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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ARGHAVAN SALLES; ABIGAIL HATCHER;
ANDREA ROSSO; ANN D. COHEN-WILSON;
DOLORES ALBARRACÍN; HEIDI MOSESON;
JADE PAGKAS-BATHER; JONATHAN KYLE
DAW; KATIE EDWARDS; KELTON MINOR;
MICHAEL D. GREEN; SARA JACKSON;
SUZANNE BELL; JORDAN DOE 1; JORDAN DOE
2; JORDAN DOE 3; and JORDAN DOE 4, *on behalf
of themselves and all others similarly situated,*

Plaintiffs,

v.

NATIONAL INSTITUTES OF HEALTH; JAY
BHATTACHARYA, *in his official capacity as
Director of the National Institutes of Health*; UNITED
STATES DEPARTMENT OF HEALTH AND
HUMAN SERVICES; ROBERT F. KENNEDY, JR.,
*in his official capacity as Secretary of the United States
Department of Health and Human Services*; and
UNITED STATES DOGE SERVICE,

Defendants.

Case No. 3:26-cv-10510-SK

**DECLARATION OF
KATIE EDWARDS**

* Application for *Pro Hac Vice* Admission Forthcoming

** Out-of-State Licensee Renewal Pending

(Additional Counsel on Behalf of Plaintiffs)

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* Application for *Pro Hac Vice* Admission Forthcoming

1 I, Katie Edwards, declare:

2 1. I have personal knowledge of the facts set forth in this declaration, and if called to testify
3 as a witness thereto, could do so competently under oath.

4 2. I am a Professor of Social Work at the University of Michigan. My research focuses on
5 preventing sexual and related forms of violence among minority communities by using evidence-based,
6 affirming, and culturally-grounded approaches. My current work is focused on program development
7 and evaluation with Indigenous youth and communities, as well as LGBTQ+ youth. In 2025, I was
8 named by Stanford University as one of the top two percent researchers in the world, and ranked 25th
9 out of 13,543 researchers in the field of criminology. In my lab, we have some of the first studies ever to
10 show we have reduced violence and alcohol use among LGBTQ+ youth as well as sexual violence
11 among Indigenous youth.

12 3. I offer this declaration in my individual capacity and not on behalf of my employer.

13 4. My interest in this area of work began during my undergraduate studies. Through my
14 studies and volunteer work, I saw the damaging effects of sexual violence and other forms of violence,
15 and I wanted to learn how to prevent violence from happening in the first place. While most of my work
16 in graduate school focused on college students, early on in my career as an assistant professor, I realized
17 that most of the scientific literature at the time did not address the particular needs of LGBTQ+ youth, a
18 glaring gap especially given that this demographic experiences disproportionately higher rates of sexual
19 and other forms of violence. My passion grew from wanting to work to help all youth who were
20 experiencing these harms and especially youth experiencing high rates of violence about whom we as a
21 field had done relatively less research.

22 5. Before working at the University of Michigan, I was a Professor of Educational
23 Psychology at the University of Nebraska-Lincoln. Before that, I was an Assistant and Associate
24 Professor of Psychology at the University of New Hampshire.

25 6. I received my B.S. in Psychology in 2005 from the University of Georgia. I completed
26 my Ph.D. in Clinical Psychology at Ohio University in 2011, and I received a graduate certificate in
27 Women and Gender Studies from Ohio University that same year.
28

1 7. To date, I have published more than 240 peer-reviewed journal articles, which were made
2 possible, in part, through obtaining more than \$25 million in research funding over the course of my
3 career.

4 8. I have applied for and received 13 grants from the National Institutes of Health (NIH)
5 over the course of my career. The application process for each grant was a lengthy and involved one, but
6 that process—at least until recently—helped ensure that the most rigorous and impactful research is
7 conducted. In my experience, preparing an application requires months, if not years, of work—from
8 pilot studies, literature review or other background research, to input from community partners and
9 fellow researchers, to honing methodological design—and often new studies will build off of the work
10 and findings from previous studies.

11 9. I am a plaintiff in the lawsuit *American Public Health Association v. National Institutes*
12 *of Health*, No. 1:25-cv-10787 (D. Mass.). Several of my grants and research applications were the
13 subject of the lawsuit. The grant applications discussed in this declaration are separate from the grants
14 and applications that are at issue in that lawsuit.

15 10. I have had at least one grant application—an application for an R21 grant—for which I
16 have been told by NIH to remove certain words or concepts from the scope of my intended work. Our
17 goal with this study is to evaluate the impact of a sexual violence prevention program for youth living on
18 or near the Pine Ridge Indian Reservation.

19 11. Through previous work, we developed a program that served K-12 Indigenous youth,
20 with the goal of developing skills to reduce and prevent instances of sexual violence. The program was
21 tailored to the developmental needs of different age groups. For example, students in third through fifth
22 grade were grouped into the same program, where they learned skills like how to seek help from adults
23 if someone is hurting them. As another example, high school students were also grouped in one of two
24 classes, with high school girls getting lessons on empowerment self-defense, including verbal and
25 physical resistance strategies, and high school boys received lessons on bystander intervention, sexual
26 consent, and gender equity. There were six classes for each age bracket, and each class met once a week
27 for two hours. In total, around 650 students in schools on or near the Pine Ridge Indian Reservation
28 participated in this program, and we collected data in the form of surveys to measure the efficacy of this

1 program. However, we have not yet been able to thoroughly analyze the data we have collected due to
2 limited funding; new funding would permit staff to spend dedicated time processing and analyzing the
3 data, as well as allow us to hire a biostatistician to spend time dedicated to this project.

4 12. The goal of the R21 grant application is to evaluate the impact of this program using the
5 data that has been collected. Funding from this grant would go towards the time and labor to clean and
6 analyze the data and disseminate the findings. That would allow us to better understand the efficacy of
7 the program, which demographic subgroups benefitted from this program, and whether and how the
8 program could be implemented more broadly to benefit other Indigenous youth and communities. In
9 addition, conducting these analyses would benefit the members on the team who would be able to
10 disseminate the findings of this research in peer-reviewed journals, helping not only spread this
11 information to the broader scientific community but also supporting their career trajectory and
12 supporting more meaningful engagement with Tribal community members.

13 13. We submitted the R21 application in June 2025. Putting together this application took a
14 significant amount of time, totaling hundreds of hours over months across members of our team.

15 14. In February 2026, we received our summary statement for this application. In July 2026,
16 I emailed the program officer assigned to the application to meet to discuss it, and around that time, the
17 status of my application on eRA Commons changed from “Council Review Completed” to “Pending.”

18 15. On August 6, 2026, I met with my program officer to discuss this application. During that
19 meeting, she told me that I could not use the term “gender” in the application, and that instead I should
20 change the word “gender” to “biological sex.” Following that meeting, later that day, I received an
21 official request from NIH to submit Just-in-Time information for the application.

22 16. On August 10, 2026, the program officer assigned to my grant emailed me about the
23 status of the grant application. Attached hereto as Exhibit 1 is a true and correct copy of that email.
24 According to the program officer, “[t]he purpose of [that] email is to resolve any administrative issues
25 that may delay the release of a Notice of Award should we be able to fund your application pending
26 final NICHD leadership and budgetary review.” Ex. 1 at 1. In that email, the program officer also stated:
27 “To ensure alignment with Administration priorities, please adjust the term gender in the abstract and
28 specific aims when referring to biological sex. Use the attached word document template for the edits,

1 and have your [Authorized Organization Representative] submit the edits via email, back to me.”

2 Attached hereto as Exhibit 2 is a true and correct copy of the Word document template attached to that
3 email.

4 17. Following this conversation and email with my program officer, I revised the application
5 materials for this R21 grant application, changing the word “gender equitable attitudes” to “healthy
6 attitudes.” I did not and do not believe that the term “biological sex attitudes,” instead of “gender
7 equitable attitudes,” meaningfully or accurately describes the scope of our work. In addition, I revised
8 the application materials to change standalone uses of the word “gender” to “biological sex.” On
9 September 18, 2026, NIH issued a notice of award (NOA) for this grant (R21HD122186). Attached
10 hereto as Exhibit 3 is a true and correct copy of that NOA.

11 18. In light of these interactions with the program officer assigned to this grant application,
12 as well as the priority statements issued by NIH since 2025, including in August 2025 and December
13 2025, I am concerned that the revisions to my application will limit the scope and scientific accuracy of
14 our analyses, publications, and findings. Some of the youth in our study identify as Two Spirit,
15 transgender, or nonbinary, and restrictions on the use of the term “gender” may prevent us from fully
16 examining and reporting their experiences, meaning that we will not as fully be able to analyze the
17 impact of the program on these populations. More broadly, gender is central to the study and prevention
18 of sexual violence. Gender socialization, gender norms, and attitudes about gender and gender equity are
19 among the factors that can shape sexual violence and are directly relevant to understanding how and
20 why prevention programs work. Replacing a concept such as “gender equitable attitudes” with “healthy
21 attitudes” changes its meaning and makes it more difficult to accurately describe and evaluate the
22 mechanisms our intervention is designed to address. These restrictions could therefore cause our
23 analyses to miss important differences and nuances in how youth experience and respond to the
24 intervention and limit our ability to understand for whom and how the program works, which in turn
25 limits the scope of the recommendations that can be used to better public health. I am concerned that this
26 will both exclude or obscure the experiences of populations who may particularly benefit from this
27 research and reduce the scientific quality and usefulness of the findings. And I am worried about being
28

1 able to describe any work funded by this grant in publications or presentations in a manner that is
2 inconsistent with the language that NIH forced me to adopt in my application materials.

3 19. In addition, I have at least one R01 grant application that I have not resubmitted because
4 of the actions NIH has taken against disfavored viewpoints. The research that would be funded by this
5 grant application builds off the findings and research coming out of a successful R34 grant, titled
6 Development and Pilot Evaluation of an Online Intervention to Prevent Dating Violence and Problem
7 Drinking in Sexual Minority Youth. Through that R34 grant, my team developed and evaluated a new
8 intervention program (called the Promoting Resilient Youth and Strong Hearts and Minds program),
9 which provided online support and skill building to LGBTQ+ youth. The program consisted of one-hour
10 weekly sessions for nine weeks, where 2 LGBTQ+ adults would lead group sessions with 10-15
11 LGBTQ+ youth. Topics covered during these sessions included positive identity development,
12 debunking myths and dispelling stigma around being LGBTQ+, and building skills such as regulating
13 emotions and handling conflict. Our results showed that this type of program was an efficacious
14 intervention to reduce teen dating violence, alcohol use, and alcohol consequences in LGBTQ+ youth,
15 and findings from this work were published in the *Journal of Studies on Alcohol and Drugs*, a leading
16 peer-reviewed journal.

17 20. As is the standard scientific progression following a successful R34 grant, we submitted
18 an R01 application in early February 2025 to build on our prior work. Our goal with an R01 was to
19 evaluate the efficacy of the program in a larger sample, examine whether effects from the program
20 differed across demographic subgroups, and better understand how and why the program was producing
21 reductions in dating violence, alcohol use, and related harms in youth. Our goal was also to follow
22 participants for a substantially longer period, extending follow-up from 3 months in the R34 study to 18
23 months in the R01, which would allow us to determine whether the program's effects were sustained
24 over time.

25 21. In July 2025, NIH informed us that our application had been denied. The peer reviewers
26 recognized the significance and public health importance of the project, the strength of the pilot
27 findings, the expertise of the investigative team, and additional strengths of the proposed study. The
28 reviewers consistently recognized the need for an evidence-based intervention addressing teen dating

1 violence and alcohol use among LGBTQ+ youth and viewed the pilot findings from the R34 research as
2 promising. The principal critiques focused on methodological issues—including statistical modeling,
3 implementation details, and aspects of the analytic plan—that are readily addressable in an R01
4 resubmission, rather than fundamental concerns about the intervention itself or its scientific merit.

5 22. Under ordinary circumstances, I would have revised the R01 application and submitted a
6 revised R01 proposal. However, following the initial submission of this application, the federal funding
7 environment for research involving LGBTQ+ populations has changed substantially, appearing to target
8 and forbid studies explicitly including transgender and gender-diverse youth. Based on my experience as
9 an NIH-funded investigator and the changes I observed in NIH funding priorities and decision, along
10 with the public guidance issued by NIH in August 2025 and December 2025, I believe that the
11 likelihood of successfully obtaining funding for this R01 application in its intended form is extremely
12 low. My hesitation to resubmit this application is also informed by my experience of being told that I
13 must remove certain concepts from the other grant application discussed above. Especially in light of the
14 experiences discussed in this declaration, I am concerned that I would have to remove certain
15 demographic populations from the R01 application before resubmitting, such as transgender individuals,
16 nonbinary individuals, and racial and ethnic minorities. Doing so would not only exclude populations
17 who experience disproportionately high rates of dating violence and alcohol-related harms from research
18 intended to benefit them, but would also weaken the scientific value of the study by preventing us from
19 examining important differences and nuances in how the intervention works for youth with different
20 identities and experiences.

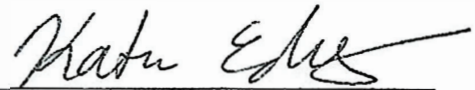
21 23. At this time, I am not sure whether I will resubmit this R01 application. Even if I do, the
22 application will not be as strong, and will not benefit as broad of a population, as it would be if I could
23 resubmit with the populations and terms targeted by the NIH.

24 24. I have never been so scared in my life about the future of our field and my work. Many of
25 our major grants are nearing an end, and in light of the current censorship by the NIH, I am concerned
26 about the ability to obtain enough funding to support my staff of approximately 50 individuals. I am also
27 concerned about the erasure of populations in public health—such as transgender, Two-Spirit, and
28 nonbinary individuals—who experience substance abuse, sexual assault, and dating violence at higher

1 rates than the general population, and who would therefore stand to benefit significantly from research
2 aimed at understanding and addressing those disparities. And at a personal level, I am concerned that,
3 even if I do receive funding with revised and more limited grant proposal, the restrictions required to
4 obtain that funding will compromise the scientific quality of our research. The restrictions required to
5 obtain that funding may prevent us from asking important research questions, examining meaningful
6 differences across populations, accurately studying factors such as gender that are central to
7 understanding and preventing violence, and fully reporting what our data show. These limitations would
8 ultimately reduce the usefulness and impact of the research and the publications that result from it,
9 hinder the development of effective prevention strategies, and reduce the positive impact of this research
10 on the health of LGBTQ+ youth and/or Indigenous youth.

11 25. I understand that, as a class representative, I represent the interests of everyone in the
12 class, and not just myself. I am prepared to stay informed about what is happening with my case and
13 stay in touch with my attorneys to give them information they need. I am committed to being a class
14 representative because I do not want other researchers to be subjected to the same unlawful policies and
15 actions that I have experienced. I have never served as a class representative in any prior action.

16
17 I declare under penalty of perjury that the foregoing is true and correct, and that this declaration
18 was executed at Ann Arbor, Michigan this 22nd day of September 2026.

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22 Katie Edwards
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