC RESEARCH	\$10.9M
National Institutes of Health	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: PROGRAM MANAGEMENT/SUPPORT	\$8.9M
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; APPLIED RESEARCH	\$8.3M

U.S. Special Operations Command	THE GENERAL HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; APPLIED RESEARCH	\$8M
National Institutes of Health	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	SUPPORT- PROFESSIONAL: OTHER	\$6M
National Institutes of Health	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: PROGRAM MANAGEMENT/SUPPORT	\$5.3M
Food and Drug Administration	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	SPECIAL STUDIES/ANALYSIS-CHEMICAL/BIOLOGICAL	\$4.7M
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE SERVICES; APPLIED RESEARCH	\$3.3M
Office of Assistant Secretary for Preparedness and Response	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	HEALTH R&D SERVICES; HEALTH CARE SERVICES; EXPERIMENTAL DEVELOPMENT	\$3.2M
Department of Veterans Affairs	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	HEALTH R&D SERVICES; HEALTH CARE - OTHER; APPLIED RESEARCH	\$3.2M
National Institutes of Health	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: PROGRAM MANAGEMENT/SUPPORT	\$2.8M
Centers for Disease Control and Prevention	THE GENERAL HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH RESEARCH AND TRAINING; APPLIED RESEARCH	\$2.3M

National Institutes of Health	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: OTHER	\$1.3M
National Institutes of Health	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: PROGRAM MANAGEMENT/SUPPORT	\$1.2M
Food and Drug Administration	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: OTHER	\$978.3K
Department of Veterans Affairs	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	HEALTH R&D SERVICES; HEALTH CARE SERVICES; BASIC RESEARCH	\$965.7K
Department of Veterans Affairs	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	HEALTH R&D SERVICES; HEALTH CARE SERVICES; APPLIED RESEARCH	\$901.3K
National Oceanic and Atmospheric Administration	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	NATURAL RESOURCES & ENVIRONMENT R&D SVCS; POLLUTION CONTROL & ABATEMENT; EXPERIMENTAL DEVELOPMENT	\$750K
Indian Health Service	MASSACHUSETTS GENERAL PHYSICIANS ORGANIZATION, INC	MEDICAL- OTHER	\$733.9K
National Institutes of Health	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	REFERENCE LABORATORY TESTING	\$700.1K
Department of Veterans Affairs	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	SPECIAL STUDIES/ANALYSIS-MEDICAL/HEALTH	\$693.7K

National Institutes of Health	THE GENERAL HOSPITAL CORPORATION	SPECIAL STUDIES/ANALYSIS-SCIENTIFIC DATA	\$625K
National Institutes of Health	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: PROGRAM MANAGEMENT/SUPPORT	\$593.1K
Washington Headquarters Services	HARVARD BUSINESS SCHOOL PUBLISHING CORPORATION	IT AND TELECOM - PLATFORM AS A SERVICE: DATABASE, MAINFRAME, MIDDLEWARE	\$527K
Food and Drug Administration	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	SPECIAL STUDIES/ANALYSIS-SCIENTIFIC DATA	\$523.4K
Office of the Assistant Secretary for Administration	CHILDREN'S HOSPITAL CORPORATION	EDUCATION/TRAINING-SCIENTIFIC/MANAGEMENT	\$450K
Defense Advanced Research Projects Agency	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: OTHER	\$393.3K
National Oceanic and Atmospheric Administration	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	OTHER ENVIRONMENTAL SERVICES	\$250K
Department of Veterans Affairs	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	EDUCATION, TRAINING, EMPLOYMENT, & SOCIAL SVCS R&D SVCS; EDUCATION SVCS R&D; APPLIED RESEARCH	\$249.4K

Consumer Product Safety Commission	THE GENERAL HOSPITAL CORPORATION	SUPPORT- MANAGEMENT: DATA COLLECTION	\$240K
Department of Veterans Affairs	MASSACHUSETTS GENERAL PHYSICIANS ORGANIZATION, INC	REFERENCE LABORATORY TESTING	\$200K
National Institutes of Health	THE GENERAL HOSPITAL CORPORATION	SUPPORT- PROFESSIONAL: PROGRAM MANAGEMENT/SUPPORT	\$198.2K
Department of Veterans Affairs	THE GENERAL HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH CARE - OTHER; BASIC RESEARCH	\$176.4K
Department of the Navy	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	EDUCATION/TRAINING- TUITION/REGISTRATION/MEMBERSHIP FEES	\$175.6K
Immediate Office of the Secretary of Transportation	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	TRANSPORTATION R&D SERVICES; AEROSPACE RESEARCH; BASIC RESEARCH	\$150.7K
Department of Veterans Affairs	BETH ISRAEL DEACONESS MEDICAL CENTER, INC.	GENERAL SCIENCE AND TECHNOLOGY R&D SERVICES; GENERAL SCIENCE AND TECHNOLOGY; BASIC RESEARCH	\$133.4K
National Institutes of Health	CHILDREN'S HOSPITAL CORPORATION	SPECIAL STUDIES/ANALYSIS- SCIENTIFIC DATA	\$105.6K
Department of Veterans Affairs	THE GENERAL HOSPITAL CORPORATION	LABORATORY EQUIPMENT AND SUPPLIES	\$95.5K

Department of Veterans Affairs	THE GENERAL HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH RESEARCH AND TRAINING; APPLIED RESEARCH	\$95.2K
Department of Veterans Affairs	THE GENERAL HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH RESEARCH AND TRAINING; APPLIED RESEARCH	\$95.2K
Department of Veterans Affairs	BETH ISRAEL DEACONESS MEDICAL CENTER, INC.	GENERAL SCIENCE AND TECHNOLOGY R&D SERVICES; GENERAL SCIENCE AND TECHNOLOGY; BASIC RESEARCH	\$74.9K
Smithsonian Institution	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	LEASE/RENTAL OF OTHER EDUCATIONAL BUILDINGS	\$63.6K
Washington Headquarters Services	HARVARD BUSINESS SCHOOL PUBLISHING CORPORATION	EDUCATION/TRAINING- OTHER	\$52.5K
National Institutes of Health	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	REFERENCE LABORATORY TESTING	\$49.9K
Department of Veterans Affairs	BETH ISRAEL DEACONESS MEDICAL CENTER, INC.	HEALTH R&D SERVICES; HEALTH CARE SERVICES; BASIC RESEARCH	\$45.8K
Smithsonian Institution	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	IT AND TELECOM - NETWORK: SATELLITE COMMUNICATIONS AND TELECOM ACCESS SERVICES	\$32.6K

Smithsonian Institution	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	EDUCATION/TRAINING-TUITION/REGISTRATION/MEMBERSHIP FEES	\$32K
Department of Veterans Affairs	THE GENERAL HOSPITAL CORPORATION	HEALTH R&D SERVICES; HEALTH RESEARCH AND TRAINING; APPLIED RESEARCH	\$27.4K
Office of Procurement Operations	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	SUPPORT- PROFESSIONAL: PERSONAL SERVICES CONTRACTS	\$25.8K
National Aeronautics and Space Administration	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	EDUCATION/TRAINING- OTHER	\$25.8K
National Institutes of Health	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	SPECIAL STUDIES/ANALYSIS-SCIENTIFIC DATA	\$19.4K
Immediate Office of the Secretary of Transportation	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	EDUCATION/TRAINING-TUITION/REGISTRATION/MEMBERSHIP FEES	\$18.6K
National Institutes of Health	HARVARD BUSINESS SCHOOL PUBLISHING CORPORATION	EDUCATION/TRAINING-TUITION/REGISTRATION/MEMBERSHIP FEES	\$16K
Agency for International Development	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	EDUCATION/TRAINING- GENERAL	\$11.2K

Food Safety and Inspection Service	PRESIDENT AND FELLOWS OF HARVARD COLLEGE	EDUCATION/TRAINING- TRAINING/CURRICULUM DEVELOPMENT	\$10.5K
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Table: NEENA HAGEN, MIKE DAMIANO, LIZ KOWALCZYK AND YOOHYUN JUNG/GLOBE STAFF•Source: USAspending.gov, Globe reporting

The contract for tuberculosis funding with the Harvard School of Public Health supports labs across the country working on vaccine development, according to publicly available data on federal research contracts. Another contract with Boston Children’s Hospital funds studies on whether the Covid vaccine reduces Multisystem Inflammatory Syndrome in children, according to publicly available records. There is also a contract with Boston Children’s funding development for a vaccine to prevent opioid addiction.

One contract with Mass General Brigham worth \$8 million, according to the memo, came from the US Special Operations Command, which hired the hospital to provide research and technical services related to traumatic brain injuries, according to publicly available records.

On Thursday, the Trump administration sent Harvard a list of demands detailing what the school’s leaders must do to avoid cancellation of federal funding. The list included: shuttering diversity offices, implementing “merit-based” admissions and hiring practices, cooperating with federal immigration authorities, and altering student disciplinary procedures.

The Trump administration contends those measures will help combat antisemitism and reduce what officials have described as illegal race-based discrimination.

In a message to the campus community Monday after the funding review was announced, Harvard president Alan Garber, said, “If this funding is stopped, it will halt life-saving research and imperil important scientific research and innovation.”

He also said: “We fully embrace the important goal of combatting [SIC] antisemitism, one of the most insidious forms of bigotry” and that Harvard would “engage with members of the federal government’s task force to combat antisemitism to ensure that they have a full account of the work we have done and the actions we will take going forward to combat antisemitism.”

The institutions targeted in the review include Harvard University itself and its affiliated teaching hospitals and research institutions, such as Mass General Brigham, Beth Israel Deaconess Medical Center, Boston Children’s Hospital, and the Broad Institute, according to the list of contracts included in the memo.

The memo describes the \$255 million as a “ceiling value.” That may be a reference to the fact that some of the contracts have already been partially paid out and at least one has already been canceled in a separate round of federal research funding cuts, according to a Globe review of federal contract data.

The antisemitism task force says its goal is to investigate universities that have violated civil rights laws by allegedly failing to protect Jewish students from antisemitic harassment related to the campus protest movement over the Israel-Hamas war.

At Columbia University last month, the task force used threats to federal funding to compel the school’s leaders to accept a list of demands related to antisemitism and campus protest.

Some have questioned the legality of the task force’s methods. Although the government may legally withhold federal funding for civil rights violations, there was no public process to adjudicate the the accusations against Columbia before the task force paused \$400 million of funding for the school last month.

Tyler Coward, a lawyer with the Foundation for Individual Rights and Expression, a free speech advocacy group, said the Trump administration’s reliance on the convenience clause in federal contracts may be a way for the task force to bypass the formal process that would require the government to present evidence for its claims.

“Using federal contract law to bypass federal anti-discrimination law is a massive concern because these ad-hoc determinations from these agencies are ripe for abuse,” Coward said.

Spokespeople for the Department of Education, the Department of Health and Human Services, and the US General Services Administration, three agencies participating in the antisemitism task force, did not respond to requests for comment Friday.

Neena Hagen of the Globe staff contributed to this report.

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EXHIBIT 15

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Harvard Researchers Develop AI-Driven Framework To Study Social Interactions, A Step Forward for Autism Research



NEWS

Harvard Innovator 25 President's Inno Finalists



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Trump Admin's \$9 Billion Review of Harvard's Grants Could Hit Boston's Hospitals Hardest



The brunt of the threatened \$9 billion cuts by the federal government will hit Boston hospitals, not Harvard. By [Lucy H. Vuong](#)

By [Saketh Sundar](#), Crimson Staff Writer

April 4, 2025

Sections

The Trump administration's **sweeping federal review** of nearly \$9 billion in multi-year research funding tied to Harvard has sparked uncertainty across the University — but the brunt of the planned cuts may be felt by Boston hospitals, not the University.

Five independent Boston hospitals affiliated with Harvard Medical School — Massachusetts General Hospital, Brigham and Women's Hospital, Boston Children's Hospital, Dana-Farber Cancer Institute, and Beth Israel Deaconess Medical Center — collectively received more than \$1.56 billion in National Institutes of Health funding in fiscal year 2024.

That figure is more than double the \$686 million the University **received from the federal government** at large in the same year.

The Trump administration's funding review stems from an **investigation launched by** the Federal Task Force to Combat Antisemitism, which has accused Harvard of failing to adequately address antisemitic incidents on campus.

While the alleged violations are largely related to Harvard College and the University's Cambridge campus, the consequences could fall mostly on the hospitals.

The Crimson analyzed the proposed Trump administration funding cuts and estimated that the five hospitals' multi-year commitment from the NIH is over \$6.2 billion and the University's multi-year federal research funding exceeds \$2.7 billion.

The combined figure nears the \$9 billion cited by federal officials, but it remains unclear if the funding review is limited to these select grants.

The methodology utilized a four-year projection based on fiscal year 2024, since Harvard and its affiliates would not face an immediate single-year loss of \$9 billion, as most federal research awards span three to five years.

These hospitals — despite employing Harvard Medical School faculty and co-sponsoring research projects — are not governed by the University and are not backed by Harvard's \$53.2 billion endowment. Instead, they operate as financially independent nonprofits, with federal grants comprising a large share of their research budgets.

Sections

HMS Affiliated NIH Funding

Fiscal Year 2024

Source: National Institute of Health • By Saketh Sundar — Crimson Designer

✱ A Flourish chart

In an **email to Harvard affiliates** on Monday, University President Alan M. Garber '76 confirmed that the nearly \$9 billion in multi-year federal grants supported “Harvard and other institutions, including hospitals in our community.” Garber cautioned that the loss of that funding would “halt life-saving research.”

Jonathan C. Kagan, director of basic research and chair of gastroenterology at BCH, criticized the response from academic leaders at Harvard.

“Before any budget cuts have even been made, academic leaders have stalled hiring, stalled expansions, stalled research conferences and graduate student admissions,” Kagan wrote in a statement to The Crimson.

“Stated differently, our academic leaders are following the White House in cutting research opportunities,” he added.

University Spokesperson Sarah Kennedy O'Reilly declined to comment on whether the University plans to support these institutions during the funding review.

Sections

protecting our community and its academic freedom.”

MGH was the top-funded hospital in the country by NIH in fiscal year 2024, receiving \$655 million. BWH received \$388 million, BCH \$230 million, Dana-Farber \$164 million, and Beth Israel Deaconess \$119 million.

All five hospitals ranked among the top ten nationwide in NIH funding.

Sally Rockey, a former deputy director for extramural research at the NIH under the recent Bush and Obama administrations, said the disconnect between the review’s stated purpose of campus antisemitism and its actual target — federally funded biomedical research — is “unprecedented.”

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“That relationship between what’s going on in biomedical research versus the stance any particular institution is taking to monitor its antisemitism or other types of activity is really unheard of,” she said.

Rockey explained that it is highly unusual for federal grant oversight to conflate University and hospital-based research funding even in ecosystems like HMS, where clinical and academic boundaries are often blurred.

“There’s a close association with the hospitals, with Mass General and Brigham,” she said. “But in general, they’re not considered affiliated, particularly in the research world.”

“That’s very unheard of, I don’t know how they’re making those links so that they can use that to extend their inquiries,” Rockey added.

Beth Israel Lahey Health spokesperson Sarah Finlaw wrote in a statement to The Crimson that BIDMC administration is monitoring the situation closely.

“Any changes to federal research funding will have a significant impact on our ability to recruit talented clinicians, who have led medical breakthroughs impacting care for patients around the world,” she wrote. “We are aware of the announced review of Harvard and its affiliates by the federal government and continue to monitor the situation.”

A spokesperson for Dana-Farber Cancer Institute declined to comment on how

Sections

Mass General Brigham — the parent organization of MGH and BWH — confirmed internally to its research staff that preparations to respond to funding cancellations are underway.

In a Mar. 20 email obtained by The Crimson addressing funding cancellations at Columbia and the University of Pennsylvania, MGB Chief Academic Officer Paul Anderson wrote that “a task force composed of senior MGB leadership, physician-scientists and chairs is working to identify immediate strategies and contingency plans to respond to potential funding disruptions and terminations across the organization.”

Still, many researchers said they had not received any direct communication from the various hospitals’ administrations about the \$9 billion review since Monday. However, they were provided with general institutional guidance on how to respond if an NIH grant is terminated.

These guidelines instructed principal investigators to immediately halt project activities, notify personnel, initiate formal appeals, and coordinate with oversight bodies to shut down the project.

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The hospitals depend on NIH support to fund thousands of active research programs. In 2024 alone, MGH held over 1,000 NIH awards; BWH, 675; DFCI, 243; BIDMC, 215; and BCH had 429.

The grants support a wide range of activities including molecular biology wet labs and late-stage clinical trials. With limited information about which programs fall under the scope of the review, researchers said they are unsure whether their work will be paused, scaled back, or canceled entirely.

“There is much concern among members of our research community as we cope with the national news,” wrote Philip A. Cole, a HMS professor and researcher at BWH.

“We are especially worried about younger scientists, and how the threat of major funding reductions will impact their well-being and outlook,” Cole added.

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EXHIBIT 16



Kris Snibbe/Harvard file photo

WORK & ECONOMY

With federal funds, Harvard helps drive local economy

March 1, 2020 ■ 4 min read

Research money supports scientific breakthroughs

Federal research funding is a key driver for the advances in scientific knowledge that deepen our understanding of intractable diseases, hasten new treatments, and improve our daily lives.

Allon Klein, associate professor of systems biology at Harvard Medical School (HMS), used federal money to help propel a breakthrough in how researchers analyze cells in the body. His newly developed device lets researchers analyze single cells in large numbers, helping them understand diseases and where to intervene.

“It’s rare that a disease only affects a single cell type, and a good example of that is cancer, where inside a tumor there is much more than just the cancer cells themselves,” Klein said. “They would not be able to survive without being fed from blood vessels, and they interact with immune cells, and with cells that lay down the matrix on which tumors grow.”

“We can already see tremendous uptake of single-cell technologies in disease research across both academic and pharmaceutical research,” he said, “I expect that in the coming years we will find these methods central to identifying new therapeutic targets, developing biomarkers that predict which patients will respond to therapies, and identifying side effects of trial therapies.”

The device, which he created with support from the National Institutes of Health (NIH), has been licensed to private industry, where it can potentially be brought to market and help patients.



Each dollar invested in research at medical schools and teaching hospitals generates \$2.60 in economic activity.



— Greater Boston Chamber of Commerce

Groundbreaking work by Klein and other researchers across Harvard attracts hundreds of millions of research dollars to campus, and in turn, to Massachusetts. This means that federal funding plays a critical role in advancing impactful discoveries and in stimulating the regional economy.

“The Harvard community learns, teaches, and innovates in Massachusetts, harnessing the power of new ideas and discovery to solve challenging problems and contribute to the well-being of our communities,” said Harvard President Larry Bacow. “We are proud of our strong connections to Massachusetts and the cities Harvard calls home.”

According to the Greater Boston Chamber of Commerce, federal research funding is a critical building block in Massachusetts’ knowledge-based economy. Each dollar invested in research at medical schools and teaching hospitals generates \$2.60 in economic activity.

Last year, for example, **Harvard University** attracted more than \$800 million in research funding, with 70 percent coming from the federal government. This funding supported hundreds of millions in salaries and wages for Massachusetts residents, as well as purchases from local businesses, with more than \$21 million directed to companies in Harvard’s host communities of Boston and Cambridge.

Beyond the University’s research enterprise, Harvard’s 14 affiliated teaching hospitals — such as Boston’s Children Hospital, Brigham and Women’s Hospital, and Beth Israel Deaconess Medical Center — attracted additional funding, helping keep Massachusetts at the forefront of cutting-edge health care.

“This funding grows our economy and the investment of research dollars can be seen throughout Greater Boston and the commonwealth through new companies that generate innovation and sustain high-paying jobs,” said James Rooney, president and chief executive officer of the Greater Boston Chamber of Commerce. “Institutions like Harvard University are invaluable anchors for attracting this kind of investment.”

LOCAL SUPPORT, LOCAL HIRES, LOCAL PURCHASING

See how Harvard's research funding supports local jobs and businesses.

\$353.8M

of the research dollars received were spent on purchases and salaries in Massachusetts (FY18)

\$324.4M

supported researchers and staff

\$29.4M

were used to purchase goods and services from companies located in Massachusetts



\$17.5M

supported companies in Boston



\$4.6M

supported companies in Cambridge



FACTS & IMPACT 2019

Graphic by Dan Hassett-Salley/Harvard Staff

In addition to external funding, the University invests institutional resources to help translate researchers' innovations into products and services that benefit the public good. For example, as of July 2019, more than \$19 million in grants had been awarded to 108 projects through the Blavatnik Biomedical Accelerator. These projects, in turn, attracted an additional \$36 million in industry-sponsored research funding and helped launch new Massachusetts-based companies such as Elevian, FogPharma, Macrolide Pharmaceuticals, Magenta Therapeutics, Mellitus, and Nocion Therapeutics, to name a few. In return, these companies attract venture capital, further adding to medical discoveries and stimulating the state's life-sciences ecosystem.

For Junying Yuan, Elizabeth D. Hay Professor of Cell Biology at HMS, funding from the Blavatnik Biomedical Accelerator helped pave the way for her breakthrough work on nerve cell damage — critical for the understanding and treatment of neurodegenerative diseases such as Alzheimer's and ALS — to reach the vital human clinical trial phase.

Meanwhile, the Harvard Innovation Labs in Allston have helped launch more than **1,600 ventures** in the past 10 years, providing valuable incubation space and advising to entrepreneurs across social enterprise, tech, and health care.

To learn more, read the recently released annual report, **Facts & Impact: Harvard and the Massachusetts Economy**, which describes more ways in which Harvard contributes to the commonwealth.

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HARVARD
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EXHIBIT 17

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER, and AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE, et al. Defendants.	Case No. _____
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Declaration of Kirsten Weld

I, Kirsten Weld, declare as follows:

1. I am a tenured Professor of History at Harvard University.
2. I have a PhD in history from Yale University as well as MPhil and MA degrees from Yale University and a BA degree from McGill University.
3. I am over the age of 18 and competent to testify as to the matters set forth in this affidavit based on my own personal knowledge.
4. I am the President of the American Association of University Professors – Harvard Faculty Chapter (“Harvard AAUP”). I have voluntarily served in this role since April 2024. I have been an American Association of University Professors (“AAUP”) member since April 2024.
5. As a chapter of the AAUP, Harvard AAUP advocates for policies at Harvard that promote the AAUP’s mission of advancing academic freedom and shared government, defining professional values and standards for higher education, ensuring higher education’s contribution

to the common good, and safeguarding the economic security of faculty, academic professionals, graduate students, post-doctoral fellows, and others engaged in teaching and research in higher education.

6. Harvard AAUP is not aligned with any political party or ideology. Our members have diverse political and personal beliefs, and we welcome that diversity.

7. All Harvard AAUP members are members of the AAUP.

8. I am aware that the Trump administration has taken a series of actions targeting Harvard. In particular, I am aware that on March 10, 2025, the federal government sent a letter to Harvard and many other universities warning of potential enforcement actions. I am aware that on March 31, 2025, the U.S. Department of Education (DOE), U.S. Department of Health and Human Services (HHS), and U.S. General Services Administration (GSA) announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. Most recently, I am aware that on April 3, 2025, officials from the GSA, HHS, and DOE sent a letter to Harvard that was made public and demanded that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “Demand Letter”). I have read the demands listed in the Demand Letter.

9. I am also aware of a variety of “stop work” orders that have been issued by federal funding agencies to grants held by researchers working at Harvard beginning in February 2025. I am aware that on April 4, 2025, the Boston Globe reported on a federal government memorandum issued March 31 that specified grants for specific research projects the current administration is targeting. I know that some of these grants belong to AAUP members.

10. I am further aware of a variety of public statements made by the Trump administration beginning in January 2025 slandering the work of university researchers, impugning the

integrity of the university, and making a variety of threats about the ways the federal government intends to use its authority to impose a moving target list of demands on Harvard.

11. I am also aware of the cancellation of \$400 million in federal grants and contracts to Columbia University and the changes Columbia agreed to implement because of the Trump administration's cutting of funding and other demands. Everyone on Harvard's campus seemed to be aware of what was going on at Columbia; there was a lot of discussion, fear, and uncertainty. I am also aware that even after Columbia capitulated to the Trump administration's demands it still wasn't enough; Columbia's federal funding has not been restored, and indeed, on April 9, the National Institutes of Health announced that all its research grants to Columbia would be frozen effective immediately.

12. It is my understanding that Harvard preemptively took a series of actions in anticipation of similar demands and threats to cancel its federal funding and in response to threats made by the Trump administration targeted at Harvard as far back as January 2025.

13. I understand that Title VI and its implementing regulations require the government to provide notice and opportunity for a hearing, followed by a finding on the record, before terminating federal funding in any program or part thereof based on a violation of Title VI. I am not aware of any such notice having been provided to any AAUP member to date.

14. I fear that the recent actions of the Trump administration will lead to Harvard making decisions that stifle the ability of AAUP members to exercise their academic freedom and freedom of speech to express differing viewpoints. I am also afraid of the profound negative impacts the loss of Harvard's federal funding would have on research across the campus.

Impact on AAUP as an Organization and on its Members

15. The series of actions the Trump administration has taken targeting Harvard have already had negative impacts on AAUP as an organization.

16. The Trump administration's actions are also causing a drain on the AAUP's resources because the organization has to spend time dealing with crises and putting people in touch with needed resources instead of doing the internal governance work that the AAUP usually does within the university. For example, we were asked to cosponsor a training on digital surveillance and information security for our members, and we are in the process of planning a Know Your Rights workshop aimed specifically at faculty.

17. The AAUP has three guiding principles: academic freedom, governance, and economic security. These are core objectives of the Harvard AAUP chapter that track the priorities of AAUP national. Even a narrow interpretation of the capacious demands in the Demand Letter will have severe impacts on each of these three areas, which I will discuss in turn.

Academic Freedom

18. This first AAUP principle involves upholding agreed upon norms and standards of academic freedom for scholarly research and teaching.

19. Harvard has already taken actions in anticipation of the Trump administration investigating the university and threatening to withhold its federal funding. For example, on March 26, 2025—after the March 10, 2025 warning letter was sent to Harvard and other universities—there was a very unusual firing of the Director and Associate Director of the Center for Middle Eastern Studies. They were removed from their directorship positions at the Center, seemingly based on a handful of accusations that their programming was “imbalanced” regarding Palestine. Harvard also declined to renew a long-standing partnership between the Harvard School of Public Health's François-Xavier Bagnoud (FXB) Center for Health and Human Rights and Birzeit University in the West Bank.

20. Around the same time, Harvard declined to renew the annual contract of a colleague who had served as Associate Director for the Religion, Conflict, and Peace Initiative at Harvard

Divinity School. That colleague, who had led programming in Middle East Studies at Harvard for 23 years, was the only Palestinian-American employed at the Harvard Divinity School. The Religion, Conflict, and Peace Initiative was suspended.

21. I believe it reasonable to interpret all these actions as having been taken in anticipation of a Trump administration investigation. These were all programs criticized by the congressional Committee on Education & the Workforce as being antisemitic, echoing inflammatory statements by Harvard affiliates about many units of the Harvard Divinity School being “ Hamas or Palestinian embassies.” The fact that these programs were all shut down around the same time raised grave concerns that legitimate inquiry regarding Israel and Palestine was being shut down by Harvard as a result of threats made by the Trump administration to investigate the university.

22. What is likely to follow as a result of the Demand Letter presents an even greater threat to academic freedom. The Demand Letter seeks to force Harvard to alter its criteria for hiring and elevate voices of compliant faculty into administrative positions while marginalizing the roles of “noncompliant” faculty.

23. I have two colleagues who have already changed their plans for the courses they were going to teach in the fall out of self-preservation because their planned courses were on topics explicitly disfavored by the Trump administration. They changed their curricular offerings to no longer be explicitly about transgender issues in one case and no longer be explicitly about race in the other.

Governance

24. This second AAUP principle involves advocating for robust shared governance at universities according to guidelines and recommendations that AAUP national has established over the course of the past century. These guidelines detail the joint responsibility of faculty,

administrations, and governing boards to govern colleges and universities, and they note that “when it comes to academic matters, a faculty decision should normally be the final decision.”

25. The governance and leadership reforms listed in the Demand Letter are a clear infringement on the autonomy of Harvard to manage its personnel in the manner that is most conducive to research and teaching at the university. Capitulation by Harvard to this demand would constitute not shared governance, but governance by unlawful federal fiat.

26. The demand concerning Diversity, Equity, and Inclusion (DEI) programs in the Demand Letter is vague. It will be interpreted, especially among non-tenure-track and other contingent faculty who do not have the protections of tenure, as implying that any kind of teaching and research related to race, ethnicity, racial equity, and identity, whether in a U.S. or global context, is too risky and could lead to career-damaging consequences. This has obvious implications for faculty who work in the field of U.S. history. It has immediate and devastating implications for many faculty in the field of public health because much work in the public health field relates to equity in some way. This demand signals clearly that the Trump administration will target areas of inquiry that it disfavors.

27. More than 800 Harvard faculty signed a letter urging Harvard not to cave into the Trump administration’s demands. If the Harvard President and Office of General Counsel decide to hand down unilateral decisions that restructure teaching and research at the university like Columbia did in response to the Trump administration demands, that will send a powerful and frightening message about the shredding of well-established professional norms around shared governance in higher education. These are shared norms that have been in place for decades about how university decision making happens.

Economic security

28. This third AAUP principle involves advocating for the economic security of all members of a university community so they can do their work under dignified and equitable economic conditions.

29. Cutting \$8.7 billion dollars in federal grant funding would leave no part of Harvard untouched and would have catastrophic implications for the economic security and lives of vast swathes of researchers, from post-graduate researchers to tenured faculty. The Harvard School of Public Health is especially vulnerable—nearly 60% of their operating budget comes from sponsored support, including federal grants. The School of Public Health has already begun to shrink admissions pools in their PhD programs, which will have lasting effects on the pipeline for future scientific research, and grants funding subjects like vaccine hesitancy, LGBTQ health, and the impact of racial discrimination on health outcomes have already been cut.

30. I am particularly fearful that colleagues who are coming up for tenure will be denied tenure if their research falls under the broad areas for “reform” listed in the Demand Letter.

31. Harvard has already implemented a hiring freeze. It is my understanding that this hiring freeze was implemented in part in anticipation of threats from the Trump administration to cancel Harvard’s federal funding. This funding freeze has impacted me directly because it includes a freeze on hiring new research assistants, which slows the pace of faculty research, as well as a freeze on new tenure-track hiring, which means we cannot fill crucial teaching gaps in the history department.

32. It is important to understand the way researchers who are funded by federal grants—especially biomedical researchers, of whom we have numerous AAUP members and who have explained to me in detail the implications of these threatened cuts for their work—organize their careers. Biomedical research funded by federal grants is built upon a complex infrastructure

of scientists, data analysts, administrators and trainees. It requires technical expertise that is developed over years of mentoring and is often held in the hands of specific experienced individuals. Human samples are necessary for the work, and such samples are obtained at significant cost and effort—to the researchers as well as to the study participants. This type of research therefore requires planning years in advance. Part of that planning involves always having additional fundable projects lined up to provide continuous resources for long-term research initiatives. So if federal funding were precipitously withdrawn, it would not just be researchers' current grants that were at risk of cancellation, it would be years' worth of future grants. This can be career ending; it may well unrecoverably disrupt these researchers' life work.

33. These threats are not unique to Harvard. Earlier this week, Cornell and Northwestern had \$1 billion and \$800 million in federal funds frozen respectively, and Columbia, despite having already agreed to many of the Trump administration's demands, saw all its NIH grants newly frozen.

Specific Impacts on Anonymous AAUP Members

34. As President of the Harvard AAUP chapter, I have heard from dozens of our members who fear that federal funding cuts would severely disrupt their ability to conduct essential academic research and teaching or whose speech has been chilled as a result of recent Trump administration threats and demands directed at Harvard. Many of them, including the AAUP members discussed below, are afraid to publicly testify about the impacts of these cuts and the chilling of their speech because they fear retaliation from Harvard University, Harvard affiliates, or the federal government.

35. Members, including those discussed below, have expressed fear that they will be blacklisted from future federal grant funding, denied tenure or academic promotion, and/or face retaliation against other members of their department or the students they advise. Certain members

have expressed concern that because they or their family members are noncitizens, their visas or green cards could be revoked in retaliation for their participation in this litigation. This section of the declaration discusses the experiences of AAUP members without providing names because of the reasonable fears of retaliation these members have expressed.

AAUP Member #1

36. An AAUP member in the Faculty of Arts and Sciences changed their teaching plans for next semester because they feared harassment.

37. This professor has been vocal in support of pro-Palestine student protestors and has already experienced public targeting and harassment as a result; however, they have not previously adjusted their public speech or teaching before this latest chilling wave of attacks from the federal government.

38. The course they had planned to teach would have addressed the lead-up to the U.S. Civil War; it would have dealt with topics including settler colonialism, slavery, Indian removal, and the U.S.-Mexico War, all of which could reasonably be assumed to be covered by the federal government's demand that anything related to "DEI" be eliminated.

39. Additionally, the professor feared facing false accusations on Title VI grounds because the course would have explored the subject of white supremacy in American history.

AAUP Member #2

40. Another AAUP member is a member of the faculty at Harvard Medical School.

41. This AAUP member has arranged to spend part of next year working outside the United States because they do not feel comfortable being at Harvard anymore due to their pro-Palestine advocacy and opinions. This member's decision to spend part of next year working outside the United States is intended as a step towards their full transition outside of the United States.

This means that the medical school and patients in the Harvard-affiliated hospital system will not receive the benefit of this faculty member's decades of clinical expertise.

AAUP Member #3

42. Another AAUP member is a member of the faculty at Harvard Medical School. They are an internationally recognized scholar in their field.

43. This faculty member attests that the current threat to precipitously withdraw support that has been promised by the federal government has already had a detrimental effect on the atmosphere and conduct of biomedical research at the Medical School.

44. This faculty member has already seen administrative staff—those who are responsible for tasks such as grants administration and human studies review—seek employment elsewhere. They note that early career scientists who have completed multiple years of postgraduate training are newly seeking career opportunities outside of basic research. Scientists with unique and advanced skills are seeking positions outside of academia, because of uncertainty for their future salary support. Projects that require the recruitment of human study participants are being slowed for concern that the associated research project will not be continued to completion.

45. This faculty member attests that the institution has already halted seed grants that are fundamental to initiating new projects and scientific collaborations. Harvard is encouraging faculty to pursue philanthropic funding for their work, yet the type of research this faculty member performs is unlikely to garner private funding.

46. This faculty member further attests that foundational scientific work that has taken many years of human effort and institutional investment to reach its current state is being paused in a manner that may fundamentally preclude the possibility of future research.

47. This faculty member remains anonymous because absent federal funding, they will need bridge funding from another source to maintain their research program. This funding may originate from, or be directed by administrators from within, their institution, and they fear that their actions might influence the possibility of receiving such support.

Impact on Student Speech and Academic Freedom

48. The recent Trump administration demands and threats targeted at Harvard also have had a profound chilling effect on students at Harvard.

49. Graduate students are having to reorganize their research plans because funding sources are drying up. A lot more doctoral research funding that graduate students depend on will dry up if federal funds are withheld. This makes it very difficult to do academic work in any discipline because serious research requires multiple years of planning.

50. I can also provide numerous examples of the ways in which students have changed their behavior as a result of threats from the Trump administration.

51. In one of my classes, students were recently talking about setting up a Signal group for mutual support because they were terrified about the detention of Rumeysa Ozturk at Tufts University close by. One student said they were too scared to even have the Signal app on their phone because if their devices got searched at the border, they didn't want border agents to think they had something to hide by virtue of having the app. This fear prevents this student from participating fully in their scholarly community.

52. When the Director and Associate Director of the Center for Middle Eastern Studies were removed from their positions, there was a protest criticizing their removal. One of my noncitizen students told me he was walking through Harvard Yard when the demonstration was ongoing, and when he saw there was a protest with cameras everywhere he pulled his hoodie over his face

and fled in the opposite direction because he was so afraid of being photographed at a protest he was not even involved in.

53. I know of undergraduate students who have changed their senior thesis topics—not necessarily because they themselves are fearful of personal repercussions, but because their advisors, in an effort to protect them, advised they research less controversial topics for their own safety. This represents an internalization of the demands being imposed by the Trump administration; it is a textbook example of their chilling effects.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Dated: April 11, 2025

Signed: _____

Kirsten Weld
Professor of History

EXHIBIT 18

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER, and AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE, et al. Defendants.	Case No. _____
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DECLARATION OF TODD WOLFSON

I, Todd Wolfson, hereby declare as follows:

1. I currently serve as President of the American Association of University Professors (“AAUP”), a plaintiff in this action. I have served in that position since June 2024. I also previously held various leadership roles for the Rutgers University chapter of AAUP, including as the chapter’s President and Vice President.

2. I am also a trained anthropologist and an Associate Professor of Journalism and Media Studies at Rutgers. I received my Ph.D. in Anthropology and Social and Cultural Foundations of Education from the University of Pennsylvania.

3. I have personal knowledge of the facts set forth in this declaration in support of Plaintiff’s Motion for Preliminary Injunction, and if called as a witness in this action, I could and would testify competently to these facts.

4. The AAUP is a membership association and labor union of faculty and academic professionals with chapters at colleges and universities throughout the country.

5. The AAUP is a 501(c)(6) organization headquartered in Washington, D.C.

6. The primary mission of the AAUP is to advance academic freedom and shared governance in higher education, define fundamental professional values and standards for higher education, promote the economic security of academic workers, and ensure higher education's contribution to the common good.

7. The AAUP was founded by John Dewey and other preeminent scholars in 1915 to defend the ability of scholars, researchers, and educators to teach, write, and research without political and economic retaliation based on their viewpoints. Since its founding, the AAUP has helped to shape American higher education by developing the standards and procedures that maintain quality in education and academic freedom in this country's colleges and universities.

Harms to AAUP's Members

8. The AAUP has approximately 44,000 members on college and university campuses across the country, including approximately 122 members at Harvard University. Many of these members, including members at Harvard, rely on federal grants to support their research, scholarship, and teaching activities.

9. I am aware of and can identify AAUP members who are at risk of losing their funding and whose speech and academic freedom has been chilled as a result of the federal government's series of actions targeting Harvard University, including the March 10, 2025 letter to Harvard and many other universities warning of potential enforcement actions; the March 31, 2025 announcement by the government of a comprehensive review of federal contracts and grants at Harvard University and its affiliates; and the April 3, 2025 letter from officials at the U.S. General

Services Administration, U.S. Department of Health and Human Services, and U.S. Department of Education that was made public and demanded that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “Demand Letter”). Those AAUP members will suffer irreparable harm to their research, work, reputation, academic freedom, and ability to pursue their careers if federal funding is cancelled or if the Harvard administration accedes to the federal government’s demands in the Demand Letter.

10. I am aware of and can identify AAUP members who rely on federal funding that the federal government threatened to cancel in its April 3, 2025 letter demanding that Harvard implement a long list of “non-exhaustive areas of reform” to “remain a responsible recipient of federal taxpayer dollars.” Many of those AAUP members are suffering harm as a direct result of that threat, including because the continued viability of their work is now uncertain, making it difficult to plan, maintain professional relationships, and recruit potential staff to work on their projects. Those AAUP members will also suffer irreparable harm to their research, work, reputation, and ability to pursue their careers and work if the federal government cancels that funding.

11. I am aware of and can identify AAUP members at Harvard University who are concerned about losing their jobs or ability to continue to support their livelihoods, either as a direct result of the Trump Administration’s threat to cancel nearly \$9 billion in federal grants and contracts to Harvard University, or because they fear they may be let go by Harvard if they engage in speech the Trump Administration disfavors as Harvard seeks to placate the Trump Administration and encourage it not to carry out its threats to cancel federal funding, and who now feel limited in what they can say in and outside the classroom for fear of the loss of additional funding to themselves or the University.

12. I am aware of and can identify AAUP members at Harvard University who have started to self-censor their language both inside and outside the classroom following the Trump Administration's threats to investigate the university and the April 3, 2025 Demand Letter threatening to cancel federal funding. These members fear that they may face backlash from Harvard and may lose their jobs as a result of exercising their academic freedom.

13. I am also aware of and can identify AAUP members at other colleges and universities who are similarly concerned about losing their jobs or ability to support their livelihoods, and who now feel limited in what they can say in and outside the classroom for fear of the Trump Administration summarily canceling federal funding to their programs, universities, or colleges without following applicable statutory requirements or other law in the same way that the Trump Administration has canceled funding at Columbia, Cornell, and Northwestern, and threatened to cancel federal funding at Harvard and at numerous other universities and colleges.

Harms to AAUP as an Organization

1. The Trump administration's threats to terminate at least \$255.6 million in contracts and hold over \$8.7 billion in grant commitments to Harvard University, along with the Trump administration's demands that Harvard make Trump administration-imposed reforms for continued federal financial assistance to the University, has harmed and is continuing to harm AAUP as an organization.

2. As noted above, the primary mission of the AAUP is to advance academic freedom and shared governance in higher education, define fundamental professional values and standards for higher education, promote the economic security of academic workers, and ensure higher education's contribution to the common good. The Trump administration's threats to cancel federal

funding at Harvard and other universities and colleges and demand that Harvard implement a long list of “reforms” to maintain its federal funding is directly impairing the AAUP’s mission.

3. As part of its core activities, the AAUP regularly consults, works with, and represents local chapters and individual members regarding academic freedom, shared governance, and other issues involving the employment relationship between AAUP members and their university employers, including but not limited to collective bargaining.

4. For example, the AAUP maintains a standing committee, known as Committee A on Academic Freedom and Tenure, which “[p]romotes principles of academic freedom, tenure, and due process in higher education through the development of policy documents and reports relating to these subjects and the application of those principles to particular situations that are brought to its attention.”

5. The AAUP also conducts investigations of individual complaints of institutions violating academic freedom principles in relationship to AAUP members, issues reports of the results of some of those investigations, and advocates with those institutions to seek to remedy such violations and prevent future violations from occurring. Such investigations are authorized by the AAUP Executive Director, and conducted by a subcommittee appointed by the Executive Director.

6. Through its local chapters, including the Harvard Faculty AAUP chapter, the AAUP also provides for the representation of individual members regarding academic freedom, shared governance, and due process issues in proceedings before their university employers. The AAUP has diverted internal resources of staff time and expenses to assist Harvard members prepare to respond to the demands the Trump administration.

7. I understand that Title VI and its implementing regulations require the government to provide notice and a hearing before terminating federal funding to any program based on a

violation of Title VI. I understand that the government has not as of now provided any notice to Harvard. If the government were to provide notice, both the AAUP and individual AAUP members would seek to participate in that hearing to protect the federal funding supporting the work of AAUP members at Harvard and to protect the principles of academic freedom, due process, and shared governance that are at the core of the AAUP's mission.

8. The Trump administration's March 10 letter, March 31 press release, and April 3 Demand Letter, along with other public statements made by government officials, disrupt and frustrate the AAUP's efforts to secure principles of academic freedom, shared governance, and due process at Harvard and elsewhere.

9. The government's actions and statements have made it more difficult and resource-intensive for the AAUP to carry out its representation of chapters and individual members, in particular on issues of academic freedom. Because of government pressure on Harvard and other universities to abandon their commitment to academic freedom, shared governance, and due process principles, the AAUP must now expend more time and money to ensure that its members' rights in these regards are protected.

10. The Trump administration's threats to cancel funding at Harvard and other universities and colleges also make it harder for the AAUP to achieve its goals of promoting academic freedom, shared governance, and due process principles in part because Harvard has taken steps in direct response to the Trump administration's actions to undermine those principles, and Harvard and other higher educational institutions are less willing now to protect those principles in the face of threatened funding cuts from the federal government. The Trump administration has directly impaired the AAUP's mission by pressuring Harvard to curtail speech and academic freedom on campus.

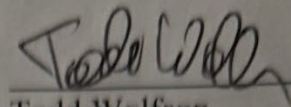
11. For example, in response to the significant influx of inquiries from chapter leaders and members regarding the effect of the government's actions on members' academic freedom, shared governance, and due process rights, and to ensure that individual members are adequately represented before their university employers, AAUP staff have had to conduct nationwide calls and virtual meetings with chapter leaders regarding the government's actions and how to represent individual members in the face of such actions.

12. The AAUP has committed staff and leadership time to support members of Harvard's AAUP chapter regarding how to respond to the government's actions, including the April 3, 2025 Demand Letter.

13. The government's actions and statements have also caused a pervasive sense of fear and intimidation among AAUP members. Because of the government's conduct and the threats of further cuts to research funding, I am aware that some AAUP members no longer feel comfortable participating in and supporting the AAUP's activities, or asserting their academic freedom, shared governance, and due process rights. As just some examples, in direct response to the government's threats to cut federal funding to Harvard and to other universities, some AAUP members at universities across the country have cancelled conferences, pulled papers set for publication, decided not to teach classes or certain topics within those classes that may be perceived as being at odds with the Trump administration's preferred viewpoints, stopped attending talks, refrained from attending lawful protests, and stepped down from their AAUP chapter board.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 11 day of April, 2025.



Todd Wolfson

EXHIBIT 19



An official website of the United States government



U.S. General Services Administration

DOJ, HHS, ED, and GSA announce initial cancellation of grants and contracts to Columbia University worth \$400 million

March 07, 2025







Members of the Joint Task Force to Combat Anti-Semitism take swift action to protect Jewish students in response to inaction by Columbia University

WASHINGTON — Today, the Department of Justice (DOJ), Department of Health and Human Services (HHS), Department of Education (ED), and the U.S. General Services Administration (GSA) announced the immediate cancellation of approximately \$400 million in federal grants and contracts to Columbia University due to the school’s continued inaction in the face of persistent harassment of Jewish students. These cancellations represent the first round of action and additional cancellations are expected to follow. The Task Force is continuing to review and coordinate across federal agencies to identify additional cancellations that could be made swiftly. DOJ, HHS, ED, and GSA are taking this action as members of the Joint Task Force to Combat Anti-Semitism. Columbia University currently holds more than \$5 billion in federal grant commitments.

On March 3, the Task Force [notified](#) the Acting President of Columbia University that it would conduct a comprehensive review of the university’s federal contracts and grants in light of ongoing investigations under Title VI of the Civil Rights Act. Chaos and anti-Semitic harassment have continued on and near campus in the days since. Columbia has not responded to the Task Force.

“Since October 7, Jewish students have faced relentless violence, intimidation, and anti-Semitic harassment on their campuses – only to be ignored by those who are supposed to protect them,” said **Secretary of Education Linda McMahon**. “Universities must comply with all federal antidiscrimination laws if they are going to receive federal funding. For too long, Columbia has abandoned that obligation to Jewish students studying on its campus. Today, we demonstrate to Columbia and other universities that we will not tolerate their appalling inaction any longer.”

President Trump has been clear that any college or university that allows illegal protests and repeatedly fails to protect students from anti-Semitic harassment on campus will be subject to the loss of federal funding.

“Freezing the funds is one of the tools we are using to respond to this spike in anti-Semitism. This is only the beginning,” said **Leo Terrell, Senior Counsel to the Assistant Attorney General for Civil Rights and head of the DOJ Task Force to Combat Anti-Semitism**. “Cancelling these taxpayer funds is our strongest signal yet that the Federal Government is not going to be party to an educational institution like Columbia that does not protect Jewish students and staff.”

The decisive action by the DOJ, HHS, ED, and GSA to cancel Columbia’s grants and contracts serves as a notice to every school and university that receives federal dollars that this Administration will use all the tools at its disposal to protect Jewish students and end anti-Semitism on college campuses.

“Anti-Semitism is clearly inconsistent with the fundamental values that should inform liberal education,” said **Sean Keveney, HHS Acting General Counsel and Task Force member**. “Columbia University’s complacency is unacceptable.”

GSA will assist HHS and ED in issuing stop-work orders on grants and contracts that Columbia holds with those agencies. These stop-work orders will immediately freeze the university’s access to these funds. Additionally, GSA will be assisting all agencies in issuing stop work orders and terminations for contracts held by Columbia University.

“Doing business with the Federal Government is a privilege,” said **Josh Gruenbaum, FAS Commissioner and Task Force member**.

“Columbia University, through their continued and shameful inaction to stop radical protestors from taking over buildings on campus and lack of response to the safety issues for Jewish students, and for that matter — all students — are not upholding the ideals of this Administration or the American people. Columbia cannot expect to retain the privilege of receiving federal taxpayer dollars if they will not fulfill their civil rights responsibilities to protect Jewish students from harassment and anti-Semitism.”

For more information, read the [HHS, ED, and GSA joint press release](#) from Monday, March 3.

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About GSA: GSA provides centralized procurement and shared services for the federal government. GSA manages a nationwide real estate portfolio of over 360 million rentable square feet, oversees more than \$110 billion in products and services via federal contracts, and delivers technology services that serve millions of people across dozens of federal agencies. GSA’s mission is to deliver the best customer experience and value in real estate, acquisition, and technology services to the government and the American people. For more information, visit [GSA.gov](https://www.gsa.gov) and follow us at [@USGSA](https://twitter.com/USGSA).

Contact

press@gsa.gov

EXHIBIT 20

Trump Administration Freezes \$1 Billion for Cornell and \$790 Million for Northwestern, Officials Say

The funding pause amid civil rights investigations into both universities sharply escalates the Trump administration's campaign against elite colleges.



By Michael C. Bender and Sheryl Gay Stolberg

Reporting from Washington

April 8, 2025

The Trump administration has frozen more than \$1 billion in funding for Cornell and \$790 million for Northwestern amid civil rights investigations into both schools, two U.S. officials said.

The funding pause involves mostly grants from and contracts with the Departments of Agriculture, Defense, Education and Health and Human Services, according to the officials, who spoke on the condition of anonymity to discuss the unannounced decision.

The moves are the latest and largest in a rapidly escalating campaign against elite American universities that has resulted in billions in federal funds being suspended or put under review in just over a month. Other schools that have had funds threatened include Brown, Columbia, Harvard, the University of Pennsylvania and Princeton.

Cornell and Northwestern are both facing investigations into allegations of antisemitism and into accusations of racial discrimination stemming from their efforts to promote diversity.

Cornell officials said in a statement that they had received more than 75 stop-work orders from the Defense Department on Tuesday, but that they had no information to confirm that more than \$1 billion in funding had been suspended. The affected grants, they said, supported research that they described as “profoundly significant to American defense, cybersecurity and health.”

“We are actively seeking information from federal officials to learn more about the basis for these decisions,” said the joint statement from Michael Kotlikoff, the university president; Kavita Bala, the provost; and Robert Harrington, provost for medical affairs.

Jon Yates, a spokesman for Northwestern, said that the university had not been notified by the federal government that funding had been frozen.

Northwestern, a Big Ten university, is the first non-Ivy League school to have funding from the Trump administration targeted under investigations of alleged discrimination. The university issued a “progress report” last week that highlighted its efforts to protect Jewish students, including mandatory antisemitism training for all students, faculty and staff.

“Federal funds that Northwestern receives drive innovative and lifesaving research, like the recent development by Northwestern researchers of the world’s smallest pacemaker, and research fueling the fight against Alzheimer’s disease,” Mr. Yates said. “This type of research is now at jeopardy.”

Mr. Yates added that Northwestern had “fully cooperated” with federal and congressional investigations.

Linda McMahon, the education secretary, has been explicit about the administration’s focus on elite universities, which Mr. Trump has criticized as bastions of left-wing thought. She has said that taxpayer support is a “privilege” that can be withdrawn if universities do not adhere to civil rights law.

Like other universities, Cornell and Northwestern were the site of clashes over the war in Gaza.

Cornell and Northwestern were among 60 universities that the Trump administration warned last month of potential enforcement actions over investigations into allegations of antisemitism. Each school also has investigations pending into accusations of racial discrimination.

Last month, the Republican-controlled House Education Committee chided Northwestern over legal clinics at its law school that had represented organizers of an anti-Israel protest.

University officials have said the legal clinics were providing training for students and were not representing the views of the school. In a letter to the school, Representative Tim Walberg, the chairman of the committee, and Representative Burgess Owens, the chairman of the panel's subcommittee on higher education, described the training as "illegal, antisemitic conduct."

Cornell also recently defended itself against claims that it was not doing enough to stop antisemitism. In a New York Times opinion essay, Dr. Kotlikoff, the president of Cornell, described the nation's universities as institutions built to uphold and advance democratic norms even in the face of escalating political and legal risks.

"A messy event that turns into viral videos causes understandable concern to trustees and alumni, and adds more fuel to already burning fires," Dr. Kotlikoff wrote last week. "But if we are to preserve our value and our meaning, we cannot let our caution overtake our purpose. Our colleges and universities are cradles of democracy and bulwarks against autocracy."

Vimal Patel contributed reporting.

Michael C. Bender is a Times political correspondent covering Donald J. Trump, the Make America Great Again movement and other federal and state elections.

Sheryl Gay Stolberg covers health policy for The Times from Washington. A former congressional and White House correspondent, she focuses on the intersection of health policy and politics.

EXHIBIT 21



March 13, 2025

Dr. Katrina Armstrong
Interim President
Columbia University
Office of the President
202 Low Library
535 W. 116 St., MC 4309
New York, NY 10027

David Greenwald
Claire Shipman
Co-Chairs
Columbia Board of Trustees
202 Low Library
535 W. 116 St. MC 4309
New York, NY 10027

Dear Dr. Armstrong:

Please consider this a formal response to the current situation on the campus of Columbia University and a follow up to our letter of March 7, 2025, informing you that the United States Government would be pausing or terminating federal funding. Since that date your counsel has asked to discuss “next steps.”

U.S. taxpayers invest enormously in U.S. colleges and universities, including Columbia University, and it is the responsibility of the federal government to ensure that all recipients are responsible stewards of federal funds. Columbia University, however, has fundamentally failed to protect American students and faculty from antisemitic violence and harassment in addition to other alleged violations of Title VI and Title VII of the Civil Rights Act of 1964. Pursuant to your request, this letter outlines immediate next steps that we regard as a precondition for formal negotiations regarding Columbia University’s continued financial relationship with the United States government. Please ensure and document compliance with the following no later than the close of business on Wednesday, March 20, 2025:

- **Enforce existing disciplinary policies.** The University must complete disciplinary proceedings for Hamilton Hall and encampments. Meaningful discipline means expulsion or multi-year suspension.
- **Primacy of the president in disciplinary matters.** Abolish the University Judicial Board (UJB) and centralize all disciplinary processes under the Office of the President. And

empower the Office of the President to suspend or expel students with an appeal process through the Office of the President.

- **Time, place, and manner rules.** Implement permanent, comprehensive time, place, and manner rules to prevent disruption of teaching, research, and campus life.
- **Mask ban.** Ban masks that are intended to conceal identity or intimidate others, with exceptions for religious and health reasons. Any masked individual must wear their Columbia ID on the outside of their clothing (this is already the policy at Columbia's Irving Medical Center).
- **Deliver plan to hold all student groups accountable.** Recognized student groups and individuals operating as constituent members of, or providing support for, unrecognized groups engaged in violations of University policy must be held accountable through formal investigations, disciplinary proceedings, and expulsion as appropriate.
- **Formalize, adopt, and promulgate a definition of antisemitism.** President Trump's Executive Order 13899 uses the IHRA definition. Anti-"Zionist" discrimination against Jews in areas unrelated to Israel or Middle East must be addressed.
- **Empower internal law enforcement.** The University must ensure that Columbia security has full law enforcement authority, including arrest and removal of agitators who foster an unsafe or hostile work or study environment, or otherwise interfere with classroom instruction or the functioning of the university.
- **MESAAS Department – Academic Receivership.** Begin the process of placing the Middle East, South Asian, and African Studies department under academic receivership for a minimum of five years. The University must provide a full plan, with date certain deliverables, by the March 20, 2025, deadline.
- **Deliver a plan for comprehensive admissions reform.** The plan must include a strategy to reform undergraduate admissions, international recruiting, and graduate admissions practices to conform with federal law and policy.

We expect your immediate compliance with these critical next steps, after which we hope to open a conversation about immediate and long-term structural reforms that will return Columbia to its original mission of innovative research and academic excellence.

Sincerely,



Josh Gruenbaum
Comm'r of the Fed. Acquisition Serv.
General Services Administration



Thomas E. Wheeler
Acting General Counsel
U.S. Dept. of Education



Sean R. Keveney
Acting General Counsel
U.S. Dep't Health & Human Servs.

EXHIBIT 22



← Truth Details

7626 replies



Donald J. Trump 

@realDonaldTrump

All Federal Funding will STOP for any College, School, or University that allows illegal protests. Agitators will be imprisoned/or permanently sent back to the country from which they came. American students will be permanently expelled or, depending on on the crime, arrested. NO MASKS! Thank you for your attention to this matter.

17.5k ReTruths **79k** Likes

Mar 04, 2025, 7:30 AM



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EXHIBIT 23

Leo Terrell, Senior Counsel to the Attorney General for Civil Rights, On Crushing Anti-Semitism On Campus

Mar 19, 2025 / Transcripts

Text Size:

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Leo Terrell is the new Senior Counsel in the Division of Civil Rights at the DOJ, who is leading a task force for Attorney General Pam Bondi aimed at stamping out anti-Semitism on the campuses of the United States.

Audio:

[03-19hhs-terrell](#)

Transcript:

HH: I'm pleased to welcome to the program this morning Leo Terrell. He is senior counsel to Attorney General Pam Bondi in the Civil Rights Division. And Leo may not remember this, but he was my guest on the old Life and Times show that I hosted for ten years in L.A. from 1992 to 2002, because Leo and I have been doing this a while. He's also a very expert broadcaster, superb lawyer. He's a young man. He's a year younger than I am, so he's a young man. But I am so glad to see you at the Civil Rights Division, Leo. Welcome. How are you?

LT: Hugh, I remember that. Was that on KCET?

HH: You bet. Life and Times.

LT: You better believe it. It was a great program. And to answer your question, I am extremely happy. I am very happy that President Trump appointed me to this position. I'm very happy to work with Pam Bondi. This is something that as a civil rights attorney for 30 years, it is a privilege to serve this country, and I'm glad to be on your show.

HH: You know, Leo, we've got about, out of law school about the same time, and I did a clerkship, and then I went over to DOJ working as a special assistant for Ed Meese and Bill Smith. And now it's been 40 years, and I'm in radio, and you're back at DOJ. So things turn around. You know, things change. But you did a great thing last week. You cut off \$400 million dollars to the Columbia University in order to stop their continued non-protection of Jewish students on their campus pursuant to Title VI of the Civil Rights Act of 1964. Do I have that right?

LT: Yes, you are 100% correct. Title VI is the mechanism to defund Columbia of \$400 million dollars.

HH: So what did you actually do? Let's work out and be a little bit lawyerly with me. Did you send them a notice letter? Did you send a letter to everyone in the federal government saying no more money for Columbia? How did it actually roll out?

LT: Well, it's important that your viewers and listeners understand what I am doing. I am part of a task force to combat anti-Semitism. President Trump, Hugh, issued an executive order. He wants to eradicate anti-Semitism in this country. If you recall, the last administration turned their backs on the Jewish-American community, turned their backs on Jewish students. So President Trump gave Pam Bondi and the DOJ a directive. Eradicate anti-Semitism throughout the country, and at the schools – at Columbia and Harvard, NYU, at UCLA where I went to law school at. And so we created a task force. And part of that task force responsibility was to go after these anti-Semitic universities that receive federal funding. President Trump and Pam Bondi will not have taxpayers' dollars subsidize anti-Semitic behavior. And we're going to take their money away.

HH: And I am applauding this. I think this is great. My alma maters are Harvard undergrad and Michigan Law School. And you can go after then second and third. Cut them off well, because they have not protected their Jewish students, either. UCLA is an absolute disgrace. It's all over this country. Anti-Semitism has exploded. I'm just wondering how you do it. I mean, just as a practical lawyering matter, I practiced law. I'm not retired, but I'm not taking any more clients. I just don't know, did you send them a letter? Do you just cut the checks off? What do you do?

LT: Well, you first of all give them notice, because remember, Hugh, they have an obligation under Title VI to provide education opportunities and not to discriminate against protected class status – religion, color, ethnicity. And basically, they were receiving taxpayer dollars illegally, because they were not protecting Jewish-American citizens. And so what we did was we basically gave them notice, and we stopped providing the funding. And I've got news for you. To Harvard, to NYU, to Michigan, same thing's happening to them. It's going to happen,

because we're going to look at the numbers of federal dollars, and Hugh, it totals in the hundreds of millions of dollars. And we're going after them.

HH: You are, you're doing the Lord's work. The Civil Rights Act of 1964 is very explicit that you may not discriminate against students based upon their ethnicity or race, and Jews are both an ethnicity and a race. And they've been discriminated against. So they shouldn't get any federal money. I just want to know the evidentiary basis that you're going to use going forward. If you're sitting out, let's say The Ohio State University, The Ohio State University, the national football champions, they had some anti-Semitism last year. They brought the hammer down on it, and they stopped it. Are they going to get a letter? I mean, what do they have to worry about? How far back are you looking? Or are you just looking about right now?

LT: Well, no. We're looking back in the number of years that the statute of limitations allows us not only under Title VI, Hugh, but Title VII as well. Title VII protects the employer-employee relationship. There are Jewish professors, Jewish student workers. So what we have is to follow the statute of limitations on both not only Title VI, but Title VII. And it applies to all these universities that not only receive federal funds, but have to follow the Civil Rights Act regarding the employer-employee relationship. They can't discriminate based on, again, protected class status – race, religion, ethnicity.

HH: Have you got a stack of complaints from professors who feel that they've been discriminated against on the...

LT: (nods yes)

HH: Good. Investigate them all. The guy whose picture is up here, Ronald Reagan, when I was at Justice Department, his division of Civil Rights was run by William Bradford Reynolds. His deputy was Chuck Cooper. They were the brass knuckled enforcers. They were really good lawyers. The Civil Rights Division went way left, Leo. Did you find, is anyone on the task force with you? Have you got anyone else to work with there, because they went way to the left.

LT: You are 100% correct. The Civil Rights Division, when the Trump team came in, way, way, way, let me say it again, way left. Pam Bondi, President Trump have made a determination very simply. Everyone's going to be treated fairly. If you're far left, you're not going to be part of this DOJ team that's going to eradicate not only anti-Semitism. The Trump and Bondi administration just wants a level playing field. No one's treated preferentially better than others. Everyone's treated equally. The Jewish community has been treated unfairly. And I have to say this, Hugh. It's not only at the universities. Look at these blue cities that have turned their back on the Jewish community in New York, in Chicago and L.A. Where are the

hate crime charges? Pam Bondi and President Trump have given us a directive to stop it. And those cities are going to lose their funding as well.

HH: So you need prosecutors, because you can prosecute people. It's a crime to violate people's civil rights. It's not only a federal forfeiture of funds, it's a crime. Are you going to have enough lawyers to work with? I mean, is there anyone in the Civil Rights Division left, because they were all wokesters? And when you came in, you knew they were all wokesters. Have they left?

LT: Well, I'll tell you right now. As you know, there are procedures. They safeguard for employees who have been here for a while. We're working through them. But I'll tell you right now. Pam Bondi has made it a directive. Get the work done, work through these people. We're hiring people, because we have an obligation to make sure Jewish-Americans can be treated fairly at the universities, and I take that order to heart, and that's why we're complying not only with Pam Bondi's directive, but President Trump's executive order. We're obligated to do it, Hugh, and we're doing it. And not only are we going to these ten schools just as our first step, we're going to these four cities – [New York], Boston, Chicago, Los Angeles, and talk to their mayors, talk to their district attorneys, do the job of prosecuting hate crimes, or the U.S. Attorneys office, the DOJ's office, will do it for them.

HH: So going back to nuts and bolts, Leo. You're a real lawyer, as opposed to a lot of people who play one on TV. You're a real lawyer. You know Columbia's going to come at you and try to get their money back. Have they done that, yet? Have they filed an attempt to enjoin your enforcement action against their federal funding?

LT: Let me answer that. No, they haven't, but they're trying to change their ways. But it's not good enough. They're talking about making changes. Not good enough. We haven't seen the evidence. We have not seen any type of evidence. There's been communications, Hugh. I can only go that far and disclose, but what they have done is not enough. And the motivation, Hugh, is wrong. They're only talking to us now because we took away their money. The issue is not the money. The issue is treating Jewish-American students fairly. Are they motivated by the money?

HH: Now you'll remember, Leo, whenever we had findings of discrimination that were systemic in a school district, for example, the federal judge involved would take over the school district. I'd like to see the Department of Justice get a consent decree where Columbia gets a new law school dean, they get a new president, a new board, a new department of history, a new set of reasonable time, place, and manner regulations for a speech on campus that ban masks. I'd like to see monetary payment to students whose lives were disrupted for the last two years, because they paid a lot of, they pay \$75,000 dollars to go to Columbia and they

couldn't go to class? I mean, I really want you to bring the hammer down. Is that your intention?

LT: Yes. Let me think about that. Yes, yes, and yes. And I'll tell you right now, Hugh, we have an investigation going on against a UC regent in California. And I'll tell you right now, injunctive relief, pattern and practice is on the table. So we're using every tool in the toolbox. I've been a civil rights attorney for 30 years.

HH: Yeah, I know.

LT: I know how to go after these guys. And I'm telling you, I cannot thank Pam Bondi and President Trump enough. They have told me to go after them. You talk about a hammer, I'm talking about a hammer, a cannon, grenades. We're going after these schools, and we're going to deter this conduct and make sure it never occurs again. What happened before...

HH: Give me a couple of bits of information. You need some nails. You are the hammer, but you need some nails. You need some young lawyers, you need some special assistants. You need Todd Blanche to return your phone call, the deputy attorney general. You need some special assistants on the 5th floor. Is there a chain of command? Or have they just sent you out there on the good ship Leo Terrell to go off and right wrongs? Or are they backing you up? Are they checking in every day and making sure you're getting what you need?

LT: I want everyone to hear this. I am blessed to have Pam Bondi and Todd Blanche. They have given me a directive, and given me the resources I need. They have never said no when it comes to eradicating anti-Semitism. And I'll tell you right now, Hugh. The Trump administration and the DOJ, we're on the same channel. Everyone's working together. We have the right management team in place with Pam Bondi and Todd Blanche.

HH: Okay, last couple of questions, Leo. You started with Columbia. Who's the next target? I want it to be Harvard, and I want it to be Michigan, and I want it to be UCLA, but I don't get to pick the targets. I'm a talking head. You're the lawyer. Who's the next target?

LT: I'm going to give you a little breaking news. It's one of those three schools. I can't disclose it right now, because I'll get in trouble. But one of those three schools. I just gave you some breaking news.

HH: All right, give me a little on that. How much money's involved?

LT: (laughing)

HH: Come on, Leo.

LT: Now you're asking for too much. I'll take you out to dinner. I'll take you out to dinner.

HH: Is it bigger than Columbia?

LT: If I tell you here, I don't want to get in trouble.

HH: Is it bigger than Columbia?

LT: President Trump and Pam Bondi are watching. They're my bosses. I can't breach my relationship with my bosses. I'll tell you right now.

HH: All right, I get it. Leo...

LT: They're going to get the hammer.

HH: God, it is good to see you on the side of the angels, and it's great to know that the Civil Rights Division's got a new Brad Reynolds and a new Chuck Cooper. God bless you. By the way, who is the assistant Attorney General for Civil Rights? Have we got one nominated, yet?

LT: Oh, yes, we have one. And she, it's Harmeet Dhillon.

HH: Oh, yes.

LT: She's going to be a tsunami in here. She's going to be great. Can't wait for her to get here.

HH: Now you know, this is like the old days. And I'm so happy you're there, Leo. Keep coming back. Keep talking to me. It's great to have someone who knows what they're doing on the side of the angels. Leo Terrell, special advisor in the division of Civil Rights, Department of Justice, thank you for joining me on the Hugh Hewitt Show.

End of interview.

EXHIBIT 24

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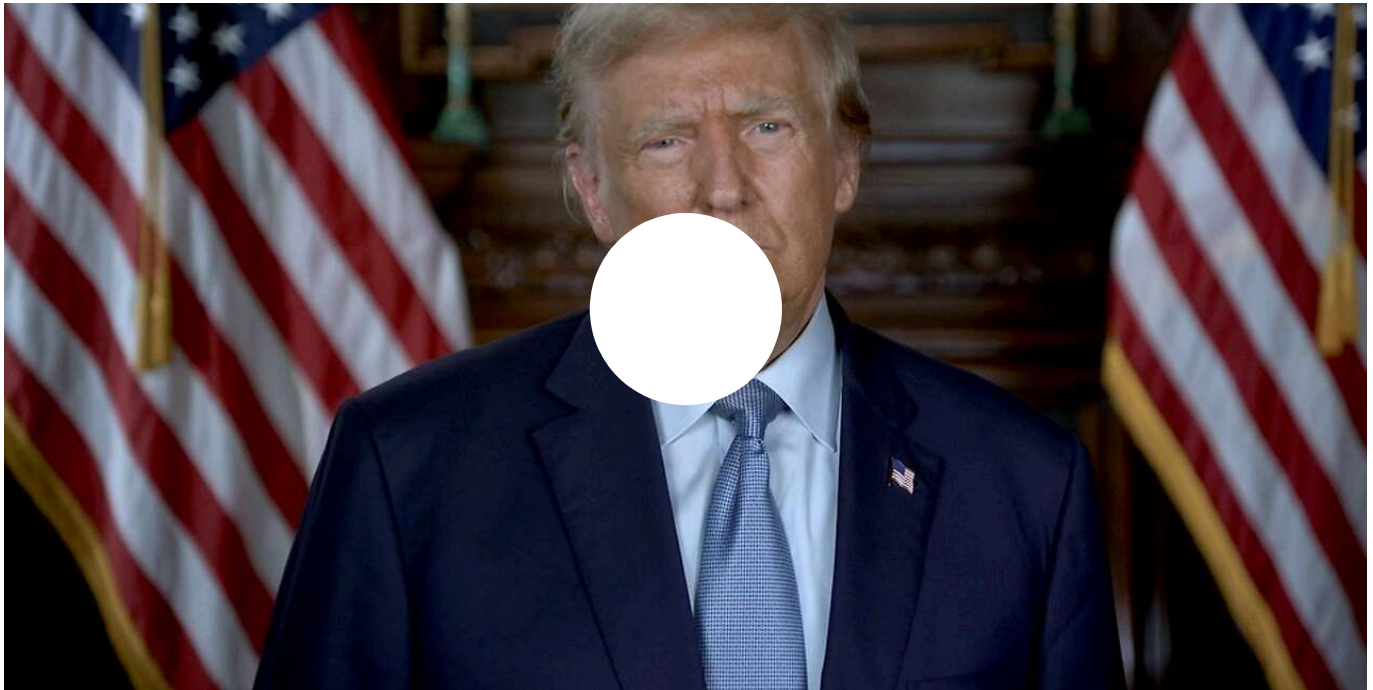
BACK TO VIDEOS

Agenda47: The American Academy

November 01, 2023



Agenda47: The American Academy



President Donald J. Trump will endow the American Academy with the billions we will collect by taxing the large endowments of private universities plagued by antisemitism.

TRANSCRIPT



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any other country, and yet they're turning our students into Communists and terrorists and sympathizers of many, many different dimensions — we can't let this happen. It's time to offer something dramatically different.

Under the plan I'm announcing today, we will take the billions and billions of dollars that we will collect by taxing, fining, and suing excessively large private university endowments, and we will then use that money to endow a new institution called the American Academy.

Its mission will be to make a truly world-class education available to every American, free of charge, and do it without adding a single dime to the federal debt. This institution will gather an entire universe of the highest quality educational content, covering the full spectrum of human knowledge and skills, and make that material available to every American citizen online for free.

Whether you want lectures or an ancient history or an introduction to financial accounting, or training in a skilled trade, the goal will be to deliver it and get it done properly, using study groups, mentors, industry partnerships, and the latest breakthrough in computing. This will be a truly top-tier education option for the people.

It will be strictly non-political, and there will be no wokeness or jihadism allowed—none of that's going to be allowed.

Most importantly, the American Academy will compete directly with the existing and very costly four-year university system by granting students degree credentials that the U.S. government and all federal contractors will henceforth recognize. The Academy will award the full and complete equivalent of a bachelor's degree.

In addition to help the 40 million Americans who have some college education but no degree, the American Academy will grant credit for past coursework at legacy institutions and give you the chance to complete your education at the American Academy for free and much more quickly than is now possible or available.



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EXHIBIT 25



PRESS RELEASE

Federal Task Force to Combat Antisemitism Announces Visits to 10 College Campuses that Experienced Incidents of Antisemitism

Friday, February 28, 2025

For Immediate Release

Office of Public Affairs

The Federal Task Force to Combat Anti-Semitism announced that it will be visiting 10 university campuses that have experienced antisemitic incidents since October 2023. Created pursuant to President Trump's Executive Order on Additional Measures to Combat Anti-Semitism, the Task Force set as its first priority to eradicate antisemitic harassment in schools and on college campuses.

Leading Task Force member and Senior Counsel to the Assistant Attorney General for Civil Rights Leo Terrell informed the 10 universities yesterday that the Task Force was aware of allegations that the schools may have failed to protect Jewish students and faculty members from unlawful discrimination, in potential violation of federal law. Mr. Terrell said he intends for the Task Force to meet with university leadership, impacted students and staff, local law enforcement, and community members as it gathers information about these incidents and considers whether remedial action is warranted.

"The President, Attorney General Pamela Bondi, and the entire Administration are committed to ensuring that no one should feel unsafe or unwelcome on campus because of their religion," said Mr. Terrell. "The Task Force's mandate is to bring the full force of the federal government

to bear in our effort to eradicate Anti-Semitism, particularly in schools. These visits are just one of many steps this Administration is taking to deliver on that commitment.”

The 10 universities identified by the Task Force are: Columbia University; George Washington University; Harvard University; Johns Hopkins University; New York University; Northwestern University; the University of California, Los Angeles; the University of California, Berkeley; the University of Minnesota; and the University of Southern California.

If you have been discriminated against, you can file a complaint with the Civil Rights Division at civilrights.justice.gov. President Trump’s Executive Order can be found at www.whitehouse.gov/presidential-actions/2025/01/additional-measures-to-combat-anti-semitism/.

Updated February 28, 2025

Topic

CIVIL RIGHTS

Component

[Civil Rights Division](#)

Press Release Number: 25-202

Related Content

PRESS RELEASE

Department of Justice Terminates Environmental Justice Settlement Agreement, Advancing President Trump’s Mandate to End Illegal DEI and Environmental Justice Policies

Today, the Department of Justice announced that that its Civil Rights Division will immediately close an “environmental justice” matter. Effective immediately, the division will terminate the environmental justice settlement agreement...

April 11, 2025

PRESS RELEASE

Unlawful Illinois DEI Scholarship Program Suspended After Justice Department Threatened Lawsuit

WASHINGTON — Today, the Justice Department announced that it has acted to end the state of Illinois’ unlawful minority-only scholarship program. After the Justice Department threatened to file suit, the state and...

April 11, 2025

PRESS RELEASE

Justice Department Files a Proposed Statement of Interest Supporting Equal Access to Southwest Airlines Travel Program

The Justice Department filed a proposed [statement of interest](#) today in the U.S. District Court for the Northern District of Texas to make clear that federal law protects the equal...

April 10, 2025



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EXHIBIT 26

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER, and AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE, et al. Defendants.	Case No. _____
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Declaration of Caroline Light

I, Caroline Light, declare as follows:

1. I am a Senior Lecturer and Director of Undergraduate Studies in Women, Gender, and Sexuality Studies (“WGS”). I have been a member of Harvard University since 2008.
2. I have a BA in history from Duke University and a PhD from the University of Kentucky in history, with a particular focus on gender, race, and sexuality in the United States South.
3. My research explores the ways in which race, gender, and region have shaped collective memory and archival silence. I have studied and written about the experience of southern Jewish assimilation as well as the intersection between armed self-defense, and race and gender violence. I teach undergraduate courses on labor history, immigration, and gun violence, and I advise undergraduates pursuing independent research on a variety of topics related to gender, sexuality, and power.

4. I am Jewish and have conducted significant research on Jewish history in the U.S.

5. I am a member of the American Association of University Professors (“AAUP”) and AAUP – Harvard Faculty Chapter.

6. I am over the age of 18 and competent to testify as to the matters set forth in this affidavit based on my own personal knowledge.

7. I am aware that the current administration has taken a series of actions targeting Harvard. In particular, I am aware that on March 31, 2025, the U.S. Department of Education (DOE), U.S. Department of Health and Human Services (HHS), and U.S. General Services Administration (GSA) announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. Most recently, I am aware that on April 3, 2025, officials from the DOE, HHS, and GSA, sent a letter to Harvard, that was made public, and demanded that Harvard immediately take a long list of actions to remain a recipient of federal funding.

8. I am aware that the demands made of Harvard are vaguely defined but include mandates regarding silencing pro-Palestinian political speech or political speech critical of Israel. The demands also target the institution’s commitment to Diversity, Equity, and Inclusion (“DEI”).

9. I work in a field that is under particular scrutiny and is disfavored by the current administration. Specifically, my research and teaching concerns gender and sexuality studies, ethnic studies, African American studies, and critical race theory. I believe that the Trump administration would consider these topics “woke.” I understand that the Trump administration has not defined the term “woke” but instead uses it to refer to anything that the administration perceives as a threat to the kind of reactionary politics it is trying to instantiate.

10. I am concerned about the future of my research because I worry that Harvard University may feel forced to accede to the Trump administration’s pressure. Harvard’s leadership has

made some statements to suggest that it intends to support academic freedom. In the face of immense financial pressure, however, I worry about the future security of teaching and scholarship in gender and sexuality studies which has contributed to Harvard's prominence as a vibrant and diverse intellectual community.

11. If Harvard's leadership decides to make concessions to comply with the Trump administration's demands, I believe it is likely to start with the programs, centers, and departments that the Trump administration would identify as "woke." Studies of Women, Gender, and Sexuality could then become a target, with enhanced scrutiny on its curricular offerings and research. The work that WGS does is likely to be viewed as a threat to the exclusionary values the Trump administration seeks to implement nationwide. My position as the Director of Undergraduate Studies in WGS is thus vulnerable.

12. I do not have tenure, which makes me particularly vulnerable to the administration's demands for budget cuts.

13. As the Director of Undergraduate Studies in WGS, I work closely with more junior lecturers and pre-tenure faculty. From my personal conversations with junior colleagues, I can tell that they are fearful of losing their jobs. Lecturers' positions are among the most precarious, and they stand to lose the most if Harvard's leadership decides to make concessions to comply with the Trump administration's demands.

14. I have witnessed a chilling effect on scholarly and pedagogical innovation as a direct result of the Trump administration's attacks on higher education. My colleagues teaching on topics related to gender and sexuality – not only in my program, but also in other departments – have been targeted and doxed based on the titles and intellectual foci of their courses. These attacks

are harmful to academic freedom and freedom of expression, and they are likely to increase if institutions, like Harvard, feel forced to comply with the administration's demands.

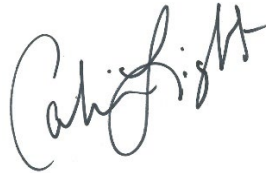
15. I also worry about the mental health of my students. Many of them are women, first-generation college students, queer, low-income, non-white, non-U.S. citizens, gender nonbinary, and/or transgender. They are socially and politically vulnerable. In this moment, many are demoralized and worried about whether their university will protect them if they are targeted by the Trump administration.

16. The Trump administration's demands have led to a chilling impact on the academic environment at Harvard. I have observed that students are becoming more fearful about sharing their perspectives in public fora. Last semester, the fall of 2024, I taught a general education class about gun violence. I sought to create an environment where students could speak freely about the impacts of firearm violence in their own lives and share and challenge their own beliefs about these important issues without fear. I worked hard to present a multiplicity of sometimes conflicting perspectives about guns and "gun rights" and encouraged students to debate the complexities of our nation's historic and contemporary approach to gun violence. I shared my own critical research on the unjust and deadly effects of "stand your ground" laws. Given the current administration's efforts to abolish bipartisan efforts to prevent gun violence and their efforts to undermine and defund empirical research, I am thankful that I am not teaching that class now.

17. I feel the chilling effects of the demand letter around campus. For example, one of my children gave me a keffiyeh as a Hannukah gift. I wear it as a reminder of my obligation as a Jew, to use my relative privilege to participate in tikkun olam, or healing the world. For me, that means caring about and responding to the suffering of others, like those who are experiencing genocide in Gaza. There is nothing Antisemitic in my expression of care for and solidarity with

Palestinian people. And yet, I have become more cautious about sharing my thoughts on issues related to Palestine and Israel, in the classroom as well as on campus more generally. I also worry that, when I wear my keffiyeh in public, I may be inviting physical harm or violence. I want my institution to continue to be a space of intellectual innovation and freedom of expression, but the vague demands from the Trump administration stand as a direct threat to these core values.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Caroline Light", written in a cursive style.

Dated: April 11, 2025

Signed: _____

Caroline Light
Senior Lecturer and Director of
Undergraduate Studies in Women, Gender,
and Sexuality Studies

EXHIBIT 28

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER, and AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS, Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE, et al. Defendants.	Case No. _____
---	-----------------------

Declaration of Meredith Rosenthal

I, Meredith Rosenthal, declare as follows:

1. I am the C. Boyden Gray Professor of Health Economics and Policy in the Department of Health Policy and Management at the Harvard T.H. Chan School of Public Health. I am also the Director of Graduate Studies for the Harvard PhD Program in Health Policy. I previously served as the Associate Dean for Diversity at the Harvard School of Public Health for 8 years, overseeing the Office of Diversity and Inclusion. I joined the Harvard University faculty in 1998.
2. I earned my B.A. in International Relations from Brown University in 1990 and my PhD in Health Policy from Harvard University in 1998.
3. My research focuses on policies to improve affordability, equity, and access to healthcare in the United States. This includes the design and impact of market-based health policy mechanisms, with a particular focus on the use of financial incentives to alter consumer and

provider behavior. I have advised federal and state policymakers in healthcare payment policy and its implementation.

4. My work has been published in the New England Journal of Medicine, the Journal of the American Medical Association, Health Affairs, and numerous other peer-reviewed journals. In 2014, I was elected to the National Academy of Medicine. I also serve on advisory boards for the Peterson Center on Health Care, The Source on Health Care Price and Competition, and the LGBTQ Health Center of Excellence.

5. I am a member of the American Association of University Professors (“AAUP”) and AAUP – Harvard Faculty Chapter.

6. I am over the age of 18 and competent to testify as to the matters set forth in this affidavit based on my own personal knowledge.

7. I am aware that the current administration has taken a series of actions targeting Harvard. In particular, I am aware that on March 10, 2025, the federal government sent a letter to Harvard and other universities warning of potential enforcement actions. I am aware that on March 31, 2025, the federal government announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. Most recently, I am aware that on April 3, 2025, officials from the Trump administration sent a letter to Harvard, that was made public, demanding that Harvard immediately implement a long list of “reforms” to remain a recipient of federal funding (the “Demand Letter”). I have read the demands listed in the Demand Letter.

8. I am also aware of public statements made by the Trump administration beginning in early 2025 attacking the work of university researchers and the integrity of the university, and making a variety of threats about ways the federal government intends to use its authority to impose a moving target list of demands on Harvard.

9. I am aware of the cancellation of \$400 million in federal grants and contracts to Columbia University and the changes Columbia agreed to implement as a result of these funding cuts and other Trump administration demands. Colleagues in my department and I have been following what has been going on at Columbia and there has been a lot of discussion, fear, and uncertainty. I am also aware that even though Columbia capitulated to the Trump administration's demands, Columbia's federal funding has not been restored.

10. It is my understanding that Harvard preemptively took a series of actions in anticipation of similar threats to cancel its federal funding and in response to threats made by the Trump administration targeted at Harvard beginning in early 2025. Harvard implemented a blanket hiring freeze across campus in anticipation of the administration's actions, which extended into research assistant positions funded by federal grants.

Research Funding

11. Approximately sixty percent of my salary comes from research grants, including those funded by National Institutes of Health ("NIH") and The Agency for Healthcare Research and Quality. Harvard pays a portion of my salary for my non-research work, including teaching students and co-directing the Health Policy PhD program, but federal funding has provided critical support for my work over the course of my career.

12. I am, for example, the co-investigator on a research grant from the National Institute on Minority Health and Health Disparities program at NIH with a fellow Harvard colleague. The grant, titled "Evaluating an Intervention to Improve Medication Access and Quality of Care for Underserved Populations with Chronic Conditions," funds research to improve health outcomes and eliminate health disparities. More specifically, we are studying how a tool designed to help physicians offer their patients lower cost medication alternatives can help reduce out-of-

pocket costs and increase medication adherence among people with chronic conditions. One aim of the research is to understand whether the tool differentially benefits patients based on their socioeconomic status and geographic location.

13. The grant provides almost \$2.5 million in federal funding over 3.5 years. We currently have one more year left on our funding term. Grant funding provides salary support for four faculty at Harvard (including myself), two research assistants, a PhD student, and collaborators at two other institutions.

14. As discussed above, Harvard has instituted a hiring freeze in anticipation of threats by the Trump administration. The hiring freeze has impacted my team directly: even though we currently still have the funding to cover the salaries of our team members, we have been unable to extend the employment of an invaluable research colleague of mine whose work is instrumental to parsing through the data from our study and interpreting its results, nor hire the research assistants we need to help out with our study day-to-day.

15. A loss of NIH funding would be devastating for our health policy research. Without federal funding, we would quickly run out of money to continue our work and would likely have to stop our study entirely. It would be almost impossible to raise private, foundation funding to finish our research if our federal funding were to be cut because there are so few funding sources for data-heavy projects. We would not receive substantive answers to questions we have spent many resources trying to answer. This also very quickly would lead to gaps in grant research, which may be career-ending, particularly for our PhD students and my non-tenured junior colleagues.

16. We also undoubtedly would have to let go of some of our staff if the NIH rescinds our grant money. Our staff are entirely grant-funded; their positions are contingent in part on NIH

funding. The grants also fund graduate student summer research, providing PhD students with the valuable opportunity to produce written work product about their research. None of this would be possible without federal funding.

17. A loss of federal funds would make collaboration across institutions much more challenging. Ambitious, federally-funded programs, like the one I conduct research under, allow multiple faculty members from different disciplines to work closely together and produce more robust research. Those opportunities for academic discourse and innovation would vanish, even if we were able to secure smaller, private funding sources.

18. It feels futile to apply for additional NIH funding while the Trump administration continues to wage a war against academic and research freedom. I believe my current grant and future grants I could apply for fall within the funding the Trump administration has threatened to withhold from Harvard.

19. I am very worried about what will happen with our upcoming annual renewal. Our federal grants are re-authorized every year (in this case on June 1), in what is typically a very routine process that involves providing some reporting on how the funds were spent and progress made on the study. This year, however, in light of the tumultuousness around federal funding, whether the NIH renews our grant is more uncertain than ever. While our whole team has been working overtime to squeeze in as much work as possible while we still have our grant funding, there is simply no way we will be able to finish our research before our grants are up for renewal. This rush to squeeze in as much work as possible under threat of funding termination could affect the quality of our research and has taken a significant toll on the entire team.

20. In addition, as a tenured professor and longtime graduate student advisor, I can confidently say that a funding cut would have catastrophic effects on all those involved,

particularly on my junior colleagues. I am particularly fearful that any colleagues who are coming up for tenure will be denied tenure if their research falls under the broad areas for “reform” listed in the Demand Letter.

Impact on Speech and Academic Freedom

21. I firmly believe that equity is at the root of public policy—I have dedicated my career to improving health and affordability for everyone, both through my research and by overseeing the school’s Office of Diversity and Inclusion (from 2013-2018) to improve diversity, equity and inclusion of those who work in the industry and on our campus. I worry that the Trump administration will label my focus on equitable access to healthcare as an “ideologically captured” DEI program and demand that the school “shutter” the program, particularly because of my former diversity-related administrative role, but because of the vagueness of the Demand Letter, I cannot be sure.

22. As the Director of Graduate Studies and a PhD advisor, I interact closely with Harvard’s health policy doctoral students on a daily basis. I have had heartbreaking conversations with my graduate students about the risks associated with pursuing questions and topics related to the administration’s political agenda due to fear that it will inhibit their ability to receive federal grants and find an academic job. Receiving federal grants is not just about the funds themselves—it is a key indication that your peers recognize the rigor and caliber of your work because federal grant applications are always peer-reviewed. This is already having an immediate effect on the questions that Harvard’s brightest minds are choosing to examine and discuss and sends a powerful message to our students about the priorities of the administration.

23. I have been anticipating the loss of federal funds and its wide-reaching ramifications, including the potential impact of demands the Trump administration may issue to avoid the loss of funds, since January. Those fears spiked when the Trump administration began calling out

Harvard explicitly, and have only compounded in the last month since Harvard received the Demand Letter.

24. That fear was felt across campus. During our most recent admissions cycle, it forced our school to confront painful new realities about our financial capacity for accepting new students. During this recent admissions season, which ended at the end of March 2025, many of the PhD programs in the Harvard T.H. Chan School of Public Health admitted fewer students, and our Global Health program accepted no new students at all. With the vulnerable state of our federal funding, many programs determined they needed to contract in size in order to meet existing commitments to current PhD students without federal funds.

25. I am scared to submit this testimony and identify myself publicly. However, I feel strongly about both the importance of my work for public health and about protecting academic freedom. As a tenured faculty member and respected academic in my field, I feel a particular responsibility to speak out from my place of relative security in defense of the students and junior professors at Harvard who are unable to speak so publicly for fear of retaliation against themselves or their loved ones.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 11, 2025


Signed: _____

Meredith B. Rosenthal, PhD.
C. Boyden Gray Professor of Health Economics and Policy