

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

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS,

and

AMERICAN FEDERATION OF  
TEACHERS,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
JUSTICE, *et al.*,

Defendants.

Case No. 1:25-cv-02429-MKV

# Declaration of Susan Witte

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PROFESSORS,

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Defendants.

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**DECLARATION OF SUSAN WITTE**

I, Susan Witte, declare as follows:

1. I am a Professor of Social Work. I have been on the faculty of the School of Social Work since 2001.

2. I received my Doctor of Philosophy (Ph.D) in Social Work from Columbia University. I also have a Master of Social Work (M.S.W.) from the University of Connecticut and a Bachelor of arts (B.A.) cum laude in Public Policy Studies from Duke University.

3. My research focuses on community and global health.

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 am a member of AAUP and AFT.

6. I am a researcher on a team that has had multiple grants terminated as a result of the \$400 million in funding cuts. I supervise work on this team, and I am the faculty mentor of the principal investigator.

7. One of the grants was an approximately \$3.5 million NIH grant categorized as a P20, a 3-year center grant. Another was an over \$370,000 NIH grant categorized as an R21, a research grant. The principal investigator (PI) of the grant got an email from Columbia University informing the team of these terminations around March 11 or so.

8. The notices cancelling the grants stated, "This project has been terminated due to unsafe antisemitic actions that suggest the institution lacks concern for the safety and well-being of Jewish students."

9. The grants support research on how extreme weather and climate change influence health, mental health, and well-being among women in East Africa. The implications of this work are far-reaching, and they inform the understanding of health in low-resourced US areas experiencing extreme weather as well.

10. Because the center grant was awarded recently, hiring had not yet begun for the US-based team of that part of the project. Now, we are not able to move forward with this hiring at all.

11. We had already hired staff in Nairobi, Kenya, who were all laid off due to these grant terminations. If not for the terminations, they would have continued on as key staff for this new center grant. When we hired these individuals, we looked for life experience and standing in the community. These individuals were informal leaders and community health champions. It will be very detrimental to our research on this project to lose the expertise of these individuals.

12. This team of already-hired and now laid-off individuals included 16 community women from informal settlements in Nairobi who were going to move into research leadership positions because of their expertise. They would have had salaries under this grant for the next three years. That is now lost.

13. The team of already-hired and now laid-off individuals also included three individuals who would have made up full-time operations staff to build the sustainability of a Climate Change and Health Research Center in East Africa. We were going to hire three more individuals in addition to these three people. This is a huge loss of infrastructure and human resource capacity.

14. We have had to tell these already-hired individuals that we need to break our promises to them and that we can no longer work with or pay them. We have been having these conversations, and it is really difficult. These individuals currently do not have a way to replace not only the consistent salary but also the career growth this would have meant for them.

15. The center grant was also going to provide salary support for a team of nine scientific leaders from four countries, the United States, Kenya, Uganda, and Tanzania. We had already identified all of these scientific scholars, who were all co-investigators and Multiple Principal Investigators (MPIs) to the project. I was one of them. We had already been meeting regularly and were engaged with moving forward this project until now.

16. The center grant was also to provide financial support for a new cohort of four PhD students from four different countries, the United States, Kenya, Tanzania, and Uganda. Three of the four PhD students had already been identified and now will have no training opportunity.

17. The project supported by the center grant was also going to involve the enrollment of 1854 women from across these 18 communities in Uganda, Tanzania, and Kenya. Individuals from six pastoralist communities, six farming communities, and six informal settlements were going to participate in a study that would have strengthened knowledge, capacity, and climate adaptation strategies. We were also going to hire a cohort of 36 women in these communities to engage in this research, providing them with a stipend and growth opportunities. We had already identified some of the communities that we were going to be working with. We had told those communities about this work, and we had been so thrilled that they trusted us enough to agree to work with us. We have now had to go back to these communities and tell them that we cannot work with them on this project anymore.

18. The termination of the center grant also means loss of support for the Trans-African Hydrometeorological Observatory (TAHMO), in whom we were investing in setting up weather stations in these 18 communities, including training community members, developing climate-related curriculums in schools, and linking data to national meteorological authorities.

19. The termination of the grant also now means the loss of opportunities for conferences and knowledge-sharing across countries, communities, cultures, and disciplines.

20. Stopping this work and laying off these individuals also breaks the trust of the community. For those women we had agreed to work with in the pastoral and farming communities and informal settlements, it is hard to explain why we are now breaking our promises. Community trust is vital for rigorous, relevant, productive research.

21. As a result of the loss in expertise and trust, even if it were possible to eventually get funding again, I and the research team would struggle to bring this center together with the same quality and comprehensiveness.

22. This center grant was supposed to be a keystone of research on climate vulnerable communities in the region. It was the base upon which other grants could grow. The loss of this grant is about more than just this project – it completely upends the entire trajectory of knowledge building and sharing for this type of climate and community work in that region. The future impact and potential are gone.

23. The work on the project funded by the terminated \$379,000 NIH research grant has also stopped. For example, efforts to share the substantive results with stakeholders in the regions and for them to make use of findings have been unable to continue.

24. Stopping this sharing of knowledge will also harm the trust and long-standing relationships with the local stakeholders critical to this research.

25. It will be difficult for me and the other members of the research project team to establish future projects in that area as a result of this damaged trust and relationship.

26. I have no ability to do long-term planning for my work. I have no idea what to expect in terms of access to resources. I do not know why these grants were selected for termination, as the grants have no conceivable connection to concerns over antisemitism. I do not know how best to move forward with future grants.

27. None of the work funded by either of these two grants were related to Israel or Palestine. The work was not related in any way to antisemitism. The projects funded by these two grants have never faced any investigation or complaint related to antisemitism. If there had

ever been any type of Title VI complaint or investigation against these projects, I would have fully participated as appropriate under the law.

28. 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 to any program or part thereof based on a violation of Title VI. I was not provided any such notice, and I am not aware of any such notice having been provided or any such hearing occurring prior to the termination of \$400 million in federal funding to Columbia.

29. I feel chilled in my speech because of the government's actions with these funding cuts. I am uncertain about what I can and cannot say in the classroom or in public. I must now consider what I say and am afraid of people recording me and photographing me in spaces that may be in proximity to a rally or protest. I have to be careful about what I write publicly and privately. I am concerned in the classroom, at the School of Social Work, and on the main campus. I am also concerned in private and social media spaces. I am very careful and mostly do not post on social media at all anymore.

30. I try to join with other professors and students to promote Palestinian freedom and an anti-war perspective. I believe this viewpoint is very different from antisemitism. Nevertheless, I have seen how Defendants' actions have equated any support for Palestinian freedom and an anti-war perspective with antisemitism. I feel that Defendants' actions have prevented me from expressing what should be a valid and legal viewpoint in the United States.

31. I have observed that many others at the University feel similarly.

32. I teach a class on reproductive justice. After the \$400 million funding cuts, I assigned a self-reflection asking students to write about how they perceive reproductive justice

issues based on their own experiences and identities. A student refused to complete the assignment because it needed to be uploaded to the course website, and the student was afraid that the government would be able to access the answer and target the student.

33. I have taught that class for a number of semesters. No student has ever before expressed that concern.

34. The funding cuts also impact what I teach, as I am concerned about students and their confidentiality. Now I must consider what is safe to ask my students, so what the student says in the classroom doesn't make the student a target if repeated outside of the classroom. This applies to the questions I ask in class and the materials I post for the course.

35. I find myself second-guessing how my words may be taken out of context, particularly where funding and reputational harm can follow from even principled, professional speech.

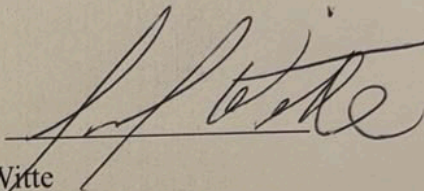
36. I also feel that my academic freedom is chilled. I now hesitate before speaking on issues of race, equity, or global human rights, even when such topics are directly relevant to the curriculum I am responsible for delivering.

37. Even though I am scared to publicly speak out about the funding cuts as part of this lawsuit, I feel a particular responsibility to do so because I have more vulnerable colleagues who I know feel unable to express how the government's actions have affected them.



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

Dated: 3/31/25

Signed:   
Susan Witte  
Professor of Social Work