

**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.

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. 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.

9. 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.¹

10. 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, and University Press. These terminations effectively ended UIUC's active NEH portfolio.

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

12. For example, the Illinois Newspaper Project has been a partner in national newspaper preservation efforts spearheaded and funded by the Library of Congress and the National Endowment for the Humanities for almost forty years, starting in 1987 as part of the United States Newspaper Program, and since 2009, under the National Digital Newspaper Program. The Illinois Newspaper Project has digitized over 610,000 pages of Illinois newspaper content with National Digital Newspaper Program funding. All digitized content is freely available, both on the Library of Congress Chronicling America site and the Illinois Digital Newspaper Collections site. This freely available collection of historical newspapers is a valued asset for scholars, students, local historians, and genealogists throughout the United States.

13. The terminated grant was structured around a call for proposal shared with Illinois cultural heritage institutions of all sizes, from local historical and genealogical societies to public and academic libraries.

¹ 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 May 13, 2025.

14. With no prospect of further NEH funding, UIUC will be unable to continue this important collaborative project. Digitization of newspapers by not-for-profit institutions is an important contribution to the public good. In addition to helping to preserve the historical record and make it more discoverable (via keyword searching), such initiatives also provide a vital resource for all U.S. citizens, especially those in rural and small-town communities where access to historical newspapers on microfilm is no longer sustainable, and subscription costs of commercially produced digital newspaper collections are prohibitive.

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 May 13, 2025 in Urbana, Illinois.

A handwritten signature in black ink, appearing to read "J.T. Walsh". The signature is written in a cursive, flowing style with a horizontal line extending from the end of the name.

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