

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS, LEONARD
BRIGHT, VANITA REDDY, LONDON
SADLER, and AARON GEORGE,

Plaintiffs,

v.

ROBERT L. ALBRITTON, JAY GRAHAM,
DAVID C. BAGGETT, JOHN W.
BELLINGER, JAMES R. BROOKS,
MICHAEL A. HERNANDEZ III, WILLIAM
MAHOMES JR., KELLEY SULLIVAN
GEORGIADES, and SAM TORN, in their
official capacities as members of the Texas
A&M University System Board of Regents,

Defendants.

CIVIL ACTION NO. 4:26-cv-
06268

**DECLARATION OF TEXAS CONFERENCE OF AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS IN SUPPORT OF PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, Teresa Klein, declare as follows:

1. The facts set forth in this Declaration are based on my personal knowledge, and if called as a witness, I could and would competently testify to the following matters under oath.
2. I am both a Professor of Psychology at Del Mar College in Corpus Christi, Texas and the President of the Texas Conference of the American Association of University Professors

(“Texas AAUP-AFT”). I previously served as First Vice President of Texas AAUP-AFT. I am authorized to provide this Declaration on behalf of the Texas AAUP-AFT.

3. The Texas AAUP-AFT is a state conference of the national American Association of University Professors (“AAUP”) and is affiliated at the state level with the Texas American Federation of Teachers (“Texas AFT”). When faculty members join the Texas AAUP, they are also joining the Texas AFT. The Texas AAUP-AFT is organized into college and university AAUP chapters across Texas. The Texas AAUP-AFT exists to advance the interests and mission of the AAUP and its members in Texas. Texas AAUP-AFT provides members with guidance to navigate state and federal laws and advocates for academic freedom in Texas colleges and universities.

4. As of July 29, 2026, AAUP and Texas AAUP-AFT had 464 full members in the Texas A&M University System. Dues-paying members consist of part-time and full-time faculty, graduate students, and staff involved in the academic mission of their respective universities, excluding those in administrative roles.

5. Texas AAUP-AFT also has associate members spread across several Texas A&M University System campuses. Associate members consist of undergraduate students, staff not involved in the academic mission, those in administrative titles, and community members.

6. Since the announcement of System Policy 08.01 (the “Censorship Policy”), the Texas AAUP-AFT has received a near-constant deluge of questions and complaints from members at Texas A&M University System campuses. In these communications, members have expressed confusion and uncertainty about the scope of the Censorship Policy, as well as fears of censorship or discipline for teaching about various topics in A&M classrooms.

7. The questions and complaints from members concern topics such as uncertainty based on the lack of clear standards for what can and cannot be taught (including what the line between advocating or teaching is, what will be considered race or gender ideology, and what is considered a topic related to sexual orientation or gender identity), the arbitrary and inconsistent nature of the syllabus review processes across campuses, and the fact that the Censorship Policy generally bars the expression of certain politically disfavored views about race, gender, and sexual orientation in the classroom while allowing opposing, politically-approved views on the same topics.

8. There is also confusion about the exception process, which appears to be arbitrary and ad hoc. Members do not understand why some courses receive exceptions with no modifications, some courses are forced to remove content before being approved, some courses are forced to disclaim advocacy before being approved, and some courses fail to receive exceptions even after disclaiming advocacy or explaining their educational purpose.

9. The constant deluge of communications has also reflected the inevitable result of the Censorship Policy—a systemic degradation of academic freedom through the banning of ideas on campus. Members have reported their classes being canceled or their being forced to remove content from their classes because the class or content touched on politically disfavored ideas. And while some AAUP members have been told that they may not teach certain ideas or texts at all, others have had their courses removed from the core curriculum due to the Censorship Policy. Core courses typically have higher enrollment numbers because they are required for undergraduates. Non-core courses typically have substantially lower enrollment numbers because they do not satisfy the same requirements as core courses. Removing a course from the core curriculum means that fewer students are likely to be exposed to the ideas taught in the course than

would were the class part of the core curriculum. It also makes it more likely that a course will be cancelled due to low enrollment numbers.

10. AAUP members have been and will continue to be chilled in their speech as a result of the Censorship Policy and have been and will continue to be forced to censor their academic teachings to conform to the vague and shifting guidance from the Texas A&M University System if the Censorship Policy continues

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 31, 2026.

/s/ Teresa Klein