

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

Amended Declaration of Melanie Wall (Witness A)

**IN THE UNITED STATES DISTRICT COURT
FOR THE 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

Amended Declaration of Melanie M. Wall

I, Melanie M. Wall, declare as follows:

1. I am a Professor of Biostatistics with tenure in the Department of Biostatistics at the Mailman School of Public Health. I am also the Director of Mental Health Data Science in the Department of Psychiatry at the Columbia University Irving Medical Center (“CUIMC”) and the New York State Psychiatric Institute.

2. I have a PhD in statistics from Iowa State University and a B.S. in mathematics from Truman State University. I have been a member of the Columbia faculty since 2010.

3. My research focuses on modeling complex multilevel and multimodal data on a wide array of psychosocial public health and psychiatric research questions in both clinical studies and large epidemiologic studies. My current research mission is improving the accessibility and application of state-of-the-art and reproducible statistical methods across different areas of psychiatric research.

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 the American Association of University Professors (“AAUP”) and American Federation of Teachers (“AFT”).

6. My salary – similar to many faculty at CUIMC– is nearly 100 percent covered by grant funding. There is a direct relationship between my salary and grant funding, hence if I lose grant funding, I may lose whatever portion of my salary that grant funded unless I can find something else to replace it.

7. As Director of Mental Health Data Science in the Department of Psychiatry at CUIMC, I am the co-investigator on 20 federal grants. In total, at least 6 of the grants I am a co-investigator on have been terminated. These grants account for 35 percent of my salary.

8. I am aware of two grants on which I am a co-investigator which have been officially terminated by NIH “due to unsafe antisemitic actions that suggest the institution lacks concern for the safety and well-being of Jewish students.” The notices state that termination of these grants was a “final decision of the NIH.”

9. The first grant is a 2 year approximately \$ 3 million grant which began in 2024 to study the relationship between U.S. adolescent brain structure development and acute and chronic stresses experienced when living in harmful, chronically adverse environments and how these ultimately are associated with development of substance use disorders. The second grant is a 4 year approximately \$ 790,000 grant which began in 2021 to study trust in and trustworthiness of precision medicine research among disability and scientific communities. This important topic aims to ensure medical progress in precision medicine is widely acceptable and reaches all types of communities, including people with mobility, vision and hearing disabilities (the most common

disabilities in the U.S.). Terminations of these grants affect all members of the research teams who rely on the grants for their salaries and also affects the study subjects, who now must be told their involvement is no longer needed. It is extremely challenging to recruit subjects to research studies like these and ending abruptly breaks trust with the community, reducing the likelihood subjects will want to enroll with Columbia researchers in the future.

10. I am also a co-investigator on one grant which Columbia administration officials have notified investigators is terminated as part of the \$ 400 million funding cuts. The grant is a 6-year approximately \$ 520,000 grant which began in 2019 to study the impact of stress on heavy drinking and intimate partner aggression in women. Similar to the projects above where I am co-investigator, this project also funds a portion of my salary.

11. I also am a mentor to many young researchers including graduate students and post-doctoral health science researchers. Four NIH T32 training programs which support these young and future health scientists that I serve as a mentor for have been terminated – three were informed by Columbia officials their grants were on a list of grants that were cancelled by the administration as part of the \$ 400 million in funding terminations. One received notice from the NIH that it was cancelled “due to unsafe antisemitic actions that suggest the institution lacks concern for the safety and well-being of Jewish students.”

12. These NIH T32 training grants are essential for training the next generation of health scientists and provide critical funding for training and skill development in addition to pure research. Additionally, NIH T32 grants are specifically designed to develop American scientific expertise and only citizens or lawful permanent residents are eligible to apply. By terminating these grants, it makes recruiting American students to health science even more difficult than it is already.

13. The termination of these federal grants is already causing substantial hardship for myself and those I supervise.

14. We are required to map out financial resources needed to cover next fiscal year salaries for ourselves and our teams. Now, with the abrupt termination of federal NIH grant funding, I have had to resort to using unrestricted financial resources that I had been saving at CUIMC for a future sabbatical in order to cover my salary. With the current amount of grant terminations, that unrestricted money is already projected to not be enough for the next fiscal year.

15. Without additional external funding, it is likely that staff on the various terminated grants will have to be let go, and some faculty will either have to take salary reductions or be reduced to part time.

16. None of the work funded by these grants was related to Israel, Palestine, Judaism, or any topic related in any way to antisemitism. To my knowledge, the research teams I collaborate with on these grants have never faced any investigation or complaint related to antisemitism.

17. I sought to submit my initial declaration under seal because I was afraid that filing it publicly might lead to negative consequences. I am still afraid of those consequences, but I am willing to make this amended declaration public in light of the Court's decision on sealing, as I understand the only alternative is to withdraw the submission. Others in my field may feel the risk is too great for them to participate publicly, and I hope my participation can support them.

18. I am aware that the current administration has taken a series of actions targeting Columbia. In particular, I am aware that on February 3, 2025, the U.S. Department of Education announced an investigation into Columbia. I am aware that on February 28, the federal Task Force to Combat Anti-Semitism announced that it would visit the Columbia campus. I am aware that on March 3, 2025, several federal agencies announced that they would review funding to Columbia.

I am aware that on March 7, 2025, several federal agencies announced \$ 400 million in grant cancellations to Columbia, and stated that that “[t]hese cancellations represent the first round of action and additional cancellations are expected to follow.” Most recently, I am aware that on March 13, 2025, officials from the General Services Administration (GSA), the Department of Health and Human Services (HHS), and the Department of Education (ED) sent a letter to Columbia that was made public, and demanded that Columbia immediately take a long list of actions as a precondition of further negotiations regarding federal funding. I am aware that Columbia adopted numerous of these policy demands on March 21, 2025.

19. 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.

20. I understand that Title VI requires federal agencies to provide a full report to Congress thirty days before terminating federal funds under Title VI. I am not aware of any federal agencies providing any such report to Congress regarding funding to Columbia. If any such report had been filed, I likely would have contacted my congressional representatives to express my opposition to termination of the federal funding that supports 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: 5-22-2025

Signed: Melanie M. Wall

Melanie M. Wall

Professor of Biostatistics