

**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 Victoria Frye

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

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS,

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Plaintiffs,

v.

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

Defendants.

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

**DECLARATION OF VICTORIA FRYE**

I, Victoria Frye, declare as follows:

1. I am a Professor of Social Work in the School of Social Work. I have been on the faculty at Columbia University since 2023.

2. I received my Bachelor of Arts (BA), Master of Public Health (MPH), and (Doctor of Public Health) all from Columbia University.

3. My research focuses on HIV-prevention science.

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 the mentor of a pre-doctoral graduate student who lost a T32 training program grant as part of the \$400 million funding cuts. We found out about the cuts the week of March 10. I think the students were told that on the Monday of that week or so, and then notices went out a couple days afterwards.

7. The student works on data analysis for my research. This research project is a multilevel modeling analysis of the relationship between violence exposure and HIV care engagement.

8. I am concerned that in the future, I will not have any more pre-doctoral students to work with, given all the training grant cuts. Pre-doctoral students benefit my research because the students do work on my projects.

9. Furthermore, training program grants are critical to the development of future scientists in HIV-prevention and in research generally – the cutting of training program funding risks decimating a generation of scientists. This has huge negative ramifications to the work that I have dedicated my career.

10. These funding cuts have harmed my ability to do any long-term planning. I have no way to know what funds might be terminated without warning in the future. This uncertainty has both affected the research and also taken a significant emotional toll on me and my team.

11. The harm to HIV research threatens the health of all our communities. HIV-prevention science is vital. Without this research of my team and my colleagues, many of whom are also clinicians, we risk having a renewal and resurgence of the HIV epidemic.

12. None of the work funded by this grant was related to the Israel/Palestine conflict. I have no knowledge of any Title VI investigations of any projects I am involved in. If there were such investigations, I would have complied with the investigation. I am opposed to discrimination of any kind.

13. I understand that Title VI and its implementing regulations require the government to provide notice and opportunity for a hearing, followed by a finding on the record, before terminating federal funding 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.

14. I am concerned that I will not be allowed to write grants in the future that use words that the government bans. For example, many words that I understand the government to have deemed as related to “DEI” are core to my HIV research. Furthermore, speaking authentically, including in grant proposals, is an important part of being an HIV-prevention researcher and HIV-prevention activist; being open and honest myself is necessary to destigmatizing HIV and asking people to engage in health-maintaining behavior.

15. I now no longer talk freely in my work building. I and my colleagues look around to see who’s around before speaking and speak in lower voices. I am afraid of people I do not know. For example, if someone hears me complaining about the way things are being handled, I am afraid that the unknown person will report me.

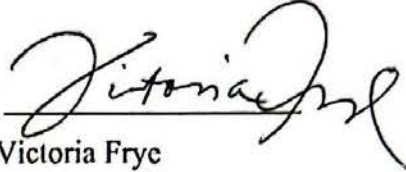
16. I have also made a change to a reproductive health rights information session event that I was organizing. It was originally going to be in person, but then I made the decision to move it online for participant safety. Now I have decided that I am just going to do the info-sharing as the only speaker, and everyone’s cameras will be off and names hidden. I have taken the Columbia logo off the event, and I will not use the Columbia videoconferencing Zoom account. The federal government’s funding withdrawals have contributed to these decisions.

17. After the government’s funding withdrawal, I am concerned that if I speak out, I will lose funding or others close to me will lose funding, and then our research study participants will be harmed.

18. It is scary to speak out publicly in this lawsuit, but I know there are many colleagues and students who are more vulnerable than me who are being affected by the government’s actions. I feel a responsibility to speak out for all of us.

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

Dated: 03/30/2025

Signed:   
Victoria Frye  
Professor of Social Work