

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS-HARVARD  
FACULTY CHAPTER,

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS AT NEW  
YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS-AMERICAN  
FEDERATION OF TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and the DEPARTMENT  
OF STATE,

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, and the  
DEPARTMENT OF HOMELAND  
SECURITY,

TODD LYONS, in his official capacity as  
Acting Director of U.S. Immigration and  
Customs Enforcement,

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

UNITED STATES OF AMERICA,

Defendants,

Civil Action No. 1:25-cv-10685

**[PROPOSED] BRIEF OF AMICUS CURIAE THE PRESIDENTS' ALLIANCE ON  
HIGHER EDUCATION AND IMMIGRATION IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

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**INTEREST OF *AMICUS CURIAE***

*Amicus curiae* the Presidents’ Alliance on Higher Education and Immigration (the “Alliance”) submits this brief to advise the Court of the effects of the administration’s policy of targeting non-citizen students and faculty at institutions of higher education throughout the country based on their political views.<sup>1</sup> The Alliance is uniquely positioned to do so. It consists of over 570 presidents and chancellors of colleges and universities who lead institutions public and private, large and small, urban and rural, faith-based and secular, across the country. These institutions collectively educate over five million of the approximately eighteen million post-secondary students in the United States and contribute to our nation’s economic growth, innovation, and national security. The Alliance is dedicated to increasing public understanding of the impact of immigration policies on higher education, supporting policies that encourage international students and scholars to enrich American institutions of higher learning, and ensuring a talent pool that contributes to our communities and nation. It has a strong interest in explaining the policy’s effects.

The following 86 institutions and associations support the Alliance’s filing of this brief:

AIRC: The Association of International Enrollment Management	Gustavus Adolphus College	Santa Clara University
Amherst College	Hamilton College	Scripps College
Antioch College	Hamline University	Seattle University
Association of Catholic Colleges and Universities	Harold Washington College	Smith College
Association of International Education Administrators (AIEA)	Haverford College	Soka University of America
Augsburg University	Hofstra University	St. Catherine University
	Illinois Institute of Technology	St. Lawrence University
	Loma Linda University	St. Olaf College
	Loyola University Maryland	Suffolk University
		Swarthmore College

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<sup>1</sup> No counsel for a party authored this brief in whole or in part, and no counsel or party made a monetary contribution intended to fund the preparation or submission of this brief. No person other than *amicus curiae* made a monetary contribution to the preparation or submission of this brief.

Augustana College	Macalester College - Saint Paul, MN ( MBR )	The College of St Scholastica
Bard College	Maine College of Art and Design	The College of Wooster
Bates College	Marymount University	The President & Fellows of Middlebury College
Bennington College	Maryville College	The President and Trustees of Colby College
Bentley University	Michigan State University	Toyota Technological Institute at Chicago
Carleton College	Mount Holyoke College	Trinity College (CT)
Clark University	MSU Denver	Trinity Washington University
College of Saint Benedict and Saint John's University	Naropa University	Trustees of the College of the Holy Cross
College of the Atlantic	National Association for College Admission Counseling	University of Dayton
Concordia College	Northern Illinois University	University of Maryland Eastern Shore
Concordia University St. Paul	Notre Dame de Namur University	University of Redlands
Delaware State University	Occidental College	University of San Diego
Dominican University	Oregon State University	University of St. Thomas
Donnelly College	Pacific Lutheran University	University of the West
Eastern Oregon University	PEN American Center, Inc.	University System of Maryland
Edgewood College	Pitzer College	Wesleyan University
Foothill-De Anza Community College District	Pomona College	Western Oregon University
Fordham University	Reed College	Williams College
Georgetown University	Regis University	
Gonzaga University	Riverside Community College District	
Goucher College	Rutgers, The State University of New Jersey	
Grinnell College		

**PRELIMINARY STATEMENT**

The policy has created a climate of fear among non-citizens at American colleges and universities. The administration has made high-profile arrests of non-citizens based on their political views, revoked the visas of hundreds of international students, and terminated foreign students' records in the Student Visitor and Exchange System ("SEVIS"). It is also threatening the ability

of schools to enroll any foreign students at all through decertification under the Student Exchange and Visitor Program (“SEVP”). Seeing these actions, non-citizen students and faculty report being scared that they, too, will be targeted by the administration. As Tufts University said recently: “In the worst cases, many [foreign students] report being fearful of leaving their homes, even to attend and teach classes on campus.”<sup>2</sup> This fear extends beyond non-citizens who have expressed pro-Palestinian views; many are afraid of expressing any political views contrary to those of the current administration for fear of reprisal.

This climate of fear will repel international students, scholars, and other non-citizens from attending or teaching at American colleges and universities—all of which will harm the United States in multiple ways. Reduced non-citizen enrollment in American schools will harm American students, who will be denied the educational benefits of learning with and from citizens of other countries. It will harm American colleges and universities too, as they lose those educational benefits and lose enrollments, faculty, and tuition. It will harm the American economy, limiting the economic contributions made by hundreds of thousands of non-citizens. Because of the high concentration of non-citizens in scientific and technological fields, it will hurt American research and innovation. And it will exacerbate the troubling trend of top foreign students choosing non-US institutions over American schools—handing a competitive advantage to other countries.

This reality exposes the policy’s underlying premise as false. The policy presumes that it will benefit the United States while harming only those non-citizens whom the administration disfavors. In fact, in the long run, the policy will benefit other countries—by encouraging ever more non-citizens to attend foreign schools instead of American schools—and it will grievously harm

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<sup>2</sup> *University Declaration for Rümeyşa Öztürk*, Tufts Univ. (Apr. 2, 2025), <https://tinyurl.com/yck9pa8y>.

the United States, by depriving this country of the many benefits that non-citizens at American colleges and universities provide and by diminishing American higher education.

## ARGUMENT

### **I. THE ADMINISTRATION’S POLICY HAS CREATED A CLIMATE OF FEAR AMONG NON-CITIZENS AT U.S. COLLEGES AND UNIVERSITIES**

#### **A. The President’s Executive Orders and the Administration’s Actions**

Shortly after taking office, the President issued two executive orders relating to non-citizens at United States post-secondary institutions.<sup>3</sup> The administration has since arrested several non-citizens involved with higher education based on their purported political views, including (1) Mahmoud Khalil, a recent graduate of Columbia University’s School of International Public Affairs;<sup>4</sup> (2) Badar Khan Suri, an Indian scholar at Georgetown University whose research focuses on peacebuilding in the Middle East;<sup>5</sup> and (3) Rūmeysa Öztürk, a Turkish Ph.D. student at Tufts University and Fulbright scholar.<sup>6</sup>

The administration has also revoked the visas or statuses of and initiated removal proceedings against many non-citizens based on their purported roles in on-campus political advocacy, including Yunseo Chung, a US permanent resident and junior at Columbia University, and Ranjani Srinivasan, an Indian citizen and Fulbright recipient attending Columbia’s Graduate School of Architecture, Planning and Preservation.<sup>7</sup>

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<sup>3</sup> Compl. ¶¶ 25-29.

<sup>4</sup> Karina Tsui, *What We Know About the Federal Detention of Activists, Students and Scholars Connected to Universities*, CNN (Apr. 2, 2025), <https://tinyurl.com/359wbssz>.

<sup>5</sup> *Id.*

<sup>6</sup> Gloria Pazmino et al., *What We Know About the Tufts University PhD Student Detained by Federal Agents*, CNN (Mar. 28, 2025), <https://tinyurl.com/bdcwb4cs>

<sup>7</sup> Tsui, *supra* note 4.

In some cases, there is no clear link between the targeted non-citizen's political activity and their visa revocation. For example, University of Alabama mechanical engineering graduate student Alireza Doroudi was arrested and detained by ICE agents on March 25, 2025, although there is "no evidence" that he was involved in pro-Palestinian advocacy on campus.<sup>8</sup> As of April 8, 2025, the administration has revoked the status of over 500 non-citizens, including many international students, in some cases based on alleged participation in campus activism or social media activity deemed contrary to administration policies.<sup>9</sup> The Secretary of State said of these revocations: "If [non-citizens are] taking activities that are counter ... to our national interest, to our foreign policy, we'll revoke the visa,"<sup>10</sup> without explaining what actions the administration believes are contrary to the nation's interests or its foreign policy. According to media reports, the administration uses artificial intelligence to identify possible infractions, including by scraping the social media accounts of non-citizens.<sup>11</sup>

The administration has cancelled the visas of many foreign students without notifying the colleges or universities that they attend.<sup>12</sup> Administrators at Minnesota State University, for example, learned that the visas of five students had been revoked only after running a status check in a

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<sup>8</sup> Patrick Darrington, *Video Captures ICE Agents Detaining Alireza Doroudi, Iranian Born Alabama Doctoral Student*, AL.com (Apr. 4, 2025), <https://tinyurl.com/3vmwuepu>.

<sup>9</sup> Andrew Jack, *US revokes more than 500 foreign student visas*, FT (Apr. 8, 2025) <https://tinyurl.com/4rz4wzpt>.

<sup>10</sup> Press Release, U.S. Department of State, *Secretary of State Marco Rubio Remarks to the Press* (Mar. 28, 2025), <https://tinyurl.com/3hkz2cum>.

<sup>11</sup> Marc Caputo, *State Dept. to Use AI To Revoke Visas of Foreign Students Who Appear 'Pro-Hamas'*, Axios (Mar. 6, 2025), <https://tinyurl.com/bdas984h>.

<sup>12</sup> Collin Binkley et al., *Federal Officials are Quietly Terminating the Legal Residency of Some International College Students*, Associated Press (Apr. 4, 2025), <https://tinyurl.com/3wbhda83>.

database of international students.<sup>13</sup> The Alliance has received reports that the government has revoked hundreds more visas without providing any basis for its decision.<sup>14</sup>

The administration is also terminating the SEVIS student record of the students whose visas it revokes—a change from prior practice, under which students with revoked entry visas retain their status and could remain in the country as long as they were enrolled in courses.<sup>15</sup> By terminating the students’ SEVIS record, the administration appears to be paving the way to arrest and deport them.<sup>16</sup>

The administration is also threatening higher education institutions’ ability to enroll any foreign students. Under SEVP, certified post-secondary institutions may issue eligibility certificates to prospective international students (which the students may use to apply for student visas) and enroll them after they enter the country.<sup>17</sup> In the past, the government has decertified institutions that it determined were issuing too many certificates as a ruse to enable students to live and work in the United States.<sup>18</sup> The administration now threatens to decertify schools that it determines have “too many bad apples in one place,” including those whom the administration deems

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<sup>13</sup> *Id.*

<sup>14</sup> See also Vimal Patel, *Nearly 150 Students Have Had Visas Revoked and Could Face Deportation*, NY Times (Apr. 7, 2025), <https://tinyurl.com/6vcjrv62>

<sup>15</sup> See Liam Knox, *Smashing the Student Visa System*, Inside Higher Ed (Apr. 3, 2025), <https://tinyurl.com/pcjy94bt>; Juliet Schulman-Hall, *Trump Administration Revokes Visas of 5 UMass Amherst Students*, MassLive (Apr. 5, 2025), <https://tinyurl.com/34tcanws>; Jaweed Kaleem, *Trump Administration Cancels Dozens of International Student Visas at University of California, Stanford*, Los Angeles Times (Apr. 5, 2025), <https://tinyurl.com/43xjf23z>.

<sup>16</sup> *Id.*

<sup>17</sup> *Getting Started with SEVP Certification*, U.S. Department of Homeland Security, <https://tinyurl.com/2p9uru88>.

<sup>18</sup> Caputo, *supra* note 10.

as holding pro-Hamas views.<sup>19</sup> “I don’t think we’re at that point yet,” said a U.S. official, “[b]ut it is not an empty threat.”<sup>20</sup> If the administration revokes a school’s SEVP certification, that school will no longer be able to admit any foreign students.<sup>21</sup>

**B. The Administration’s Actions Sow Fear and Uncertainty Across Post-Secondary Institutions**

The administration’s actions have created a climate of fear among non-citizen students on campuses across the country. Several non-citizen students targeted by the administration, fearing reprisals if they challenged their visa revocations, have opted to leave the United States instead. Rajani Srinivasan, an Indian graduate student at Columbia, left the country after the administration revoked her visa and ICE agents appeared at her door without a warrant. “The atmosphere seemed so volatile and dangerous,” she said, “[s]o I just made a quick decision.”<sup>22</sup>

Non-citizen students wonder whom the administration will target next. A British student at Harvard University said: “There is a concern amongst international students—and there were many international students who did participate in pro Palestinian activities on campus—that they could be targeted by the Trump administration and made an example of through deportation, and that Harvard will not have the power to stop that.” She continued: “As an international student,

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<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> Luis Ferré-Sadurni & Hamid Aleaziz, *How a Columbia Student Fled to Canada After ICE Came Looking for Her*, N.Y. Times (Mar. 15, 2025), <https://tinyurl.com/5n83bn4z>; see also Tsui, *supra* note 4 (listing other non-citizen students who have left the United States).

you can imagine that's very scary to know that at any point in time, your future outlook and what you had imagined for yourself can go away overnight.”<sup>23</sup>

Non-citizens at Columbia University said that “they feel they must be careful who they speak to and censor what they say. They fear being questioned by [ICE] agents, having their visas revoked or being arrested and detained. Some feel like they are being watched while walking around Morningside Heights and on campus[.]”<sup>24</sup> An Indian student said: “What scares me the most is that I would be fast asleep at home and I would hear a bang on my door and I'd be taken away in the middle of the night by [ICE] and nobody will ever know what happened to me. ... It feels as if people are getting targeted for just speaking up for their political views last year.”<sup>25</sup> A Russian master's student likened the atmosphere on campus to that in Russia when police were “knocking on doors to draft male citizens at the start of the Russia-Ukraine war. ... ‘[I]t feels like “the police state is coming after you.””<sup>26</sup>

This fear is pervasive. “There is a palpable sense of fear among international students on campus,” said the director of Columbia University Law School's Immigrants' Rights Clinic, which has been “inundated with requests for legal consultation.” She continued: “They are worried about what may happen to their student visas. They are concerned that they may not be able to complete their degree programs if they are targeted. They're wondering how they can make changes to their

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<sup>23</sup> Samuel A. Church & Cam N. Srivastava, *As Trump Floats New Travel Restrictions, International Students Look for Guidance from Harvard*, The Harvard Crimson (Mar. 13, 2025), <https://tinyurl.com/nhhxzhve/>.

<sup>24</sup> Jazzmin Jiwa, *'I could be next': International Students at Columbia University Feel 'Targeted' After Mahmoud Khalil's Arrest*, The Guardian (Mar. 19, 2025), <https://tinyurl.com/2t82svy4>.

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

daily life to reduce the risk.”<sup>27</sup> After two Saudi Arabian students at North Carolina State University who were both “in good standing” on campus decided to leave the country following the administration’s revocation of their visas, the school’s chancellor stated: “the university’s international students are ‘very concerned’ about the revocations of visas taking place around the country.”<sup>28</sup> After a student at Temple University also opted to leave the country after their visa was revoked, Temple’s president similarly said: “News like this is distressing and frightening, especially for international members of our community.”<sup>29</sup> Following Öztürk’s arrest, Tufts University said: “In the worst cases, many [foreign students] report being fearful of leaving their homes, even to attend and teach classes on campus.”<sup>30</sup>

Non-citizens fear being targeted for expressing any views contrary to those of the administration. A South Asian graduate student at the University of Rochester said: “it feels too risky to speak about LGBTQ+ causes ... or even be seen near a political demonstration.”<sup>31</sup> A chemistry professor living in Canada recently turned down an invitation to attend a conference in the United States, fearing “that because of her vocal support of diversity, equity, and inclusion (DEI) initiatives—a target of the Trump administration—she will be hassled by border guards.”<sup>32</sup> One

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<sup>27</sup> Liam Knox, ‘Palpable Fear’ Hangs Over International Students, Inside Higher Ed (Mar. 18, 2025), <https://tinyurl.com/y85jh578>.

<sup>28</sup> Korie Dean, *NC State Students Who Lost Visas were in ‘Good Standing’ with University, Chancellor Says*, The News & Observer (Apr. 3, 2025, 1:11 PM), <https://tinyurl.com/pdn6rcnx>.

<sup>29</sup> Susan Snyder, *Temple Student Whose Visa was Revoked has Self-deported, University Says*, Philadelphia Inquirer (Apr. 2, 2025), <https://tinyurl.com/4vabmzny>.

<sup>30</sup> Tufts University, *supra* note 2.

<sup>31</sup> Carolyn Thompson, *International Students Weigh New Risks of Pursuing Higher Education in the US Under Trump*, Associated Press (Mar. 25, 2025, 12:14 AM), <https://tinyurl.com/4u266tn6>.

<sup>32</sup> Katie Langin, *International Scientists Rethink U.S. Conference Attendance*, Science (Mar. 31, 2025), <https://tinyurl.com/3b58ybd2>.

Alliance member institution reports that visa-holders fear majoring in certain subjects, taking specific classes, and facing backlash from prior art exhibits. Even student newspapers are anonymizing non-citizen sources and journalists who risk immigration consequences, in some cases pausing publication or deleting existing articles.<sup>33</sup> As one editor of a campus outlet said: “For students who disagree with the Trump administration’s stance, they fear real retaliation.”<sup>34</sup>

## **II. THIS CLIMATE OF FEAR WILL REPEL NON-CITIZENS FROM ATTENDING U.S. COLLEGES AND UNIVERSITIES, THREATENING U.S. INTERESTS**

The policy threatens to significantly reduce the number of foreign students and other non-citizens seeking to attend U.S. post-secondary institutions. The executive director of the Association of International Enrollment Management (“AIRC”), an organization focused on recruiting and enrolling international students, said: “It has a chilling effect[.] ... [A]ll of this cumulatively produces an impression that the U.S. is not welcoming, it’s not open or that you may be in some kind of danger or jeopardy if you do come to the U.S.”<sup>35</sup> AIRC reports a consensus among recruiting agencies in India, the largest source of foreign students coming to the United States, that “far fewer of that country’s students are interested in American colleges than in recent years.”<sup>36</sup>

Available data show that foreign student interest in attending American schools has plummeted since the policy went into effect. StudyPortals, an online portal used by 55 million prospective international students from 240 countries to learn about and apply to international programs, reports that the demand for international graduate students to study in the United States “has

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<sup>33</sup> Anvee Bhutani, *US Student Journalists Go Dark Fearing Trump Crusade Against Pro-Palestinian Speech*, *The Guardian* (Apr. 7, 2025), <https://tinyurl.com/mtzvpa2w>.

<sup>34</sup> *Id.*

<sup>35</sup> Thompson, *supra* note 31.

<sup>36</sup> *Id.*

dropped a dramatic 42% since the beginning of the year.”<sup>37</sup> A March 2025 survey performed by an international student placement organization similarly found that more than one in four international students say that they “[have] soured on studying in the U.S.”<sup>38</sup>

The decline in non-citizen enrollment at American colleges and universities caused by the policy will harm the United States in multiple ways.

#### **A. The Policy Will Harm U.S. Students**

The policy threatens to deny American students the many benefits of interactions with non-citizens. A comprehensive report by the Association of International Educators (“NAFSA”) explained that college life provides many American students with their “first close and extensive contacts with foreigners,” helping to prepare them for such interactions over the course of their lives.<sup>39</sup> Exposing domestic students to international students on American campuses is especially critical because few domestic students study abroad; in the academic year 2022-2023, less than 2% of domestic students did so.<sup>40</sup> The NAFSA report also found “ample evidence” that “[i]nternational student enrollments and international teaching assistants enable universities to offer

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<sup>37</sup> Nathan M. Greenfield, *Interest in studying in US dropped 42% in January*, Univ. World News (Mar. 18, 2025), <https://tinyurl.com/ycxz5pcm>.

<sup>38</sup> Liam Knox, *Colleges Fear Decline in International Student Enrollment*, Inside Higher Ed. (Mar. 19, 2025), <https://tinyurl.com/45c5y76m>.

<sup>39</sup> *In America’s Interest: Welcoming International Students: Report of the Strategic Task Force on International Student Access* 6, NAFSA (Jan. 2003), <https://tinyurl.com/mr2ak99k>.

<sup>40</sup> *U.S. Study Abroad*, Open Doors (2024), <https://opendoorsdata.org/annual-release/u-s-study-abroad/> (In 2022-2023, 280,716 American students studied abroad); *Fast Facts 2024* 1, Open Doors (2024), <https://tinyurl.com/39yhec6t> (In 2022-2023, there were 17,904,092 domestic students and 1,057,188 international students for a total of 18,961,280 students at American institutions).

classes to American students that would not otherwise be available.”<sup>41</sup> It stated: “[G]raduate education as we know it could not function without international students.”<sup>42</sup>

Studies confirm these benefits. A 2013 study, for example, concluded that interaction between American and international students “was consistently and positively correlated with college outcomes and that U.S. students who interacted extensively with international students reported higher levels of engagement in college activities, such as coursework outside the major, contact with faculty outside class, ethnic or cultural clubs or organizations, and visiting speakers.”<sup>43</sup> A 2020 study concluded that “foreign students increase the performance of host universities with respect to the graduation numbers of all and native students.”<sup>44</sup>

American students recognize and want these benefits. As the President of an Alliance member institution reports, the institution’s 2023 prospective student survey indicated that the opportunity to learn from faculty with a global perspective, and to learn on a campus with students from around the world were the most important and compelling aspects of the college experience.

By causing a decline in non-citizen enrollments, the policy threatens to deprive American students of these benefits and the opportunity to pursue certain fields. A 2021 National Foundation

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<sup>41</sup> *In America’s Interest*, *supra* note 39.

<sup>42</sup> *Id.*

<sup>43</sup> Jiali Luo & David Jamieson-Drake, *Examining the Educational Benefits of Interacting with International Students*, 3 *J. Int’l Stud.* 85, 87 (2013), <https://tinyurl.com/yvm6p7cp> (compiling studies on the benefits international students provide to domestic students).

<sup>44</sup> Melaku Abegaz et. al., *Does The Presence of International Students Improve Domestic Graduations in the US?* 75 *The Quarterly Rev. Econ. & Fin* 95, 98 (Feb. 2020), <https://tinyurl.com/4r3cjp5h>.

for American Policy study concluded that “it would be difficult to maintain important graduate programs without international students,” including in engineering and computer science.<sup>45</sup>

Reducing these interactions will not only harm individual students—it will harm the nation. As a review of the strategic benefits of international student access found: “The ties formed at school between future American and future foreign leaders have facilitated innumerable foreign policy relationships. The millions of people who have studied in the United States over the years constitute a remarkable reservoir of goodwill for our country, perhaps our most undervalued foreign policy asset.”<sup>46</sup> As former Secretary of Defense Robert Gates recognized, the cross-cultural understanding gained through these interactions is critical to national security:

We cannot begin to understand other countries and deal with security challenges around the world if we don’t have leaders—not just in government but in other sectors as well—who understand those cultures and the history and something about those nations’ interests. And the best way that people can get a foundation for that is by having both direct experience and studying it in school. ... [W]e have had enormous success over the years with students coming to this country, including as adults to professional schools and professional military schools and learning about us.<sup>47</sup>

## **B. The Policy Is Harming and Will Harm U.S. Colleges and Universities**

The policy is hampering the ability of American colleges and universities to carry out their educational missions. Regardless of their individual views on campus political activity, Alliance members are firmly committed to the constitutionally-protected rights of freedom of speech and assembly for citizens and non-citizens. These freedoms are not only central tenets of American

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<sup>45</sup> *International Students in Science and Engineering* 1, National Foundation for American Policy (Aug. 2021), <https://tinyurl.com/4ar264r5>.

<sup>46</sup> *In America’s Interest*, *supra* note 39 at 5.

<sup>47</sup> *An Interview with Former Secretary of Defense Robert M. Gates*, NAFSA (2012), <https://tinyurl.com/3pftd4af>.

democracy; they are necessary to create the free academic inquiry at the core of teaching and research at American colleges and universities. By restricting these freedoms, the policy strikes at the heart of American higher education.

The policy is also harming post-secondary institutions by effectively restricting non-citizens' freedom of movement. As Tufts University said: "The free movement of our international community members is ... essential to the functioning of the University and serving our mission. The University has heard from students, faculty and staff who are forgoing opportunities to speak at international conferences and avoiding or postponing international travel."<sup>48</sup> Some institutions, including the University of California Berkeley<sup>49</sup> and Brown University<sup>50</sup> have felt compelled to caution international students against international or even domestic travel.

By revoking students' visas and terminating their SEVIS records without informing their schools, the administration is also preventing colleges and universities from properly advising their non-citizen students on how to comply with federal law and from ensuring their own compliance. University officials said that the "[administration's] tactics are severely limiting universities' options to help students who may be targeted by ICE."<sup>51</sup> "Many [university officials] fretted over how to advise affected students without running afoul of immigration authorities themselves."<sup>52</sup> One said: "We're in a strange new world where little from past practice seems to apply."<sup>53</sup>

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<sup>48</sup> Tufts University, *supra* note 2.

<sup>49</sup> Langin, *supra* note 32.

<sup>50</sup> Lexi Lonas Cochran, *Brown University Tells International Community to Avoid Foreign Travel*, The Hill (Mar. 17, 2025, 3:06 PM), <https://tinyurl.com/3bpu23xc>.

<sup>51</sup> Knox, *supra* note 15.

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

In the longer term, declining international student enrollment caused by the policy will financially harm American colleges and universities—a lot. International students are a significant and dependable source of tuition payments: approximately 80% pay full tuition,<sup>54</sup> and they must demonstrate that they can fund their tuition at the start of each academic year.<sup>55</sup> In total, they pay tens of billions of dollars in tuition to American universities and colleges every year.<sup>56</sup> As outlined in Appendix 1, for example, estimated tuition revenues from international students at just the twenty top-ranked universities with the largest international enrollments would be over \$7.3 billion a year—even if the 20% of international students who do not pay full tuition paid nothing.

Higher tuition payments by international students also help boost American student enrollments: A 2017 study found that adding ten international students led to roughly eight additional domestic enrollments.<sup>57</sup> Lower revenues from international students will limit a school’s resources

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<sup>54</sup> Omar Duwaji, *High fees paid by international students help US universities balance their books*, The World (Mar. 28, 2024), <https://tinyurl.com/4w62ecya>.

<sup>55</sup> Niall Hegarty, *Where We Are Now: The Presence and Importance of International Students to Universities in the U.S.*, 4 J. Int’l Students 223, 227 (2014), <https://tinyurl.com/4vfwa5cy>.

<sup>56</sup> Annual tuition paid by international students to post-secondary institutions is estimated to be between \$29.8 and \$34.1 billion, assuming that 68% of an international student’s economic contribution comes from tuition paid to American post-secondary institutions, see Rajika Bhandari & Patricia Chow, *Report on International Education Exchange* 17, Open Doors (2008), <https://tinyurl.com/kz3pw6sm>, and using NAFSA and Department of Commerce estimates of international students’ economic contributions. *International Students Contribute Record-breaking Level of Spending and 378,000 Jobs to the U.S. Economy*, NAFSA (Nov. 18, 2024), <https://tinyurl.com/puskrnbs> (“international students at U.S. colleges and universities contributed \$43.8 billion to the U.S. economy during the 2023-2024 academic year”); Press Release, U.S. Department of State, *Department of State Reports Record High Number of International Students in the United States at Start of International Education Week* (Nov. 18, 2024), <https://tinyurl.com/bdpsdhhh/> (international students’ economic contribution was “more than \$50 billion in 2023”). See also John Bound et. al, *The Globalization of Postsecondary Education: The Role of International Students in the US Higher Education System*, 35 J. Econ. Persps. 163, 176 (2021), <https://tinyurl.com/9j5bzs4x>.

<sup>57</sup> Kevin Shih, *Do International Students Crowd-Out or Cross-Subsidize Americans in Higher Education?*, 156 J. Pub. Econ. 170, 172 (Dec. 2017), <https://tinyurl.com/4f723kdr>.

to offer financial aid to domestic students.<sup>58</sup> If international student enrollments decline, the tuition lost by American colleges and universities will not be offset by increased domestic enrollment; beginning in 2025, the number of American undergraduates is forecasted to fall due to declining domestic birth rates.<sup>59</sup>

### **C. The Policy Will Harm the U.S. Economy**

By reducing the number of international students in the United States, the policy will harm the American economy. International students do not just contribute to the economy by paying tuition; they increase domestic demand for goods and services, which creates and supports domestic jobs—for every three international students, one U.S. job is created or supported.<sup>60</sup> Over 1.1 million international students enrolled in American colleges and universities in 2023 contributed more than \$50 billion to the U.S. economy,<sup>61</sup> and supported over 378,000 jobs during the 2023-2024 academic year.<sup>62</sup> As fewer international students come to the United States, these economic benefits will begin to disappear.

While the full economic impact of the policy cannot yet be quantified, one study provides a helpful benchmark. In January 2024, the Alliance co-published a study on the effects of ending the Optional Practical Training (“OPT”) Program, which allows temporary employment related to international students’ area of study. The study concluded that if the 43% of international students who use OPT decided not to study in the United States because the program ended, it could cost

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<sup>58</sup> *Id.* at 176; *see also* Duwaji, *supra* note 54.

<sup>59</sup> Emma Dorn et. al, *Higher Education Enrollment: Inevitable Decline or Online Opportunity?*, McKinsey & Co. (Nov. 2020), <https://tinyurl.com/3d9kfsxn>.

<sup>60</sup> *International Students Contribute Record-breaking Level of Spending*, *supra* note 56.

<sup>61</sup> U.S. Department of State, *supra* note 57.

<sup>62</sup> *International Students Contribute Record-breaking Level of Spending*, *supra* note 56.

the country \$17.2 billion annually.<sup>63</sup> This indicates that even smaller drops in international enrollment caused by the policy could cost the United States billions of dollars per year.

The United States will not just lose the economic benefits that non-citizens would have provided as students—it will lose the benefits that they would have continued to provide as graduates. To take one example, over 70% of international Ph.D. students in STEM fields remain in the United States after graduation and enter the American workforce.<sup>64</sup> The average foreign-born STEM professional generates a net benefit to the American economy of \$3 million over 20 years,<sup>65</sup> and foreign-born American STEM talent collectively accounted for 1.7 percent of U.S. Gross Domestic Product in 2019—over \$367 billion.<sup>66</sup> As fewer non-citizens come to the United States as students, fewer will enter the workforce after graduation, and the American economy will lose out on this economic activity.

#### **D. The Policy Will Harm U.S. Innovation**

Reducing non-citizen enrollments will also degrade American research and innovation. A July 2022 study found that immigrants started the majority of American start-up companies

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<sup>63</sup>Dominic Berardi et. al., *Data Snapshot: The Essential Role of Practical Training in U.S. Higher Education and the Innovation Economy* 11, Shorelight (2024), <https://tinyurl.com/yktd3r43> (last accessed Apr. 8, 2025).

<sup>64</sup> Sandip K. Sureka & James C. Witte, *Immigrant Nobel Laureates: U.S. Higher Education Infrastructure in a Global Context* 2, Inst. for Immigr. Rsch. (Dec. 2024), <https://tinyurl.com/y35rnbff>.

<sup>65</sup>*The Return on Investment of TMF's U.S. STEM Track*, Talent Mobility Fund (Jan. 2025), <https://tinyurl.com/2vv9wsub>

<sup>66</sup> Keith W. Crane et. al., *Economic Benefits and Losses from Foreign STEM Talent in the United States* iv, Inst. for Defense Analyses (Oct. 2021), <https://tinyurl.com/m2fyaha8>.

valued at \$1 billion or more.<sup>67</sup> Many of these immigrants started out as international students at American colleges and universities: As one study put it, “[t]he majority came to the United States to study and decided to stay.”<sup>68</sup> The July 2022 study lists 147 such former non-citizen students who graduated from 75 American colleges and universities and went on to found billion-dollar American companies with an estimated value of over \$586 billion and 80,000 employees.<sup>69</sup> A list of these entrepreneurs, the colleges they attended, the companies they founded, and the value of those companies is attached as Appendix 2. As non-citizen enrollments decline so too will the number of founders of the next generation of innovative American start-ups.

American technology companies also seek to hire non-citizens who attend American universities and colleges because they cannot find enough domestic STEM talent.<sup>70</sup> As the Executive Director of Global Detroit said: “When international students help a U.S. employer satisfy hard-to-fill STEM jobs, they allow those employers to better serve existing customers, expand their operations, and grow the business in ways that enable the employer to hire additional workers.”<sup>71</sup> American companies also seek to hire non-citizens because, as one CEO put it, they have “a high motivation and their willingness to work hard overcomes all their obstacles. Success is not an

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<sup>67</sup> Stuart Anderson, *Immigrant Entrepreneurs and U.S. Billion Dollar Companies* 1-3, Nat’l Found. for Am. Pol’y (Jul. 26, 2022), <https://tinyurl.com/3ae3k4yu> (noting that only 14% of America’s billion-dollar companies, as of May 2022, had a majority of native-born founders).

<sup>68</sup> Vivek Wadhwa et al., *Education and Tech Entrepreneurship* 2, Kauffman (May 2008), <https://tinyurl.com/6kv468m2>.

<sup>69</sup> Anderson, *supra* note 67 at Table 9.

<sup>70</sup> *International Students Are U.S. Business’ Best Hope For Growth*, Global Network, <https://tinyurl.com/u2ywvm8m/>.

<sup>71</sup> *Id.*

option for them. It’s a mandated requirement.”<sup>72</sup> As fewer non-citizens enroll in American colleges and universities, high-tech American businesses will have fewer such workers to hire.

**E. The Policy Will Exacerbate a “Brain Drain” from U.S. Schools to Foreign Schools**

By repelling non-citizens from enrolling and teaching at American schools, finally, the policy will lead to more of the brightest foreign students attending foreign schools instead of American ones—handing other countries a competitive advantage. For decades, the United States, home to more top-rated colleges and universities than any other country,<sup>73</sup> attracted far many more foreign students to its colleges and universities than it sent American students to foreign schools.<sup>74</sup> Recently, however, America has lost ground to other countries, especially Australia, Canada, and the United Kingdom—while nearly 60% of all inbound international students studied in the United States in 2000, only about 40% studied here in 2022.<sup>75</sup>

The policy will worsen this trend: As non-citizens are deterred from attending American colleges and universities, other countries are taking advantage. China is aggressively recruiting Chinese undergraduates to enroll in its domestic universities instead of going abroad, and recently changed its doctoral matriculation requirements to welcome “PhD refugees from the U.S” to its top universities.<sup>76</sup> France is explicitly targeting American scientists: Aix Marseille University

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<sup>72</sup> *Id.*

<sup>73</sup> *World University Rankings 2025*, Times Higher Educ. (2025), <https://tinyurl.com/2sfftsj8>.

<sup>74</sup> *Compare International Students, 1948/49-2023/24*, Open Doors Data, <https://tinyurl.com/5by2mjv7/>, with *U.S. Students Studying Abroad, 1989/90-2022/23*, Open Doors Data, <https://tinyurl.com/mpevzavf/>.

<sup>75</sup> Berardi, *supra* note 63.

<sup>76</sup> Dannie Peng, *America’s Loss, China’s Gain: Top Chinese Universities Welcome PhD Refugees from the US*, S. China Morning Post (Feb. 23, 2025), <https://tinyurl.com/5fvfkhka>. This will further

rolled out a “Safe Place for Science” program and is receiving a dozen applications a day for 15 openings from American students seeking “scientific asylum”;<sup>77</sup> its cancer research foundations are similarly welcoming American researchers to their research programs.<sup>78</sup> In Canada, the province of Quebec announced that it “was actively looking to recruit scientific talent from the U.S. who are wary of ... ‘the climate-skeptic directions that the White House is taking.’”<sup>79</sup> Policymakers and commentators are calling for Europe<sup>80</sup> and Australia<sup>81</sup> to do likewise. Several U.S.-based academics have already left the United States for other countries in direct response to the administration’s actions,<sup>82</sup> including a star faculty member and highly-rated teacher at an Alliance member institution with Lawful Permanent Residency status. This trend will only get worse the longer that the policy remains in effect.

### CONCLUSION

The Alliance urges the Court to grant Plaintiffs’ motion for a preliminary injunction.

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America’s decline as a global leader. According to the Global Diplomacy Index, China is already ahead of the U.S. in terms of expanding its diplomatic influence across the world. Ryan Neelam, *Global Diplomacy Index*, Lowy Inst. (2024), <https://tinyurl.com/4m865nu7>.

<sup>77</sup> Catherine Porter, *As Trump’s Policies Worry Scientists, France and Others Put Out a Welcome Mat*, N.Y. Times (Mar. 26, 2025), <https://tinyurl.com/ycyths83>

<sup>78</sup> *Id.*

<sup>79</sup> Alexandra Mae Jones, *A U.S. Brain Drain Could be Canada’s Brain Gain*, CBC (Mar. 30, 2025), <https://tinyurl.com/5xbrd96x>.

<sup>80</sup> Aitor Hernandez-Morales et al., *Europe to burned American scientists: We’ll take you in*, Politico (Apr. 4, 2025), <https://tinyurl.com/bde2zkar>.

<sup>81</sup> Danielle Cave, *As Trump Sacks Scientists, Australia Should Hire Them. US Drain is Our Brain Gain*, Australian Strategic Pol’y Inst. (Mar. 7, 2025), <https://tinyurl.com/hnz349ny>.

<sup>82</sup> Andrew Jack, *American Academics Seek Exile as Trump Attacks Universities*, FT (Mar. 31, 2025), <https://tinyurl.com/5xdmhwjj>.

Dated: April 9, 2025

Respectfully submitted,

*/s/ Lauren Godles Milgroom*

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**APPENDIX 1:**  
**International Student Tuition Revenues at Top US Colleges<sup>83</sup>**

Institution	Total Enrollment <sup>i</sup>	% International Students <sup>ii</sup>	Undergraduate International Students <sup>iii</sup>	Annual Undergraduate Tuition	Graduate International Students <sup>iv</sup>	Annual Graduate Tuition	Estimated Tuition Paid by International Students <sup>v</sup>
Columbia University	37,954	40%	6319	\$71,170 <sup>vi</sup>	8863	\$70,628 <sup>vii</sup>	\$860,536,538
New York University	64,951	33%	8921	\$62,796 <sup>viii</sup>	12513	\$56,646 <sup>ix</sup>	\$1,015,202,162
MIT	12,829	31%	1655	\$61,990 <sup>x</sup>	2322	\$61,990 <sup>xi</sup>	\$197,226,888
University of Chicago	21,578	31%	2784	\$67,446 <sup>xii</sup>	3905	\$67,200 <sup>xiii</sup>	\$360,158,208
California Institute of Technology	2,518	30%	314	\$65,622 <sup>xiv</sup>	441	\$65,706 <sup>xv</sup>	\$39,686,323
Georgia Institute of Technology	53,737	29%	6486	\$32,938 <sup>xvi</sup>	9098	\$31,180 <sup>xvii</sup>	\$397,842,282
Washington University in St Louis	18,292	27%	2056	\$64,500 <sup>xviii</sup>	2883	\$64,500 <sup>xix</sup>	\$254,844,144
Rice University	9,185	27%	1032	\$62,874 <sup>xx</sup>	1448	\$59,784 <sup>xxi</sup>	\$121,160,519
University of Southern California	52,694	27%	5921	\$69,904 <sup>xxii</sup>	8306	\$69,904 <sup>xxiii</sup>	\$795,640,617
Stanford University	20,955	26%	2268	\$65,127 <sup>xxiv</sup>	3181	\$61,095 <sup>xxv</sup>	\$273,605,330
Harvard University	37,613	26%	4070	\$56,550 <sup>xxvi</sup>	5709	\$55,656 <sup>xxvii</sup>	\$438,335,892
Johns Hopkins University	39,399	26%	4263	\$64,730 <sup>xxviii</sup>	5980	\$71,203 <sup>xxix</sup>	\$561,430,477
Cornell University	26,510	25%	2758	\$68,380 <sup>xxx</sup>	3869	\$20,800 <sup>xxxi</sup>	\$215,274,674
Yale University	16,416	24%	1640	\$67,250 <sup>xxxii</sup>	2300	\$49,500 <sup>xxxiii</sup>	\$179,301,977
Duke University	20,664	24%	2064	\$66,326 <sup>xxxiv</sup>	2895	\$65,120 <sup>xxxv</sup>	\$260,354,223
University of Pennsylvania	32,205	23%	3083	\$60,920 <sup>xxxvi</sup>	4324	\$41,584 <sup>xxxvii</sup>	\$294,102,607
Princeton University	8,946	23%	856	\$62,400 <sup>xxxviii</sup>	1201	\$65,910 <sup>xxxix</sup>	\$106,087,437
University of Illinois Urbana-Champaign	62,417	22%	5715	\$40,712 <sup>xl</sup>	8017	\$30,356 <sup>xli</sup>	\$380,820,827
Brown University	11,766	21%	1028	\$68,612 <sup>xlii</sup>	1443	\$68,608 <sup>xliii</sup>	\$135,619,901
UC-San Diego	44,050	20%	3667	\$77,886 <sup>xliv</sup>	5143	\$68,427 <sup>xlv</sup>	\$510,019,958
<b>Total</b>	<b>594,679</b>		<b>66,900</b>		<b>93,842</b>		<b>\$7,397,250,985.80</b>

<sup>83</sup> Based on the twenty institutions on the Forbes Top 50 Colleges list with the highest proportion of international students. Emma Whitford, *Suddenly Colleges With Big Foreign Student Populations Face Existential Risk*, Forbes (Apr. 3, 2025), <https://tinyurl.com/2z9t54yf/>.

<sup>i</sup> Whitford, *supra* note 83.

<sup>ii</sup> *Id.*

<sup>iii</sup> Assuming 42% of international students are undergraduates. *2024 Fast Facts* at 1, Open Doors (2024), <https://tinyurl.com/nhhsd3t9> (proportion of international students who are undergraduates was 43% in 2022-2023 academic year and 41% in 2023-2024 academic year).

<sup>iv</sup> Assuming 58% of international students are graduate students. *Id.* (proportion of international students who are graduates was 57% during 2022-2023 academic year and 59% during 2023-2024 academic year). Because graduate tuition varies by program length and credit requirements, the tuition figure that applies to the broadest range of graduate degrees—the Graduate School of Arts and Sciences or its equivalent—is used as a proxy for graduate school tuition across programs.

<sup>v</sup> Assuming 80% of international students pay full tuition. *See* Duwaji, *supra* note 54; Open Doors *supra* note iii. For the purposes of the above table, it is assumed the remaining 20% of international students pay no tuition. When an institution does not list a tuition rate for international students, it is assumed they pay the out-of-state rate (for schools that offer in-state and out-of-state tuition) or baseline tuition (for schools that do not distinguish between in-state and out-of-state students). Where applicable, reduced tuition rates for continuing students are not taken into account. Calculations reflect tuition costs only and exclude additional fees such as housing, meals, health insurance, student activities, and graduate services.

<sup>vi</sup> *Cost & Aid*, Columbia Undergraduate Admissions, <https://tinyurl.com/3sueks8m>.

<sup>vii</sup> *2024-2025 Academic Year Cost of Attendance*, Columbia University Graduate School of Arts and Sciences, <https://tinyurl.com/4fywwy5v>.

<sup>viii</sup> *Cost of Attendance*, NYU, <https://tinyurl.com/ym5k2b46>.

<sup>ix</sup> *Graduate Student Expenses*, NYU, <https://tinyurl.com/4pu6sjh8>.

<sup>x</sup> *Cost of attendance*, MIT Student Financial Services, <https://tinyurl.com/4v8w4ya2>.

<sup>xi</sup> *Graduate tuition*, MIT, <https://tinyurl.com/bdz48u3w>.

<sup>xii</sup> *Undergraduate Costs*, The University of Chicago Financial Aid, <https://tinyurl.com/mt597nsy>.

<sup>xiii</sup> *Tuition and Fees 2024-25 Social Sciences Division*, UChicago Office of the Bursar, <https://tinyurl.com/3rhmh9r5>.

<sup>xiv</sup> *2025-2026 Cost of Attendance*, Caltech Financial Aid, <https://tinyurl.com/mr7ysmv2>.

<sup>xv</sup> *Graduate Expenses*, Caltech Catalog, <https://tinyurl.com/59huj3br/>.

<sup>xvi</sup> *Office of Scholarships & Financial Aid*, Georgia Tech, <https://tinyurl.com/3ersfus3>.

<sup>xvii</sup> *Office of the Bursar*, Georgia Tech, <https://tinyurl.com/ycyy8ret>.

<sup>xviii</sup> *Cost of Attendance*, WashU Financial Aid, <https://tinyurl.com/yky37vk4>.

<sup>xix</sup> *Graduate Tuition*, Washington University in St. Louis Arts & Sciences Office of Graduate Studies, <https://tinyurl.com/bdd7h2na>.

<sup>xx</sup> *Cost of Attendance*, Rice University Office of Financial Aid, <https://tinyurl.com/5bj22hsf>.

<sup>xxi</sup> *Tuition, Fees, and Expenses*, Rice General Announcements, <https://tinyurl.com/424cehmx>.

<sup>xxii</sup> *Cost of Attendance*, USC Financial Aid, <https://tinyurl.com/2s4t9xdd>.

<sup>xxiii</sup> *Cost of Attendance*, USC Financial Aid, <https://tinyurl.com/3mwdvfpb>.

<sup>xxiv</sup> *Estimate Your Undergraduate Charges*, Stanford Student Services, <https://tinyurl.com/4vzytpa4>.

<sup>xxv</sup> *2024-2025 Graduate and Professional Tuition Rates*, Stanford Student Services, <https://tinyurl.com/5y375cr4>.

<sup>xxvi</sup> *Tuition and Fees*, Harvard Faculty of Arts and Sciences Registrar's Office, <https://tinyurl.com/mrxnhvsa>

<sup>xxvii</sup> *Cost of Attendance 2024-2025*, Harvard Kenneth C. Griffin Graduate School of Arts and Sciences, <https://tinyurl.com/yxj426zb>.

<sup>xxviii</sup> *Cost & Tuition*, Johns Hopkins University, <https://tinyurl.com/4stzxsrf>.

<sup>xxix</sup> *Cost of Attendance*, Johns Hopkins Krieger School of Arts and Sciences, <https://tinyurl.com/57u49ka7>.

<sup>xxx</sup> *Cost to Attend*, Cornell Financial Aid, <https://tinyurl.com/37ffrcu>.

<sup>xxxi</sup> *Tuition Rates by Field*, Cornell University Graduate School, <https://tinyurl.com/3ue7c2cb>.

<sup>xxxii</sup> *Financial Aid*, Yale University, <https://tinyurl.com/2mn9vasw>.

<sup>xxxiii</sup> *Tuition and Fees*, Yale Graduate School of Arts and Sciences, <https://tinyurl.com/47dbxk5p>.

<sup>xxxiv</sup> *Cost of Attendance*, Duke Karsh Office of Undergraduate Financial Support, <https://tinyurl.com/4uayrbwv>.

<sup>xxxv</sup> *Tuition, Fees, and Ph.D. Stipends*, Duke The Graduate School, <https://tinyurl.com/3z5vdydh>

<sup>xxxvi</sup> *Undergraduate Cost of Attendance*, University of Pennsylvania Student Registration & Financial Services, <https://tinyurl.com/4vw228sj>.

<sup>xxxvii</sup> *Tuition and Fees*, Penn LPS College of Liberal & Professional Studies, <https://tinyurl.com/3h2e6rc8>.

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- <sup>xxxviii</sup> *Cost & Aid*, Princeton University Undergraduate Admission, <https://tinyurl.com/2ur39c4u>.
- <sup>xxxix</sup> *Funding Calendar, University Rates & Costs*, Princeton The Graduate School, <https://tinyurl.com/mr2jaeu3>.
- <sup>xl</sup> *Tuition*, University of Illinois Urbana-Champaign, Undergraduate Admissions, <https://tinyurl.com/bdhrv8bw>.
- <sup>xli</sup> *2024-2025 Academic Year Graduate & Professional Tuition Rates*, University of Illinois Urbana-Champaign Office of the Registrar, <https://tinyurl.com/54sxt83m>.
- <sup>xlii</sup> *Cost of Attendance*, Brown Undergraduate Financial Aid, <https://tinyurl.com/46t4j57c>.
- <sup>xliii</sup> *Cost of Attendance by Program*, Brown Graduate Student Funding and Support, <https://tinyurl.com/3tfs7wz7>.
- <sup>xliv</sup> *Continuing Undergraduates Fall 2024 Cohort*, UC San Diego, Financial Aid & Scholarships, <https://tinyurl.com/4crn5h6s>.
- <sup>xlv</sup> *Graduate Students 2024-2025*, UC San Diego, Financial Aid & Scholarships, <https://tinyurl.com/yck6y7mx>.

**APPENDIX 2:**  
**International Students Who Became Founders of U.S. Billion-Dollar Companies<sup>84</sup>**

Name	University/Degree	Company Founded/ Cofounded	Employees	Value of Company
Wemimo Abbey	UC Berkeley, B.A., Public Policy, NYU, MPA	Esusu	91	\$1.0 Billion
Harish Abbott	Univ. of Illinois Urbana Champaign, M.S. Operations Research, Stanford University, MBA	Deliverr	462	\$2.1 Billion
Godard Abel	MIT, B.S. & M.S. Engineering, Stanford, MBA	G2	810	\$1.10 Billion
Noubar Afeyan	MIT, Ph.D. Biochemical Eng.	Indigo Ag	2,422	\$3.5 Billion
Milind R Agarwal	Michigan State, MBA	GupShup	1,200	\$1.4 Billion
Olugbenga Agboola	MIT, MBA	Flutterwave	465	\$3.0 Billion
Francesco Agosti	Duke, B.S. Comp. Sci.	Phantom	50	\$1.20 Billion
Ikkjin Ahn	UPENN M.S. Engineering, UC San Diego, Ph.D. Comp. Sci.	MOLOCO	300+	\$1.5 Billion
Sri Satish Ambati	Univ. of Memphis, M.S. Math & Comp. Sci.	H2O.ai	347	\$1.7 Billion
Mohit Aron	Rice, Ph.D. & M.S. Comp. Sci.	Cohesity	1,900	\$3.7 Billion
Krste Asanovic	UC Berkeley, Ph.D. Comp. Sci.	SiFive	455	\$2.5 Billion
Karim Atiyeh	Harvard, M.S. Comp. Sci., B.S. Elec. & Comp. Eng.	Ramp Financial	238	\$3.9 Billion
Tope Awotona	Univ. of Georgia, Mng. Info. Systems	Calendly	400+	\$3.0 Billion
Ignacio Bachiller	MIT, M.S. Mechanical Engineering	Fever Labs	935	\$1.0 Billion
Aravind Bala	Ohio State, M.S. Comp. Sci.	SeekOut	158	\$1.2 Billion
Hari Balakrishnan	UC Berkeley, Ph.D. Comp. Sci.	Cambridge Mobile Telematics	401	\$1.5 Billion
Nasser Barghouti	Columbia Univ., B.S. & Ph.D. Comp. Sci.	Seismic	1,500	\$3.0 Billion
Mikhail Bautin	Stony Brook Univ., Ph.D. Comp. Sci.	YugaByte	327	\$1.3 Billion
Hari Bayireddy	Temple Univ., MBA, Wharton School, Business Strategy	Phenom People	1,352	\$1.4 Billion
Mahe Bayireddi	Penn State, Bus. Planning & Accounting, Wharton School, Bus. Strategy	Phenom People	1,352	\$1.4 Billion

<sup>84</sup> Source: Anderson, *supra* note 67.

<b>Name</b>	<b>University/Degree</b>	<b>Company Founded/ Cofounded</b>	<b>Employees</b>	<b>Value of Company</b>
<b>Ali Behnam</b>	UC San Diego, B.S. Structural Eng., UCLA, MBA	Tealium	704	\$1.2 Billion
<b>Jeroen Bekaert</b>	Stanford, M.S. Bus. and Management	Orca Bio	91	\$1.0 Billion
<b>Sanjay Beri</b>	Stanford, M.S. Elec. Eng.	Netskope	1,500+	\$7.5 Billion
<b>Anant Bhardwaj</b>	Stanford, M.S. Comp. Sci., MIT, Ph.D. Comp. Sci.	Instabase	277	\$1.05 Billion
<b>Pedro Bizarro</b>	Univ. of Wisconsin-Madison, M.S. & Ph.D. Comp. Sci.	Feedzai	620	\$1.0 Billion
<b>Alex Blania</b>	Caltech, Visiting Student, Physics	Worldcoin	98	\$1.0 Billion
<b>Martin Blencowe</b>	Univ. of Southern California	Cameo	336	\$1.0 Billion
<b>Samir Bodas</b>	NC Wesleyan Univ., Univ. Texas, Austin, B.A. Comp. Sci., UPENN Wharton, MBA	Icertis	2,100	\$5 Billion
<b>Alex Bouaziz</b>	MIT, M.S. Civil & Envir. Eng.	Deel	1,000	\$5.5 Billion
<b>Mili Bustamante</b>	Stanford, MBA	Jokr	200	\$1.20 Billion
<b>Cesar Carvalho</b>	Harvard, MBA	Gympass	1,400	\$2.2 Billion
<b>Daniel Gershuni</b>	NYU, B.S. Bus. & Info. Systems	OwnBackup	704	\$3.35 Billion
<b>Viral Bajaria</b>	USC	6Sense	1,250	\$5.2 Billion
<b>Adam Bowen</b>	Pomona College, B.S. Physics, Stanford, MSME Product Design	JUUL Labs	1,474	\$12 Billion
<b>Bruce Buchanan</b>	UCLA, MBA	Rokt	342	\$1.95 Billion
<b>Felipe Capella</b>	Wharton School, Law & Business, UPENN Law School, L.M.M. Law	Loadsmart	569	\$1.3 Billion
<b>Michael Carvin</b>	Princeton, B.A. Economics	SmartAsset	300	\$1.0 Billion
<b>Jaswinder Chadha</b>	Univ. of Texas El Paso, M.S. Industrial Engineering, Texas A&M, Ph.D., Operations Research	Axtria	2,463	\$1.0 Billion
<b>Navdeep Chadha</b>	Univ. of Texas El Paso, M.S. Comp. Sci.	Axtria	2,463	\$1.0 Billion
<b>Adam Chekroud</b>	Yale, Ph.D., Psychology & Neuroscience	Spring Health	441	\$2.0 Billion
<b>Jiang Chen</b>	Yale, Ph.D. Comp. Sci.	Moveworks	456	\$2.1 Billion
<b>Ariel Cohen</b>	Northwestern, EMBA	TripActions	2,200	\$7.25 Billion
<b>Shay Cohen</b>	Univ. of Delaware, M.S. Biomechanics, Mechanical Engineering	Fabric	100	\$1.0 Billion
<b>John Collison</b>	Harvard	Stripe	7,000+	\$95 Billion
<b>Patrick Collison</b>	MIT	Stripe	7,000+	\$95 Billion
<b>Liron Damri</b>	Stanford, Finance and Strategic Market.	Forter	500	\$3.0 Billion
<b>Monish Darda</b>	Florida Atlantic Univ., M.S. Mech. Eng.	Icertis	2,100	\$5 Billion

Name	University/Degree	Company Founded/Cofounded	Employees	Value of Company
<b>Raj De Datta</b>	Princeton, B.S.E. Elec. Eng., Harvard, MBA	Bloomreach	850	\$2.2 Billion
<b>Nicolas Desmarais</b>	Amherst, B.A. Economics & Pol. Sci.	AppDirect	661	\$1.10 Billion
<b>Dave Ferguson</b>	Carnegie Mellon, M.S. & Ph.D. Robotics	Nuro	1,300	\$8.6 Billion
<b>Rich Ford</b>	Univ. of Chicago, MBA	Roofstock	670	\$1.94 Billion
<b>Luca Foschini</b>	UC Santa Barbara, M.S. Comp. Security, Ph.D. Comp. Sci.	Evidation	441	\$1.0 Billion
<b>Venky Ganti</b>	Univ. of Wisconsin-Madison, Ph.D. Comp. Sci.	Alation	650	\$1.2 Billion
<b>Ashutosh Garg</b>	Univ. of Ill., Urbana-Champaign, Ph.D. Elec. & Comp. Engineering	Eightfold.ai	475	\$2.1 Billion
<b>Ashutosh Garg</b>	Univ. of Ill., Urbana-Champaign, Ph.D. Elec. & Comp. Engineering	Bloomreach	850	\$2.2 Billion
<b>Kam Ghaffarian</b>	Capitol Tech. Univ., B.S. Elec. Eng., Catholic Univ., B.S. Engineering, George Washington, M.S. Info. Tech.	Axiom Space	500	\$1.0 Billion
<b>Elram Goren</b>	Carnegie Mellon, Exchange Student	Fabric	100	\$1.0 Billion
<b>Chakri Gottemukkala</b>	UCLA, M.S. Engineering	o9 Solutions	1,853	\$2.7 Billion
<b>Ronghui Gu</b>	Yale, Ph.D. Comp. Sci.	CertiK	163	\$2.0 Billion
<b>Divey Gulati</b>	Univ. of Illinois Urbana-Champaign, B.S. Comp. Eng., MBA	ShipBob	1,200	\$1.0 Billion
<b>Anoop Gupta</b>	Carnegie Mellon, Ph.D. Comp. Sci.	SeekOut	158	\$1.20 Billion
<b>Robert Ha</b>	MIT, B.S. Electrical Engineering	Splashtop	326	\$1.0 Billion
<b>Guru Hariharan</b>	Univ. of Texas, Austin, M.S. Elec. & Comp. Eng., Wharton, MBA	CommerceIQ	252	\$1.0 Billion
<b>Kanav Hasija</b>	Univ. of New Hampshire, M.A. Patent Law	Innovaccer	1,237	\$3.2 Billion
<b>Francisco Hein</b>	St. John's Univ., MBA	Fever Labs	935	\$1.0 Billion
<b>David Hindawi</b>	U.C.-Berkeley, Ph.D. Oper. Research	Tanium	2,200	\$9 Billion
<b>Amir Husain</b>	Univ. of Texas, Austin, B.S. Comp. Sci.	SparkCognition	400	\$1.4 Billion
<b>Sami Inkinen</b>	Stanford, MBA	Virta Health	441	\$2.0 Billion
<b>Rotem Iram</b>	Harvard, MBA	At-Bay	208	\$1.35 Billion
<b>Roman Itskovich</b>	Harvard, MBA	At-Bay	208	\$1.35 Billion
<b>Arvind Jain</b>	Univ. of Washington, M.S., Comp. Sci.	Rubrik	2,334	\$4 Billion
<b>Graham Jenkin</b>	Univ. of Mass, Amherst, Exchange Student	CoinList	150	\$1.5 Billion

Name	University/Degree	Company Founded/Cofounded	Employees	Value of Company
<b>Patricio Jutard</b>	Harvard Bus. School, Stanford, Global Leadership Program	MURAL	925	\$2.0 Billion
<b>Varun Kacholia</b>	UC Berkeley, M.S. Comp. Sci.	Eightfold.ai	475	\$2.1 Billion
<b>Tilli Kalisky-Bannett</b>	MIT, MBA	At-Bay	208	\$1.35 Billion
<b>Filip Kaliszan</b>	Stanford, B.S. & M.S. Comp. Sci.	Verkada	1,000	\$1.6 Billion
<b>Oren Kaniel</b>	Wharton School, MBA	AppsFlyer	1,461	\$2.0 Billion
<b>Chaitanya Kanojia</b>	Northeastern Univ., M.S. Comp. Systems Engineering	Starry	750	\$1.29 Billion
<b>Vikram Kapoor</b>	Univ. of Minnesota, M.S. Comp. Sci.	Lacework	1,000+	\$8.3 Billion
<b>Kohsuke Kawaguchi</b>	Baruch College, BBA Bus. & Admin.	CloudBees	600	\$1.15 Billion
<b>Osman Kibar</b>	UC-San Diego, M.S. and Ph.D., Biophotonics and Optoelectronics, Caltech, B.S. EE, Pomona College, B.A. Mathematical Econ.	Biosplice Therapeutics	100	\$12 Billion
<b>Roger Kjensrud</b>	UC Santa Barbara, M.S. EE	Impact	990	\$1.5 Billion
<b>Vijay Krishnan</b>	Stanford, M.S. Comp. Sci.	Turing	575	\$1.10 Billion
<b>Sudheer Koneru</b>	UT Austin, M.S. Comp. Sci.	Zenoti	1,000	\$1.5 Billion
<b>Manu Kumar</b>	Stanford, Ph.D. and M.S. Comp Sci, Carnegie Mellon, M.S. and B.S. Software Eng., Elec. & Comp. Eng.	Carta	1,618	\$7.4 Billion
<b>Mark Lee</b>	MIT, B.S. Elec. Eng., M.S. Comp. Sci. & Elec. Eng.	Splashtop	326	\$1.0 Billion
<b>Yunsup Lee</b>	UC Berkeley, M.S. & Ph.D. Comp. Sci.	SiFive	455	\$2.5 Billion
<b>Arad Levertov</b>	Duke, MBA	Sunbit	405	\$1.10 Billion
<b>Natan Linder</b>	MIT, M.S., Ph.D. Media Arts & Sciences	Formlabs	768	\$2.0 Billion
<b>Larry Liu</b>	UC Davis, MBA	Wee!	388	\$2.80 Billion
<b>Tom Livne</b>	Yale, MBA	VerbIT	600	\$2.0 Billion
<b>Tomer London</b>	Stanford, M.S. Electrical Engineering	Gusto	2,000+	\$1.1 Billion
<b>Joseph Lubin</b>	Princeton Univ., B.S. Elec. Eng. & Comp. Sci.	ConsenSys	755	\$3.2 Billion
<b>Max Lytvyn</b>	Vanderbilt, MBA	Grammarly	700+	\$15 Billion
<b>Chris Mansi</b>	Stanford, MBA	Viz.ai	312	\$1.20 Billion
<b>Augusto Marietti</b>	UC Berkley, Intl. Economics	Kong	448	\$1.4 Billion
<b>Paulo Marques</b>	Carnegie Mellon Univ., Software Eng.	Feedzai	620	\$1.0 Billion
<b>Ignacio Martinez</b>	Purdue Univ., Agribusiness Leadership Plus	Indigo Ag	2,422	\$3.5 Billion
<b>Ignacio Martinez</b>	Purdue Univ., Agribusiness Leadership Plus	Inari	230	\$1.2 Billion

<b>Name</b>	<b>University/Degree</b>	<b>Company Founded/ Cofounded</b>	<b>Employees</b>	<b>Value of Company</b>
<b>Rakesh Mathur</b>	Univ. of Texas at Arlington, M.S. Industrial Engineering & Operations Research	GupShup	1,200	\$1.4 Billion
<b>Soham Mazumdar</b>	Univ. of Illinois, Urbana Champaign, M.S. Comp. Sci.	Rubrik	2,334	\$4 Billion
<b>Rick McPhee</b>	UC Berkeley, EAP Comp. Sci.	Upside	300	\$2.5 Billion
<b>Manny Medina</b>	Harvard, MBA, Univ. of Penn., M.S. Comp. Sci., Stevens Inst. Tech., B.S. Comp. Eng.	Outreach	1,225	\$4.4 Billion
<b>Abhishek Mehta</b>	Univ. of Virginia, M.A. Banking Management	Tresata	70	\$1.0 Billion
<b>Domingo Mihovilovic</b>	Stanford, M.S. Comp. Sci., Elec. Eng., Ph.D. Elec. Eng.	Exabeam	594	\$2.4 Billion
<b>Mikita Mikado</b>	Univ. of Hawaii, Comp. Sci., English, Japanese	PandaDoc	390	\$1.0 Billion
<b>Keyvan Mohajer</b>	Stanford, Ph.D. Elec. Eng.	SoundHound	385	\$1.0 Billion
<b>Fayez Mohamood</b>	NJIT, B.S. Comp. Engineering, Georgia Tech, M.S. Elec. & Comp. Engineering	Bluecore	448	\$1.0 Billion
<b>Philipp Moritz</b>	UC Berkeley, Ph.D. Comp. Sci.	Anyscale	100	\$1.0 Billion
<b>Richard Morris</b>	Wharton, MBA	Tresata	70	\$1.0 Billion
<b>Maijid Moujaled</b>	Grinnell, B.A. Comp. Sci.	Chipper Cash	267	\$2.0 Billion
<b>Elon Musk</b>	Univ. of Penn., B.A., Econ & Physics, Wharton School, B.S. Business	SpaceX	12,000	\$100.3 Billion
<b>Elon Musk</b>	Univ. of Penn., B.A., Econ & Physics, Wharton School, B.S. Business	OpenAI	250	\$2.92 Billion
<b>Elon Musk</b>	Univ. of Penn., B.A., Econ & Physics, Wharton School, B.S. Business	The Boring Company	197	\$5.7 Billion
<b>Kannan Muthukkaruppan</b>	UC Berkeley, M.S. Comp. Sci.	YugaByte	327	\$1.3 Billion
<b>Sashi Narahari</b>	Univ. of Maryland, M.S. Mech. Eng.	HighRadius	3,635	\$3.10 Billion
<b>Krishna Narayanaswamy</b>	Rensselaer Polytechnic Institute, M.S. Comp. & Sys. Eng.	Netskope	1,500+	\$7.5 Billion
<b>Sergiu Nedeveschi</b>	UC-Berkeley, M.S. & Ph.D. Comp. Sci.	Tarana Wireless	279	\$1.0 Billion
<b>Aurelian Nicolae</b>	Harvard, B.S. Mech. Eng. & Mat. Sci.	WHOO	330	\$3.6 Billion
<b>Feng Niu</b>	Univ. of Miami, Computer Vision	Alation	650	\$1.2 Billion
<b>Vaibhav Nivargi</b>	Stanford, M.S. Comp. Sci.	Moveworks	456	\$2.1 Billion

Name	University/Degree	Company Founded/ Cofounded	Employees	Value of Company
<b>Kunle Olukotun</b>	Univ. of Michigan, Ph.D. Comp. Eng.	SambaNova Systems	144	\$5 Billion
<b>Aly Orady</b>	Stanford, M.S., E.E. Comp. Architecture, Networking	Tonal	790	\$1.6 Billion
<b>Bilal Orhan</b>	Univ. of Central Florida, M.S. Comp. Sci.	Rec Room	200+	\$3.5 Billion
<b>Hubert Palan</b>	UC Berkeley, MBA	Productboard	400	\$1.7 Billion
<b>Rabin Patra</b>	UC Berkeley, Ph.D. Comp. Sci.	Tarana Wireless	279	\$1.0 Billion
<b>James Peng</b>	Stanford, Ph.D., Univ. Buffalo, M.S.	Pony.ai	1,000	\$5.3 Billion
<b>German Peralta</b>	Cornell, MBA	Jokr	200	\$1.20 Billion
<b>Artem Petakov</b>	Princeton, B.A. Comp. Sci., Finance	Noom	2,090	\$3.7 Billion
<b>Amit Prakash</b>	Univ. of Texas-Austin, Ph.D. Comp. Eng.	ThoughtSpot	731	\$4.2 Billion
<b>Dhiraj Rajaram</b>	Wayne State, M.S. Computer Engineering, Univ. of Chicago, MBA	Mu Sigma	2,665	\$1.5 Billion
<b>Rajesh Ramanand</b>	Tulane Univ., B.S. Comp. Sci.	Signifyd	400+	\$1.34 Billion
<b>Daniel Ramot</b>	Stanford, Ph.D. Neuroscience	Via	1,000	\$3.3 Billion
<b>Venkat Rangan</b>	Univ. of Miami, M.S. Comp. Sci.	Clari	600+	\$2.6 Billion
<b>Karthik Ranganathan</b>	Univ. of Texas, Austin, M.S. Comp. Sci.	YugaByte	327	\$1.3 Billion
<b>Prabhakar Reddy</b>	Harvard, MBA	FalconX	165	\$3.75 Billion
<b>Tal Riesenfeld</b>	Harvard, MBA	Sunbit	405*	\$1.10 Billion
<b>Oleg Rogynskyy</b>	Boston Univ., B.A., Bus. Admin., Pol. Sci., Intl. Relations, Econ.	People.ai	294	\$1.10 Billion
<b>Martin Roscheisen</b>	Stanford, Ph.D., Comp. Sci.	Diamond Foundry	300	\$1.8 Billion
<b>Israel Roth</b>	Columbia, MBA	K Health	360	\$1.5 Billion
<b>Philippe Saint-Just</b>	Univ. of Alabama, B.S. Comp. Sci.	REEF Technology	2,288	\$1.0 Billion
<b>Daniel Saks</b>	Harvard, M.A. Finance & Accounting	AppDirect	661	\$1.10 Billion
<b>Dhruv Saxena</b>	Purdue Univ., B.A. & M.S. Elec. Eng.	ShipBob	1,200	\$1.0 Billion
<b>Susanne Schöneberg</b>	UC-Berkeley, MBA	Flexport	2,573	\$3.2 Billion
<b>Mada Seghete</b>	Cornell, B.S. Elec & Comp. Eng., Stanford, M.S. Manag. Sci. & Eng., MBA	Branch	466	\$4.0 Billion
<b>Ham Serunjogi</b>	Grinnell, B.A. Econ.	Chipper Cash	267	\$2.0 Billion
<b>Rohan Seth</b>	Stanford, M.S. Mang. Sci. & Eng., B.S. Comp. Sci.	Clubhouse	99	\$4 Billion
<b>Eric Setton</b>	Stanford, Ph.D. and M.S. Electrical Engineering	Tango	399	\$1.10 Billion
<b>Premal Shah</b>	USC, M.S. Comp. Sci.	6Sense	1,250	\$5.2 Billion
<b>Zhong Shao</b>	Princeton, Ph.D. Comp. Sci.	CertiK	163	\$2.0 Billion

<b>Name</b>	<b>University/Degree</b>	<b>Company Founded/ Cofounded</b>	<b>Employees</b>	<b>Value of Company</b>
<b>Tomer Shiran</b>	Carnegie Mellon Univ., M.S. Comp. Eng.	Dremio	350	\$2.0 Billion
<b>Beerud Sheth</b>	MIT, M.S. Comp. Sci	GupShup	1,200	\$1.4 Billion
<b>Hitesh Sheth</b>	Univ. of Texas, Austin, B.A. Comp. Sci.	Vectra AI	550	\$1.2 Billion
<b>Tim Shi</b>	Stanford, Ph.D. candidate, Machine Learning	Cresta	150	\$1.6 Billion
<b>Eyal Shinar</b>	Wharton School, MBA	Fundbox	300+	\$1.10 Billion
<b>Jonathan Siddharth</b>	Stanford, M.S. Comp. Sci.	Turing	575	\$1.10 Billion
<b>Alessio Signorini</b>	Univ. of Iowa, Ph.D. Artificial Intelligence & Epidemiology	Evidation	441	\$1.0 Billion
<b>Davis Siksnans</b>	Univ. of Wisconsin Eau Claire, Information Systems	Printful	1,700	\$1.0 Billion
<b>Varun Singh</b>	UCLA, M.S. Eng. & Applied Eng., Univ. of MD, Ph.D. Eng. & Des. Optimization	Moveworks	456	\$2.1 Billion
<b>Bipul Sinha</b>	Wharton School, MBA	Rubrik	2,334*	\$4 Billion
<b>Agustin Soler</b>	Northwestern, M.S. Industrial and Product Design	MURAL	925*	\$2.0 Billion
<b>Ion Stoica</b>	Carnegie Mellon Univ., M.S. Comp. Sci., Ph.D. Elec. and Comp. Engineering	Anyscale	123	\$1.0 Billion
<b>Ion Stoica</b>	Carnegie Mellon Univ., M.S. Comp. Sci., Ph.D. Elec. and Comp. Engineering	Databricks	3,000+	\$38 Billion
<b>Vijay Tella</b>	UCLA, M.S. Comp Sci	Workato	825	\$5.2 Billion
<b>Rich Teo</b>	Univ. of Mich., Bachelor of Bus. Admin.	Paxos	250	\$2.4 Billion
<b>Martin Tolar</b>	Univ. of Cincinnati College of Medicine, Ph.D. Neuroscience, Univ. of Michigan, Exec. Management	Alzheon	25	\$1.31 Billion
<b>Uma Valeti</b>	Mayo Clinic, Cardiology, Wayne State & State Univ. of NY, Buffalo, Internal Medicine	UPSIDE Foods	195	\$1.0 Billion
<b>Nagarjuna Venna</b>	MIT, M.S.	BitSight Technologies	650	\$2.4 Billion
<b>Romesh Wadhvani</b>	Carnegie Mellon, M.S., Ph.D. Elec. Eng.	ConcertAI	995	\$1.9 Billion