

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Michel DeGraff,

Plaintiff,

v.

Massachusetts Institute of Technology;
Tim Walberg in his official capacity as
the Chairman of the House Committee
on Education & Workforce; and
The House Committee on Education
& Workforce,

Defendants.

Case No. 1:26-cv-11488-ADB

**DECLARATION OF ANTONIO MORIELLO IN SUPPORT OF DEFENDANT
MASSACHUSETTS INSTITUTE OF TECHNOLOGY'S
MOTION TO DISMISS COUNT I OF THE COMPLAINT**

Antonio Moriello hereby states as follows:

1. I serve as Counsel in the Office of General Counsel at Massachusetts Institute of Technology (MIT). I make this declaration in support of MIT's Motion to Dismiss Count I of Plaintiff's Complaint. I have personal knowledge of the contents of this declaration and could testify thereto.

2. Attached as **Exhibit A** is a true and correct copy of the Majority Staff Report of the Committee on Education & the Workforce, U.S. House of Representatives (the "Committee"), *Antisemitism on College Campuses Exposed*, dated October 31, 2024. Exhibit A is quoted in the Complaint at paragraphs 43, 45, 60, and 118 and further referenced at paragraphs 46, 47, 93, 179, and 185.

3. Attached as **Exhibit B** is a true and correct copy of the March 8, 2024 letter from Committee Chairwoman Virginia Foxx to MIT President Sally Kornbluth and Chair of the MIT Corporation Mark P. Gorenberg. Exhibit B is quoted in the Complaint at paragraphs 42 and 53 and further referenced at paragraph 41, 45, 93, 122, and 182–88.

4. Attached as **Exhibit C** is a true and correct copy of the December 11, 2025 letter from Committee Chairman Tim Walberg to MIT President Sally Kornbluth. Exhibit C is quoted in the Complaint at paragraphs 15, 43, 49–54, and 64 and further referenced at paragraphs 17, 26, 41, 45, 93, 122, and 182–88.

5. Attached as **Exhibit D** is a true and correct copy of the Committee’s Majority Staff Report, *How Campuses Became Hotbeds: The Rise of Radical Antisemitism on College Campuses*, issued March 17, 2026. Exhibit D is quoted in the Complaint at paragraphs 1, 11, 33–40, and 53 and further referenced at paragraphs 2–4, 41, 57, 93, 122, 179, and 185.

6. Attached as **Exhibit E** is a true and correct copy of the March 17, 2026 letter from Committee Chairman Tim Walberg to MIT President Sally Kornbluth. Exhibit E is referenced in the Complaint at paragraphs 3, 57, 71, 72, 93, and 182–88.

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

Dated: June 2, 2026



Antonio Moriello

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of June, 2026, I caused the foregoing to be electronically filed with the clerk of the court for the U.S. District Court for the District of Massachusetts, by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record, a true and correct copy of the foregoing instrument and all attachments.

Dated: June 5, 2026

/s/ Ishan K. Bhabha

Ishan K. Bhabha