

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS–HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-CV-10910-ADB

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

**DECLARATION OF DANIEL H. SILVERMAN IN SUPPORT OF PLAINTIFFS’
MOTION FOR SUMMARY JUDGMENT**

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”), American Association of University Professors–Harvard Faculty Chapter (“AAUP–Harvard”), and International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“UAW”) in the above-captioned litigation

3. I submit this declaration in support of Plaintiffs’ Motion for Summary Judgment, filed herewith.

4. Attached hereto as **Exhibit 1** is a true and correct copy of a press release issued by the Department of Justice’s Office of Public Affairs entitled “Justice Department Announces Formation of Task Force to Combat Anti-Semitism” and dated February 3, 2025.

5. Attached hereto as **Exhibit 2** is a true and correct copy of a press release issued by the General Services Administration entitled “HHS, ED, and GSA announce additional measures to end anti-Semitic harassment on college campuses” and dated March 3, 2025.

6. Attached hereto as **Exhibit 3** is a true and correct copy of a post on Truth Social by Donald J. Trump dated March 4, 2025.

7. Attached hereto as **Exhibit 4** is a true and correct copy of a press release by the General Services Administration entitled “DOJ, HHS, ED, and GSA announce initial cancellation of grants and contracts to Columbia University worth \$400 million” and dated March 7, 2025.

8. Attached hereto as **Exhibit 5** is a true and correct copy of a video recording entitled “Leo Terrell with Mark Levin- How we’ll defeat antisemitism in the USA” as downloaded from YouTube’s website at <https://www.youtube.com/watch?v=NOFIKRr2Sco>.

9. Attached hereto as **Exhibit 6** is a true and correct copy of a press release by the U.S. Department of Education entitled “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.

10. Attached hereto as **Exhibit 7** is a true and correct copy of an audio recording of the March 19, 2025, interview of Leo Terrell on the Hugh Hewitt Show as downloaded from <https://eadn-wc05-2440449.nxedge.io/wp-content/uploads/2025/03/03-19hhs-terrell.mp3>.

11. Attached hereto as **Exhibit 8** is a true and correct copy of a post on Truth Social by Donald J. Trump dated April 15, 2025.

12. Attached hereto as **Exhibit 9** is a true and correct copy of a post on Truth Social by Donald J. Trump dated April 16, 2025.

13. Attached hereto as **Exhibit 10** is a true and correct copy of a post on Truth Social by Donald J. Trump dated April 24, 2025.

14. Attached hereto as **Exhibit 11** is a true and correct copy of a post on Truth Social by Donald J. Trump dated May 2, 2025.

15. Attached hereto as **Exhibit 12** is a true and correct copy of a video recording entitled “Education Secretary Linda McMahon to Harvard: Obey the law and you can be eligible for funding” as downloaded from YouTube’s website at <https://www.youtube.com/watch?v=bb6YJUHMQc4>.

16. Attached hereto as **Exhibit 13** is a true and correct copy of a video recording entitled “Watch CNBC's full interview with Education Secretary Linda McMahon” as downloaded from YouTube’s website at <https://www.youtube.com/watch?v=h3KHwRH1DYQ>.

17. Attached hereto as **Exhibit 14** is a true and correct copy of the declaration of Kirsten Weld executed on June 2, 2025.

18. Attached hereto as **Exhibit 15** is a true and correct copy of the declaration of Todd Wolfson executed on May 30, 2025.

19. Attached hereto as **Exhibit 16** is a true and correct copy of the declaration of John Quackenbush executed on June 2, 2025.

20. Attached hereto as **Exhibit 17** is a true and correct copy of the declaration of Caroline Light executed on June 1, 2025.

21. Attached hereto as **Exhibit 18** is a true and correct copy of the declaration of Molly Forrest Franke executed on May 30, 2025.

22. Attached hereto as **Exhibit 19** is a true and correct copy of the declaration of Meredith Rosenthal executed on June 2, 2025.

23. Attached hereto as **Exhibit 20** is a true and correct copy of the declaration of Paige Williams executed on June 2, 2025.

24. Attached hereto as **Exhibit 21** is a true and correct copy of the declaration of Shoba Ramanadhan executed on June 2, 2025.

25. Attached hereto as **Exhibit 22** is a true and correct copy of the declaration of Scott Delaney executed on June 1, 2025.

26. Attached hereto as **Exhibit 23** is a true and correct copy of the declaration of Walter Willett executed on May 30, 2025.

27. Attached hereto as **Exhibit 24** is a true and correct copy of the declaration of Sarah Fortune executed on May 30, 2025.

28. Attached hereto as **Exhibit 25** is a true and correct copy of the declaration of Donald Ingber executed on May 30, 2025.

29. Attached hereto as **Exhibit 26** is a true and correct copy of the declaration of Bence Ölveczky executed on May 29, 2025.

30. Attached hereto as **Exhibit 27** is a true and correct copy of the declaration of Victoria Jenkins executed on May 30, 2025.

31. Attached hereto as **Exhibit 28** is a true and correct copy of the declaration of Jennifer Chen executed on May 29, 2025.

32. Attached hereto as **Exhibit 29** is a true and correct copy of the declaration of of Beau Schaeffer executed on May 30, 2025.

33. Attached hereto as **Exhibit 30** is a true and correct copy of the declaration of Adam Sychla executed on May 30, 2025.

34. Attached hereto as **Exhibit 31** is a true and correct copy of the declaration of Kelsey Tyssowski executed on May 30, 2025.

35. Attached hereto as **Exhibit 32** is a true and correct copy of the declaration of Trudy Merritt executed on May 30, 2025.

36. Attached hereto as **Exhibit 33** is a true and correct copy of the declaration of Jules Riegel executed on May 31, 2025.

37. Attached hereto as **Exhibit 34** is a true and correct copy of the declaration of Neal Sweeney executed on June 1, 2025.

38. Attached hereto as **Exhibit 35** is filed under seal pursuant to the Court's order granting Plaintiffs' Motion to Seal, Dkt. 72.

39. Attached hereto as **Exhibit 36** is filed under seal pursuant to the Court's order granting Plaintiffs' Motion to Seal, Dkt. 72.

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 2nd day of June, 2025, in Boston, Massachusetts.

Signed: /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

EXHIBIT 1



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

Former Alabama Police Officer Sentenced for Civil Rights Violation and Child Sexual Exploitation

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950 Pennsylvania Avenue, NW
Washington DC 20530



Office of Public Affairs Direct Line
202-514-2007

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EXHIBIT 2



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U.S. General Services Administration

March 03, 2025

HHS, ED, and GSA announce additional measures to end anti-Semitic harassment on college campuses





Measures will include a comprehensive review of federal contracts and grants given to institutions of higher education that are being investigated for dereliction of duties to curb or combat anti-Semitism violence and harassment

WASHINGTON — Today, the Department of Health and Human Services (HHS), Department of Education (ED), and the U.S. General Services Administration (GSA) announced a comprehensive review of Columbia University’s federal contracts and grants in light of ongoing investigations for potential violations of Title VI of the Civil Rights Act.

Given Columbia’s ongoing inaction in the face of relentless harassment of Jewish students, the Federal Government’s Task Force to Combat Anti-Semitism is considering Stop Work Orders for \$51.4 million in contracts between Columbia University and the Federal Government. The task force will also conduct a comprehensive review of the more than \$5 billion in federal grant commitments to Columbia University to ensure the university is in compliance with federal regulations, including its civil rights responsibilities.

“Anti-Semitism – like racism – is a spiritual and moral malady that sickens societies and kills people with lethalties comparable to history’s most deadly plagues,” said **HHS Secretary Robert F. Kennedy, Jr.** “In recent years, the censorship and false narratives of woke cancel culture have transformed our great universities into greenhouses for this deadly and virulent pestilence. Making America healthy means building communities of trust and mutual respect, based on speech freedom and open debate.”

The Task Force’s review is the first major action announced from the multi-agency Task Force to Combat Anti-Semitism created by President Trump’s [Executive Order titled “Additional Measures to Combat Anti-Semitism.”](#)

“Americans have watched in horror for more than a year now, as Jewish students have been assaulted and harassed on elite university campuses. Unlawful encampments and demonstrations have completely paralyzed day-to-day campus operations, depriving Jewish students of learning opportunities to which they are entitled,” said **Secretary of Education Linda McMahon.** “Institutions that receive federal funds have a responsibility to protect all students from discrimination. Columbia’s apparent failure to uphold their end of this basic agreement raises very serious questions about the institution’s fitness to continue doing business with the United States government.”

GSA has been asked to facilitate the review of federal funding received by Columbia including grant and contract reviews across the Federal Government.

“GSA remains committed to upholding federal acquisition standards and ensuring that government contracts reflect our nation’s values, including the fight against anti-Semitism,” said **FAS Commissioner and Task Force Member Josh Gruenbaum**. “With this partnership, we’ll be working across the government to end the culture of anti-Semitism in our institutions of higher education — putting all institutions on notice that it will not be tolerated per President Trump’s Executive Order.”

At this time, no immediate contracting actions are being taken.

For more information, visit the announcement on the [formation of the Task Force to Combat Anti-Semitism](#).

###

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 and follow us at [@USGSA](#).

Contact

press@gsa.gov

EXHIBIT 3



← Truth Details

7569 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 **78.9k** Likes

Mar 04, 2025, 7:30 AM



EXHIBIT 4



An official website of the United States government



U.S. General Services Administration

March 07, 2025

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







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.

###

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](#).

Contact

press@gsa.gov

EXHIBIT 5

“Leo Terrell with Mark Levin- How we’ll defeat antisemitism in the USA”

Downloaded from YouTube’s website at

<https://www.youtube.com/watch?v=NOFIKRr2Sco>

A digital file copy of this exhibit is being maintained by plaintiff’s counsel and will be provided to the Court and defendant’s counsel.

EXHIBIT 6

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)

Office of Communications and Outreach (OCO)

Page Last Reviewed: May 7, 2025

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EXHIBIT 7

March 19, 2025, interview of Leo Terrell on the Hugh Hewitt Show

Downloaded from

<https://eadn-wc05-2440449.nxedge.io/wp-content/uploads/2025/03/03-19hhs-terrell.mp3>

A digital file copy of this exhibit is being maintained by plaintiff's counsel and will be provided to the Court and defendant's counsel.

EXHIBIT 8



← Truth Details

3715 replies



Donald J. Trump 

@realDonaldTrump

Perhaps Harvard should lose its Tax Exempt Status and be Taxed as a Political Entity if it keeps pushing political, ideological, and terrorist inspired/supporting “Sickness?” Remember, Tax Exempt Status is totally contingent on acting in the PUBLIC INTEREST!

8.08k ReTruths **34.7k** Likes

Apr 15, 2025, 10:09 AM



EXHIBIT 9

TRUTH.**← Truth Details**

3809 replies

**Donald J. Trump** 

@realDonaldTrump

Everyone knows that Harvard has “lost its way.” They hired, from New York (Bill D) and Chicago (Lori L), at ridiculously high salaries/fees, two of the WORST and MOST INCOMPETENT mayors in the history of our Country, to “teach” municipal management and government. These two Radical Left fools left behind two cities that will take years to recover from their incompetence and evil. Harvard has been hiring almost all woke, Radical Left, idiots and “birdbrains” who are only capable of teaching FAILURE to students and so-called “future leaders.” Look just to the recent past at their plagiarizing President, who so greatly embarrassed Harvard before the United States States Congress. When it got so bad that they just couldn’t take it anymore, they moved this grossly inept woman into another position, teaching, rather than firing her ON THE SPOT. Since then much else has been found out about her, but she remains in place. Many others, like these Leftist dopes, are teaching at Harvard, and because of that, Harvard can no longer be considered even a decent place of learning, and should not be considered on any list of the World’s Great Universities or Colleges. Harvard is a JOKE, teaches Hate and Stupidity, and should no longer receive Federal Funds. Thank you for your attention to this matter!

10.1k ReTruths **42.4k** Likes

Apr 16, 2025, 7:05 AM



EXHIBIT 10



← Truth Details

3158 replies



Donald J. Trump 

@realDonaldTrump

Harvard is an Anti-Semitic, Far Left Institution, as are numerous others, with students being accepted from all over the World that want to rip our Country apart. The place is a Liberal mess, allowing a certain group of crazed lunatics to enter and exit the classroom and spew fake ANGER AND HATE. It is truly horrific! Now, since our filings began, they act like they are all "American Apple Pie." Harvard is a threat to Democracy, with a lawyer, who represents me, who should therefore be forced to resign, immediately, or be fired. He's not that good, anyway, and I hope that my very big and beautiful company, now run by my sons, gets rid of him ASAP!

9.15k ReTruths **40.8k** Likes

Apr 24, 2025, 9:33 AM



EXHIBIT 11



← Truth Details

4440 replies



Donald J. Trump



@realDonaldTrump

We are going to be taking away Harvard's Tax Exempt Status. It's what they deserve!

9.58k ReTruths 47.9k Likes

May 02, 2025, 7:25 AM



EXHIBIT 12

**“Education Secretary Linda McMahon to
Harvard: Obey the law and you can be
eligible for funding”**

**Downloaded from YouTube’s website at
[https://www.youtube.com/watch?v=bb6YJU
HMqc4](https://www.youtube.com/watch?v=bb6YJUHMqc4)**

**A digital file copy of this exhibit is being
maintained by plaintiff’s counsel and will be
provided to the Court and defendant’s
counsel.**

EXHIBIT 13

CNBC's full interview with Education Secretary Linda McMahon

**Downloaded from YouTube's website at
<https://www.youtube.com/watch?v=h3KHwRH1DYQ>**

A digital file copy of this exhibit is being maintained by plaintiff's counsel and will be provided to the Court and defendant's counsel.

EXHIBIT 14

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-cv-10910-ADB
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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. As part of this mission, Harvard AAUP provides support to AAUP members on Harvard's campus.

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.

9. 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 "April 3 Letter"). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that "incorporate[ed] and supersed[ed] the terms of" the April 3 Letter (the "April 11 Letter," and together with the April 3 Letter, the "Demand Letters"). I have read the demands listed in the Demand Letters, which were made public.

10. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds under these grants despite receiving requests from Harvard University to do so.

11. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (NIH) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the DOE, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters. The government has now canceled about \$2.7 billion in federal grants to Harvard.

12. 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.

13. I am aware that after the Trump administration froze over \$2.2 billion in federal funds to Harvard on April 14, 2025, approximately twenty AAUP members have had their federal grants and contracts cancelled. This has happened in waves. I am aware that AAUP members received a large wave of grant cancellation notices from Harvard on May 15, 2025.

14. 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.

15. 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 NIH announced that all its research grants to Columbia would be frozen effective immediately.

16. 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.

17. 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.

18. 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 will have on research across the campus.

Impact on AAUP as an Organization and on its Members

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

20. The Trump administration's actions are 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 sponsored 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.

21. We now hold twice as many meetings with our members as we did before the Trump administration began attacking Harvard University. We use these meetings to address the significant obstacles these demands, funding freezes, and terminations pose to the academic freedom and economic security of our members, such as by discussing how and whether AAUP-Harvard members can maintain their academic freedom in the wake of these attacks.

22. 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 Letters will have severe impacts on each of these three areas, which I will discuss in turn.

Academic Freedom

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

24. Harvard has already taken actions in anticipation of the Trump administration investigating the university, threatening to withhold its federal funding, and termination of about \$2.7 billion in federal funds. 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. Secretary of Education McMahon recently highlighted this dismissal when asked if the Trump administration was succeeding in its goals of changes at Harvard. 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.

25. 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.

26. I believe it reasonable to interpret all these actions as having been taken in anticipation of a Trump administration investigation. These were all programs accused by the congressional Committee on Education & the Workforce of being antisemitic, echoing inflammatory statements by Harvard affiliates about 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.

27. Recently, Harvard changed its disciplinary procedures for students accused of committing infractions of the student code of conduct. A new committee called the University Committee of Rights and Responsibilities now has final authority over certain student discipline cases and faculty have lost power and jurisdiction over such cases – indeed, the Harvard Corporation amended the University Statutes to this effect. This change was made in response to one of the demands in the April 11 Letter.

28. Recently, Harvard renamed its Office for Equity, Diversity, Inclusion, and Belonging as the Office of Community and Campus Life, and charged it with pursuing a different set of objectives. I understand this move to amount to a shuttering of Harvard's DEI office in compliance

with the demands in the April 3 and April 11 Letters. Similar changes were made to the diversity offices at Harvard's affiliated hospitals in the weeks following the April 3 and April 11 Letters. For example, at Massachusetts General Hospital and at Brigham and Women's Hospital, the former Centers for Diversity and Inclusion at MGH and BWH, as well as the Office for Belonging and Engagement and the Center for Faculty Development at MGH, were collapsed and amalgamated into the MGB Center for Academic Development and Enrichment (CADE). One AAUP-Harvard member who is employed at one of the affected hospitals reports that in late April, "we had a department meeting in which we were told that there was going to be no DEI anymore."

29. I have also received confidential reports of both top-down censorship and anticipatory self-censorship at Harvard-affiliated publications, in which authors of both scholarly and public-facing material attest to being discouraged from publishing on topics disfavored by the Trump administration. Individuals who have shared these confidential reports with me have stressed that I cannot discuss these incidents with any specificity because they fear being fired from their positions or facing professional retaliation.

30. What is likely to follow if Harvard further capitulates to the demands in the Demand Letters presents an even greater threat to academic freedom. The Demand Letters seek 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.

31. 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.

32. Biomedical researchers have expressed concerns to me about whether they can do research anymore concerning topics like health equity, maternal mortality for women of color, and disparities in health outcomes, which is a clear issue of academic freedom. Some of these researchers received stop work orders in early February, and others received them more recently. They are being prevented from doing work they have done all their lives and are concerned they will no longer have the freedom to conduct their research in the way their professional training and disciplinary expertise leads them to deem most appropriate.

Governance

33. 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.”

34. The governance and leadership reforms listed in the Demand Letters 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 these demands would constitute not shared governance, but governance by unlawful federal fiat.

35. The demands concerning discontinuation of Diversity, Equity, and Inclusion (DEI) programs in the Demand Letters are vague. They 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.

36. The April 11 Letter demands the “empowering” of, “from among the tenured professoriate and senior leadership, exclusively those most ... committed to the changes indicated in this letter,” as well as the “reducing” of “the power held by faculty (whether tenured or untenured) and administrators more committed to activism than scholarship.” Though these criteria are vague, they suggest the imposition of a litmus test upon faculty, whereby certain faculty members are to be disempowered or professionally marginalized based on ideological criteria.

37. The April 11 Letter stipulates that “an external party” must “audit the student body, faculty, staff, and leadership for viewpoint diversity, such that each department, field, or teaching unit must be individually viewpoint diverse.” It notes that “Every department or field found to lack viewpoint diversity must be reformed by hiring a critical mass of new faculty within that department or field who will provide viewpoint diversity.” This would constitute an unacceptable infringement upon the ability of scholars to direct the faculty appointments process according to their professional competence and expertise in their respective fields, and would insert inappropriate and extra-academic ideological considerations into the evaluation of candidates for teaching and research positions. It would have an intense chilling effect upon faculty speech.

38. The April 11 Letter explicitly targets “programs, schools, and centers of concern” which “include but are not limited to the Divinity School, Graduate School of Education, School of Public Health, Medical School, Religion and Public Life Program, FXB Center for Health & Human Rights, Center for Middle Eastern Studies, Carr Center for Human Rights at the Harvard Kennedy School, Department of New Eastern Languages and Cultures, and the Harvard Law School International Human Rights Clinic.” It insinuates that all of these units have “egregious

records of antisemitism or other bias,” without offering evidence. Many AAUP Harvard members work in these programs, schools, and centers of concern, and they report fear and anxiety stemming from having been singled out for exceptional scrutiny in the April 11 Letter.

39. 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 comply with any of the demands listed in the Demand Letters to prevent further terminations of federal funding, 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

40. 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.

41. The termination of roughly \$2.7 billion dollars in federal funding and continued threats to terminate all \$9 billion of Harvard’s federal funding has left and will leave no part of Harvard untouched. These terminations will have and are already having catastrophic implications for the economic security and lives of vast swathes of researchers, from post-graduate researchers to tenured faculty.

42. The Harvard School of Public Health is especially vulnerable—nearly 60% of their operating budget comes from sponsored support, including federal grants. Before the April 14, 2025 freezing of over \$2.2 billion in federal funding, the School of Public Health had already begun to shrink admissions pools in their PhD programs. Now, virtually every federal grant at the School of Public Health has been terminated. Multiple colleagues at the School of Public Health have expressed doubt about whether the School of Public Health will be able to continue existing.

The threat to their institution and work is existential and they will not be able to recoup their institution and work if federal funding is not resumed within a short time period. This will also have lasting effects on the pipeline for future scientific research, as NSF grants designed specifically for early-career scientists have been cancelled wholesale.

43. I am also 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 Letters. This is both an academic freedom issue and an economic security issue.

44. Harvard implemented a hiring freeze on March 10, 2025, hours before the federal government sent a letter indicating it was monitoring Harvard. 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.

45. There are also a number of term-limited lecturers who are timing out of their contracts. Some are language instructors who are the only person at Harvard teaching their specific language. Due to the hiring freeze, these lecturers will not be replaced and various bodies of knowledge will no longer be taught at the University as a result. If federal funding is not restored soon, the hiring freeze will be prolonged for years even as a generation of older faculty members retires.

46. 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 it is not just researchers' current grants that are at risk of cancellation or have been cancelled, it is years' worth of future grants. This can be career ending; it may well unrecoverably disrupt these researchers' life work.

47. I have heard colleagues express concerns that Harvard University may no longer be able to function as a research university due to the collapse of biomedical sciences resulting from withdrawals of federal funding.

48. These threats are not unique to Harvard. Earlier this semester, 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. But the scale and retaliatory nature of the attacks at Harvard are thus far without parallel at other institutions.

Specific Impacts on Anonymous AAUP Members

49. As President of the Harvard AAUP chapter, I have heard from dozens of our members about how federal funding cuts are severely disrupting 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.

50. 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

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

52. 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.

53. 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 discontinued.

54. 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

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

56. 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

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

58. This faculty member attests that the precipitous termination of billions of dollars in federal grants and contracts, as well as the statement by the Secretary of Education that Harvard researchers need not apply for future federal grants, has had a catastrophic effect on the atmosphere and conduct of biomedical research at the Medical School.

59. This faculty member has seen all three of their NIH grants suspended as of May 1, totaling millions of dollars of competitively secured multi-year research support. They have spent their career working in partnership with biomedical researchers abroad, but the federal government's suspension of all grants with foreign subawards imperils the international research collaborations this faculty member has developed over decades. They have had to suspend ongoing clinical trials and they do not know what will happen to the valuable biomedical samples that have already been gathered as part of their ongoing projects. The suspended grants support the work of 5 Boston-area biomedical researchers and many more biomedical researchers based at the faculty member's international research site.

60. This faculty member has seen administrative staff—those who are responsible for tasks such as grants administration and human studies review—be dismissed from their jobs. They note that early career scientists who have completed multiple years of postgraduate training are newly seeking career opportunities outside of basic research and/or outside the United States, thus disrupting the scientific research pipeline in ways that will have generational effects. Scientists with unique and advanced skills are seeking positions outside of academia and/or outside the United States, because of the lack of prospects for continued research funding. Projects that require the recruitment of human study participants have had to suddenly suspend operations because the funds enabling the completion of the associated research projects have been terminated.

61. This faculty member attests that the institution has 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. Laboratory facilities and other physical spaces that support laboratory research are now being consolidated and closed. Harvard University and Harvard-affiliated hospitals have offered small amounts of bridge funding but in quantities that are nowhere near what would be necessary to permit the survival of these research programs.

62. 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 terminated in a manner that will fundamentally preclude the possibility of future research. As a result, this faculty member attests they are actively looking to move their research program away from the United States if possible.

63. 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. Administrators at the Harvard-affiliated hospital where they work have explicitly instructed this faculty member not to voice any public concerns about what is occurring and not to speak to the media.

Impact on Student Speech and Academic Freedom

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

65. Graduate students are having to reorganize their research plans because funding sources have been wiped out, and because Harvard's very authorization to enroll international students has been thrown into doubt by the Department of Homeland Security's attempted revocation of its SEVP certification. This makes it very difficult to do academic work in any discipline because serious research requires multiple years of planning.

66. 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.

67. In one of my classes, students were talking in April 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, however, 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 has prevented this student from participating fully in their scholarly community.

68. 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. This fear is not unwarranted: the Department of Homeland Security has demanded that Harvard turn over five years' worth of any surveillance video documenting protest activities involving international student participation.

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

Dated: June 2, 2025

Signed: _____

Kirsten Weld
Professor of History

EXHIBIT 15

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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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 previously held various leadership roles for the Rutgers University chapter of AAUP, including as the chapter’s President and Vice President.

2. I am 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 Summary Judgment, 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 Members

8. The AAUP has approximately 48,000 members on college and university campuses across the country, including approximately 247 members at Harvard University (the "Harvard-AAUP members"). Many of these members, including members at Harvard, rely on federal grants to support their research, scholarship, and teaching activities.

9. I am aware that the Trump administration has taken a series of actions targeting Harvard University. 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. I am aware of the April 3, 2025 letter from officials at the GSA, HHS, and DOE that was made public and demanded that Harvard immediately implement a long list of "non-

exhaustive areas of reform” to “remain a responsible recipient of federal taxpayer dollars” (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[ed] and superseded[ed] the terms of” the April 3 Letter (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). I have read the demands listed in the Demand Letters, which were made public.

10. I am aware that on April 14, 2025 the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds under these grants despite receiving requests from Harvard University to do so.

11. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the DOE, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

12. Harvard-AAUP members will suffer harm to their research, work, reputation, academic freedom, and ability to pursue their careers if federal funding is not restored or if the Harvard administration accedes to the federal government’s demands listed in the Demand Letters.

13. I am aware of and can identify Harvard-AAUP members who have lost their federal funding as a result of the Trump administration’s series of actions targeting Harvard. The

continued viability of these AAUP members' work is now uncertain, making it difficult for them to continue their research, plan future research, maintain professional relationships, and recruit potential staff to work on their projects. Since the mass termination of NIH and NSF grants, several members have started actively seeking to move their careers and research programs out of the United States.

14. I am aware of and can identify Harvard-AAUP members whose speech and academic freedom has been chilled as a result of the federal government's series of actions targeting Harvard. Some Harvard-AAUP members have started to self-censor their language both inside and outside the classroom following the Trump administration series of actions targeting Harvard. Some Harvard-AAUP members 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. Some members are concerned that they will not be able to continue working in their chosen fields, since their work deals with topics, like health equity or climate change, that are disfavored by the Trump administration.

15. I am aware of and can identify Harvard-AAUP members 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 termination of over \$2.2 billion in federal funds to Harvard University, or because they fear they may be let go by Harvard if they engage in speech the Trump administration disfavors.

16. 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 Harvard, Columbia, Cornell, and Northwestern, and threatened to cancel federal funding at numerous other universities and colleges.

Harms to AAUP as an Organization

17. The Trump administration's termination of more than \$2.2 billion in federal grants and contracts to Harvard University, along with the Trump administration's demands that Harvard make Trump administration-imposed reforms to receive federal financial assistance, has harmed and is continuing to harm AAUP as an organization.

18. 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 and cancellation of federal funding at Harvard and other universities and colleges, along with its demands that Harvard implement a long list of "reforms" to receive federal funding, is directly impairing the AAUP's mission.

19. 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.

20. 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."

21. 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.

22. Through its local chapters, including the Harvard Faculty 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.

23. 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 did not provide any notice to Harvard before terminating its federal funding. 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.

24. The Trump administration's March 10 letter, March 31 press release, and the Demand Letters, 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.

25. 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.

26. 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.

27. 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 now less willing to protect those principles in the face of threatened and actual 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.

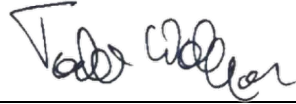
28. The AAUP has committed staff and leadership time to support members of Harvard's AAUP chapter regarding how to respond to the government's actions, including the Demand Letters and federal funding terminations.

29. The government's actions and statements have also caused a pervasive sense of fear and intimidation among AAUP members. 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, because of the federal government's conduct. As just some examples, in direct response to the government's threats to cut federal funding and actual termination of 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.

Dated: May 30, 2025

Signed: 

Todd Wolfson
President of the AAUP

EXHIBIT 16

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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DECLARATION OF JOHN QUACKENBUSH

I, John Quackenbush, hereby declare as follows:

1. I am the Henry Pickering Walcott Professor of Computational Biology and Bioinformatics at the Harvard T.H. Chan School of Public Health. I am also the Chair of the Department of Biostatistics at the School of Public Health. I have been a Professor at the School of Public Health since 2005 and Biostatics Department Chair since August 6, 2018.

2. I hold a PhD in theoretical physics from UCLA which I received in 1990. Following two years as a postdoctoral fellow in physics, in 1992 I applied for and received a prestigious Special Emphasis Research Career Award to work on the Human Genome Project. I have had continuous federal funding to support my research ever since.

3. I am a highly accomplished researcher, with more than 340 scientific papers published and over 101,000 citations. I have been a leader in the open-science movement and among my honors is recognition in 2013 as a White House Open Science Champion of Change. Because

of my contributions to advancing computational and systems biology and using these to better understand disease, I was elected to the National Academy of Medicine in 2022.

4. 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.

5. I received my first National Institutes of Health (“NIH”) research grant in 1992 and my first research grant from the National Cancer Institute (“NCI”) in 1997 and have had significant levels of continuous funding from the NIH and NCI ever since. These grants are awarded through a rigorous and competitive process to evaluate the quality, significance, and potential impact of the research proposed and ultimately carried out. My work has emphasized understanding cancer and searching for better ways to treat it and other diseases. My current research involves developing methods that map the processes that control how cells change as they transition from health to disease—basically asking what processes turn a normal cell into a cancer cell. A core component of my work has been studying how these control processes depend on sex and gender as biological variables. Addressing the role that sex plays has been critical as many cancers exhibit strong differences between males and females. For example, males are at a greater risk of developing colon cancer than females, but males respond better to chemotherapy.

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

7. 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 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. I am aware that officials from the Trump

administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

8. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

9. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the NIH terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

10. 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 American

universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

11. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the more than \$2 billion in terminated funds. That amount is far from sufficient to replace the terminated federal funds for the School of Public Health, which has the smallest endowment and donor base among the affected schools and departments at Harvard. About 60% of the School of Public Health's budget relies on federal funds, and most of the \$250 million promised will likely not go to the School of Public Health. In fact, we have recently been informed that only about \$25 million will be available to cover research costs for terminated projects during the coming fiscal year—less than 1/10 of the federal funding the School of Public Health has lost. This promised stopgap funding is also an off ramp to allow researchers to wrap up current research and not a promise of sustained funding should federal funding not be restored.

12. About 50% of my salary and research was funded by a NCI Outstanding Investigator Award through the R35 grant mechanism. The R35 grant mechanism was designed to recognize investigators with a long career of exceptional contributions and provides \$600,000 of funding a year for seven years. The overarching theme of my research funded by this award was to develop new methods to map processes involved in cellular regulation, to develop software tools that would allow us and other scientists around the world to map and study these controls, and to study sex as a biological variable in the context of how it affects cancer.

13. The NCI announced a pause in new awards in April but confirmed that the funding of current awardees would continue for the duration of their award. However, I received notice from Harvard on May 15, 2025 that this award had been terminated.

14. Prior to this grant termination, I had already lost another stream of my federal funding—a NIH grant specifically to develop methods that would help us understand sex and gender as biological variables by allowing us to account for the fact that biological females have two X (XX) “sex chromosomes,” or “allosomes,” while males replace one X with a Y chromosome (XY). That project was funded four years ago and my team had submitted a renewal application in October to continue to develop methods to study how different chromosomal backgrounds result in different risks for disease. After watching the review date for the grant change many times after January 20, 2025, on April 4, I checked the NIH website “eRA Commons” and discovered that the project no longer had a review date assigned. I arranged a conversation with an NIH program officer on April 7, who on that date informed me that the NIH program funding the grant had been cancelled as “it is no longer was consistent with NIH priorities,” and that the NIH grant review panel “study section” was permanently disbanded. This project covered a significant part of my remaining scientific effort and salary. Now that the Trump administration has terminated billions in federal grants to Harvard and indicated it will not provide future grants to Harvard, I have no avenues left to secure alternative funding for this research.

15. Losing all of my federal funding means the large repository of more than 20 cutting-edge software tools that my team developed over many years, all of which are freely and publicly available as open-source tools for academic and commercial use, will soon become dysfunctional unless they are transferred to one of my former trainees overseas.

16. The termination of my federal funding has long term implications for my future research. The Trump administration’s threat to not provide future grants to Harvard will effectively prevent me from securing federal funding to keep my research going for the foreseeable future. Even if federal funding is later restored, it takes a year or more for new research applications to be

reviewed and funded; researchers such as myself have to line up grants years in advance. And with the proposed decrease in the NIH budget, I will be at a particular disadvantage as I will not have progress to show or recent preliminary analyses to demonstrate the ongoing value of my work. And while some have suggested that I could cover my work through grants from non-governmental foundations, that pool of funding is much smaller than what the NIH had provided and competition for it is likely to be even more fierce.

17. The termination of my federal funding will have long-term impacts on society. My research has advanced the cancer research field in important ways. I published at least 40 papers under my R35 grant, some about methods and some about applications, in which we uncovered important aspects of the terrible ways in which cancers adapt to elude treatment. For example, I published a paper that helps understand why women with colon cancer do not respond as well to chemotherapy and I have looked at similar questions with lung cancer, brain tumors, and responses to immune-oncology drugs. My team built the first system capable of modeling how each of the 25,000 genes in the human genome change over time and demonstrated its application to development of breast cancer. This method was recognized by the NCI as one of the most important advances in cancer research in 2024. Now, I will not be able to move this important work forward.

18. Tenured faculty at the School of Public Health such as myself are expected to fund 90% of our workplace effort, nearly all coming from grant-funded research, and failure to meet that threshold will result in a substantial salary reduction. Trying to re-establish a research program after the rug has been yanked out from under it with little notice puts me in an untenable position. Unless funding is restored by the end of the summer and the federal government agrees to fund new and renewal grant proposals from Harvard researchers, my research will be effectively dead unless I find a position elsewhere—possibly overseas.

19. Even if I am able to secure funding again, years in the future, having a gap in their research record puts a researcher at a disadvantage irrespective of past accomplishments. For example, I have participated in grant reviews where I had to fight to get someone a grant when they had a gap in their research record because of personal or family reasons such as going on maternity leave.

20. Part of my role as a faculty member is to train the next generation, and the federal funding terminations at Harvard will have a devastating impact on graduate students and postdoctoral fellows (“postdocs”). I have an exceptional record of training over 80 postdocs, many of whom are now at leading institutions across the country and around the world. The students I have trained have also done exceptionally well and are leaders in their own right. I currently have three postdocs and one graduate student. One of my postdocs applied for a NIH career development award. That grant was reviewed and received an exceptional score, but the grant never received final approval and because of the Trump administration actions targeting Harvard, it may never be funded. Another postdoc was planning to submit a proposal to study autism; now she is unsure if she should submit that proposal or find someone else to mentor her at a different institution. She is also looking for jobs outside of academia. All three of my current postdocs are also considering positions overseas in Canada and Europe; that loss would be a blow to science in the U.S. My graduate student will likely also leave my research group when she completes her studies and is applying for jobs outside of academia. All four will likely be gone in the near future and with them, promising lines of research will disappear. Even if federal funding is later restored, new postdocs and graduate students would face hurdles restoring the research lines that had been terminated due to a lack of continuity and loss of institutional knowledge.

21. A critical part of my commitment to training is reflected in my involvement with training grants from the NIH. My department currently has four training grants—one in genetics and genomics, a second in HIV/AIDs research, a third in environmental health, and the final one in cancer (now in its 44th year). These training grants support U.S. citizens and permanent residents by providing tuition and a stipend and generally cover those students for their first two years (and sometime longer) after which they join faculty research teams. I began the genetics and genomics training grant and served as its co-principal investigator for years before launching another “big data” training program.

22. All four of my department’s training grants were subject to the mass termination notice, meaning that more than forty students in our program are now facing a loss of support to continue their studies and complete their research. The genetics and genomics training grant was reviewed in the fall and was slated for funding this year, but the grant was never rewarded. Because of this and other uncertainties caused by threats from the Trump administration, our incoming PhD class only has four students—far fewer than the twelve to fifteen we normally admit. The damage to the future of research in the U.S. is astounding.

23. I have been co-principal investigator for the cancer training grant for the past four years, which supports ten students and one postdoctoral fellow. I spent most of the last four months preparing a renewal application that would have supported eight students to receive training in cancer research in the following year. That grant application was submitted but now it will likely never be reviewed.

24. The costs of the Trump administration’s terminations of federal research funding for Harvard University are devastating. Personally, those of us who have dedicated our lives to doing life-changing research for the public good have seen our careers devastated—I have 33 years

of continuous NIH funded research that has been stopped. The costs to our students and postdocs who train by apprenticing with working researchers is also devastating. If I have no funds, my mentees cannot train. And the cost to the U.S. and its future health and well-being as well as its world leadership in science and scientific innovation are also terrible as the Trump administration decimates an 80 year government-academic research partnership and threatens to wipe out an entire generation of researchers.

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

Dated: June 2, 2025

Signed:  _____

John Quackenbush, PhD
Professor, Harvard T.H. Chan School of Public Health
Chair, Department of Biostatistics

EXHIBIT 17

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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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’s faculty 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 immigration, gender, race, and sexuality in the United States South.
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. My research explores the ways race, gender, and region shape collective memory and archival silence. I have studied and written about the experience of southern Jewish assimilation as well as the intersection of 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, race, and power.

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

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

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. I am aware that on April 3, 2025, officials from the DOE, HHS, and GSA sent a letter to Harvard and demanded that Harvard immediately take a long list of actions to remain a recipient of federal funding. I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 letter. Both of these letters were made public and I have read the demands listed in them.

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 am also aware that the federal government has terminated more than \$2 billion in federal grants to Harvard and has threatened to withhold all of Harvard’s federal funding if the University does not comply with the administration’s demands.

10. I work in a field that is under particular scrutiny and is disfavored by the current administration. Specifically, my research and teaching treat the concepts of gender, sexuality, ethnicity, and race as analytically useful categories for studying history and society. 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 particular kind of exclusionary politics it is trying to instantiate in our universities and in our culture writ large.

11. 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. Although Harvard’s leadership has made statements to suggest that the institution intends to support academic freedom, I have seen Harvard take actions that suggest the university is actively making concessions to comply with the Trump administration’s demands in the face of immense financial pressure. For example, in response to the Department of Education’s prohibition of graduation celebrations based on race, Harvard renamed its Office of Equity, Diversity, Inclusion, and Belonging the Office of “Community and Campus Life,” and discontinued financial support for all affinity group graduation celebrations. This included the cancellation of “Lavender Graduation” for LGBTQ+ students, graduation ceremonies for First Generation Low Income (“FGLI”) students, and celebrations for students of different races and ethnicities.

12. If Harvard continues to capitulate to the Trump administration’s demands, I worry about the future security of my teaching and scholarship in gender and sexuality studies and ethnic studies, all of which contribute to Harvard’s prominence as a vibrant and diverse intellectual community. If Harvard’s leadership decides to make further program cuts, I believe it is likely to target the programs, centers, and departments that the Trump administration would identify as suspect or 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.

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

14. 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 among our faculty, and they stand to lose the most if Harvard's leadership decides to make concessions to comply with the Trump administration's demands.

15. 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.

16. I also worry about the mental health of my students. I have many students who 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 and they feel themselves to be possible targets of the Trump administration's attacks. In this moment, many of my students are demoralized and worried about whether their university will protect them if they are targeted by the Trump administration.

17. 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 research on the 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.

18. I feel the chilling effects of the administration's demand letters 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 Jewish person to use my relative privilege to resist injustice and to participate in "tikkun olam," or healing the world. For me, this means caring about and responding to the suffering of others, like people 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 and constantly shifting 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.

Dated: June 1, 2025

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

EXHIBIT 18

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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DECLARATION OF MOLLY FORREST FRANKE

I, Molly Forrest Franke, hereby declare as follows:

1. I am a Professor in the Department of Global Health and Social Medicine at Harvard Medical School as well as an Associate Professor in the Department of Epidemiology at the Harvard T.H. Chan School of Public Health (“HSPH”). I joined the Harvard University faculty in 2011.

2. I earned an ScD in Epidemiology, Infectious Disease, and Biostatistics from HSPH in 2010 as well as a B.A. in Sociology and Spanish from Colby College in 2001.

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. My research focuses on improving health outcomes for individuals affected by tuberculosis and HIV. My HIV-related research focuses on improving treatment outcomes for adolescents and young adults living with HIV through community-based support and youth-friendly modalities. I also apply advanced epidemiologic methods to address critical knowledge gaps

related to conditions that disproportionately affect the poor and socially marginalized, including tuberculosis and cholera.

5. My work has been published in the *American Journal of Respiratory and Critical Care Medicine*, *Clinical Infectious Diseases*, *AIDS and Behavior*, *Nature Communications*, and other peer-reviewed publications.

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

7. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

8. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has

since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

9. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

10. 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 American universities and making a range of threats about how the federal government intends to use its authority to impose numerous demands on Harvard University specifically.

11. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the over \$2 billion in terminated funds. That amount is far from sufficient to replace the terminated funds for either Harvard Medical School or the Harvard T.H. Chan School of Public Health.

12. My research is entirely federally funded. I am expected to bring in at least 25% of my salary through grant support, and federal grants allowed me to fulfill this expectation.

13. I received notification from Harvard on May 15, 2025 that all four of my NIH grants had been terminated.

14. The first grant funded research on whether community-engaged social media campaigns and social media influencers could reduce HIV-related stigma and, thereby, improve the health of young people. This grant was about to begin a no-cost extension year when it was terminated, and we planned to use this time to complete analyses and publish our findings. Now, we do not have the funding to complete our work. If funding is not restored soon, we will not be able to publish our analyses.

15. The second grant funded research on emerging regimens to treat multidrug-resistant tuberculosis. This grant was in a no-cost extension year when it was terminated, and I had submitted another grant application to continue the work. That grant application has a competitive score, but I am virtually certain it will not be funded now due to my Harvard affiliation. In early May, shortly before I received my grant termination notices, a NIH employee told me that program officers were instructed to sit on all grant applications from Harvard. If funding is not restored soon, we will not be able to publish outstanding analyses, and we will not have the resources to make the dataset publicly available for other researchers. Without new funding, we expect to lay off staff in Peru and Lesotho, some of whom have more than ten years of specialized training and experience managing these types of data.

16. The third grant funded a project on the efficacy of a community-based support intervention for adolescents and young adults transitioning to adult-centered HIV care. We were completing the third of five years when it was terminated. I provide additional detail about this project in paragraphs 19 through 24 of this declaration.

17. The fourth grant funded research on the role of suboptimal treatment adherence and comorbidities in unsuccessful tuberculosis treatment outcomes. This was a two-year award to study the contributions of daily medication adherence and comorbidities such as HIV and diabetes

to tuberculosis treatment outcomes. As a result of this grant termination, we will not be able to complete our proposed analyses.

18. These grant terminations pose an existential threat to the projects and those involved in them.

19. The termination of the third grant is particularly devastating. This grant supported the evaluation of a community-based support intervention for adolescents and young adults with HIV in Peru. The project is just over halfway complete and involves several parties that have operated in reliance on the expectation of continued federal funding. The termination of this grant will adversely impact those involved in the project and its results. This research cannot simply be picked up at a later date if federal funding is restored; the investments and progress toward meeting the study objectives will be entirely lost.

20. The third project involves a team at Harvard that includes a postdoc, statistician, research coordinator, and programmer and 15-20 individuals in Peru. These teams communicate regularly to ensure successful conduct of research in compliance with US and Peruvian laws and regulations and international research standards. These individuals reasonably presumed that they had job security for the remaining two years of the project, and the loss of federal funding directly undermines that expectation. Without federal funding, we lack alternative sources to support these teams.

21. The termination of federal funding will also have devastating effects for the third project's participants. The project is a randomized trial in which young people ages 14-23 voluntarily enrolled. Most participants (93%) have a recent HIV diagnosis; one-third lack caregiver support, over half have mental health needs, and many live in poverty. We committed to 9-12 months of intervention for enrolled participants as well as follow-up from project staff after the

intervention. Participants are paired with health workers who attend medical visits with them, help them enroll in health insurance, and obtain national IDs, if needed. The trial also includes social support groups, education sessions, and mental health and substance use screening and linkage to care for participants. Trial participants depend on the services the trial committed to them and lack other comparable support. Termination of this trial will greatly disturb the lives and expectations of the participants who chose to participate based on the terms presented to them at the time of enrollment. For these reasons, early termination is unethical and represents an extraordinary breach of trust.

22. A foundational component of the intervention care the participants receive is the provision of consistent support by an adult health worker on whom they can rely. The third project's intervention is intended to gradually taper over time so that adolescent and young adult participants can eventually gain independence in navigating care systems. If the project is unable to continue, all participants will not receive the intended offboarding support and may be unprepared to navigate these systems and to seek alternative sources of care and support.

23. The third project also has a control group. If participants in the control group have any mental health or substance abuse concerns they want assistance with, they are also linked to care. Early termination of the trial also has ethical implications for the control group. When an individual decides to enroll in a controlled trial in which access to an intervention or novel drug is not guaranteed, they may consider potential risks against the benefits, including whether participation is likely to contribute to a "greater good" through the research discoveries. If a trial is terminated early, the initial evaluation of risks and benefits no longer holds.

24. Partnerships established throughout the third project are also gravely threatened by the termination of the grant supporting it. Local implementing partners in Peru enable this work

and include the Peruvian Ministry of Health. If I have to let project staff go because I can no longer pay them or if I do not fulfill my commitment to the participants, who are recruited from Ministry of Health facilities, I will jeopardize my relationships. I will also damage the positive reputation I have built with the Ministry of Health over the years. This will threaten the possibility of future work on HIV service delivery interventions and tuberculosis treatments.

25. My staff at Harvard are also irreplaceable. For example, my research coordinator has been crucial in bridging cultural and linguistic differences. She is bilingual and has built rapport with the team in Peru that not anyone can build. If I lose my staff because of the funding terminations, it will be very difficult to continue my research, given their central roles in the day-to-day operations of the project and the extensive time invested in training them.

26. This third grant as well as the second grant focusing on multidrug-resistant tuberculosis treatment have established and fortified critical infrastructure in Peru, Lesotho, and Kazakhstan for carrying out research aimed at improving outcomes for people with HIV and tuberculosis. Without federal funding, this critical infrastructure cannot be sustained, posing a formidable barrier to future research.

27. I do not know where else to turn for funding for these projects on the short time frame induced by these grant terminations. Harvard Medical School has communicated that some amount of funds will be made available over the short term to support our work in the absence of NIH funds. It is unclear how much and how those funds will be distributed. Disbursement of the funds Harvard provides may not be based on the quantity of research funding lost. Harvard has indicated that we should continue essential work on terminated grants for the time being. I have no guarantee of funding from Harvard in writing, and any funding Harvard can provide will be far from sufficient to replace my federal grants or allow me to bring these projects to completion.

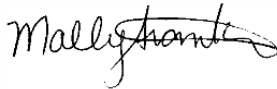
28. The only long-term alternative to federal funding would be to find emergency philanthropic support, which is exceedingly unlikely. If federal funding is not restored, project staff for the third grant will soon have to explain to participants that projects are ending, and I will soon have to let the team in Peru go.

29. Graduate students and postdoctoral fellows (“postdocs”) hired to support this research have also had funding cut as a result of my grant terminations and will suffer significantly as a result. Students and postdocs depend on federal funding to support the research that allows them to obtain degrees and advance their academic careers. For example, I have a postdoc working with me who planned to apply for a career development award from the NIH. Because the Trump administration has told Harvard that it will not receive any future federal funds, it is entirely unclear how he can advance his academic career at Harvard. It is difficult to find a new postdoc position at a different institution given the large number of trainees with funding terminations at Harvard and other institutions. Moving internationally is not an option for this postdoc. While he is currently uncertain about what he will do, leaving academia to pursue opportunities in industry is a leading possibility.

30. I know that many of my fellow faculty members and researchers are deeply concerned about the impacts of the recent Trump administration demands and terminations of federal funding on research and academic freedom. For example, I know that many faculty members are removing words like “gender”, “equity”, and “marginalization” from their research documents in an attempt to avoid the termination of grants going forward. The general feeling, however, is that regardless of what the faculty at Harvard are studying, they will not receive another NIH grant because of their affiliation with Harvard.

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

Dated: May 30, 2025

Signed: 

Molly Forrest Franke
Professor, Harvard Medical School
Associate Professor, Harvard T.H. Chan
School of Public Health

EXHIBIT 19

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al. Defendants.	Case No. 1:25-CV-10910-ADB
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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. As of May 1, 2025, I am also serving as the interim chair of my department. I previously served as the Associate Dean for Diversity and then Senior Associate Dean for Academic Affairs at the Harvard School of Public Health for a total of 5 years, overseeing the Office of Diversity and Inclusion in both of these roles. 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 Harvard 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. I am aware that a letter was sent by officials from the Trump administration to Harvard on April 3, 2025, including a long list of demands and necessary reforms (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporates and supersedes the terms” of the April 3 Letter and serves “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). The Demand Letters were made public, and I have read the demands listed in the Demand Letters. I am aware that,

on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek grants from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated Harvard’s grants. I am aware that on May 9, 2025, the Department of Agriculture terminated Harvard’s grants. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development terminated Harvard’s grants. I am also aware that the DOJ Task Force to Combat Anti-Semitism expressly cited antisemitism allegations and race discrimination as the reason for the Trump administration’s termination of approximately \$450 million in grants to Harvard. Letters regarding each of these terminations were made public, and I have read each of them.

9. 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.

10. 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.

11. 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.

12. After the university received notice that the Trump administration terminated all federal funding on May 14, it pledged \$250 million across the university in one-time stopgap funding to replace some of the more than \$2 billion in terminated funds. That amount is far from sufficient to replace the terminated funds for the Harvard School of Public Health, which typically receives around \$200 million in federal funding annually across its departments, and the cancelled grants included many multi-year commitments.

Research Funding

13. Approximately sixty percent of my salary comes from research grants, including those funded by NIH and the Agency for Healthcare Research and Quality within the Department of Health and Human Services. Harvard pays a portion of my salary for my non-research work, including teaching students and serving as interim department chair, but federal funding has provided critical support for my work over the course of my career.

14. 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.

15. The grant provides almost \$2.5 million in federal funding over 3.5 years. We had one more year left on our funding term when the grant was cancelled on May 15, 2025. Grant funding provided salary support for four faculty at Harvard (including myself), two research assistants, a PhD student, and collaborators at two other institutions.

16. As discussed above, Harvard has instituted a hiring freeze in anticipation of threats by the Trump administration. The freeze has meant that several staff positions in our department remain unfilled and our administrative staff are stretched thin. Several faculty searches that I was involved with were cancelled just as we were identifying finalists for these positions. Moreover, as department chair I am now working with my colleagues to help them forecast the impact of grant terminations on their ability to cover the salaries of their research teams. Almost surely, my colleagues will be in the terrible position of having to let go members of their research staff whose work was funded by federal grants. It has also become much harder to find funding for our PhD students, many of whose stipends were paid by federal training and research grants.

17. The loss of NIH funding is devastating for our research. Without federal funding, we will have to stop our studies entirely while we look for other resources. It will be almost impossible to raise private, foundation funding to finish all the research previously funded by the federal government because there are so few funding sources for large, data-heavy projects. Consequently, we will fall short of illuminating the questions we have spent many resources trying to answer. For example, one of my junior colleagues has been working to better understand the impact of new Medicare payment models on patients with health and social programs that make them

particularly vulnerable to changes in access to care. The cancellation of his funding leaves him unable to complete this timely research, which is needed to inform Medicare policy. I am particularly fearful that the funding lapse may be career-ending, particularly for our PhD students and my non-tenured junior colleagues. Without federal funding, my colleagues who are coming up for tenure may not be competitive applicants for that crucial promotion. Federal grants impact tenure decisions beyond just the dollars themselves—tenure candidates must demonstrate that they have served as principal investigators on federal research grants and are capable of performing the sort of rigorous research that federal grant study sections (peer reviewers) approve for scarce federal dollars.

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 understand that the administration has actively discouraged Harvard researchers from submitted grants; few of my colleagues are continuing to apply for federal funding.

19. A loss of federal funds would also make collaboration across institutions much more challenging. Ambitious, federally-funded programs, like many I am involved with, 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.

20. The funding freeze and subsequent grant cancellation at Harvard is not the only threat to my research collaborations. One of my collaborators is a professor at Northwestern University and I am told their funding is also frozen, so the possibility of obtaining funding through a subcontract with that university is no longer viable. Moreover, this week some of our collaborators at Harvard's teaching hospitals (which are not owned by Harvard) have been advised by their

leadership that they should avoid subcontracting to Harvard affiliates lest their grants be tainted by association.

Impact on Speech and Academic Freedom

21. I firmly believe that equity is an essential value in health 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 Letters, I cannot be sure.

22. As a PhD advisor and senior leader in our doctoral program, I interact 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 topics that the Trump administration may label as "DEI" or contrary to its policy agenda due to fear that it will inhibit their ability to receive federal grants and find an academic job. As noted above, 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 since Harvard received the Demand Letters.

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 concluded 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, which usually accepts 5-6 new students, 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: June 2, 2025

Signed: 

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

EXHIBIT 20

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER, et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE, et al. Defendants.	Case No. 1:25-CV-10910-ADB
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DECLARATION OF PAIGE WILLIAMS

I, Paige Williams, hereby declare as follows:

1. I am a Senior Lecturer in the Department of Biostatistics at the Harvard T.H. Chan School of Public Health (“HSPH”). I was previously the Director of Graduate Studies for the Harvard PhD Program in Biostatistics (2015-2021). I joined the Harvard University faculty initially as an Assistant Professor in 1991 and was promoted to Associate Professor in 1996. In 2001, I was appointed as Senior Lecturer on Biostatistics.

2. I earned my B.S., M.S. and PhD in Biostatistics from the University of North Carolina at Chapel Hill in 1983, 1984, and 1990, respectively.

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. My research focuses on design and analysis of cohort studies, particularly on those evaluating health outcomes in pregnant women and their children. My HIV-related research

focuses on statistical methods for the evaluation of health outcomes in children born to mothers with HIV and exposed *in utero* to antiretroviral agents, such as adverse birth outcomes, growth, and neurobehavioral functioning. My work in environmental epidemiology complements my HIV-related work, focusing on the reproductive and child health outcomes associated with prenatal exposures to endocrine-disrupting chemicals.

5. My work has been published in the *New England Journal of Medicine*, the *Journal of the American Medical Association*, *Lancet*, *Environmental Health Perspectives*, *Epidemiology*, *American Journal of Epidemiology*, and numerous other peer-reviewed journals, particularly those addressing HIV-related and environmental research topics.

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

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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025, including a long list of demands and insisting on particular reforms (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the

April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public. I have read the demands listed in the Demand Letters.

8. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard University. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

9. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard, although I did not receive the notice of termination of my own grants until May 15, 2025. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read all of the letters.

10. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands specifically on Harvard University.

11. I am aware that the Trump administration threatened to cancel \$400 million in federal grants and contracts to Columbia University. Despite Columbia University promptly agreeing to implement many changes after these announced funding cuts and their capitulation to the Trump administration’s demands, the Trump administration has not restored Columbia’s federal funding.

This action has created an environment of fear and uncertainty among myself and my colleagues at Harvard University.

12. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the over \$2.2 billion in terminated funds. That amount is far from sufficient to replace the terminated funds for HSPH, which alone typically receives around \$200 million in federal funding annually.

Research Funding

13. Approximately ninety percent of my salary comes from research grants, all of which are funded by NIH. Harvard pays the remainder of my salary for my non-research work, including teaching and advising students, and serving on departmental, HSPH, and university-wide committees. Federal funding, particularly from NIH, has provided critical support for my work over the 34 years that I have been a faculty member at Harvard.

14. Until the NIH terminated them on May 6, I was one of the Principal Investigators (“PI”) for two NIH grants based at Harvard. I am also a co-investigator on 4 additional NIH research grants, of which 3 were terminated as well.

15. I am the primary PI for the Pediatric HIV/AIDS Cohort Study (“PHACS”), a 20-year U.S.-based multisite network conducting multiple studies evaluating the effects of antiretroviral treatment for mothers with HIV and their children, many of whom are now young adults. Until the grant was terminated on May 6, PHACS was funded by multiple rounds of five-year grants from the National Institute of Child Health and Human Development (“NICHD”), a part of the NIH. Over the last 5-year grant cycle (2020-2025), this would have provided a total of over \$88 million dollars in federal funding.

16. Funding disbursement for this grant ceased following the Trump administration's notice of its suspension of federal government research funding to Harvard on April 14, and I understand this grant has now been terminated pursuant to the May 6 Letter from NIH. Grant funding provided salary support for 7 faculty (including myself), 6 senior research scientists, and over 20 additional staff at Harvard. In addition, the grant supported 24 clinical research sites conducting five different research studies involving about 150 total staff, along with collaborators at other institutions. The collaborators at other institutions include Protocol Chairs and members of our Scientific Leadership Committee, along with several early-stage investigators who were awarded PHACS funding for their research.

17. In addition to outright termination, Defendants' suspension of funding to Harvard prevented the pre-termination release of carry-over funds to PHACS. Before it was terminated, this grant was in the fifth year of its fourth cycle of funding. The last year of 20-year grant like this one typically involves crucial study closure activities like data and specimen submission, document archiving, and regulatory compliance for human research activities at the clinical sites, which require more funding to complete than the routine study participation activities that take place in the first four years. To prepare for that higher level of spending in year five, we intentionally left funds from years one through four of this grant unspent. These funds were committed to our project by NICHD and held there in reserve because we planned to use them in the last year of the five-year grant to ensure the appropriate closure of the studies. Reserving funds in this way for use in later years is common practice for researchers who recognize that research expenditures often are not equally distributed across all years of the grant. For this grant, accessing those unspent funds in later years requires sponsor approval of a carry-over request. In my experience, these carry-over requests are generally approved as a matter of course and our previous requests have never been

denied. Even before NIH sent its May 6 Letter to Harvard terminating this and hundreds of other grants, NICHD had not agreed to release these carry-over funds.

18. As the contact PI of PHACS, responsible for communications with all members involved in the study, I was in charge of facilitating a smooth closeout process for the clinical research sites. As part of that process, we were set to host a spring network meeting, which is a gathering of all the clinical sites, researchers, advisory boards, and other members of our community. Because this was the final year of a 20-year study, it was a very important event. As a result of the PHACS grant termination, we were not able to host our final meeting, our early-stage investigators were not able to present their research findings, and we were unable to express our gratitude for the contributions of our community over the last 20 years. I am frustrated by my inability to finish this important work and by the impact that this has on the entire PHACS community and our research participants.

19. I was also the PI of the Health Outcomes around Pregnancy and Exposure to HIV/ARV, or “HOPE” study, an NICHD-funded multisite cohort study on women with HIV at 13 clinical research sites around the country. This grant would have provided about \$14.5 million in federal funding over 5 years and entered its final year of funding in March 2025. Grant funding provided salary support for 4 PIs and the equivalent of 6 additional full-time staff members. In addition, the grant supported 13 clinical research sites and their staff at other institutions which enrolled women into HOPE and conducted study visits, along with members of a Community Advisory Board who provided input to the study based on their lived experiences.

20. NICHD never issued funding for the fifth year, so we instructed our clinical sites that they would not be able to submit invoices for any additional expenses. Because of funding shortages, we have had to lay off one HOPE staff member and furlough 3 additional HOPE staff

members. In addition, none of our 13 clinical sites were able to perform any close out activities after Defendants terminated the HOPE grant, and we were unable to provide them with funding required for human subjects research. As a result, we stand to lose a significant amount of data gathered in the last four years of the study and were unable to provide our voluntary study participants and our Community Advisory Board members the dignified closeout proceedings they deserve. I feel particularly responsible for ensuring compliance with federal regulations as the contact PI of PHACS and am frustrated that we cannot facilitate proper closeout for our research partners.

21. The loss of funding to both PHACS and HOPE has already been devastating for our research program evaluating antiretroviral treatment effects on health outcomes in women, children, and young adults with HIV and with HIV exposure during gestation. In particular, the Trump administration's failure to disperse funding for both grants in their last year will result in a loss of public access to valuable data collected on our voluntary study participants. The loss of funding also hurts the studies and career prospects of our graduate and PhD students, with whom I work closely across both grants: they lose the opportunity to conduct high-impact collaborative research without federal funding and I, as a researcher, lose the opportunity to collaborate with, to educate, and ultimately to learn from them and benefit from the contributions they will make to our field. Given the broad scope of our research and the need to fund many clinical research sites across the United States, securing sufficient private funding will be virtually impossible.

22. The cessation of HOPE study funding and required discontinuation of its study activities have also had an enormous impact on our study participants, who are women living with HIV. There remains an unfortunate stigma attached to HIV. As HIV researchers, we rely on the willingness of our study participants to share openly some of the most vulnerable and challenging aspects of their lives. Our work thus depends on a foundation of trust between us and the

participants we work with, and many of our participants have expressed that they feel we betrayed the commitment we made to better understand their health conditions when we abruptly ceased study activities. I believe the Trump administration's funding terminations will impede my ability to recruit participants into all types of research in the future even if funding were restored because I and many other researchers have had to abruptly terminate so many studies in the United States with little to no explanation to participants.

23. At a larger scale, I believe that the sudden termination of longtime clinical research sites will create negative downstream effects on clinical research in the future. Future studies enrolling voluntary participants, particularly those who study chronic and stigmatized health conditions, are not as likely to want to participate in similar longitudinal studies due to feelings of betrayal and frustration with the sudden termination and lack of closure of a twenty-year relationship. Losing the data arising from such studies would be devastating for the entire scientific community and for the many Americans whose lives would be forever improved by scientific breakthroughs.

24. Because PHACS was in the last year of its current grant, I recently submitted a competitive application to NICHD for new funding involving issues of health disparities in people with HIV for the next PHACS grant cycle. However, I believe it is nearly impossible for us to receive funding because Defendants have clearly stated that they will not provide Harvard any federal grants and because the Trump administration has deemed research involving health disparities inconsistent with its priorities. Thus, I am very nervous about NICHD accepting my new application and funding my research and the impact that failing to receive funding would also have on the team of researchers included as collaborators, both at Harvard and many other institutions. Even if this funding is secured, the broken relationships between us and our voluntary study

participants will be nearly impossible to mend, and we would need to expend significant resources to re-engage with the clinical research sites after their abrupt closeouts.

25. My own faculty position at Harvard is no longer secure: I am not a tenured professor, and the PHACS and HOPE grants together cover about 70 percent of my salary. My employment contract with Harvard provides that the university would “ordinarily” cover my salary for 12 months if I lost funding, but I am concerned the university will no longer honor that agreement because Defendants terminated all federal grants to Harvard. In any event, I would not be able to keep my position beyond that one-year extension without federal funding.

26. I worry also about the impact of our grant termination on more junior and non-tenured colleagues: the cessation of funding and loss of their positions will be even more devastating given their career stage and family responsibilities.

27. We have already lost 4 PHACS staff members to other jobs because of the job insecurity created by the Trump administration’s termination of funding to Harvard. I also serve as an advisor to our 7 senior research scientists, who are non-tenured academic appointments. Many of these research scientists have worked at Harvard for over a decade and have dedicated their careers to the university. Due to the funding termination, their positions at Harvard are not guaranteed past July 2025 and two of them will be forced into early retirement.

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

Dated: June 2, 2025

Signed: _



Paige L. Williams, PhD
Senior Lecturer on Biostatistics
Harvard T.H. Chan School of Public Health

EXHIBIT 21

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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Declaration of Shoba Ramanadhan

I, Shoba Ramanadhan, hereby declare as follows:

1. I am an Associate Professor of Social and Behavior Sciences at the Harvard T.H. Chan School of Public Health (“HSPH”).
2. I hold a ScD from HSPH and an MPH in Health Management from the Yale School of Public Health.
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. My research focuses on strengthening systems in underserved communities to leverage the best available evidence for cancer prevention and control. I also research issues at the intersection of climate change and the health of marginalized populations. Much of my work is conducted in partnership with community-based organizations and coalitions.
5. I am a member of the American Association of University Professors (“AAUP”) and AAUP–Harvard Faculty Chapter.

6. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and

Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public.

9. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

10. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the more than \$2 billion in terminated funds. That amount is far from sufficient to replace the terminated funds for HSPH.

Research Funding

11. I conduct research under five major projects that are fully funded with federal funding. Four out of five of my federal grants have been terminated or otherwise ended early. My four terminated grants were funded by the NIH. Work on the projects that were funded by these grants is expected to stop soon and my department is already helping to plan layoffs for staff on these grants.

12. The first terminated grant funded research about the impact of climate change-related heat stress on people across the globe. The information we collect for this project is intended to support the local communities where the research is taking place, but also support other areas with limited resources to protect communities against heat stress. The work is designed to support scale-up of successful findings, including dissemination of results to country-level policymakers.

13. The second terminated grant funded training of researchers to expand the impact of their work on local communities and public health systems. The project focuses on social

determinants of health, e.g., education and housing, to develop sustainable, high-impact solutions to cancer inequities. The project is conducted in partnership with local community members.

14. The third terminated grant funded cancer-focused outreach to immigrant, refugee, and racial/ethnic minority communities. This project also trains students from under-represented minority backgrounds to support them in pursuing research careers focused on cancer and other health inequities. The main grant is held by the Dana Farber Cancer Institute and HSPH has a subaward. The workforce development programs funded by this grant bring minorities into the public health field. Losing this grant will impact who ultimately goes on to work in the field. Discouraging minorities from entering this space will negatively impact quality of care in marginalized communities.

15. The fourth terminated grant supported academics across Harvard-affiliated hospitals, HSPH, and Harvard Medical School to translate their research into programs, practices, and policies that can be implemented widely. The component of the project I support engages community leaders from underserved communities to help design and execute research projects that are likely to be high impact in their communities.

16. The termination of four of my federal grants is devastating for my research. I work closely with communities that have been subject to discrimination in the United States, such as racial and ethnic minorities and LGBTQ+ groups. Given historical and current abuses of power, these communities are understandably skeptical of scientists and academic researchers. It can take us anywhere from 5 to 15 years to build the requisite trust and relationships with a community and partner on research. In my work, the relationships we have cultivated with leaders and community members in these marginalized communities are the result of 15 years of federal investment in the projects.

17. A long term loss of federal funding will irreparably harm our research and force us to start again at zero. We will not be able to honor our existing commitments to the communities we serve. If people in these communities believe that we are walking away from our agreements to support them, we will lose much of the trust that we have spent the last 15 years building.

18. I will not be able to obtain private foundation funding to replace my terminated federal funding. Foundation grants are narrower and for smaller amounts than federal grants. Many researchers are turning to private funding given the current state of federal funding for the sciences, making the environment for private foundation grants even more competitive than it has been in the past. Colleagues working in community-based organizations have also highlighted the concern that academic researchers will now be competing for funds typically reserved for local organizations, which has the potential to increase inequities further.

19. My team supports local organizations to use evidence-based interventions for cancer prevention and control. If we cannot complete our projects, people in the communities we serve will not be supported to engage in cancer prevention activities, such as breast cancer screening or vaccination against HPV. That is a real physical harm. Without my team's work, misinformation and disinformation may fill the void, further harming affected communities.

20. The loss of federal funding for my research and at the School of Public Health generally is also devastating for students. My colleagues and I have had to rescind offers of employment for students at the Masters and Doctoral levels, due to the abrupt termination of funding. This has negative consequences for their livelihood and for their long-term career prospects.

21. Terminating the grants that fund my research impacts three generations of scientists at Harvard. There are graduate students at Harvard on these terminated grants, who have lost out on valuable training opportunities, from conducting research to publishing papers and presenting

findings at scientific conferences. Losing our grants also means we lose the ability to support post-doctoral fellows because we rely on federal grants to cover their stipends and tuition.

22. Finally, for faculty who are working towards tenure (as I am), the loss of federal funding for public health research restricts the ability to create the type of broad, high-impact program of research required for tenure. As noted above, private funding is a limited alternative, and given the large number of researchers suddenly turning towards the same, limited pool of resources, it is likely that many academics will have to leave the field. This is particularly true for individuals working in areas disfavored by this administration, e.g., LGBTQ+ health. An entire cohort could lose the opportunity to become tenured because of these cuts, which puts the future of public health training and leadership at risk and risks skewing the field away from topics related to equity and diversity.

Impacts on Speech and Academic Freedom

23. Health equity is central to the classes I teach on implementation science and qualitative analysis. There is no accurate language that I can use in my courses that does not use terms disfavored by the Trump administration, such as LGBTQ, discrimination, minority and more. I cannot change the language that I use in my work to comply with the Trump administration's priorities. If I am not able to use terminology disfavored by the Trump administration, I will not be able to teach or conduct research effectively.

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

Dated: June 2, 2025

Signed: _____

Shoba Ramanadhan
Associate Professor of Social and Behavior
Sciences
Harvard T.H. Chan School of Public Health

EXHIBIT 22

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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DECLARATION OF SCOTT DELANEY

I, Scott Delaney, hereby declare as follows:

1. I am offering this Declaration in my individual capacity and not on behalf of my employer. 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.

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

3. I am an epidemiologist at the Harvard T.H. Chan School of Public Health (HSPH). My research investigates how environmental, social, and legal forces affect neurodegenerative diseases in older Americans and neurodevelopmental health in American children. The singular focus and driving motivation of my career is to improve the lives of Americans battling neurological disorders.

4. I have conducted epidemiologic research at HSPH in various capacities—first as a student, then as a postdoctoral research fellow, and finally as a Research Scientist—for 11 years.

I hold a Doctor of Science from HSPH (ScD, 2020); a Master of Public Health from the Johns Hopkins Bloomberg School of Public Health (MPH, 2015); a Juris Doctor from the University of Illinois College of Law (JD, 2004); and a Bachelor of Science from the University of Illinois College of Business (BS, Finance, 2000). Prior to my career in epidemiology, I practiced law in several capacities.

5. At HSPH, I formally hold the title of “Research Scientist” in the Department of Environmental Health. I currently have a three-year employment agreement with HSPH as a Research Scientist that began in May 2024.

6. The title and role of a “Research Scientist” can entail somewhat different privileges and responsibilities at different universities, and even at different schools within universities. At HSPH, Research Scientists are appointed by the faculty, and we have full privileges to conduct independent research. This means we can apply for and receive NIH grant funding as Principal Investigators (PIs), and we can conduct research independently and build our own teams. We can also conduct research on teams led by—and funded by the grants of—other PIs (including both Research Scientists and faculty members). At HSPH, some Research Scientists have secured their own grants as PIs, while others have developed productive careers conducting research in support of grants led exclusively by other PIs.

7. The Research Scientist career “track” at HSPH, which entails three tiers of scientists (Research Scientist, Senior Research Scientist, Principal Research Scientist) at increasing levels of seniority, entails many benefits. Specifically, Research Scientists of all levels have considerable latitude to define and develop their research portfolios. And unlike tenure-track faculty members, Research Scientists are not required to teach courses or mentor students. Research

Scientists are also generally free from requirements imposed on tenure-track faculty members to serve on departmental or school committees.

8. However, the benefits of the Research Scientist track (i.e., flexibility, minimal non-research obligations) are tempered by a reduced institutional commitment to our positions and salaries. We have no tenure protections and are not eligible for them. In general, HSPH pays us to conduct research, not to teach, mentor, or perform other duties. We are professional researchers. As a result, we must ensure our salaries are fully funded by research grants. There are many sources of research grants, including governments, private foundations, philanthropic organizations, and even the university itself. However, for many Research Scientists at HSPH, grants from the National Institutes of Health (NIH) provide most funding for our research and salaries.

9. Throughout my career in epidemiology, I have applied for and, in some cases, received multiple types of grants from NIH either individually or as part of teams. These include training grants (T90 and T32 as a student trainee), a fellowship grant (F31 as a student PI), multiple loan repayment awards (“L” grants as a PI), and multiple research “R” grants (as a Co-Investigator). My current research activities—and my entire salary—were wholly supported by a single NIH R01 research grant, for which two of my colleagues (both of whom are Principal Research Scientists) are the Principal Investigators.

10. The core of my current research activities focuses on the health effects of various environmental exposures, including fine particle air pollution and extreme temperature events, on brain health. In particular, I study the effects of these exposures on Americans with neurodegenerative diseases, including Alzheimer’s Disease, and Parkinson’s Disease. My team also plans to expand our research to include Americans with Lewy Body Dementia, a devastating yet understudied syndrome that shares some symptoms in common with both Alzheimer’s and Parkinson’s

Diseases. In the past, I have also studied how environmental exposures affect neurodevelopmental outcomes in American children. An important facet of my research is to explore reasons why some population groups are more susceptible to the effects of air pollution or extreme temperatures than others.

11. My research has generated nearly 50 scientific manuscripts. My work has been published in several high-impact journals, including, among others, the *New England Journal of Medicine*, *Science*, *Nature Communications*, *JAMA Internal Medicine*, *JAMA Psychiatry*, *Annals of Internal Medicine*, the *Journal of the American Heart Association*, and *Developmental Cognitive Neuroscience*. These manuscripts have received press coverage in over 250 publications, including *The New York Times* and *CNN*.

12. Given my role as a researcher and employee at Harvard—and as an American invested in and proud of the leading role American universities play in health science research—I have followed the Trump administration’s actions toward Harvard over the past three months closely. These actions began in early 2025, when I read news reports of public statements made by the Trump administration attacking the work of university researchers like me. The Trump administration also attacked the integrity of American universities and made a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

13. In early March, these attacks increased. I am aware that on March 10, 2025, the federal government sent a letter to Harvard warning of potential enforcement actions, and that on March 31, 2025, the federal government announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. I am also aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025, demanding that Harvard immediately take

a list of exceedingly burdensome actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware the Trump administration sent yet another letter on April 11, 2025, with more detailed and intrusive demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public by the press and / or Harvard University officials, and I have read the demands listed in the Demand Letters.

14. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism “froze” over \$2.2 billion in federal grants to Harvard. While the exact meaning of this freeze was not clear at the time, I learned later in April that the federal government simply began refusing to disburse funds obligated to NIH (and potentially other) grants, despite receiving requests from Harvard University to do so. Effectively, this meant that HSPH could not draw down NIH grant funds to support my research activities or salary.

15. I am further aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS (sic) from the federal government, since none will be provided.” Secretary McMahon’s letter was followed by a series of other letters from various government agencies and departments formally terminating a wide array of grants with Harvard.

16. These included letters from NIH (received by Harvard on May 6, 2025), the Department of Agriculture (May 9, 2025), and the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development (all on

May 12, 2025). Letters communicating each of these terminations were made public, and I have read each of those letters.

17. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the over \$2 billion in terminated funds. HSPH will receive only a portion of those funds, which will be used primarily to support tenured and tenure-track faculty and students. That amount is far from sufficient to replace the terminated research funds for HSPH.

18. Until NIH's mass grant terminations at Harvard, my salary was entirely funded by a single NIH grant. The Principal Investigators of this grant are leading researchers in environmental epidemiology and biostatistics, with over 40 combined years of experience conducting groundbreaking research. It is an extraordinary privilege to work alongside them on their team. My research under this grant investigated how exposures to different environmental factors, including air pollution and extreme heat, impact symptoms of Americans living with Parkinson's disease. This Trump administration froze this grant in April 2025, and Harvard notified the PIs of the grant (who subsequently notified me) that it was terminated on or about May 15, 2025.

19. This was a five-year grant meant to support research from September 2022 until July 2027. Each year, HSPH receives a new Notice of Award (NOA) that formally obligates the funds for each year, and I understand that HSPH draws on these funds approximately once per month.

20. Before NIH issues a new NOA each year, it requires PIs to submit progress reports demonstrating their ongoing productivity toward the aims of the grant. Provided that expert staff at NIH are satisfied with the grantee team's progress, NIH issues a new NOA, and NIH obligates additional funding for the year ahead. While this review process is key to oversight and the responsible stewardship of federal funds—and while researchers are required to demonstrate their

productivity and maintain rigorous standards—I am not aware of any instances in which a research grant was not renewed after this yearly review process. My team fully expected the grant that supports my salary to be renewed for an additional year in August 2025.

21. Prior to the termination of my federal funding, I received a conditional layoff notice from HSPH that said if I do not obtain grants to support my salary within six months, I will be laid off on October 14, 2025. Given that grants for academic research typically take many months or more to apply for and receive, I will not be able to obtain private funding to replace my federal funding, and I fully expect to be laid off in October.

22. However, if my research group's federal grant is restored within a few months, my position will continue to exist and my job will no longer be in peril.

23. The termination of federal funding will have catastrophic effects on the larger research group within which I carry out my work. My research group at HSPH is made up of 4 research scientists (including myself), a masters-level biostatistician, and 5-6 students and post-doctoral fellows. Everyone is now at risk of losing their jobs. In collaboration with a broader team at HSPH, our group has contributed to the compilation of one of the largest datasets of Medicare claims data available. We have 21 years' worth of data of every fee-for-service Medicare hospitalization claim in the entire country. It has taken years to train our staff and researchers to work with this massive dataset, and we have had to invest significantly in their training. Even if we were able to hire different researchers at a later date, years of productivity and resources would be required to train these individuals. There is a very steep learning curve for anyone working with our data.

24. The collective knowledge of the staff and researchers in my research group is also irreplaceable. The value of experience and institutional memory within the research group will be

lost if individuals are forced to turn to other institutions that are able to fund their work. Projects that have been years in the making, with extensively trained and specialized staff, will be compromised if our team members are forced to find jobs elsewhere. We—and by extension the scientific community and American public—will lose research meant to benefit the lives of people living with neurodegenerative diseases. This is the impending reality if funding is not restored within the next few months.

25. Students and postdoctoral researchers hired to work in my research group may also lose their jobs if funding is not restored. I have already begun using my network to try to get younger staff hired into jobs elsewhere that are able to fund their research and salaries and support their careers.

26. While some particularly senior faculty have discretionary funds from Harvard, Research Scientists like me generally have no access to non-grant funding. There is no way for my larger research team to be sheltered from the termination of these grants. And even if some of the senior faculty were to attempt to use discretionary funding to continue paying some salaries, these discretionary funds would be far from sufficient to maintain the larger research group.

27. The morale of students, staff, and faculty at HSPH are at an all-time low. NIH grants comprise a larger proportion of HSPH's budget than of any other school within Harvard. The grant terminations across HSPH have had a huge impact on the psyche of everyone within the school. While our resolve to carry on our work to advance America's health in the face of these unprecedented attacks is strong, none of us knows where to turn for continued funding to save our research. Our careers are in grave danger. But more far importantly, the sustained progress and innovation that we have worked so hard to achieve on behalf of the American people is under direct threat by the Trump administration.

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

Dated: June 1, 2025

Signed: _____

Scott Delaney
Research Scientist

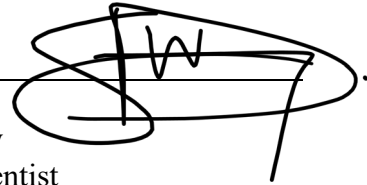
A handwritten signature in black ink, appearing to be "SD", enclosed within a large, loopy oval. A vertical line extends downwards from the bottom of the oval.

EXHIBIT 23

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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Declaration of Walter Willett

I, Walter Willett, hereby declare as follows:

1. I am a Professor of Epidemiology and Nutrition at the Harvard T.H. Chan School of Public Health (“HSPH”). I am also the director of the Thich Nhat Hanh Center for Mindfulness in Public Health. I previously served as the Chair of the Department of Nutrition at HSPH (1991-2017).

2. I hold a Masters and Doctorate of Public Health from HSPH. I also hold an M.D. from the University of Michigan Medical School.

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. My research focuses on the risk factors for heart disease, cancer, and other conditions. For more than 40 years, I have studied the effects of diet on the occurrence of major diseases. I have published more than 2,000 original academic research papers and reviews. I am the most cited nutritionist internationally and am one of the most widely cited clinical scientists in the world.

I have written a textbook on nutritional epidemiology and several books for the general public, including the bestselling *Eat, Drink, and Be Healthy*.

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

6. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none

will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

9. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

10. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the more than \$2 billion in terminated funds. That amount is far from sufficient to replace the terminated funds for HSPH.

Research Funding

11. My work is funded by two major federal grants from the National Cancer Institute at the NIH. Both grants are to conduct large follow up studies and were supplied through the NIH’s UO1 mechanism. The NIH terminated both grants on May 6, 2025.

12. The first grant funds a study that began in 1989. This study follows a cohort of 116,000 women and seeks to understand how diets and lifestyle relate to the risk of developing cancer. The primary data for this study comes from questionnaires that the study participants fill out every two years. My research team has also collected biological samples from many study participants, including fecal and urine samples. The samples must be kept frozen in repositories.

13. A parallel study started in 1986 has been tracking the diets of 52,000 adult men from all states in America who get cancer. This study collects data about heart attacks, cancer, and other conditions that share risk factors with heart disease, such as dementia and Parkinson's disease. Dozens of other grants studying many diseases have used the dataset collected by this study. Since its inception, this study has collected biological samples from approximately 30,000 participants that are also stored at low temperatures.

14. More than 90% of the funding for both studies comes from federal grants. This money cannot practically be replaced with private funding. Even if previous donors doubled or tripled their contributions, we still will not have enough money to continue our operations. Harvard has also informed me that they will not be able to provide funding to supplement what we are losing in federal funds.

15. Without the NIH grants, we will only be able to keep the biological samples frozen for a few weeks. These samples will spoil if they are allowed to thaw. No other institution in the world has this data, making our samples irreplaceable.

16. Our studies follow up with participants every two years to collect information on their physical and cognitive functions. We need to conduct the next follow-up within the next year. Otherwise, some study participants may die before we are able to follow up with them. The termination of my grants thus jeopardizes our chance to collect data from the living study participants who have voluntarily contributed personal information over the last four decades. This would deprive all Americans from the benefits of knowledge about diet, other aspects of lifestyle, and use of medications that enhance their possibilities of living longer and healthier lives.

17. I will have to lay off highly experienced researchers soon if my grants are not restored. I am currently in the process of identifying staff to layoff. This will be a huge blow to our

research—these team members have worked with us for many years and have accumulated vast knowledge about how the studies work. If we let these researchers go, many of them will have to find other jobs, and I am very concerned about our ability to rehire them even if federal funding is restored later.

18. The situation across HSPH is dire. HSPH relies on federal funding for about 60% of its operating budget.

19. Additionally, much of the research at Harvard and elsewhere that uses my data resources is conducted by international graduate students and scholars who have visas that are being revoked by the government. This attack has created major uncertainty and fear that is distracting them from their research.

Impacts on Speech and Academic Freedom

20. I worry that our students, when selecting project subject matter, may choose or change their topics based on fear that certain topics will be at risk due to the Trump administration's actions. This would include research on dietary quality in vulnerable groups such as refugees and low-income groups.

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

Dated: May 30, 2025

Signed: Walter Willett

Walter Willett, MD, DrPH
Professor of Epidemiology and Nutrition
Harvard T.H. Chan School of Public Health

EXHIBIT 24

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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DECLARATION OF SARAH FORTUNE

I, Sarah Fortune, hereby declare as follows:

1. I am the John LaPorte Given Professor of Immunology and Infectious Diseases at the Harvard T.H. Chan School of Public Health (“HSPH”) and the Chair of the Department of Immunology and Infectious Diseases at HSPH. I was previously a Postdoctoral Fellow at HSPH.

2. I hold an M.D. from Columbia University’s College of Physicians and Surgeons as well as a B.S. in Biology from Yale University. I completed my residency in Internal Medicine at Brigham and Women’s Hospital and a clinical fellowship in Infectious Diseases in the combined program of the Brigham and Women’s and Massachusetts General Hospitals.

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. My research focuses on the biology of tuberculosis infection. It seeks to identify bacterial and immune factors that shape tuberculosis infection outcomes. My research has identified novel forms of drug resistance in *Mycobacterium tuberculosis* and defined the differences

between an immune response that protects against disease and one that promotes disease. My laboratory collaborates with experts around the world including at MIT, the University of Massachusetts Medical School, Cornell, the University of Pittsburgh, Case Western University, the University of Washington and the University of Cape Town. I lead the HI-IMPacTB program, one of three initiatives that form the largest investment that the NIH has ever made in the area of tuberculosis, to identify the immune basis of protection from tuberculosis disease. My work informs strategies for tuberculosis diagnosis, vaccine design, targeting TB treatment and tracking previously unrecognized modes of TB transmission.

5. My work has been published in *Science*, *Cell*, *Nature Medicine*, *Nature Microbiology*, *Immunity*, *the Journal of Experimental Medicine*, *Lancet Microbiology*, *Plos Pathogens*, *Science Advances*, and other peer-reviewed publications.

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

7. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter, and which the Trump administration proposed would serve “as the basis for an agreement in principle

that will maintain Harvard's financial relationship with the federal government" (the "April 11 Letter," and together with the April 3 Letter, the "Demand Letters"). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

8. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

9. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that "Harvard should no longer seek GRANTS from the federal government, since none will be provided." I am aware that on May 6, 2025, the National Institutes of Health ("NIH") terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

10. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

11. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the more than \$2 billion in terminated funds. That amount is far from sufficient to replace the terminated funds for HSPH.

12. Work in my lab has shut down as the result of these federal funding terminations. I received a Stop Work Order for the HI-IMPACTB contract dated April 14, 2025 and received on April 15. This was a multi-site research contract to identify the immune basis of protection against tuberculosis infection and disease. Our program was starting its 5th of 7 years of funding and received roughly \$8 million per year to support 21 research groups over 11 institutions (Harvard; MIT; UMass Medical School; Massachusetts General Hospital; Case Western University; the Universities of Pittsburgh, Washington, Colorado and Cape Town; Stellenbosch University; and the African Health Research Institute). Many of the sites that are party to this contract lack the financial resources to buffer any of the harm that has resulted from the termination of federal funding.

13. The termination of federal funding has already had devastating effects on my lab's work. The flow of samples from other sites, the flow of operations, the flow of data and the day-to-day immune profiling at my lab have all ceased. My lab has stopped receiving shipments from our collaborators, stopped performing experiments, and has been forced to develop a layoff plan. Importantly, we are laying off some of the researchers who generated the data and have been working to analyze and distill the data. Because much of the work is not yet completed or published, we are losing whole bodies of work because we are laying off the scientists who carry the knowledge from the past 5 years of research. Thus, we are losing not only the future funding but many of the discoveries from the past investments.

14. My lab and our collaborators have been forced to scramble to coordinate our responses to the grant and contract terminations. It is unclear how we will be able to weather this situation in the long term. We are leveraging any available savings but my discretionary reserves are only about 10% of my lab's annual federal budget and thus I have now begun the process of cutting scientists and support staff through a process of lay-offs and non-renewals.

15. The ambiguity about the reasons for the termination of federal funding has created enormous financial liabilities. Our lab as well as our collaborators are unsure what steps need to be taken in order to preserve the key aspects of our work moving forward.

16. In addition to our own personnel cuts, several of our collaborators have begun to cut their staff, particularly at the University of Massachusetts and the University of Washington. These staff cuts directly affect the work in my lab, as our labs are interconnected. Our work has been deeply disrupted by these staff cuts, and more cuts are sure to come.

17. The HI-IMPACTB program supported tuberculosis studies in nonhuman primates at the University of Pittsburgh and in mice at the University of Massachusetts Medical School. To comply with regulations regarding the humane treatment of animals, these institutions assumed the cost of animal care when the Stop Work Order was issued. Animal care and use policies prohibit the careless use of animals -- such as initiation of an animal study that is not completed, wasting animal lives. The University of Massachusetts Medical School therefore completed the mouse studies underway at the time of the stop work order. Completion of the nonhuman primate study (testing a novel tuberculosis vaccine developed at The Children's Hospital of Boston) was expected to be very expensive (~\$500,000) and we were uncertain whether those studies could be continued at risk or whether the Pittsburgh team would have to euthanize the animals. After the stop work order became public, a donor provided philanthropic funds to the University of Pittsburgh for the completion of the basic parts of this study, although many aspects of the original study including the immune analyses are not funded and this opportunity, once lost, will never come back.

18. Our lab and research will be irreparably harmed if we are forced to lay off more of the investigators and staff we employ. Tenured faculty members such as myself rely on federal

funding to train valuable researchers and support staff over the long term and to staff our labs with the staff needed to conduct effective scientific inquiry. My research consortium is incredibly effective and made up of experts in our field. We train our staff using an apprenticeship model that would be extremely difficult and time-intensive to replicate. Our shared, institutional knowledge will be scattered to the wind if we are forced to let go of more individuals in the lab. It would be impossible to later reproduce the accumulated expertise of our current staff if federal funding is later restored.

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

Dated: May 30, 2025

Signed: 

Sarah Fortune, M.D.
John LaPorte Given Professor of
Immunology and Infectious Diseases
Harvard T.H. Chan School of Public Health

EXHIBIT 25

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-cv-10910-ADB
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DECLARATION OF DONALD INGBER

I, Donald Ingber, hereby declare as follows:

1. I am the Founding Director of the Wyss Institute for Biologically Inspired Engineering at Harvard University, the Judah Folkman Professor of Vascular Biology at Harvard Medical School and the Vascular Biology Program at Boston Children’s Hospital, and the Hansjörg Wyss Professor of Biologically Inspired Engineering at the Harvard John A. Paulson School of Engineering and Applied Sciences.

2. I have held an appointment at Harvard University since 1984 and been a member of the faculty of Harvard University since 1988.

3. I received my B.A., M.A., M.Phil., M.D. and Ph.D. from Yale University.

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

5. 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.

6. My research focuses on biomimetic microsystems. These systems use methods of miniaturization originally developed in the computer industry for manufacturing microchips to build devices with functional circuits that use living cells as their components. Using these techniques, we are developing human organ-on-a-chip (“Organ Chip”) technology—tiny, complex, three-dimensional models with hollow channels lined by different types of cells and tissues that recapitulate the structure and function of human organs.

7. Through my work I have authored over 600 publications and almost 200 patents, and I have founded 8 companies. I have presented more than 625 plenary presentations and been invited to lectures across the world.

8. I am a member of the National Academy of Engineering, the National Academy of Medicine, the National Academy of Inventors, the American Institute for Medical and Biological Engineering, and the American Academy of Arts and Sciences.

9. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter, and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11

Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

10. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

11. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

12. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

13. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the more than \$2 billion in terminated funds. That amount is far from sufficient to replace the terminated funds for my work specifically or the Wyss Institute more broadly.

Research Funding

14. Until April 14, I was actively working on two federally funded projects utilizing my human Organ Chip work.

15. The first project uses Organ Chip technology to study how the human lung, intestine, bone marrow, and lymph node respond to radiation and to identify drugs that can mitigate the effects of that radiation. Funding for this project came from the Center for the Biomedical Advanced Research and Development Authority (“BARDA”) and supports 21 positions in my lab, including 3 graduate students, 1 intern, 2 postdoctoral fellows, 5 technicians, and 10 technical staff members. This work will contribute to improved public safety by developing additional radiation countermeasure drugs as the country ramps up nuclear power production to support the energy-intensive artificial intelligence industry. These countermeasures also would be available in the case of a nuclear attack and to alleviate toxic side effects in cancer patients who receive radiation therapy.

16. The second project uses Organ Chip technology to study the effects of microgravity and radiation on astronauts during spaceflight. Funding for this project came from BARDA with support from the National Aeronautics and Space Administration (“NASA”) and supports 5 positions in my lab, including 5 technical staff members. This project was developing specialized bone marrow chips incorporating cells from individual astronauts to study the effects of this microgravity and radiation on their bone marrow. These specialized chips were scheduled to fly aboard the Artemis II mission to the moon alongside the astronauts who donated the cells. This work is critical to our ultimate ability to explore Mars, because protecting astronauts from radiation toxicity remains a major barrier to the long-distance space travel necessary to explore the solar system.

17. On April 14, I received 2 notices from the federal government directing me to stop work on both these projects.

18. I immediately stopped incurring expenses on those projects pursuant to the terms of these stop work orders and have not resumed doing so. As a result, no work is currently happening in my lab on either project. I have been forced to halt experiments midstream; these experiments cannot simply be restarted when or if funding resumes, and so I have lost the value of the effort expended on each such experiment to date. Similarly, the progress of my students and post-doctoral fellows working on papers or theses projects based on these projects has been lost. I can no longer support the staff for these projects and have been forced to make difficult decisions about shifting employees to other areas of work with intact funding or allocating internal funds to protect their positions. If this funding is not restored soon, I will have to terminate many of these positions.

19. Even these steps have not allowed us to maintain all our staff. For example, a European post-doctoral scientist who had accepted a position with the Wyss Institute recently withdrew his acceptance. And another European scientist who had been working at the Wyss Institute for roughly six months recently asked me to support her application for a new position in a laboratory in The Netherlands given the uncertainty around our funding situation, and I did so. I understand many other scientists and employees in the Wyss Institute are terrified of potentially losing their jobs as a result of the funding situation at Harvard.

20. Shortly after receiving the stop work order, my team was unable to participate in an important meeting related to the upcoming use of our chips on the Artemis II space mission, jeopardizing our ability to meet the deadlines associated with that project. In an attempt to salvage this important project, meet the deadlines necessary to participate in the Artemis II mission, and protect the livelihood of the staff members who rely on me for jobs, I have been forced to explore

shifting work associated with this project and many of the associated staff positions out of the Wyss Institute to a private company. Doing so will cost me and the Wyss Institute the prestige associated with our work, the ability to participate in a groundbreaking space mission, and, ultimately, the benefit of the positive-feedback loop associated with such high-profile scientific accomplishments. These sort of reputational benefits—which I will now lose—were invaluable for me in the past as I developed my career as an academic, inventor, and entrepreneur.

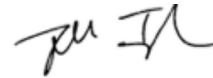
21. I currently have multiple funding proposals submitted to government agencies, including the Advanced Research Project Agency for Health (“ARPA-H”) and Defense Threat Reduction Agency (“DTRA”), which I am concerned will not receive funding given the government’s position.

22. Since receiving the stop-work order on April 14, I have spent roughly ninety percent of my time managing this crisis.

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

Dated: May 30, 2025

Signed:



Donald Ingber, M.D., Ph.D.
Founding Director
Wyss Institute for Biologically Inspired Engineering at Harvard University

EXHIBIT 26

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

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS—HARVARD FACULTY CHAPTER et al., Plaintiffs, v. UNITED STATES DEPARTMENT OF JUSTICE et al., Defendants.	Case No. 1:25-CV-10910-ADB
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DECLARATION OF BENCE ÖLVECZKY

I, Bence Ölveczky, hereby declare as follows:

1. I am a Professor of Organismic and Evolutionary Biology at Harvard University. I have held this position since 2016. Prior to this I was an Assistant (2007) and Associate Professor (2012), also at Harvard.

2. I hold a joint PhD degree from Harvard University and MIT's Division of Health Sciences and Technology in Medical Engineering and Medical Physics and from Harvard University's Program in Neuroscience. I also hold MS degrees from Imperial College, London, and the Technical University of Budapest, in Biomedical Engineering and Mechanical Engineering respectively.

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. My research focuses on how the brain learns new motor skills and how it generates complex behaviors more generally. I study how different parts of the brain work in concert to

support these learning and control processes. A main focus of my lab's work is to address the function of the basal ganglia, which goes awry in people diagnosed with Parkinson's and Huntington's disease.

5. I am a member of the American Association of University Professors ("AAUP") and AAUP-Harvard Faculty Chapter.

6. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the "April 3 Letter"). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that "incorporate[d] and supersede[d] the terms" of the April 3 Letter and which the Trump administration proposed would serve "as the basis for an agreement in principle that will maintain Harvard's financial relationship with the federal government" (the "April 11 Letter," and together with the April 3 Letter, the "Demand Letters"). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2.2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

9. 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 American universities and making a range of threats about how the federal government intends to use its authority to impose numerous demands on Harvard University specifically.

10. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the more than \$2 billion in terminated funds. That amount is far from sufficient to replace the terminated funds across the university. Although this may limit the immediate fallout for the work in my lab, the termination of federal funds will be crippling if federal funds are not restored within a few months.

11. I had three federal grants. Two of my grants from the NIH were terminated on May 15, 2025. I run a lab of 10-12 people and my lab was largely funded by these grants. My federal funding covered salaries for postdocs and technicians, reagents, animal care costs, instruments, and publication costs. My research uses rats as animal subjects.

12. One of my terminated NIH grants funded research understanding sensorimotor control through neuro-biomechanical simulation. I was leading a research collaboration with other

Institutions, including University of Washington, Stanford, and the Salk Institute, to establish a research platform to simulate the neural control of movement in environments subject to real-world physics. In effect, we were creating a virtual animal with a realistic biomechanical musculoskeletal system controlled by an artificial neural network. The virtual agent could be trained to mimic the behavior of real animals. The grant had the potential to transform how we study the brain by allowing high throughput hypothesis testing in realistic agent in-silico and then comparing these simulations to experiments in real animals. Research done as part of this grant also had the potential to improve AI algorithms required for sophisticated robotic control.

13. My second terminated NIH grant funded research aimed at understanding the neural circuits underlying the acquisition and control of motor skills. Here we were studying how subcortical circuits, including the thalamus and the basal ganglia, function to produce sophisticated learned behaviors, work that not only informs our understanding of how healthy brains work, but also the neural mechanism affected in disease. The work had the potential to improve the design of rehabilitations strategies, including after a stroke.

14. I have one research project which is funded by the Simons Foundation for Autism Research. This private funding covers work on a narrow set of questions related to autism research. By contract I can only use this private funding to advance autism research that matches the goals of the Foundation. This grant will end this year, and I was planning on applying for grants, including from the NIH, to continue this promising research and extend its scope. The research involves studying rats with genetic modifications that mirror some forms of autism to better understand how autism affects brain function and behavior, specifically social behaviors.

15. A long-term loss of federal funding would be devastating to my research. My experiments are complicated and run for a couple of years. If our work gets cut short, that means we

will not be able to finish our experiments, analyze our data, and write publications. The funds previously spent will have been for nothing, much of the work will be lost, and the public won't get the benefit of our completed research. Furthermore, when the research comes to fruition, my lab will be credited for the insights our line of research yields. This is the currency in academia—you publish and get credit for advancing the field. If our research gets cut short, my lab may have little to show for 3-5 years' worth of work. This would be a tragedy for all my staff.

16. Some of my experiments that were funded by federal grants involve training animal subjects—rats—for months. If we had to terminate or pause those experiments, I would later have to retrain new rats from scratch, which would be onerous and a waste of valuable research time.

17. If federal funding is not restored soon, I may be faced with letting critical staff members go. My staff run the experiments, analyze the data, write reports to grant agencies, write journal articles, maintain the animal colonies, and keep my research projects going. My staff have invested years in this research, and if I had to let them go, it would derail and destroy their careers.

18. I recently had to renew the contract of one of my very good technicians. They were on a nongovernmental grant, but it was still very difficult to renew their contract through Harvard. The renewal was only authorized for 6 months, whereas I had asked for 18 months. I cannot hire any new staff because of the hiring freeze Harvard implemented partly in anticipation of Trump administration threats to its federal funding. Thus, if I have to let staff go, I may not be able to replace them.

19. Even if I could later hire new staff when federal funding is restored, I could not replace my current staff who have spent 3-4 years in my lab and understand our data and how to conduct our experiments. My laid off staff would have to try to get other jobs, and it would be very difficult to find people with similar expertise to suddenly pick my research back up.

20. In each lab, including mine, there are technicians and/or researchers with institutional memories. It would be devastating to let go of a staff member who knows every little detail about what has happened with past research and understands the ins and outs of how all our research procedures work. My staff, especially my technicians, are invaluable to our research.

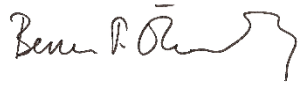
21. If I brought in new staff in a few years after federal funding resumes, I may have to train them for 2-3 years to be able to run similar experiments. This would create a lot of delays in my research. My research cannot be paused and then restarted from where I left off.

22. Furthermore, in academia, postdocs come up with their own research ideas and execute on those ideas. Someone new coming in would not want to do exactly the same type of research my current postdocs are engaged in. Their research would be entirely lost.

23. The termination of federal funding at Harvard and other American universities will be devastating to this country. I came to the United States to conduct my research because of the scientific infrastructure here and because partnerships between the federal government and universities like Harvard allowed scientists to conduct research that otherwise would not have been possible. By terminating federal funding to Harvard and other universities, the federal government is dismantling and destroying work that fuels the innovations that fuel the economy. Scientists like myself are trained in other countries but our best work has been done in this country and we generate intellectual property in this country. Countries in Europe and around the world are now luring researchers based in the United States away. This will have devastating long-term impacts for society.

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

Dated: May 29, 2025

Signed:  _____

Bence Ölveczky
Professor of Organismic and Evolutionary
Biology

EXHIBIT 27

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS—HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-cv-10910

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

DECLARATION OF VICTORIA JENKINS

I, Victoria Jenkins, declare as follows:

1. I am a Genome Database Coordinator, a staff scientist position in the Department of Molecular and Cellular Biology at Harvard University. I have been employed in this position since 2018.

2. I hold a PhD in Cell & Molecular Biology from Boston University.

3. I work at FlyBase—a free database of *Drosophila* (fruit fly) genetics research that scientists around the world rely on for their work. I extract, interpret, and archive data from a variety of sources to standardize the data and make it accessible to the public and other researchers.

4. I am a member of Harvard Academic Workers, one of the two collective bargaining units of Harvard’s chapter of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“HAW–UAW”).

5. 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.

6. I am aware that the Trump administration has taken a series of actions targeting Harvard in recent months. 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 federal government announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”)

terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation (“NSF”), and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

9. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

10. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the terminated funds. There are many departments that have been affected and my department will only get a fraction of that money. This amount is far from the roughly \$2.7 billion in terminated funds and not sufficient or sustainable to cover the terminated funds countless researchers at Harvard relied on.

11. FlyBase is the only database dedicated to the *Drosophila* (fruit fly) genome and is essential to the daily work of anyone who works with *Drosophila* around the world.

12. FlyBase received grant funding from the NIH and NSF. On May 19, 2025, I learned that the grant funding, which was previously frozen, had been terminated.

13. The termination of funding will imminently affect my work. Without funding, the FlyBase website will be frozen later this summer and need to stop updating. This means that newly discovered genes, data, and other discoveries on *Drosophila* will not be integrated in the FlyBase database and shared with the world.

14. The termination of grant funding harms society and will have ripple effects across the globe, as Drosophila scientists worldwide rely on FlyBase to conduct vital research that contributes to human medical research and fundamental understandings of biology.

15. I am also very concerned about my job security and anticipate layoffs due to the termination of funding. Years of experience and essential, historical knowledge on the FlyBase database will be lost.

16. I do not believe there is a viable alternate source of funding that would realistically replace federal funding for FlyBase. In over twenty-five years of FlyBase's existence, there has been no viable outside funding source.

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

Dated: May 30, 2025

Signed: /s/ Victoria Jenkins

Victoria Jenkins
Genome Database Coordinator

EXHIBIT 28

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS—HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-cv-10910

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

DECLARATION OF JENNIFER CHEN

I, Jennifer Chen, hereby declare as follows:

1. I am a Harvard Data Science and NIH K99/R00 MOSAIC Postdoctoral Fellow.
2. I hold a PhD in Bioinformatics and Integrative Genomics from the Massachusetts Institute of Technology. I also hold a Master of Science in Biomedical Informatics and a Bachelor of Science in Biomedical Computation from Stanford University.
3. My research focuses on evolutionary patterns of innate animal behaviors combined with comparative genomics, single cell transcriptomics, and other large-scale sequencing approaches to investigate how genes govern behavior.
4. I am a member of Harvard Academic Workers, one of the two collective bargaining units of Harvard's chapter of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("HAW-UAW").
5. 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.

6. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and

Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters. The government has now canceled about \$2.7 billion in federal grants to Harvard.

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 UAW members.

10. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

11. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the roughly \$2.7 billion in terminated funds. That amount is far from sufficient to replace the terminated funds at Harvard’s School of Arts and Sciences.

12. I received an email on April 2, 2025 notifying me that my grant program (NIH K99/R00) has been terminated and that any funds beyond the active award (which ends June 30, 2025) will not be funded.

13. The K99/R00 I received was funding a research program investigating how genes specify population sizes of different neuronal populations that are important to innate behaviors as well as disorders including autism spectrum disorder.

14. Both at present and at the time I received the grant termination notice, I have been on maternity leave. Because the funds will expire before I return from my leave, I have had to

work unpaid hours during my leave in order to attempt to use the remaining funds before the money is lost.

15. I was planning to apply for faculty positions at Harvard this fall, but I am a less competitive candidate as a result of my grant termination because that grant would have covered my salary and funded a portion of the lab as a faculty member.

16. Applying for non-governmental sources of funding to replace the frozen funds will inevitably delay my timeline for finishing my post-doctoral research and applying to faculty jobs.

17. I have no reason to believe that Harvard will provide alternative funding to support my work.

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

Dated: May 29, 2025

Signed: /s/ Jennifer Chen

Jennifer Chen
Postdoctoral Fellow

EXHIBIT 29

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS—HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-cv-10910

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

DECLARATION OF BEAU SCHAEFFER

I, Beau Schaeffer, declare as follows:

1. I am a PhD student in Population Health Sciences and teaching fellow at Harvard T.H. Chan School of Public Health.
2. I started my PhD program in 2022. I hold a Master of Science in Epidemiology from Harvard T.H. Chan School of Public Health and a Bachelor's Degree in Microbiology from The University of Alabama.
3. I teach courses on Epidemiology at Harvard T.H. Chan School of Public Health. My doctoral thesis focuses on the development of observational research methods for vaccine safety and efficacy and applying these methods to real world data.
4. I am a member of the Harvard Graduate Students Union, one of the two collective bargaining units of Harvard's chapter of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("HGSU-UAW").

5. 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.

6. I am aware that the Trump administration has taken a series of actions targeting Harvard in recent months. 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 federal government announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”)

terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

9. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

10. My PhD dissertation chapter on vaccine safety and efficacy is only possible through a NIH-funded external collaboration with a large industry partner (a health system) and the data they manage. My research group and the industry partner were awarded separate grants under the SeroNet program, a coordinated effort by the NIH to expand the nation's capacity for SARS-CoV-2 serologic testing and advance research on the immune response to SARS-CoV-2 infection and COVID-19 vaccination among diverse and vulnerable populations.

11. The termination of my NIH funding will imminently affect my vaccine study design work. The scope of my work will be reduced moving forward as the loss of NIH funding will require the industry partner to limit the labor dedicated to its collaboration with Harvard. The termination of funding will also have broader impacts on vaccine research made possible through the collaboration with the industry partner. Without the federal funding source, it is unclear whether additional, critical research projects with the industry partner would be able to continue.

12. I am uncertain whether and for how long I might receive some stopgap funding from Harvard University. I am aware that the university has pledged \$250 million in one-time

stopgap funding. That amount is far from sufficient or sustainable to replace the roughly \$2.7 billion in terminated funds across Harvard University, including terminated funds at the Harvard T.H. Chan School of Public Health.

13. The loss of NIH funding for my research will also harm society and lead to gaps in the vaccine study design literature. Improving observational research methods for vaccines is critical given the increased interest surrounding the safety and efficacy of vaccines. The termination of federal funding leaves uncertain the ability to continue vaccine research with the industry partner. This collaboration is critical to my dissertation and developing rigorous observational research to address questions around new and existing vaccines that are not feasible to assess through other means.

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

Dated: May 30, 2025

Signed: /s/ Beau Schaeffer

Beau Schaeffer
PhD Student

EXHIBIT 30

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS—HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-cv-10910

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

DECLARATION OF ADAM SYCHLA

I, Adam Sychla, hereby declare as follows:

1. I am a postdoctoral research fellow at Harvard Medical School.
2. I hold a Ph.D. in Biochemistry, Molecular Biology, and Biophysics from the University of Minnesota. I also hold a B.S. in Molecular Genetics and Physics from the Ohio State University.
3. My research focuses on using RNA secondary structure analysis to generate next-generation gene therapies.
4. I am a member of the Harvard Academic Workers, one of the two collective bargaining units of Harvard's chapter of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("HAW-UAW"). I am also a member of the bargaining committee of this chapter.
5. 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.

6. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and

Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters. The government has now canceled about \$2.7 billion in federal grants to Harvard.

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 UAW members.

10. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

11. I am aware that Harvard University has pledged \$250 million in one-time stopgap funding to replace some of the roughly \$2.7 billion in terminated funds. That amount is far from sufficient to replace the terminated funds at Harvard Medical School.

Research Funding

12. My salary is covered by an NIH virology training grant. The salaries of three of my co-workers are also covered by the National Science Foundation Graduate Research Fellowship Program, and I have been told all of these have been terminated.

13. The salary covered by the NIH virology training grant enabled me to study how the family that includes coronaviruses and the family that includes polioviruses control their gene expression. This allows me to learn how we can target new medicines to treat these viruses. I can

also use this same information to inform new designs of gene therapies so they have more specific effects.

14. At most, any backup funding source would only cover one of the two of us working on the picornavirus project and would limit funding for supplies. As a result, I have had to reallocate my time from my research to more grant writing to cover the gaps in funding for projects we had already secured funding for.

15. This grant writing time allocation is in addition to the lab management tasks I now share with the other postdoctoral fellow in my lab, as our lab manager was laid off in anticipation of these funding cuts. This includes administrative tasks like ordering supplies and hazardous waste removal.

16. The termination of funding would result in the halting of ongoing experiments, which could cost hundreds to thousands of dollars in immediate losses.

17. While I have been reassured by my direct supervisor that Harvard will provide salary support for at least one year, I have received no formal or official confirmation.

18. If I am unable to find funding to cover my salary (which used to be covered by the NIH grant), my entire project will stop, as the more junior researcher on the project is unable to execute the full scope of the project without my oversight and direction. This would cause approximately \$250,000 to \$300,000 in losses.

19. Even if I am able to find immediate partial funding for my salary or research from private sources, I do not expect this funding to continue beyond the end of this year.

20. As the Trump administration halted new grant funding for Harvard, the number of institutions that could provide grants for this project is severely limited.

Impacts on Speech and Academic Freedom

21. The threats to and terminations of Harvard's federal funding and related demands by the Trump administration that Harvard make changes to retain its funding have also had a chilling effect on my actions and the actions of those around me.

22. Because of these attacks, for the first time, I have started considering career options outside of the field I have been studying for more than a decade now. And I have specifically been applying to less virology projects due to the Trump administration's attacks on virology.

23. People, including myself, have been avoiding certain terms in grant applications, for example avoiding "diversity" when describing bio-diversity.

24. Individuals in my department are actively seeking jobs in other countries because of the Trump administration's disinformation around virology, fear for their safety as non-citizen workers, and among residents, fear that career opportunities in the United States will be gone.

25. I am aware of individuals altering their fields of study or fearing the pursuit of certain fields of study due to concerns that participating in those fields may result in targeting of them and their work.

26. As an individual from a low socioeconomic background, a first-generation citizen, and the first person in my immediate family to attend college, the attacks have impacted me both personally and professionally, as I fear that I will be targeted for identity- or diversity-related reasons in addition to my field of study.

27. I am publicly active in student and worker advocacy initiatives at Harvard, and I expect further targeting of individuals who choose to do so. While I have continued this work publicly, I am aware of others who have ceased doing so, to the detriment of our collective

advocacy. People have actively stated they are worried that even signing a petition for a fair contract could lead them to being deported.

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

Dated: May 30, 2025

Signed: /s/ Adam Sychla

Adam Sychla
Postdoctoral Research Fellow

EXHIBIT 31

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS—HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-cv-10910

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

DECLARATION OF KELSEY TYSSOWSKI

I, Kelsey Tyssowski, declare as follows:

1. I am a Postdoctoral Research Associate in the Departments of Organismic & Evolutionary Biology and Molecular & Cellular Biology at Harvard University.
2. I hold a PhD in Biological and Biomedical Sciences from Harvard University and a Bachelor's Degree in Molecular Biology and Neuroscience from Wesleyan University.
3. I am a member of Harvard Academic Workers, one of the two collective bargaining units of Harvard's chapter of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("HAW-UAW").
4. My research focuses on comparing different subspecies of deer mice with innate behavioral differences to understand how the nervous system enables skilled movement.
5. 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.

6. I am aware that the Trump administration has taken a series of actions targeting Harvard in recent months. 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 federal government announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy,

Department of Defense, the National Science Foundation (“NSF”), and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

9. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

10. I received a K99/R00 grant from the NIH that was supposed to cover my salary through March 2026, covering most of the end of my postdoctoral research and was supposed to cover the first three years of research in my own lab.

11. My understanding is that after June 30, 2025, any stopgap funding from Harvard University will not cover grants awarded to non-tenure-track researchers. It will be at the discretion of researchers’ tenured/tenure-track faculty supervisor as to whether non-tenure track researchers whose federal funding has been terminated will be provided some amount of funding. At this time, I have not been guaranteed funding to support my salary and research through the summer of 2026. If I do not receive this stopgap funding, I may be forced to leave academic science entirely.

12. The loss of federal funding will imminently affect my work and my career prospects. The loss of my NIH funding will hinder my ability to travel, especially for an extended period as I had hoped, to visit a skilled movement research lab in North Carolina that I have been collaborating with as lead scientist for the past five years. This will negatively impact the research I am doing as part of this collaboration.

13. The loss of the R00 grant, which would have funded the first few years of research in my own lab, will negatively impact my chances of getting a tenure-track faculty job and

continuing my research program. If I am unable to secure a tenure-track faculty job this year, which has been made even more challenging due to the loss of my R00 grant, I may be forced to leave academic science entirely.

14. My research has developed a new system using deer mouse lines to study skilled movement. With the termination of my R00 grant and its impact on my ability to continue my research and obtain a faculty job, the world might never benefit from the discoveries that could be made with this system, as it depends on mouse lines that don't exist anywhere else in the world and expertise that I have developed since beginning my postdoctoral research in August 2019.

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

Dated: May 30, 2025

Signed: /s/ Kelsey Tyssowski

Kelsey Tyssowski
Postdoctoral Research Associate

EXHIBIT 32

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS—HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-cv-10910

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

DECLARATION OF TRUDY MERRITT

I, Trudy Merritt, declare as follows:

1. I am a PhD student in Virology at Harvard Medical School.
2. I started my PhD program in 2023. I hold a Bachelor of Science in Cell/Cellular and Molecular Biology from Missouri State University.
3. I am a member of Harvard Graduate Students Union, one of the two collective bargaining units of Harvard's chapter of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("HGSU-UAW").
4. My research focuses on viral-host interactions and specifically how viruses interact with cell signaling pathways driving inflammation and cell death. I explore how viruses have evolved mechanisms to evade innate immune response.
5. 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.

6. I am aware that the Trump administration has taken a series of actions targeting Harvard in recent months. 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 federal government announced a comprehensive review of federal contracts and grants at Harvard University and its affiliates. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy,

Department of Defense, the National Science Foundation (“NSF”), and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

9. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

Research Funding

10. My PhD is entirely funded by the T32 grant program, which provides funding to train PhD researchers in specific research areas with a documented shortage of highly qualified scientists.

11. The loss of my T32 federal funding imminently affects my work and ability to continue in my PhD program. It impacts my ability to attend conferences to further my career and find collaborators for my research project, as I will not have the funding to attend them.

12. The termination of funding threatens the loss of my paycheck and without a paycheck, I would not be able to continue in my PhD program. As a full-time graduate student, I am not able to hold a full-time job that would financially support me. Without the T32 training grant, I am concerned I will have to halt all progress towards my degree to find employment elsewhere to afford essential living expenses. Since the termination of NIH funding, including all T32 training grants, I have received no specific information on how my PhD will continue to be funded. While Harvard has promised \$250 million to support research on campus, it remains unclear how this money will be dispersed and how individual programs might supplement the remaining billions of research funding that has been cut to date. The continued uncertainty caused

by the termination of NIH funding for my PhD has also had a detrimental impact on my research progress by increasing anxiety and impacting my ability to focus.

Impacts on Academic Freedom

13. The threats to and terminations of Harvard's federal funding and related demands by the Trump administration that Harvard make changes to retain its funding have also had a chilling effect on my actions.

14. After the termination of my funding, I rewrote grant proposals and applications for federal funding to minimize my research's contribution to understanding viral infection and spread. My research and the work done by other virologists is necessary to better understand the biology of viruses and has a direct impact on public health. But I made these changes due to concerns that the applications would be rejected outright because of the Trump administration's views on the field of virology.

15. At this time, I have not submitted the funding applications due to additional actions taken by the Trump administration. Regardless of affiliation with entities outside of Harvard University (i.e. lab specific hospital affiliation), all Harvard graduate students must submit grants through Harvard. As was made clear in the contents of the administration's May 5th letter, as a Harvard graduate student, I have no current means of securing federal funding to continue my research.

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

Dated: May 30, 2025

Signed: /s/ Trudy Merritt

Trudy Merritt
PhD Student

EXHIBIT 33

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS—HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-cv-10910

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

DECLARATION OF JULES RIEGEL

I, Jules Riegel, hereby declare as follows:

1. I am a Lecturer on History and Literature at Harvard University.
2. I hold a PhD in Modern European History and a Master of History from Indiana University Bloomington.
3. My research and teaching focuses on the Holocaust, World War II, and global transgender history.
4. I am a member of the Harvard Academic Workers, one of the two collective bargaining units of Harvard's chapter of the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America ("HAW-UAW").
5. 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.
6. 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 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. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

7. I am aware that, on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

8. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these

terminations were made public, and I have read each of those letters. The government has now canceled about \$2.7 billion in federal grants to Harvard.

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 UAW members.

10. 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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

11. The terminations of Harvard’s federal funding and related demands by the Trump administration that Harvard make changes to retain its funding have had a chilling effect on my actions and the actions of those around me.

12. Because of these actions, I have had to reevaluate how I can safely teach courses on topics including global transgender history, World War II, and the Holocaust. For example, I decided not to teach a course on global transgender history in the upcoming fall semester due to fear of content-based retaliation, fear for my students’ safety, and fear for myself as an openly transgender individual.

13. While I plan to teach courses on World War II and the Holocaust next year, since the April 11 Letter, I have been increasingly worried about how the administration’s demands for “viewpoint diversity” and attacks on diversity, equity, and inclusion may affect these courses, including both curricular and pedagogical changes.

14. Additionally, the vagueness of the administration's attacks, using language like "ideological capture" in the April 11 Letter has created an environment of uncertainty around what is safe to teach or discuss in a classroom setting.

15. I am specifically concerned about the administration's goal of "reducing the power held by students and untenured faculty" and by those "more committed to activism than scholarship," as announced in the April 11 Letter. As a non-tenure-track faculty member who is also engaged in activism in addition to my scholarship, I am concerned that these attacks may result in me having even less control around my curriculum, such as hindering my ability to determine my own course content, or being forced to teach content with which I disagree.

16. There is broad concern within my department about how these policies may affect faculty, staff, and students.

17. I am fearful for the safety of my students, especially international students or students with immigrant backgrounds, including their ability to engage with critical scholarship around the Holocaust and transgender history.

18. Because of the administration's actions, I could not in good conscience recommend that doctoral applicants attend Harvard right now.

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

Dated: May 31, 2025

Signed: /s/ Jules Riegel

Jules Riegel
Lecturer on History and Literature

EXHIBIT 34

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

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS—HARVARD
FACULTY CHAPTER et al.,

Case No. 1:25-cv-10910

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
JUSTICE et al.,

Defendants.

DECLARATION OF NEAL SWEENEY ON BEHALF OF UAW

I, Neal Sweeney, declare as follows:

1. My name is Neal Sweeney. My job title is Organizer, UAW Higher Education Department. My job duties include working closely with UAW local unions and UAW regions to develop strategic organizing goals and bargaining priorities to build power within the higher education sector; increasing membership engagement and mobilization through democratic, worker-led programs; supporting broad, diverse leadership development; and identifying and developing political and community action plans.

2. 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.

3. The International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) is one of the largest and most diverse unions in North America, with members in the United States, Canada, and Puerto Rico and in virtually every sector of the economy including approximately 120,000 workers in higher education—graduate students,

postdoctoral scholars, researchers, university staff, and faculty—at institutions across the country. From UAW’s earliest days, it has been a leader in the struggle to secure economic and social justice for all people. UAW has a strong history of supporting and bargaining for contract provisions that ensure diversity, equity and inclusion in the higher education sector and in all workplaces. UAW has been actively involved in every workers’ rights and civil rights legislative battle since the 1930s, including the campaigns to pass the Civil Rights Act of 1964, the Voting Rights Act of 1965, the Fair Housing Act, the Civil Rights Restoration Act of 1988, and legislation to prohibit discrimination against women, the elderly, and people with disabilities. In addition, UAW has long advocated for increased federal funding for scientific research, recognizing its importance for innovation, economic growth, and public health.

4. The UAW International Executive Board (which includes the President, Secretary-Treasurer, three Vice Presidents and nine Regional Directors) is responsible for carrying out the programs and policies approved by the Constitutional Convention delegates and running the day-to-day operations of the International Union. The UAW President’s Office includes a number of departments that support UAW members, including the Higher Education Department. UAW members belong to more than 600 local unions across the U.S., Canada, and Puerto Rico. Local unions get support in organizing new members, bargaining contracts, handling problems with employers, member education, political action, community activities and more from both the national UAW offices and centers and each of the nine regional offices.

5. I am aware that the Trump administration has taken a series of actions targeting Harvard in recent months. 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 federal government announced a comprehensive review of federal

contracts and grants at Harvard University and its affiliates. I am aware that officials from the Trump administration sent a letter to Harvard on April 3, 2025 demanding that Harvard immediately take a long list of actions to remain a recipient of federal funding (the “April 3 Letter”). I am aware that this was followed by a subsequent letter from Trump administration officials on April 11, 2025 with more detailed demands that “incorporate[d] and supersede[d] the terms” of the April 3 Letter and which the Trump administration proposed would serve “as the basis for an agreement in principle that will maintain Harvard’s financial relationship with the federal government” (the “April 11 Letter,” and together with the April 3 Letter, the “Demand Letters”). Both of the Demand Letters were made public and I have read the demands listed in the Demand Letters.

6. I am aware that on April 14, 2025, the DOJ Task Force to Combat Anti-Semitism froze over \$2 billion in federal grants to Harvard. I understand that the federal government has since refused to disburse funds obligated to these grants despite receiving requests from Harvard University to do so.

7. I am aware that on May 5, 2025, Secretary of Education Linda McMahon announced that “Harvard should no longer seek GRANTS from the federal government, since none will be provided.” I am aware that on May 6, 2025, the National Institutes of Health (“NIH”) terminated its grants to Harvard. I am aware that on May 9, 2025, the Department of Agriculture terminated its grants to Harvard. I am aware that on May 12, 2025, the Department of Energy, Department of Defense, the National Science Foundation, and the Department of Housing and Urban Development each terminated their grants to Harvard. Letters communicating each of these terminations were made public, and I have read each of those letters.

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 American universities and making a range of threats about how the federal government intended to use its authority to impose numerous demands on Harvard University specifically.

9. At Harvard University, the UAW represents two bargaining units that include union members directly impacted by the termination of federal funding: the Harvard Graduate Students Union (“HGSU-UAW Local 5118”) and Harvard Academic Workers (“HAW-UAW”). HGSU-UAW Local 5118 was recognized in 2018 and is currently negotiating their third collective bargaining agreement. HGSU-UAW Local 5118 represents approximately 5,400 academic workers across Harvard University, including teaching fellows, course assistants, and graduate student research assistants. HAW-UAW was recognized in April 2024 and is currently negotiating their first collective bargaining agreement, representing more than 3,300 non-student academic workers, including postdoctoral researchers, lecturers, teaching assistants, research scientists, and others who do similar work at The Faculty of Arts and Sciences, Harvard Medical School, and the Harvard Divinity School.

10. At Harvard, UAW represents thousands of academic workers and non-student academic workers who receive federal funding, including research grants from the National Science Foundation and NIH.

11. Since April 2025, UAW has witnessed the extensive termination of federal funding at Harvard University. These funding terminations have directly impacted UAW’s central activities. UAW has been forced to spend significant time and resources responding to the repercussions of the administration’s actions on its members. UAW has counseled members who have lost funding, anticipate losing their jobs, and been unable to complete their experiments or thesis research

impacting their academic process and putting them at risk of leaving academic science entirely, and connected these members with outside resources. The expenditure of time and diversion of resources to respond to the fallout of the administration's actions has affected UAW's ability to do the representational, organizing, and advocacy work that is its core mission.

12. The threats to and termination of Harvard's federal funding and related demands by the Trump administration that Harvard make changes to retain its funding have also had a chilling effect on UAW member's actions and impacted UAW.

13. The administration's actions have created a pervasive sense of fear and intimidation among UAW members. Defendants' actions have led some members to no longer feel comfortable asserting their academic freedom and First Amendment rights.

14. UAW members are at the front lines of American research, including scientific research on critical public health issues. Yet their careers are being destabilized by unexplained political interference. I have seen or heard about more than 100 grant cancellation notices directly impacting UAW members at Harvard.

15. Due to the administration's actions and the termination of over \$2 billion in federal funding, UAW has had to divert staff and financial resources to respond to the significant influx of inquiries from local union leaders and members regarding the effect of the administration's actions on their research funding, job stability, academic freedom, and due process rights.

16. UAW seeks to protect UAW-represented workers' terms & conditions of employment insofar as federal funds directly support UAW member jobs and the threatened and then actual termination of funding jeopardizes UAW members' jobs and chills their academic freedom. In addition, UAW has a long-standing history of supporting increased federal funding for scientific research, recognizing its importance for innovation, economic growth, and public health.

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

Dated: June 1, 2025

Signed: /s/ Neal Sweeney
Neal Sweeney

EXHIBIT 35

FILED UNDER SEAL

EXHIBIT 36
FILED UNDER SEAL