

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-07864-RFL

DECLARATION OF HANNAH APPEL

DECLARATION OF HANNAH APPEL

I, Hannah Appel, declare as follows:

1. I am an Associate Professor in the Department of Anthropology, as well as an Associate Faculty Director of the Luskin Institute on Inequality and Democracy, at the University of California, Los Angeles (“UCLA”). I make this statement based on personal knowledge, and if called as a witness could and would testify competently thereto.

2. This declaration is submitted in support of Plaintiffs’ Motion for a Preliminary Injunction.

3. I am an economic anthropologist by training and have been a professor at UCLA since 2014. My research focuses on transnational capitalism and finance, as well as abolitionist social movements. I hold a PhD in Anthropology from Stanford University.

4. In addition to my research, I teach undergraduate courses about critical approaches to international development, as well as introductory courses on culture and globalization, and serve as a representative for the Anthropology Department in the UCLA Legislative Assembly.

5. I am a member of the Council of UC Faculty Associations and the UCLA Faculty Association, as well as a solidarity member of the American Federation of Teachers.

Awareness of Government Actions

6. I am aware that President Trump has pledged “to reclaim our once great educational institutions from the radical Left and Marxist maniacs,” and that since taking office, President Trump and his administration have taken a series of actions to try to remove from university campuses diversity, equity, and inclusion (“DEI”) programs and other topics and viewpoints they disfavor, such as “woke gender ideology,” “the green new deal,” and pro-Palestinian views, among others.

7. I am aware that on or around July 30-August 1, the Trump administration suspended more than \$500 million in federal funding for UCLA. It is my understanding that the Trump administration is investigating the University of California (“UC”) for alleged antisemitism and other alleged violations of Title VI, Title VII, and Title IX, and has cited these pending investigations and/or the UC’s alleged policies regarding race and transgender people, as the basis for the suspension of federal funds from UCLA.

1 8. It is also my understanding that the Trump administration is demanding, as a condition
2 of restoring the suspended federal funds, that the UC Regents pay at least \$1 billion to the federal
3 government and agree to a host of programmatic demands affecting the rights of those on campus,
4 including demands that UCLA: prohibit demonstrations, protests, displays, and other expressive
5 activities in specified locations on the UCLA campus; prohibit overnight demonstrations in any
6 location; prohibit demonstrators from wearing masks in order to protest anonymously; share
7 disciplinary records of international students with the federal government; not recruit or admit
8 international students “likely to engage in anti-Western, anti-American, or antisemitic disruptions or
9 harassment”; implement trainings to ensure international students conform to campus norms; cooperate
10 with local and federal law enforcement, which includes immigration authorities; appoint a resolution
11 monitor with significant authority over campus affairs; permit the Trump administration to unilaterally
12 choose the resolution monitor if the University and the government cannot agree on the appointee;
13 review policies related to DEI efforts, including in faculty hiring, retention, and promotion; permit the
14 government to access and review a wide variety of records of university faculty, staff, and students;
15 prohibit gender-affirming care for transgender minors; and refuse to recognize transgender individuals’
16 gender identities.

17 9. Specifically, I am aware that the Trump administration issued a demand letter to the UC
18 that reportedly includes these and other demands, although a copy of the demand letter has not been
19 publicly shared.

20 10. I also understand that the Trump administration has threatened to cut more federal funds
21 from the UC if it does not comply with the administration’s demands.

22 11. I understand the Trump administration is engaging in other investigations targeting the
23 UC system and has indicated that if the UC does not agree to implement the administration’s demands
24 throughout the UC system as a whole, all of the UC’s federal funding will be at risk.

25 12. I am aware that the Trump administration has previously targeted other universities with
26 similar threats and demands. I understand the administration cut hundreds of millions and in some
27 cases billions of dollars in federal funding at other universities, including Harvard University,
28 Columbia University, Brown University, and the University of Pennsylvania, based on alleged

1 violations of civil rights laws, and then similarly conditioned restoration of those terminated funds on
2 the universities' capitulation to the Trump administration's monetary and ideological demands that
3 extend far beyond correcting any alleged civil rights violations.

4 13. I am aware that the administration's demands to targeted universities have included
5 significant financial payouts to the federal government, as well as various restrictions on academic
6 freedom and other forms of campus speech. For example, I am aware that the Trump administration
7 demanded that Columbia place the Department of Middle Eastern, South Asian, and African Studies
8 ("MESAAS") under receivership. I am also aware that the Trump administration demanded that
9 Harvard provide for "viewpoint diversity" among its faculty members, take away "power" from faculty
10 members who may be perceived as engaging in "activism," and discontinue any practices that the
11 Trump administration perceives to be connected to DEI principles.

12 14. The demands the administration has made to the Regents with respect to UCLA and
13 other universities strike at the very core of academic freedom and free-speech principles. In my view,
14 a fundamental purpose of a university is to produce new knowledge and to nuance and deepen existing
15 knowledge that exists. Universities and their faculty must give students tools to engage in this process,
16 which often includes thinking critically about background or hegemonic cultures and principles, or
17 "common sense." Scholars can use research techniques to better understand history and shape the
18 future, and often these processes are very uncomfortable. This is especially true in critical social
19 sciences where my job as a global studies professor is to think about, for instance, the relationship
20 between the United States, Israel, and Palestine. Knowledge, and the production of knowledge, are
21 always politicized, and currently they are politicized and attacked with the force of state violence. My
22 expertise provides me with skills to understand facets of this historical moment, and my role as a
23 professor requires me to share this expertise and these skills with students as they learn to do the same.

24 15. University faculty, researchers, and other academic staff cannot serve the core functions
25 of a university if they believe that they, their colleagues, their students, or their institutions will be
26 targeted because they express views or research topics that the current administration may deem
27 unfavorable.

28 16. I understand that Columbia, Brown, and the University of Pennsylvania have

1 nevertheless entered into agreements with the Trump administration to resolve the administration's
2 investigations against them, and that these agreements contain some of the terms that the Trump
3 administration demanded. For example, I am aware that Columbia agreed to pay \$200 million to the
4 federal government, conduct a review of the MESAAS Department in which I worked as a
5 postdoctoral student, hire faculty in certain subject areas that the Trump administration deems
6 favorable, and place certain restrictions on campus speech.

7 17. From my perspective, it appears the Trump administration's recent funding cuts and
8 demands targeting the UC system are taken from the same playbook as its efforts to exert control over
9 these other universities.

10 **Chilling Effects of the Trump Administration's Threats to the UC**

11 18. I have taught "Globalization: Culture and Society" for the last 10 years and
12 "International Development Studies I" for the last 5 years; both are undergraduate courses covering
13 material related to, among other things, Israel and Palestine, climate science, gender identity,
14 intersectionality, and whiteness as a racial category. I have also taught "Cultures of Capitalism,"
15 which covers Marxist materials and critiques of capitalism, as well as courses covering settler
16 colonialism and the transatlantic slave trade.

17 19. All of the undergraduate courses I teach fulfill UCLA's Diversity Requirement, which
18 requires students to take a course addressing racial, ethnic, gender, socioeconomic, sexual orientation,
19 religious, or other types of diversity.

20 20. My research concerns the anthropology of capitalism. My first book addressed how
21 American oil companies brought white supremacist labor structures to central Africa. I study how ideas
22 of race and racial value make markets in, for instance, labor and transnational oil markets. I study what
23 imperial relationships look like today through the lens of, among other theoretical schools, critical race
24 theory.

25 21. Based on public statements by administration officials, and the resulting funding freezes
26 to universities the administration regards as "left-wing" or "woke" or "Marxist," I understand the
27 Trump administration to oppose many of my areas of scholarship, including: critical analysis of the
28 role of the United States in the world; the relationships of violence underpinning the foundations of the

1 country, such as the transatlantic slave trade and settler colonialism; critical analysis of the United
2 States as white supremacist; the ways in which race, class, and gender structure markets; debt,
3 financialization, and debtors' unions; or any discussion of racism or critical race theory. By railing
4 against "woke" and "left-wing" scholarship, President Trump and other administration officials, such
5 as Education Secretary Linda McMahon and head of the DOJ Task Force to Combat Anti-Semitism
6 Leo Terrell, have clearly and repeatedly expressed their hostility to the content that I teach and study,
7 as well as to the modes of analysis I use to do so.

8 22. Additionally, I understand the Trump administration opposes scholars involving
9 "activism" in the classroom. In my roles with the Luskin Institute on Inequality and Democracy and as
10 an associate professor, I am employed to do exactly that, to work with communities and social
11 movements to inform both my own study and my teaching in the classroom.

12 23. The recent conduct by the Trump administration, and in particular the termination of
13 federal funding at UCLA with the threat of cuts to all future federal funding, have directly chilled and
14 altered my speech. For instance, I was planning to teach a course titled "Activist Anthropology" in the
15 winter quarter. In response to the Trump administration targeting UCLA and "activist" professors, I
16 have decided to change the name of my course to remove the word "activist." Moreover, I will cover
17 more right-wing social movements in my course. These changes are directly due to the Trump
18 administration's funding freeze and attempts to exert control over UCLA via the August 8 demand
19 letter. I am making these changes because I fear retaliation by the Trump administration against
20 myself, the Department of Anthropology, my students, and UCLA if I leave the word "activist" in the
21 title of the course and do not cover social movements that I find reprehensible in their advancement of,
22 for example, patriarchy and white supremacy.

23 24. My fears of retaliation based on what I teach in my undergraduate courses are amplified
24 by the possibility that, if a student files a complaint based on the content of my course or teaching, the
25 full weight of the federal government may be used to coerce UCLA into taking disciplinary action
26 against me. In light of UCLA's recent capitulations to the federal government and its willingness to
27 negotiate despite the government's clear goal of infringing on academic freedoms, I anticipate the
28 federal government would be able to succeed in coercing UCLA to discipline me based on my speech,

1 despite that speech being well within the bounds of the First Amendment and academic freedom.

2 25. I am also aware that members of the Trump administration have called upon private
3 citizens to report on faculty, students, and coworkers expressing disfavored views.

4 26. Although I wish to continue teaching the most important and most rigorous scholarly
5 content in my courses, because of the recent credible threats targeting the UC, I will change my course
6 curriculum to include more readings and teaching regarding conservative social movements. I am
7 afraid that if I do not include additional material regarding right-wing social movements in my
8 teaching, I will be targeted by the federal government and potentially be subjected to a federal
9 investigation.

10 27. I am also afraid that if I exercise my constitutional right to teach free of viewpoint
11 discrimination, the UC may take adverse action against me, including initiating an investigation into
12 my conduct, stripping me of tenure, or firing me, either at the federal government's direct instruction or
13 because UC itself fears governmental retaliation if it does not punish me for my speech. I am a Jewish
14 professor, and I have seen UCLA repeatedly fail to stand up for itself against false charges of
15 antisemitism, including by introducing policies restricting protest such as those finalized on September
16 19, 2025. If the government directs the UC to punish me based on my teaching, scholarship, and
17 viewpoints, I do not believe the UC will effectively resist.

18 28. I am further afraid that if I speak up, the government may seek to retaliate against all
19 my colleagues in the Anthropology Department, just as the government has already targeted specific
20 academic departments at other universities, such as by demanding Columbia place its MESAAS
21 Department—in which I worked as a postdoctoral student—under receivership.

22 29. I intend to continue self-censoring because I am afraid that, if I do not, the Trump
23 administration will follow through on its threats to terminate millions or potentially billions in federal
24 funding to the UC or impose oppressive policy changes that will harm me and other members of the
25 UC community.

26 30. I am not alone in having these fears. For instance, in the months since the current
27 federal administration began targeting the UC, some of my colleagues have edited their website
28 biographies to omit references to critical race theory or expressed uncertainty over continuing to teach

1 material on transgender identities.

2 31. These impacts have been even worse for my colleagues without tenure, who lack the
3 protection tenure can provide to speak one’s mind. Graduate students have also discussed with me
4 whether they should change the subject or content of their research to better appeal to the government’s
5 priorities for grant applications. And in my experience, undergraduates now fear being reported by
6 fellow students for saying the “wrong” thing.

7 32. A court order preventing the government from imposing conditions on UC funding that
8 would restrain and chill campus speech would enable me to speak more freely.

9 **Impacts of Recent Funding Cuts at UCLA**

10 33. I have already suffered and will continue to suffer irreparable harm as a result of the
11 Trump administration’s funding cuts targeting UCLA.

12 34. Progress in anthropology depends in part on federal funding. Federal funds have
13 supported the research that has led to a great deal of important work at UC in anthropology, including
14 research into the influence of the U.S. dollar on the African continent, studies of the way water ties
15 American communities together, and my book-length monograph on American oil companies in
16 Equatorial Guinea. These works and many others have been funded by Fulbright awards and NSF
17 grants.

18 35. I fear that the federal government’s targeting of the UC will immediately and severely
19 impact my ability to attract talented graduate students to continue important knowledge-making in
20 anthropology and my Department’s ability to attract talented faculty to join our Department. The July
21 and August funding freezes, combined with the threat of massive future freezes, have exacerbated the
22 financial issues UCLA faces. I understand that on August 20, 2025, UCLA announced a pause on
23 faculty hiring as a direct result of the July and August funding freezes. This causes tremendous harms
24 to me in my work, as I cannot successfully pursue my research to the same extent without skilled
25 graduate students and knowledgeable colleagues.

26 **Impacts of Threatened Federal Funding Cuts**

27 36. Federal funding is an essential component of the UC’s world-class research apparatus.

28 37. I have seen my colleagues at the UC and at other universities targeted by the Trump

1 administration, such as Harvard and Columbia, suddenly have their federal funding cut off without
2 warning or grant-specific explanation.

3 38. The threat of continued frozen funding and disfavored treatment of UCLA has caused
4 confusion for me and my colleagues. Without knowing whether our grant proposals face categorical
5 rejection, we face difficulties in planning our research activities.

6 39. If the federal government terminated all future funding to UCLA or the UC system,
7 they would become completely different entities. The UC would need to completely transform its
8 budget model. The impact on UCLA of losing all federal funding, as the government has threatened,
9 is so immense as to be almost unimaginable.

10 40. Throughout my career, my ability to work with others has been federally funded. My
11 research on pan-African capital was funded by a Fulbright award and an NSF award, my research on
12 Equatorial Guinea was funded by both as well, and many of my students and their research projects
13 have been funded by both. Being locked out of federal funding in the future would impede my ability
14 to collaborate with community partners and to conduct the kinds of research upon which I have built
15 my career.

16 **Additional Harms Resulting from Defendants' Actions**

17 41. As noted above, I understand that the Trump administration has threatened to terminate
18 more federal funding to the UC system unless the UC pays the government more than \$1 billion and
19 acquiesces to a host of oppressive demands. Specifically, I understand that the administration
20 demanded that UCLA implement: changes to protest rights, including prohibiting demonstrations in
21 certain areas at UCLA, prohibiting overnight demonstrations, and prohibiting demonstrators from
22 wearing masks; changes regarding international students, including sharing disciplinary records of
23 international students, implementing policies to ensure UCLA does not recruit or admit international
24 students who are “likely to engage in anti-Western, anti-American, or antisemitic disruptions or
25 harassment” and trainings to “socialize” international students; appointment of a monitor with
26 significant authority over campus affairs; review of policies and programs relating to DEI, including
27 faculty hiring, retention and promotion, curricular changes, and recommendations for restructuring;
28 and changes to admissions, including elimination of race- or ethnicity-based scholarships, use of any

1 “proxies” for race, and a bar on references to race in admissions materials.

2 42. I understand that there are other pending investigations against the UC system as a
3 whole and against specific campuses under Title VI, Title VII, and Title IX, and that the Trump
4 administration has threatened to impose these same demands UC-wide.

5 43. I understand that the UC is negotiating with the federal government to try to settle
6 pending charges and investigations.

7 44. I understand that, in what seems to me like an effort to appease the Trump
8 administration, the UC has already taken steps that are inconsistent with its past practices, and those
9 actions are harming me and my colleagues. For instance, as has been reported in the news, UC
10 Berkeley disclosed 160 names of faculty, students, and staff appearing in reports of alleged antisemitic
11 conduct to the federal government.

12 45. If the UC capitulates to the Trump administration’s demands, I will suffer additional
13 irreparable harm. If UC adopts the government’s restrictions on protest, overnight demonstrations, and
14 anonymous speech, I will refrain from engaging in protest to the same extent I did previously. I am a
15 mother, and the threat of jail time or federal involvement or oversight in campus policing would give
16 me new fear. I would be more afraid to participate in protests and to speak freely, and I would do so
17 less.

18 46. I also frequently interact with international students within my discipline. Part of my
19 responsibilities are to keep my students safe and to tell my students to learn and participate as deeply
20 and fully as they can. If the UC caves to vague demands to deny admission to international students
21 likely to engage in “anti-Western, anti-American” conduct, I would lose the ability to work with
22 students of certain viewpoints relevant to my work.

23 47. The appointment of an academic monitor would pose grave harms to my speech and
24 academic freedom. I am not aware of any information suggesting an academic monitor would have a
25 PhD in Anthropology or be well-versed in the research methods of the discipline. Without any formal
26 training relevant to the department they would be overseeing, it is not clear what else about my
27 teaching and research they could monitor besides its content. Even in the absence of a formal academic
28 monitor imposed by the federal government, I already plan to alter my speech by covering more right-

1 wing social movements in my upcoming course to protect myself and my students from possible
2 retribution. I would no doubt alter my speech further if the government coerced the UC into appointing
3 such an official.

4 48. UC capitulating to any restrictions on references to racial identity in admissions would
5 cause me irreparable harm. A core component of anthropology is reflexivity, that is, understanding
6 who you are, how that influences your view of the world, how your life trajectory has impacted your
7 scholarly interests, and what effect your identity as the observer or researcher has on the observed or
8 the subjects of your research. Evidence of reflexivity, including but not limited to a critical and
9 nuanced understanding of one's racial identity, is a key component of our holistic admissions rubric.
10 These considerations are crucial in deciding which 5 individuals out of the 200 annual applicants
11 would be best suited to the Department of Anthropology PhD program, or which individuals to accept
12 as faculty in the Department. Constraining our admissions decisions would directly impact our own
13 research, in which we often collaborate and discuss ideas with graduate students and other faculty.
14 Collaboration improves the quality of research and knowledge produced; restricting our ability to
15 choose the faculty with whom we might best collaborate would directly harm my own research.
16 Moreover, the UCLA Anthropology Department already uses the Alliance for Multi-campus, Inclusive
17 Graduate Admissions (AMIGA) framework in its holistic admissions process. A ban on references to
18 racial identity in applications would require our department—and much of the university—to revamp
19 our admissions framework. I and my colleagues would be required to spend time being trained in a
20 new admissions process and the accompanying software platform, time that would otherwise be spent
21 on the research that justifies and sustains our employment.

22
23 I declare under penalty of perjury that the foregoing is true and correct. Executed on October 1,
24 2025 in Los Angeles, California.

25 Signed: DocuSigned by: Hannah Appel
7FE2TCAATE7F48E...

26 Hannah Appel

27 Associate Professor of Anthropology