

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED  
SOCIETIES, et al.,

*Plaintiffs,*  
v.

MICHAEL MCDONALD, in his official  
capacity as Acting Chairman of the National  
Endowment for the Humanities, et al.,

*Defendants.*

Case No. 1:25-cv-03657

**DECLARATION OF DR. JOSEPH T. WALSH, JR.**

I, Joseph T. Walsh, Jr., hereby declare:

1. I am the Vice President for Economic Development and Innovation at the University of Illinois System, a position I have held since 2020. As the Vice President for Economic Development and Innovation, I work closely with senior leaders across the University of Illinois System, at each of the System's three universities, and with other internal and external stakeholders to lead initiatives in support of the university's research and economic development missions. Prior to holding this position, I was Vice President for Research at Northwestern University from 2007 to 2019.

2. As the University of Illinois System's Vice President for Economic Development and Innovation, I have personal knowledge of the matters set forth below or have knowledge of the matters based on my review of information and records gathered by System staff.

3. Two Universities in the University of Illinois System are member institutions of the American Council of Learned Societies (ACLS): the University of Illinois Urbana-Champaign (UIUC) and the University of Illinois Chicago (UIC).

4. I am providing this declaration to explain terminations of UIUC and UIC grants by the National Endowment for the Humanities (NEH) and certain impacts of those terminations.

5. A total of eleven grants awarded to UIUC and UIC have been terminated by NEH effective April 2 or 3, 2025. UIUC received termination notices for nine grants and UIC received termination notices for two grants. UIUC processed an additional grant termination from the University of Washington (UW) stemming from funding from an NEH award that had likewise been terminated.

6. University employees at both UIUC and UIC received a total of ten separate emails dated April 2, 2025, from the following email address: Grant\_Notifications@NEHemail.onmicrosoft.com. Each email contained statements in both the body of the email and an attached letter stating that a particular grant had been “terminated” effective April 2, 2025, and each of which purported to be signed by Michael McDonald, Acting Chairman of the National Endowment for the Humanities (NEH). Each termination notification was identical other than the grant application number.

7. A UIUC faculty member received a similar termination notice dated April 3, 2025, stating that a particular grant had been terminated effective April 3, 2025.

8. UIUC received notice of the UW grant termination from UW on April 10, 2025. This notice included the April 2, 2025 termination letter UW received from NEH. On April 23, 2025, UW issued a modification for the UIUC subaward that terminated the grant as of April 2, 2025.

9. While UIUC's staff received the notices described in Paragraph 6, above, on April 2, UIC's staff only became aware of the notices on May 7, as the emails were flagged by UIC's system as "spam" due to various characteristics, including the absence of identifying information and lack of a legitimate NEH email address.

10. The notifications appeared to be a form letter and generally indicated that the grant did not effectuate the agency's needs and priorities, but did not include any specific information about the grants (other than the grant application number), NEH's determination of how the grants no longer effectuated the agency's needs and priorities, or how to appeal the decision.<sup>1</sup>

11. The UIUC grants terminated by NEH included principal investigators from the Illinois State Archaeological Survey, Library Research and Publication, History, Art & Design, Gender and Women's Studies, Comparative & World Literature, and University Press.

12. The NEH grant terminations threaten UIUC's research into history, literature, languages, philosophy, politics, society, and culture. Many of UIUC's NEH research projects have been forced to slow down or cease abruptly and impact staffing decisions.

13. For example, the grant terminations impacted the UIUC project, "No Longer at the Margins: A Digital Project to Amplify Access to the Archives of Women in Science." This forward-looking, artificial intelligence (AI)-enabled project was focused on increasing access to the contributions of women in science, and on developing new methods for historians to discover and use digitized archival materials. The ultimate deliverable of the project was the development of a cutting-edge tool that scholars could use to interrogate historical records and connect texts in unprecedented ways, picking the AI models that would be most useful to transcribe and translate

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<sup>1</sup> A total of 4 of the grant terminations have been appealed; two pertaining to UIUC and two pertaining to UIC. The university has not received a response to the appeals as of March 2, 2026.

texts and find hidden connections to related documents. This would have positive implications for scholars in multiple disciplines, enhancing traditional methods of research with people-centered AI services.

14. The termination came just as the project was ramping up. The cuts left the university scrambling to cover costs for full-time employees, external vendors, and other partners, all while involved parties experienced stress about potential job loss. Project leaders shifted institutional funds and personal research funds to fill the gap, pulling resources away from other uses. The termination also delayed the project, leaving it less competitive with private funding opportunities, and denying students and researchers immediate access to the benefits of the federal commitment that was withdrawn.

15. The NEH grant terminations threaten UIC's research into history, literature, languages, philosophy, politics, society, and culture.

16. Specifically, the UIC grants terminated by NEH both provided support to ongoing initiatives at UIC's Jane Addams Hull-House Museum, which intended to build upon the legacy of the late Jane Addams (1860-1935), the first American woman to receive the Nobel Peace Prize.

17. As a result of the termination of the UIC grants, a strategic planning effort was paused that sought to identify critical infrastructure improvements to the museum, which is housed in the original Jane Addams Hull House building, a U.S. National Historic Landmark built in the late 1800s. The museum currently has a collection of over 5,000 historic objects currently at some level of risk of degradation absent an infrastructure improvement program. Moreover, four museum personnel who were hired to complete the work that UIC promised NEH it would perform under the grant are now being funded by operating budget.

18. Significant work was performed not only by the PIs for the two terminated grants, but also by a great deal of UIC staff and faculty members, both leading up to and during application process and after the awards were made by the NEH.

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

Executed on March 2, 2026 in Urbana, Illinois.

A handwritten signature in black ink that reads "J.T. Walsh". The signature is written in a cursive style with a horizontal line above the letters.

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Joseph T. Walsh, Jr.  
University of Illinois System  
Vice President for Economic Development  
and Innovation