No. 25-2230

UNITED STATES COURT OF APPEALS
FOR THE FIRST CIRCUIT

PRESIDENT AND FELLOWS OF HARVARD COLLEGE,

Plaintiff-Appellee,

v.

UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES; NATIONAL INSTITUTES OF HEALTH; ROBERT F. KENNEDY, JR., in his official capacity as Secretary of the United States Department of Health and Human Services; UNITED STATES DEPARTMENT OF JUSTICE; TODD BLANCHE, in his official capacity as Acting Attorney General of the United States; UNITED STATES DEPARTMENT OF EDUCATION; LINDA MCMAHON, in her official capacity as Secretary of the United States Department of Education; GENERAL SERVICES ADMINISTRATION; EDWARD FORST, in his official capacity as Administrator of the United States General Services Administration; UNITED STATES DEPARTMENT OF ENERGY; CHRISTOPHER A. WRIGHT, in his official capacity as Secretary of the Department of Energy; NATIONAL SCIENCE FOUNDATION; BRIAN STONE, in his official capacity as Acting Director of the United States National Science Foundation; UNITED STATES DEPARTMENT OF DEFENSE; PETER HEGSETH, in his official capacity as Secretary of the United States Department of Defense; NATIONAL AERONAUTICS AND SPACE ADMINISTRATION; JARED ISAACMAN, in his official capacity as Administrator of the National Aeronautics and Space Administration; UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; SCOTT TURNER, in his official capacity as Secretary of Housing and Urban Development; UNITED STATES DEPARTMENT OF AGRICULTURE; BROOKE L. ROLLINS, in her official capacity as Secretary of Agriculture,

Defendants-Appellants.

On Appeal from the United States District Court for the District of Massachusetts,
No. 25-cv-11048

BRIEF FOR AMICUS CURIAE HILLEL INTERNATIONAL IN SUPPORT OF PLAINTIFF-APPELLEE AND AFFIRMANCE

July 22, 2026

(Counsel listed on following page)

Mark B. Rotenberg
HILLEL INTERNATIONAL
800 Eighth Street NW
Washington, DC 20001

David Zimmer
ZIMMER, CITRON & CLARKE LLP
711 Atlantic Avenue, 6th Floor
Boston, MA 02111
(617) 676-9421
dzimmer@zimmercitronclarke.com

Counsel for Hillel International

CORPORATE DISCLOSURE STATEMENT

Hillel International is a tax-exempt non-profit organization. It has no parent corporation, and no publicly held corporation owns 10% or more of its stock.

TABLE OF CONTENTS

INTEREST AND IDENTITY OF AMICUS CURIAE.....1

INTRODUCTION AND SUMMARY OF ARGUMENT.....2

ARGUMENT.....3

I. In Recent Years, Antisemitism Has Become A Very Serious Problem On University Campuses, Including Harvard.....3

II. Harvard Has Recently Made Progress Toward Improving The Campus Climate For Jewish Students.....6

CONCLUSION.....13

CERTIFICATE OF COMPLIANCE

CERTIFICATE OF SERVICE

TABLE OF AUTHORITIES

American Jewish Committee, *The State of Antisemitism in America 2025: AJC's Survey of American Jews*, https://www.ajc.org/AntisemitismReport2025/AmericanJews 5

Baruch Weiss & Mark B. Rotenberg, *Lawfare: Protecting Jews in Court*, Sapir (Spring 2025), https://sapirjournal.org/activism/2025/lawfare..... 12, 13

Harvard Univ., Presidential Task Force on Combating Antisemitism and Anti-Israeli Bias (Apr. 2026), https://www.harvard.edu/task-force-on-antisemitism 11

Harvard Univ., Presidential Task Force on Combating Antisemitism and Anti-Israeli Bias, *Academic Life* (July 2026), https://www.harvard.edu/task-force-on-antisemitism/academic-life 10

Harvard Univ., Presidential Task Force on Combating Antisemitism and Anti-Israeli Bias, *Administrative Infrastructure, Policies, Procedures, and Training* (July 2026), https://www.harvard.edu/task-force-on-antisemitism/administrative-infrastructure-policies-procedures-and-training 7, 8, 9

Harvard Univ., Presidential Task Force on Combating Antisemitism and Anti-Israeli Bias, *Open Inquiry and Constructive Dialogue* (July 2026), https://www.harvard.edu/task-force-on-antisemitism/open-inquiry-and-constructive-dialogue.....9

Helene van Rossum, *Being Jewish at Princeton: From F. Scott Fitzgerald's Days to the Center of Jewish Life*, Princeton Univ. Archives (Apr. 29, 2011), https://universityarchives.princeton.edu/2011/04/printecons-jewish-students-from-the-days-of-scott-fitzgerald-to-the-center-of-jewish-life.....1

Hillel Int'l, *About*, https://www.hillel.org/about.....1

Hillel Int'l, *Best Practices and Principles: Free Speech, Academic Freedom, and Responsibilities of Students and Faculty*, https://www.hillel.org/wp-content/uploads/2026/06/AENxHillel-BestPractices.pdf.....7

Hillel Int'l, Campus Climate Initiative, *Best Practices: Fostering a Culture of Dialogue Across Difference*, https://www.hillel.org/wp-content/uploads/2025/09/Best-Practices_-Fostering-a-Culture-of-Dialogue-Across-Difference.pdf 8

Hillel Int'l, Campus Climate Initiative, *Best Practices: 'Three A Approach' to an Inclusive Climate for Jewish Students*, https://www.hillel.org/wp-content/uploads/2025/09/Three-A-Approach-to-an-Inclusive-Climate-for-Jewish-Students.pdf 8, 9, 11

Hillel Int'l, *Hillel Campus Climate Initiative*, https://www.hillel.org/campus-climate-initiative/ 2

Hillel Int'l, *83% of Jewish College Students Have Experienced or Witnessed Antisemitism Firsthand Since Oct. 7 Attack, Survey Finds* (Jan. 30, 2025), https://www.hillel.org/83-of-jewish-college-students-have-experienced-or-witnessed-antisemitism-firsthand-since-oct-7-attack-survey-finds.....4

Michael C. Bender, Alan Blinder & Jonathan Swan, *Inside Trump's Pressure Campaign on Universities*, N.Y. Times (Apr. 14, 2025), https://www.nytimes.com/2025/04/14/us/politics/trump-pressure-universities.html.....12

Open Letter from Harvard Faculty & Staff to Jewish and Israeli Students (July 2, 2026), https://www.thefp.com/api/v1/file/63774b56-6b71-4607-81e4-a40a5a0de1ab.pdf.....10

Robert A. Pape, *Understanding Campus Fears After October 7 and How to Reduce Them*, Chicago Project on Security and Threats (Mar. 7, 2024), https://cpost.uchicago.edu/publications/cpost_understanding_campus_fears_after_october_7_and_how_to_reduce_them.....5

Sebastian B. Connolly & Summer E. Rose, *Jewish Groups Say Harvard Was Not Indifferent to Antisemitism, Push Back on Justice Department Suit*, Harvard Crimson (Mar. 25, 2026), https://www.thecrimson.com/article/2026/3/25/jewish-groups-doj-lawsuit 10

Statement of Tova Kaplan, Antisemitism on America's College and University Campuses: Current Conditions and the Federal Response: Hearing Before the U.S. Comm'n on Civil Rights (Feb. 19, 2026), https://www.usccr.gov/files/2026-03/as-briefing-transcript.pdf 6

Talia Morstead & Anita DeLongis, *Antisemitism on Campus in the Wake of October 7: Examining Stress, Coping, and Depressive Symptoms Among Jewish Students*, Stress Health 41(1) (2025), https://pmc.ncbi.nlm.nih.gov/articles/PMC11750057.....5

The Derek Bok Center for Teaching and Learning, Harvard Univ., *Civil Discourse*, https://bokcenter.harvard.edu/civil-discourse 9

INTEREST AND IDENTITY OF AMICUS CURIAE[1]

Hillel International ("Hillel") is the largest Jewish campus organization worldwide. It serves more than 850 campuses and reaches over 140,000 college and university students in the United States.[2]

Hillel was founded in the United States in 1923 at a time when many universities imposed quotas on Jews and Jews faced other barriers in broader American society.[3] For over 100 years, the Hillel movement has served all Jewish students, no matter who they are or how they express their Judaism, so that these students may in turn enrich the Jewish people and the wider world. To that end, Hillel builds relationships that promote understanding among diverse groups, advocates for Jewish students, and strives to ensure a safe and supportive atmosphere on campus.

Hillel's flagship program addressing antisemitism is the Campus Climate Initiative ("CCI"), which engages thousands of higher education administrators

---

[1] No counsel for a party authored the amicus brief in whole or in part, and no person or entity, aside from amicus curiae, its members, or its counsel, made any monetary contribution intended to fund the preparation or submission of the brief. Both appellants and appellee have consented to the filing of this brief.

[2] *See generally* Hillel Int'l, *About*, https://www.hillel.org/about (last visited July 21, 2026).

[3] *See, e.g.*, Helene van Rossum, *Being Jewish at Princeton: From F. Scott Fitzgerald's Days to the Center of Jewish Life*, Princeton Univ. Archives (Apr. 29, 2011), https://universityarchives.princeton.edu/2011/04/printecons-jewish-students-from-the-days-of-scott-fitzgerald-to-the-center-of-jewish-life.

from over 100 institutions to foster an affirming campus climate for Jewish students.[4] These partnerships are catalyzing positive change on campuses that benefits Jewish students and all students alike. As part of the CCI, Hillel provides customized workshops on antisemitism, campus-climate reviews in partnership with leading research firms, and campus-tailored plans for concrete actions and ongoing engagement.

Given all this, Hillel is deeply invested in the issues this case raises and is uniquely positioned to address the extent and impact of antisemitism on college campuses and appropriate ways to build and sustain an inclusive and thriving campus environment—both for Jewish students and students as a whole.

INTRODUCTION AND SUMMARY OF ARGUMENT

The prevalence of antisemitism on university campuses in recent years would shock those who attended college in the United States twenty or thirty years ago. Especially since the attacks of October 7, 2023, the number of antisemitic incidents on university campuses has dramatically increased, transforming Jewish campus life. Harvard is no exception to this trend. But far from ignoring these issues, Harvard has begun to address them. Its Task Force on Combating Antisemitism and Anti-Israeli Bias issued detailed recommendations, many

[4] *See generally* Hillel Int'l, *Hillel Campus Climate Initiative*, https://www.hillel.org/campus-climate-initiative/ (last visited July 21, 2026).

mirroring those Hillel has long advocated. And as Harvard has started to implement those recommendations, campus life for Jewish students has meaningfully improved.

To be sure, there is much more to be done at Harvard and nationally. Hillel's work in this area teaches that the best way to address campus antisemitism and improve campus culture is through comprehensive policy and educational reforms accomplished in collaboration with the Jewish community and Jewish students. Coercive measures that cut Harvard off from billions of dollars in lifesaving scientific and medical research, on the other hand, do not help Jewish students or improve the campus climate. To the contrary, they disproportionately impact the very Jewish students and Jewish researchers the government purportedly seeks to help. Accordingly, Hillel respectfully urges this Court to affirm the district court's decision.[5]

ARGUMENT

I. In Recent Years, Antisemitism Has Become A Very Serious Problem On University Campuses, Including Harvard.

For most Jewish students who attended college or graduate school twenty or thirty years ago, antisemitism on university campuses was extremely rare. Indeed,

[5] For purposes of this brief, Hillel is not invoking a particular definition of antisemitism, nor taking a view on whether any specific antisemitic incident is legally actionable, but instead (like the Harvard Task Force) focuses on the "actual experiences" of those on campus. JA391 n.620.

most Jewish students during that period likely experienced no antisemitism at all. In recent years, however, that has changed dramatically—especially after the attacks of October 7, 2023. In its role as the largest Jewish campus organization, Hillel tracks students' reports of antisemitic incidents on campus and regularly surveys students about campus antisemitism. Hillel's internal data show a shocking increase in campus antisemitism in recent years. In 2020, Hillel recorded 180 antisemitic incidents on university campuses. By contrast, in 2025, Hillel recorded 2,334 antisemitic incidents—an increase of more than 1000%. In total, since October 7, 2023, Hillel has recorded 6,060 antisemitic incidents on over 490 campuses, including 999 incidents that threatened or involved violence.

This dramatic increase in campus antisemitism has had a profound impact on many Jewish students. In a survey of Jewish students that Hillel conducted last year, 41% felt the need to hide their Jewish identity; approximately a quarter of Jewish students felt compelled to take security precautions; and 13% of Jewish students have withdrawn from campus or social activities (as opposed to 2% of non-Jewish students).[6] Hillel is not alone in these observations. A 2025 study from the American Jewish Committee reported that 28% of Jewish college students

[6] Hillel Int'l, *83% of Jewish College Students Have Experienced or Witnessed Antisemitism Firsthand Since Oct. 7 Attack, Survey Finds* (Jan. 30, 2025), https://www.hillel.org/83-of-jewish-college-students-have-experienced-or-witnessed-antisemitism-firsthand-since-oct-7-attack-survey-finds.

reported having felt uncomfortable or unsafe at a campus event because of their Jewish identity and that 34% of Jewish college students have avoided wearing, carrying, or displaying things that would identify them as Jewish because of fears of antisemitism.[7] Recent academic research has reported increased stress and depression among Jewish students,[8] and documented that more than half of Jewish college students felt in personal danger.[9]

Harvard is no exception to this national trend. Particularly during the 2023-2024 and 2024-2025 academic years, Hillel identified Harvard as having a very serious number of reported antisemitic incidents. This is consistent with the Harvard Task Force's own report, which documents the severity of campus antisemitism at Harvard over the last few years. Beyond the numbers, Harvard

---

[7] American Jewish Committee, *The State of Antisemitism in America 2025: AJC's Survey of American Jews*, https://www.ajc.org/AntisemitismReport2025/AmericanJews (last visited July 21, 2026).

[8] Talia Morstead & Anita DeLongis, *Antisemitism on Campus in the Wake of October 7: Examining Stress, Coping, and Depressive Symptoms Among Jewish Students*, Stress Health 41(1) (2025), https://pmc.ncbi.nlm.nih.gov/articles/PMC11750057.

[9] Robert A. Pape, *Understanding Campus Fears After October 7 and How to Reduce Them*, Chicago Project on Security and Threats (Mar. 7, 2024), https://cpost.uchicago.edu/publications/cpost_understanding_campus_fears_after_october_7_and_how_to_reduce_them. Specifically, this report noted that, as a result of campus tensions surrounding the Israeli-Palestinian conflict, 56% of Jewish college students felt in personal danger and 52% of Muslim college students felt in personal danger—as opposed to 16% of other college students.

students' own accounts describe experiences of marginalization, intimidation, and discrimination that should have no place on campus.[10]

II. Harvard Has Recently Made Progress Toward Improving The Campus Climate For Jewish Students.

Far from condoning campus antisemitism, Harvard has begun to take steps to address it by fostering dialogue, collaboration, and education. Harvard's efforts have already had a positive impact. And while there is still much more to be done, and the issues are far from resolved, Hillel believes that Harvard is on the right track.

A. The serious problem of antisemitism on college campuses requires a serious response. Harvard has shown it is committed to just that. Harvard's Task Force on Combating Antisemitism and Anti-Israeli Bias proposed "a comprehensive, integrated, and sustained program of efforts" to build a campus where Jewish students—and every student—can thrive. JA371.[11] And Harvard has made real headway on that front.

---

[10] *See, e.g.*, Statement of Tova Kaplan, Antisemitism on America's College and University Campuses: Current Conditions and the Federal Response: Hearing Before the U.S. Comm'n on Civil Rights, 163-71 (Feb. 19, 2026), https://www.usccr.gov/files/2026-03/as-briefing-transcript.pdf.

[11] Hillel recognizes that Harvard's decision to propose and implement various reforms is not a concession of unlawful behavior on Harvard's part. Hillel recognizes too that Harvard is not limited to addressing legally actionable harms. JA205 ("[W]e did not conduct our work as if we were a court or a jury."). Hillel believes that universities should go beyond what the law strictly requires to foster

Hillel is well positioned to evaluate Harvard's progress given its important role in Jewish life at Harvard and at hundreds of campuses nationwide. As noted above, Hillel's CCI program is the leading provider of training, guidance, and support for higher education administrators to improve the campus climate for Jewish students, and Harvard has adopted many of the best practices and policies Hillel's CCI recommends, including several worth spotlighting here.

Of most immediate importance and in accordance with Hillel's urgent recommendations, Harvard has revised its policies and practices around protest, complaints, and discipline.[12] Widespread promulgation and vigilant enforcement of reasonable content-neutral rules around student activism are vital to protect the rights of students to speak and assemble while also ensuring that campus protests do not interfere with the university's academic mission and the equally important rights of others to teach, research, study, and learn.[13] Accordingly, Harvard has

---

inclusive environments for all students.

[12] *See* Harvard Univ., Presidential Task Force on Combating Antisemitism and Anti-Israeli Bias, *Administrative Infrastructure, Policies, Procedures, and Training* (July 2026), https://www.harvard.edu/task-force-on-antisemitism/administrative-infrastructure-policies-procedures-and-training.

[13] *See* Hillel Int'l, *Best Practices and Principles: Free Speech, Academic Freedom, and Responsibilities of Students and Faculty*, https://www.hillel.org/wp-content/uploads/2026/06/AENxHillel-BestPractices.pdf (last visited July 21, 2026); Hillel Int'l, Campus Climate Initiative, *Best Practices: 'Three A Approach' to an Inclusive Climate for Jewish Students* 3, https://www.hillel.org/wp-content/uploads/2025/09/Three-A-Approach-to-an-Inclusive-Climate-for-Jewish-

clarified its rules governing protests, barring them from classrooms, libraries, dormitories and dining halls, and offices, while permitting them elsewhere subject to reasonable time, place, and manner requirements.[14] Harvard has also committed to strengthening in various ways its non-discrimination policy, its reporting mechanisms, and its Title VI office, and has promised greater transparency into its response to incidents of discrimination and harassment.[15]

Hillel also recommends universities offer programming on how to foster respectful dialogue in the classroom and around the university.[16] Consistent with that, Harvard has begun implementing its Task Force's recommendation to "create opportunities, support, and incentives for all instructors to learn how to facilitate difficult conversations across lines of difference." JA375. Harvard's Derek Bok Center for Teaching and Learning now conducts mandatory anti-bias training for hundreds of Harvard teaching fellows and teaching assistants, counseling them on

---

Students.pdf (last visited July 21, 2026).

[14] *See* Harvard Task Force, *Administrative Infrastructure*, *supra* (specifically, "Safety and Protest Policies").

[15] *See* Harvard Task Force, *Administrative Infrastructure*, *supra* (specifically, "Accountability and Complaint Policies and Procedures").

[16] Hillel Int'l, Campus Climate Initiative, *Best Practices: Fostering a Culture of Dialogue Across Difference*, https://www.hillel.org/wp-content/uploads/2025/09/Best-Practices_-Fostering-a-Culture-of-Dialogue-Across-Difference.pdf (last visited July 21, 2026).

how to teach controversial topics in inclusive ways.[17] In addition, Harvard now offers courses and trainings to students, faculty, and staff on resolving conflicts, responding to bias, and managing disruptions.[18] Harvard is also planning CCI-sponsored trainings for teaching assistants, has organized training sessions with one of CCI's partner organizations (Project Shema), and is working with CCI to develop asynchronous training materials on antisemitism that can be used across the United States.

Harvard, like Hillel, also recognizes the importance of studying Jewish identity, the Israeli-Palestinian conflict, and antisemitism from a diversity of viewpoints[19]—an approach that helps reduce the tendency to see these topics in the binary, distorted, and simplistic terms that fuel campus antisemitism. Harvard has

---

[17] Harvard Univ., Presidential Task Force on Combating Antisemitism and Anti-Israeli Bias, *Open Inquiry and Constructive Dialogue* (July 2026), https://www.harvard.edu/task-force-on-antisemitism/open-inquiry-and-constructive-dialogue; The Derek Bok Center for Teaching and Learning, Harvard Univ., *Civil Discourse*, https://bokcenter.harvard.edu/civil-discourse (last visited July 21, 2026).

[18] *See* Harvard Task Force, *Open Inquiry and Constructive Dialogue*, *supra*; Harvard Task Force, *Administrative Infrastructure*, *supra* (specifically, "Training for Harvard Community"); *see also* JA376.

[19] JA376 (Task Force recommending Harvard "[c]reate opportunities for students to engage in a more comprehensive course of study on Israel and the Palestinians, Jewish Studies, and Peace and Conflict Studies."); Hillel Int'l, *Three A Approach*, *supra* at 3 (calling for academic courses on Jewish identity, Jewish history, and antisemitism).

recently increased its course offerings for undergraduates and graduate students, hired new faculty, and expanded partnerships with other institutions of higher learning.[20]

In these and other ways, Harvard has taken important steps toward creating a healthier campus environment in which Jewish students and all students can thrive together.

B. Based on Hillel's work with Jewish students at Harvard, Harvard's reforms have already made a meaningful difference. While Harvard's reforms are relatively recent, Hillel's preliminary data and engagement on the ground at Harvard suggest that Jewish students are experiencing less antisemitism and feel more comfortable on campus than they have in recent years.

That is not to say, of course, that the problem has been solved or that there is not more work to do.[21] Campus antisemitism will not disappear overnight, and it

---

[20] *See* Harvard Univ., Presidential Task Force on Combating Antisemitism and Anti-Israeli Bias, *Academic Life* (July 2026), https://www.harvard.edu/task-force-on-antisemitism/academic-life (specifically, "Faculty, Staff, and Course Offerings").

[21] *See* Open Letter from Harvard Faculty & Staff to Jewish and Israeli Students (July 2, 2026), https://www.thefp.com/api/v1/file/63774b56-6b71-4607-81e4-a40a5a0de1ab.pdf ("We believe that the situation has improved to some extent recently, but challenges remain"); Sebastian B. Connolly & Summer E. Rose, *Jewish Groups Say Harvard Was Not Indifferent to Antisemitism, Push Back on Justice Department Suit*, Harvard Crimson (Mar. 25, 2026), https://www.thecrimson.com/article/2026/3/25/jewish-groups-doj-lawsuit (reporting similar sentiments).

will take time for Jewish students to regain the comfort on campus that so many of them previously felt. Harvard itself acknowledges that there is still more progress to be made.[22]

In Hillel's experience, the key to expanding and sustaining progress is a comprehensive, customized plan of action developed in conjunction with Jewish students and experts who understand the particular problems facing the campus and what needs to be done to address them.[23] It takes hard work and institutional commitment to create and carry out such a plan. Among other things, it requires collecting campus-specific data, securing strong support from university leadership, coordinating university units, empowering stakeholders to implement interventions, and building coalitions. The Harvard Task Force recognizes much the same: To be most effective, reforms "must be adopted through internal processes that have widespread buy-in within the Harvard community." JA202.

Hillel's experience with the Campus Climate Initiative shows that there are better alternatives to draconian one-size-fits-all approaches of the sort the

---

[22] Harvard Univ., Presidential Task Force on Combating Antisemitism and Anti-Israeli Bias (Apr. 2026), https://www.harvard.edu/task-force-on-antisemitism (front page) (acknowledging the need to "continue[] to take substantive actions to advance" its "commitment to combating antisemitism and anti-Israeli bias").

[23] Hillel Int'l, *Three A Approach*, *supra* at 1 ("Sustaining an inclusive campus climate for Jewish and all students requires a holistic approach that aligns an institution's policies, procedures, customs, and educational programs with its educational mission and values.").

government here pursues. The government's view is that it terminated Harvard's federal grants in a genuine effort to address antisemitism and racial discrimination at Harvard. Opening Br. 4. Even assuming that is true, however, Hillel does not believe that the government's across-the-board funding cut is a constructive solution to the problem at hand. Indeed, the government appears more interested in vastly reshaping universities—or even destroying them—than combating the specific problem of antisemitism within them.[24]

Indeed, the government's funding cuts risk harming the Jewish students and researchers the government claims to protect—to say nothing of the harm that will

[24] *See* Baruch Weiss & Mark B. Rotenberg, *Lawfare: Protecting Jews in Court*, Sapir (Spring 2025), https://sapirjournal.org/activism/2025/lawfare; Michael C. Bender, Alan Blinder & Jonathan Swan, *Inside Trump's Pressure Campaign on Universities*, N.Y. Times (Apr. 14, 2025), https://www.nytimes.com/2025/04/14/us/politics/trump-pressure-universities.html (reporting that "Mr. Trump and his top aides are exerting control of huge sums of federal research money to shift the ideological tilt of the higher education system, which they see as hostile to conservatives and intent on perpetuating liberalism"); Eve Glover, *Leo Terrell's Civil Rights Roots Fuel His Fight Against Antisemitism*, Jerusalem Post (Apr. 24, 2026) (reporting that the chair of the Department of Justice Federal Task Force to Combat Antisemitism publicly declared, "We're going to bankrupt these universities"); Brooke Singman, *Trump Says He'll 'Fire the Radical Left' From Colleges, Focus on 'Defending' American 'Tradition' If Elected*, Foxnews.com (Apr. 23, 2024) ("Former President Trump said he plans to 'fire' the 'radical left' individuals that 'have allowed our colleges to become dominated by Marxist maniacs and lunatics' and ensure higher education is focused on 'defending the American tradition' if elected to a second term."), https://www.foxnews.com/politics/trump-says-hell-fire-radical-left-from-colleges-focus-on-defending-american-tradition-if-elected.print.

befall the countless others who benefit (today and in the future) from the scientific and medical research now in jeopardy. One reason Jewish students and faculty choose to attend and work at Harvard is to participate in cutting-edge research in medicine, public health, and other fields heavily supported by federal grants. And everyone benefits from the lifesaving breakthroughs this research yields, whether that is preventing tuberculosis, curing childhood cancer, or improving health outcomes for impoverished populations.[25] In short, the government's funding cuts could worsen the Harvard experiences of the very same Jewish students and researchers the government says it is trying to protect.

To say all this is not to deny the critically important role that government enforcement and litigation play in combating campus antisemitism and discrimination in education more generally. Indeed, Title VI suits and the specific remedies they provide have led to important victories in the fight against unlawful discrimination at universities. But there is a world of difference between Title VI's carefully structured enforcement processes and the peremptory actions at issue here—unilateral cuts to billions of dollars of vital research funding.

CONCLUSION

This Court should affirm the judgment below.

[25] Weiss & Rotenberg, *supra*.

July 22, 2026

Respectfully submitted,

/s/ David Zimmer

David Zimmer
ZIMMER, CITRON & CLARKE LLP
711 Atlantic Avenue, 6th Floor
Boston, MA 02111
(617) 676-9421

Mark B. Rotenberg
HILLEL INTERNATIONAL
800 Eighth Street NW
Washington, DC 20001

Counsel for Hillel International

CERTIFICATE OF COMPLIANCE

Pursuant to Fed. R. App. P. 32(g), I hereby certify that this document complies with the type-volume limitations set forth in Fed. R. App. P. 32(a)(7)(B) because, excluding the parts of the document exempted by Fed. R. App. P. 32(f), this document contains 2,928 words.

I further certify that this brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type-style requirements of Fed. R. App. P. 32(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word in a 14-point Times New Roman font.

July 22, 2026 */s/ David Zimmer*

CERTIFICATE OF SERVICE

I hereby certify that, on this 22nd day of July 2026, I have caused the foregoing document to be electronically filed with the Clerk of Court for the United States Court of Appeals for the First Circuit by the CM/ECF system and that a copy of this brief has been served on all parties by CM/ECF.

July 22, 2026 */s/ David Zimmer*