

EXHIBIT 2

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF ABA SAM
(HARVARD-RADCLIFFE BLACK STUDENTS ASSOCIATION)**

Aba Sam, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Aba Sam. I am a member of Harvard College Class of 2021.
2. I am currently Vice President of the Harvard-Radcliffe Black Students Association (“BSA”) and am submitting this declaration individually and on behalf of BSA in support of race consciousness in Harvard College’s admissions policy.
3. BSA exists to foster community among Black students at Harvard College, as well as to encourage interaction and facilitate dialogue among all members of the Harvard community, and between the Harvard, Cambridge and Boston communities. Essentially, BSA organizes venues and channels to provide a forum for the open expression of the political, social, and cultural views of Black students. To this end, it provides a variety of programs and services to its membership and the Black community at Harvard.

4. BSA was established during the 1976-1977 academic year, in response to a call to protest an article in the *Harvard Lampoon*. BSA replaced the Association of African and Afro-American Students at Harvard and Radcliffe (“AFRO”). BSA aimed to present the Black student perspective on various issues of concern at Harvard, such as affirmative action and the development of Harvard’s Afro-American Studies Department. BSA strives to be an organization that provides programming and support for all students that identify with the Black experience and coordinates between many different Black student groups on campus.

5. BSA is responsible for planning welcome events for new Black students, including a Black Convocation, which is a formal welcome into Harvard University to show freshmen that Black students exist here and that Black excellence happens here. In 2003, the BSA published the first *Black Guide to Life at Harvard*.

6. BSA works in coalition with other affinity groups to promote diversity and inclusion, such as Fuerza Latina, the Asian American Students Association, and the First Generation Student Union.

7. BSA members experience isolation in the social and academic spheres. For example, some of our members who are STEM majors have particularly felt that they are treated as if they have a lot to prove and that students are less willing to collaborate with them. In social science classes, our members have also described how certain opinions are ascribed to them because of race.

8. I am a pre-med major and I have experienced this isolation, particularly at the beginning of a course. Sometimes, when I present an idea, it is ignored by other students until a teaching fellow or a professor agree with me. That’s not something that’s new for me as a Black student, but it is pretty pronounced in the first couple of weeks of a class before people know me

as an individual. One thing that helped me maintain myself in these classes is the fact that there were other Black students who I could lean on or speak to about these experiences. Having a community of other Black students has been important to my academic wellbeing, particularly during the first year.

9. In the social sphere, dorm life can sometimes be isolating for Black students. In my section of the dorm last year, there were about 25 students. There were four Asian American students and the remainder were white. Some people considered our entryway very diverse; I did not. I was the only Black girl in the section, and I was the only Black girl in my suite. There was one Black boy in my section.

10. Once, when I was styling my hair in my suite, some other girls walked in. When they saw me unbraiding my hair, they screamed. They asked me a bunch of questions, such as “did you cut your hair?” because they had never seen extension braids. They brought in other girls to watch me. One said, “can you clean this up, this is dirty,” implying stereotypical ideas about Black people that were very hurtful to me.

11. During my freshman year, I would go to parties or to concerts on campus and see groups of white people singing the N-word. Sometimes those groups included some of the guys from the section of my dorm. I would then enter my dorm and hear songs containing the N-word blasting out of their rooms. It was frustrating and isolating to me. I never was able to work up the courage to start a conversation because the problem is so systemic, and I knew the pressure would be on me to stay calm.

12. During the 2017-2018 school year, one of my friends confided in me about an experience that was a sobering reminder that college campuses are too often unsafe for Black students. One night, my friend was walking from CVS back to her dorm. She began to hear some

loud drunk people walking and singing behind her and she started to walk faster. She couldn't hear their entire conversation, but she did hear them say "Black person" multiple times. Then she heard them say, "It's a Black person! It's a nigger, it's a nigger." In shock, my friend paused for a moment, deciding whether to confront them and stand up for herself. However, they quickened their pace and started chanting, "Hey nigger, come be our slave, come be our nigger slave." At this point she was scared and ran back to her dorm. She told me this story the next day. This deeply upsetting incident had obviously weighed heavily on her and had impacted her ability to focus on work. Her story shows how important it is for Black students not to be isolated. The bleak reality is that without a critical mass of Black people on campus, students like my friend would be left feeling more isolated and helpless than before.

13. In April 2018, there was an incident of police brutality against a Black Harvard student by Cambridge police. It served as yet another reminder that college campuses can be unsafe for Black students. In response, BSA held town halls and meetings to support students who were upset by this incident. It was a significant academic and emotional stress for many Black students at Harvard. Students at that time should have been only worried about studying for finals. Instead, we were also fearing for our safety on campus. We were given really shallow excuses to justify the beating of this Black kid and the reasons that Harvard police could not adequately take care of the situation without external support.

14. When the incident happened, I had just been elected Vice President of BSA and a lot of responsibility was put on our board. The President of BSA called me to say that we needed to write a statement. I had to go to many meetings about the incident, trying to figure out what we could do. I saw my Black peers stressed out and crying, struggling to figure out how to continue to go on with their day. At the same time, we were under a lot of pressure to study for finals. If I had to relive that next year or during the following years, it would be horrible. The planning and responsibility required

to respond to issues of racial discrimination takes away from our chance to just be regular college students.

15. The police brutality incident provides a prime example of why there needs to be a critical mass of Black students on campus. If Harvard's Black students were limited to just me and a few others to deal with all of that, it would have been much more challenging to organize a response and provide support for each other. A reduction in Black students on campus would be very damaging for us.

16. At Harvard, Room 13 provides a space where students go to talk about feelings anonymously. With everything going on, I decided to seek mental health support. There were two white students there. They were good listeners, but as I was telling them about the police brutality incident and other issues dealing with race, I could see the shock on their faces. Their eyes were filled with sympathy, but their lack of knowledge made me more agitated about the entire situation.

17. When I returned to my dorm, I saw my roommates who were not Black enjoying their evening, unaware of what had happened. During that entire incident, my entryway was having an ice cream social. After experiencing the intense reaction of BSA students, not having the rest of the college even acknowledge the incident for a full 24 hours was frustrating to say the least. My saving grace was my proctor, who sent out letters to our entire entryway telling everyone to be sensitive and summarizing the incident. But then, when other students were talking about the incident, some said "I agree with them arresting the student," or "yeah, maybe he was threatening." Hearing the incident discussed in this way, while many of my Black peers have been stressed out all weekend, added to my frustration.

18. That same day as the incident, we had to go to a meeting with the Task Force on Asian and Pacific American Studies about the *Students for Fair Admissions v. Harvard* case. It felt exhausting to be speaking about ending race conscious admissions while discrimination

against Black students remained so blatant. This affirmative action case makes me angry because the implication that race is irrelevant in our academic experience is just the height of ignorance in my opinion. The BSA Board went through this challenging period right before finals.

19. The Harvard administration needs to do more to support Black students and students of color. Harvard has the office of Equity, Diversity, and Inclusion, which Harvard uses to determine what all multicultural students need. However, this one office is definitely not sufficient. A lot of the planning to organize town halls and meetings is essentially done by Black students for Black students. But supporting students in times of need should not fall solely on the students; it is Harvard's responsibility to make campus safe and accessible.

20. Many organizations on campus have been trying to get a multicultural center at Harvard—not just a center for Black students, but for all minority students. Despite widespread support for a multicultural center, it has been difficult to get the support from the Harvard administration, even though this conversation has been happening for years. In a place where a Black student was beaten in the middle of the street, the Harvard administration has communicated the message that they do not want to alienate white students by having a multicultural center and are more concerned about whether those students feel uncomfortable or unsafe. Because we did not have a physical multicultural center, Black students had nowhere to convene when the police brutality incident occurred. Instead, we had to contact Black faculty to reserve a room, or we had to have town halls off campus because BSA could not provide a space for students to come together and organize.

21. Despite not having a physical building, BSA has really done a lot to provide a space where Black students feel comfortable. It provides support in a way that Harvard does not do, even though some faculty and administrators try.

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

Executed on this day, July 24, 2018.

/s/ Aba Sam
Aba Sam

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF CECILIA NUÑEZ
(FUERZA LATINA)**

Cecilia Nuñez, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Cecilia Nuñez, and I am over 18 years of age and fully competent to make this Declaration.
2. I am the Vice-President of Fuerza Latina at Harvard.
3. Fuerza Latina is Harvard's undergraduate, pan-Latinx organization that seeks to expose the diversity of Latinx culture at Harvard and create a support system for Latinxs in their academic and extracurricular pursuits. We organize and co-sponsor events that promote the Latinx student's experience on campus. Through this strong community, we hope to enhance the experience of both Latinxs and other students at Harvard.
4. Fuerza Latina was originally founded in 1993 as Fuerza Quisqueyana. The club was created by ten Dominican undergraduates who envisioned a group that would specifically address Dominican issues and concerns. At the time, Harvard College had several Latinx groups, including

RAZA, Causa, and a Puerto Rican group called “La O,” but nothing dedicated to Dominican issues and cultural sharing. As an organization, Fuerza Quisqueyana brought speakers to campus, engaged in community service in Brighton (an area that housed a large Dominican community), and founded the now annual tradition of Quisque Jam, a party that features salsa, merengue, and hip-hop—music that was not heard at Harvard’s parties at that time.

5. By 1998, the membership of Fuerza was no longer mostly Dominican, as a larger Latinx community grew on campus. After the board and members began a dialogue on whether the group’s name should better reflect its membership, the name was changed to Fuerza Latina by a majority vote. The focus of the organization, however, remained unchanged because, by that time, Fuerza had taken up a much broader Latinx agenda. Today, Fuerza Latina is Harvard’s Pan-Latinx umbrella organization and boasts members from numerous Latin American countries, as well as non-Latinx members who share our interest in Latinx and Latin American culture.

6. Every Monday, Fuerza Latina hosts a dinner of some type to give people a more casual space to make connections, network, and socialize with other people on campus—essentially, students talk through their week with people who understand more of what they are going through. We have a general meeting every week and a board meeting every week. These meetings and events require a lot of planning and coordination with leaders of other cultural organizations on campus. Fuerza Latina also has overnight retreats—sometimes to speak to the Harvard administration about issues of concern to our members and improvements we want to see on campus.

7. In addition, Fuerza Latina offers a mix of social, political, and identity-based programming and discussions on issues pertinent to the Latinx community at Harvard and in the larger United States. We have sponsored debates and discussions about issues like immigration or

issues of Latinx representation in the United States. Especially in the current political climate, we feel a need to create a space for Harvard Latinx students to discuss issues that are affecting them. We also sponsor a lot of political actions on campus on issues such as affirmative action and policing of Latinx communities in Boston.

8. Fuerza Latina and other cultural organizations do a lot to provide academic support to students who do not come from a college preparatory background. We create databases of study guides, organize forums for people to talk about issues that they may be having in classes or generally on campus, and create spaces for people to get advice and receive tutoring from each other.

9. As an organization, we also have had to address insensitive incidents that affect Latinx students. For example, as part of a political protest, one of the clubs on Harvard's campus slipped fake deportation notices under doors to try to raise awareness of immigration issues, not realizing that we have people in our community who are undocumented. That incident was very scary for some of our members, and they relied on Fuerza Latina for help. Because Fuerza Latina has such a strong presence, we were able to very quickly communicate to all of our members explaining that these notices were fake and to alleviate many people's worries. But if Fuerza Latina's membership was reduced, it may not have been as successful at organizing to quickly notify the Latinx community that the deportation notices were fake, resulting in some individuals wasting time worrying about whether they or their roommate were actually being deported.

10. There have also been incidents where people don't respect the Latinx presence on campus and it helps to have a support system to respond collectively. For example, on Mexican Independence Day, a lot of us were out and celebrating at night. Some white students walked by called us "a bunch of wetbacks." I think that's one of those experiences where, because we were

in a group, we could respond and push back, but I think it would be very threatening to a student who was alone—especially because it occurred at night.

11. Our organizations have been able to come together to fight discrimination and hostility toward Latinx students, but if we didn't have a critical mass of Latinx students, we wouldn't necessarily be able to advocate for ourselves in that way and make people realize why that's not okay.

12. This case could be very damaging for Fuerza Latina in terms of our membership if there is not a critical mass of Latinx students to run the organization. We are already a small community, but if admissions for Latinx students dropped by 50%, as estimated by Harvard's expert if all considerations of race were eliminated from Harvard's admissions policy, Fuerza Latinx could not realistically be able to sustain our club, or at least not in at our current capacity. We would not be able to offer that same support to our members, leading to more isolation of Latinx students in the Harvard community.

13. This is case is particularly troubling for the Latinx community because we are comprised of diverse nationalities and a drop in admissions increases the likelihood that, for instance, there may be only one Cuban or El Salvadorian student in the entire Harvard undergraduate campus. It would be very isolating to basically be the only one. Certain sub-Latinx organizations cannot sustain themselves when there are not enough students from a particular background. A lot of Latinx clubs on campus have gone through periods of being defunct since their founding. In fact, a lot of clubs right now are not recognized as clubs by the Harvard administration because they have encountered so many difficulties to formally exist due to the fluctuation of admissions of students of various nationalities.

14. Fuerza Latina takes on a lot of responsibilities to support students on campus that are often handled by the administration at other universities. For example, other universities have multicultural centers or a dean in charge of inclusion or diversity. At Harvard, the cultural organizations have to pick up the slack in terms of creating an inclusive environment on campus for our members because Latinx students cannot assume that we necessarily have a space for ourselves.

15. Harvard does not have that much institutional support for diversity once students are admitted. I think Harvard assumed that by recruiting more people, these issues will take care of themselves. But this kind of attitude does not reflect the reality that students face—the reality is that the Harvard administration needs to step up to provide a lot more support so that students can depend on them when negative incidents happen on campus.

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

Executed on this day, July 28, 2018

/s/ Cecilia Nuñez
Cecilia Nuñez

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF JONATHAN PAEK
(HARVARD-RADCLIFFE ASIAN AMERICAN ASSOCIATION)**

Jonathan Paek, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Jonathan Paek. I am a rising junior at Harvard and expect to earn my bachelor's degree in Sociology in 2020. I am writing this declaration individually and on behalf of the Harvard-Radcliffe Asian American Association ("AAA") in support of race consciousness in Harvard College's admissions policy.

2. Along with Genevieve Hu, I am Co-President of AAA. After consulting with AAA's board members, I have been given authority to submit this declaration on behalf of AAA.

3. AAA was founded in 1976 to unite Asian American students at Harvard and raise greater awareness of Asian American issues through social, cultural, and political events. AAA seeks to foster a community within Harvard dedicated to embracing our shared identity and promoting greater awareness of Asian American issues and perspectives; provide a forum for Asian Americans at Harvard to voice their opinions and comfortably explore their culture, identity,

and individuality; address political, economic, and social issues affecting our communities at Harvard, as well as at the local and national levels; celebrate achievements of Asian Americans, including those in the arts, entertainment, politics, business, science, and academia; develop long-lasting partnerships between students, alumni, community activists, and scholars; and inspire participants to contemplate their roles and responsibilities in forging the future of Asian America.

4. AAA supports the consideration of race in admission because race plays a serious role in our lives and greatly affects each person's lived experiences. Race is a factor, among many, that should be considered for a university to better understand its applicants and their experiences. Moreover, it is important to note that we are not currently in a society where all racial backgrounds have equal opportunities and access to higher education. As such, it is even more critical to take into consideration the distinct challenges that minority groups face.

5. In addition, it is important to have a diverse student body in order to promote a well-rounded educational experience. Learning from people who have lived experiences that are different from our own helps with the development of genuine human connection and understanding. I have been able to learn so many valuable lessons from my peers that I have not—and would not have—been able to experience or understand myself. While these lessons should never be interpreted as the sole explanation for an entire community or as tokenizing individuals, they have added different perspectives to my life and have made me a better person.

6. Outlawing the consideration of race in admissions would detrimentally affect the student experience at Harvard. Not only would we be deprived of the benefits of learning from a wealth of experiences of others who are different from us, but students of color would also feel much less comfortable on campus. Having a sufficient number of students from different minority groups is imperative to promote genuine environments of inclusion and for organizations like AAA

to function properly and serve their communities. If Mr. Blum's efforts to end the consideration of race in admissions are successful, future students may not enjoy a sense of belonging and organizations that historically serve minority communities could lose members of their population as well as their ability to serve them.

7. Nevertheless, AAA firmly opposes racial discrimination and is very troubled that Harvard has been accused of intentionally discriminating against Asian American applicants.

8. While we are not in a position to say whether those allegations are true, AAA does believe that those in Harvard's admissions process may be affected by implicit bias.

9. It is absolutely imperative that Harvard takes these allegations seriously and takes deliberate steps to make its admissions process more equitable. We strongly recommend that Harvard conducts deeper reviews of its admissions process, hires more Asian American admissions officers, recruits more Asian American alumni interviewers, and does implicit bias training to ensure that everyone involved in the admissions process is aware of the myriad lived experiences of applicants from various Asian American subgroups.

10. Likewise, AAA condemns the prevailing treatment of Asian Americans as a monolith—as though all Asian Americans have access to the same opportunities and share the same lived experiences. Asian Americans are incredibly diverse with vastly different lived experiences. Asian Americans have and do benefit from race conscious policies, and applying blanket statements on behalf of the population is misleading and irresponsible.

11. As such, we believe that it is incredibly important that Asian American organizations on campus are given the opportunity to have conversations with administrators to help ensure that steps are taken to move forward towards a more equitable admissions process.

12. AAA and its board strongly oppose the usage of Asian Americans as a political weapon to pit minority groups against each other. We are proud of our history of representing Asian Americans and lending to our fellow minority communities and people of color. We will not waver from that support now.

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

Executed on this day, July 29, 2018

/s/ Jonathan Paek
Jonathan Paek

EXHIBIT 5

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF CATHERINE HO
(ASIAN AMERICAN WOMEN’S ASSOCIATION)**

Catherine Ho, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Catherine Ho, and I am over 18 years of age and fully competent to make this Declaration. I am writing this Declaration on behalf of Harvard Asian American Women’s Association to support the continuation of race-conscious admissions policies for Harvard College.

2. Along with Stephanie Tang, I am Co-President of the Asian American Women’s Association (“AAWA”). After discussion with AAWA’s board members, I have received approval and authority to submit this declaration on behalf of AAWA.

3. AAWA was created in 2005 as an inclusive, welcoming space for those on campus who identify as Asian American women, including those who identify as gender non-conforming. AAWA’s mission is to be a space where students can learn from each other, including both commonalities and differences. Our founding members felt that Harvard students needed a

community that was non-competitive and open to understanding each other's experiences—a community that at the time they felt Harvard was lacking. Thus, membership to AAWA is open to anyone with no membership fees or requirements. AAWA was intentionally designed so that students would not feel as though they had to be a certain type of person or fit a particular mold to be included. Because AAWA values every lived experience as inherently valid, it has been committed to diversity and supporting fellow students from the very beginning of its existence. AAWA has and always will endeavor to foster a sense of belonging for people of very different backgrounds.

4. The Harvard administration has not done enough to foster inclusion. When you ask students to describe a typical Harvard student, a lot of them will respond by describing someone other than themselves. Harvard has historically served people of a certain gender, sex, race, economic background, or family lineage. If someone does not fit any of those specified categories, that person often does not feel like a “Harvard Student” despite having been admitted. Having safe spaces where students realize that they are not alone with these feelings is very important to our members, especially when the Harvard administration does not itself provide that support.

5. AAWA strives to address these needs and goals through open and accessible community-building events and dialogue events. Community-building events are more inward looking and are positioned as a way for those who are in AAWA and those interested in the organization or its mission to simply come together and enjoy each other's company. These events serve to foster a sense of belonging within the larger Asian American Pacific Islander (“AAPI”) community at Harvard and between various other organizations of color on campus, as well as build connections between students of a wide variety of backgrounds. AAWA also holds dialogue events, during which attendees discuss substantial issues that impact the AAPI community, both

on campus and at large. In this last year, we have held dialogue events about anti-black racism in the AAPI community, sexual assault in the AAPI community, and being an Asian American woman in graduate school, to name a few. However, we do not focus extensively on the distinction between dialogue and community events; the community-building events are important to build relationships and trust so that, through the dialogue, we can open up a space where people can be vulnerable. By generating discussion about and spreading awareness of issues that pertain to the varied, intersectional identities of the members of our community, AAWA seeks to promote the prominence and concerns of Harvard's female and non-binary Asian American Pacific Islander population in a way that is accessible and pertinent to the greater Harvard community.

6. AAWA has allowed me to explore how facets of my identity interact with each other and I really needed a space to do that at Harvard. AAWA's focus on intersectionality matters a lot to me because my identity isn't just being Asian American, or Vietnamese American, or a woman, or first-generation status—it's the intersectionality of that. I am Vietnamese American. My parents were refugees who came to America because of the war. We are systemically underrepresented in institutions of higher education. That's why it is really important to disaggregate data for Asian American subgroups because our experiences are not monolithic, especially for the Southeast Asian community. But I also identify as an Asian American. When people see me, they say I am Asian because they can't discern what ethnicity I am, but being Asian, a lot of expectations are placed on me, and a lot of my peers in high school thought my parents were doctors or engineers. In reality, I didn't have a lot of the opportunities that my peers did.

7. Reflecting on my own application process, I wrote about the Vietnamese language and the lack of conjugation and how that has so greatly shaped how my parents, refugees, have refused to dwell on the past and continue to march bravely into the future. I also wrote about how

volunteering and tutoring at the refugee community center my mother first utilized upon her arrival in America showed me the truly personal impact of community service. Finally, I wrote about how a trip to Vietnam informed me of my unique identity as a first-generation Vietnamese-American and how that trip allowed me to come to terms with the tension of not being “American” enough or not “Asian” enough. My race is integral to my identity and had race-conscious admissions been eliminated, I would not have been able to convey such a large part of who I am and what has shaped me.

8. AAWA has decided to partake in this lawsuit because we believe firmly that a rising tide lifts all boats and that the maintenance of race-conscious admissions policies is integral to preserving the unique Harvard experience. The idea that communities of color must fight over limited space in college admissions is inherently in conflict with our values as an organization dedicated to diversity and inclusion. Race-conscious college admissions is not a zero-sum game; we all benefit from increased diversity. Asian Americans have so much to offer due to our experiences with race and our experiences with other cultures, but other communities of color offer perspectives that we simply do not and cannot. Our experiences do not and should not come at the expense of other communities of color; it is vital to be in solidarity with and to lift up these other communities of color.

9. Having many students of different races on campus contributes to the richness of the fabric of Harvard College and the experiences that our and other organizations provide. AAWA collaborates a great deal with other women of color organizations and other organizations of color on and off campus for multiple events throughout the year. There is so much emotional burden placed on people of color, specifically women of color, which is why it is so critically important to have other women of color present as allies. We have particularly close relationships with three

major women of color organizations on campus—Association of Black Harvard Women (ABHW), Latinas Unidas (LU), and South Asian Women’s Collective (SAWC). Started by AAWA, WOCTails is one of our largest and most popular community-building events and is held jointly by AAWA and the three women of color organizations listed; the event brings our communities together and provides an opportunity to engage in meaningful conversation and enjoy each other’s company. Other jointly held events provide spaces to discuss our shared experiences as women of color, as well as identify how our experiences may differ.

10. While we recognize that there are nuances that race conscious admissions does not fully consider, we also think it is of utmost importance that we stand for the principles of diversity and inclusion and that we resist the false narrative that is being spun by individuals who do not have the full interests of the AAPI community at heart.

11. We are frustrated and confused by the data released that suggests problems with how Harvard admissions officers have profiled and described Asian American applicants. However, we must be careful not to conflate society’s tendency to view the AAPI experience as a monolithic one with any effects of race-conscious admissions. The problem of seeing AAPI applicants as somehow less likeable or personable may stem from the lack of implicit bias training for Asian American students or from ways that principals and teachers describe students. It cannot be stressed enough that any potential implicit bias in Harvard admissions does not stem from the consideration of race in admissions.

12. If all considerations of race were to be eliminated from Harvard’s admissions process, Harvard students, including AAWA members, would lose a lot of perspectives that enable us to learn for our peers. Some of our members come from areas where everyone around is Asian or primarily East Asian. Being from communities that are exclusively one race prevents self-

reflection and eliminates any possibility of listening to and learning from other communities of color. It would be impossible for Harvard students to reflect on our own identities if we cannot interact with students who are different from us.

13. Harvard is special because learning is not limited to the classroom and there are opportunities to interact with people who we might never meet otherwise. This variety of experiences is partially reinforced through the application of race-conscious admissions policies. Everyone is an expert in their own experience. If experts of certain experiences are excluded from Harvard, we have fewer people to learn from; it would be like going to the history section of the library and reading a single random page of every seventh book on the shelf. We would lose the ability to form a robust and complex understanding of lived experiences that are dissimilar from our own and I cannot fathom how that could be beneficial to anyone.

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

Executed on this day, July 28, 2018

/s/ Catherine Ho
Catherine Ho

EXHIBIT 6

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF ALBERT CHOI
(ASIAN AMERICAN BROTHERHOOD)**

Albert Choi, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Albert Choi. I am a rising senior at Harvard and expect to earn my bachelor's degree in 2019. I am writing this declaration individually and on behalf of the Asian American Brotherhood in support of race consciousness in Harvard College's admissions policy.
2. I am President of the Asian American Brotherhood ("AAB"). After consulting with AAB's board members, I have been given authority to submit this declaration on behalf of AAB.
3. AAB seeks to forge a stronger sense of unity among Asian Americans in our community and to foster solidarity without coercion. In promoting understanding and bonds across ethnic lines, the Asian American Brotherhood seeks to empower both our members and the communities that we serve.
4. AAB has elected to become involved in this lawsuit due to our commitment to all forms of diversity on campus. We believe that diversity within Harvard's campus is crucial to the

development of a student body focused not solely on academic or extracurricular excellence, but more importantly focused on personal development as thoughtful and considerate constituents of a diverse society.

5. Accordingly, AAB welcomes as members all students who care about Asian American issues, action and service at Harvard and in Boston. The diversity of our membership is indicative of how strongly we feel about elevating differences of opinion and background. We believe that a diverse set of beliefs and upbringings within a group only serve to provide more fruitful dialogue and opportunities for growth and maturation.

6. We do not believe that Edward Blum or SFFA represent the interests of Asian-American students or other students at Harvard. The practice of using the Asian American experience as a front for attack on Affirmative Action continues to be a troubling historical slight on our community. After centuries of systematic pressures placing minorities at apparent odds, we as the Asian American Brotherhood refuse to submit to this practice any longer.

7. To the extent there is a problem with the way Harvard approaches Asian and Asian-American applicants, the problem does not lie with race-conscious admissions or affirmative action. Though we admit that the implementation of affirmative action at Harvard is not perfect, the solution to the problem cannot lie in the disruption and destruction of the program. It is irrefutable that we as Asian American individuals have all benefitted in some regard from affirmative action and we cannot stand to attack one of the underpinnings of diversity and progress within the United States.

8. Removing Harvard's ability to consider race as one of many factors in admissions will adversely affect AAB members and the Harvard community at large. Removing a mechanism

designed to improve racial diversity at our university would only result in furthering the dense bubble of privilege that comes inherent with our education.

9. The moment I stepped on Harvard's campus I was forewarned of the dangers of the "Harvard Bubble" — a 210-acre campus that few students rarely venture out of. Though the term conventionally refers to a geographical limit that students enjoy referring to with an ironic sense of self-imposed imprisonment, I have come to understand that the term extends far beyond its colloquial definition. The reality is that as Harvard students, we exist in an environment of immense privilege.

10. Witnessing Mr. Blum's attempt to actively destabilize the very programs that seek to disrupt this bubble of privilege and increase diversity, is personally frustrating. I have benefitted immensely from having my personal beliefs and understandings challenged by those with differing upbringings and outlooks to my own. I have experienced the feelings of pride and solidarity which come from standing with other minority groups who seek to challenge the status quo. It is these unique and formative experiences that I seek to protect by signing on to this document.

11. I have studied the historical use of Asian Americans as tools to combat affirmative action including the report issued under the Reagan administration titled "Discrimination against Asian-Americans in Higher Education: Evidence, Causes and Cures". I have grown weary of minorities being pitted against one another and the utilization of the model minority narrative to serve the interests of groups outside our own.

12. If there is reform to be done to the current system of academic admissions it cannot take the form of destabilizing affirmative action. Asian Americans continue to face quietly pervasive discrimination in the workplace, in media and entertainment, and in simple everyday

interactions. These are issues that must be addressed, but we cannot submit to taking one step backwards if we hope to make any progress forward.

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

Executed on this day, July 26, 2018

/s/ Albert Choi

Albert Choi

EXHIBIT 7

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF MELISSA TRAN
(HARVARD VIETNAMESE ASSOCIATION)**

Melissa Tran, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Melissa Tran. I am a rising senior at Harvard and expect to earn my bachelor's degree in Molecular and Cellular Biology in 2019. I am writing this declaration individually and on behalf of the Harvard Vietnamese Association ("HVA") in support of the consideration of race, as one of many factors, in Harvard's admissions policy.

2. I am a Co-President of the HVA. After consulting with HVA's Board, I have been given authority to submit this declaration on behalf of HVA. This declaration represents a collection of different experiences shared with me by members of HVA.

3. HVA is dedicated to promoting awareness of Vietnamese and Vietnamese-American culture, history, and community on campus. HVA maintains a strong commitment to building a warm community amongst its members.

4. HVA was founded in the early 1990s, serving as an outlet for Vietnamese students to socialize with one another and to learn more about Vietnamese culture. Since then, HVA has continued to promote culture, community, and educational/political awareness at Harvard. It has become a voice on campus for Vietnamese and Vietnamese Americans and maintains a strong dedication to the needs of the greater Boston and Vietnamese community.

5. In areas of higher education, Southeast Asians, including Vietnamese students, are not well represented, but are often grouped with other Asian students despite significant cultural and socioeconomic differences. These differences have often resulted in HVA members feeling isolated due to expectations that we have had similar opportunities as other Asian students, when instead we come from a demographic with a distinctly lower educational and economic background.

6. Some members have also experienced stigma due to a perception by others that people from Southeast Asian countries are poorer, less intelligent, and even more barbaric than people from other Asian countries. We think that admissions policies should actually be more race-conscious in this regard, to understand how our Vietnamese history and heritage continue to affect our lives in ways that other Asian groups are unaffected.

7. Many of our HVA members come from families that lived through war-torn and refugee conditions, and therefore lack connections or mentorship to know how to navigate through networks of higher education. HVA provides a network and level of comfort for Vietnamese students who come from similar backgrounds and can share feelings of uncertainty and alienation in environments like Harvard. Having a Vietnamese community here helps us to know that we belong at Harvard, when we might otherwise feel lost. However, HVA is a relatively small organization due to the limited number of Vietnamese students, and we believe that prohibiting

race from admissions considerations would significantly harm our ability to create a cohesive community and support our members.

8. For some members' families, coming to America was not just a choice of pursuing a better life, but rather of trying to stay alive, which has come with repercussions, ranging from trauma to prioritizing survival above all else. For others, they are still recovering from the lasting economic and social damage of life in a country healing from conflict. Generations later, these memories and experiences continue to shape the lives of our members, some of whom are the first in their families and communities to enter an institution like Harvard. If not for race-conscious admissions policies, we believe these struggles could never be properly understood.

9. It is also important for us, HVA, to support race-conscious admissions because we strongly believe in the value of racial diversity, which allows the opportunity to learn from people from different backgrounds, such as Black, Latinx, and other Asian communities. We believe that race is an important, rich part of the identity of many students, and that it is irreplaceable in the pursuit of a diverse student body.

10. Lastly, we stand firmly in support of other underrepresented groups that race-conscious admissions policies seek to benefit. We believe that there are persistent, societal inequalities on the basis of race that cannot be corrected for by looking only at other factors, and that race-conscious admissions are necessary to close that gap. Other measures for admissions are insufficient due to inherent biases and their inability to fully capture the difficulties faced by marginalized groups.

11. We believe that it is important for our voices to be heard in this discussion pertaining to race-conscious admissions. As an Asian student group with members who also come

from underprivileged backgrounds, we believe we can offer a unique perspective on the positive impact of race-conscious admissions policies on Harvard students.

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

Executed on this day, July 27, 2018

/s/ Melissa Tran
Melissa Tran

EXHIBIT 8

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF JASMINE PARMLEY
(HARVARD JAPAN SOCIETY)**

Jasmine Parmley, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Jasmine Parmley. I am a rising sophomore at Harvard and expect to earn my bachelor's degree by 2021. I am writing this declaration individually and on behalf of the Harvard Japan Society in support of race consciousness in Harvard College's admissions policy.
2. Along with Luna Sano, I am Co-President of the Harvard Japan Society ("HJS"). After consulting with HJS's board members, I have been given authority to submit this declaration on behalf of HJS.
3. HJS seeks to spread Japanese cultural awareness throughout the Harvard community, provide Harvard students more opportunities to engage with other Japanese students, be an intermediary contact for Japan-related opportunities and Harvard students, provide support for students seeking postgraduate career opportunities in Japan, provide a platform to discuss

critical issues on Japan, and solidify relationships with other Japanese communities and organizations within and outside of Harvard.

4. HJS decided to get involved in this lawsuit to support race consciousness in Harvard's admission policy and also as an act of solidarity with other supporters of race consciousness in Harvard's admissions policy. While we all still have room to grow, we would rather stand for something that isn't perfect that aligns with our principles rather than remain silent. HJS stands for diversity as exemplified in race conscious admissions.

5. We do not agree with Edward Blum or SFFA. They do not speak for us. Their actions and words do not reflect how we feel, nor our lived experiences. We in no way want to negate nor discount the very valid and real opinions of those who are part of SFFA's brief, but they should not be seen as representatives of the Asian American Pacific Islander ("AAPI") community. We are uncomfortable with the way that Blum and SFFA could pit Asian Americans against Harvard and against other people of color, especially given the AAPI community's history of being used as a racial wedge. The categorization of our community as a model minority is a problem and not a stereotype that all of us want to fall into.

6. While there is a problem with the way Harvard approaches Asian and Asian-American applicants as a group, the problem does not lie with race-conscious admissions or affirmative action. Rather, there may be a widespread problem with implicit bias with the way that AAPI applicants are discussed, both by Harvard Admissions Officers as well as by high school teachers.

7. The problem with implicit bias can better be addressed by getting more Asian and Asian-American representation within the admission's office and among alumni interviewers. For example, my alumni interviewer turned out to be someone with whom I had a lot in common. My

interviewer's ability to understand my lived experience as a woman of color made me more comfortable. I was able to relax and be more open when answering his questions. I may not have had as positive an experience with the alumni interview had my interviewer not had that baseline level of understanding.

8. Removing Harvard's ability to consider race as one of many factors in admissions will adversely affect HJS members and applicants like us. Being Japanese is a big part of who we are. If our application materials are to authentically reflect who we are, it is important that we be able to write about the culture we grew up with. We would not have felt comfortable applying to Harvard if the application process required us to censor who we are.

9. Furthermore, HJS members benefit from interacting with students from other walks of life. Because I have had the opportunity to interact with people of diverse backgrounds, I have learned more about other cultures and have become more socially and politically aware of how other communities of color face similar problems that are manifested in different ways.

10. Like many other students of color at Harvard, I grew up in a predominately white community. While I generally had a wonderful experience there, I felt especially visible, even as a small child, because I was often the only Asian-American person or the only person of color in the room. Since I was the only Asian-American student in many of my classes, hurtful, racially insensitive words made by my classmates were often excused as light-hearted comments.

11. When you are the only person of a particular background in a class, you are a lot more aware of the words coming out of your mouth and the weight that they carry. You feel pressure to represent something more than yourself. It is very scary when you have to be the only story or the only person of a particular background that people know.

12. Many of the colleges I toured as a high school student looked like the community in which I grew up. Harvard was different. The prospect of not feeling like I always had to represent my culture or anyone who in any way looked like me and meeting others who shared my experience as a person of color made Harvard especially appealing.

13. Harvard, with its vibrant community of students of color, was a refreshing change. It was so nice to meet other Japanese or Asian American students and learn that they, too, felt the way I did growing up. For many of us, coming to Harvard was the first time we found a community of others who share this experience. When you are not the odd one out, it makes you feel like you belong. When there are others from a similar background as you, there is a certain level of understanding that establishes more of a safe space. At Harvard, I feel safer voicing my opinions without someone taking my opinions as representative of a whole community.

14. The support of a welcoming community has been especially important for me. Since I am the first student in recent years from my Midwestern high school to attend an Ivy League college, coming to Harvard was especially intimidating. I would not have adjusted to Harvard as quickly had I not felt I belonged.

15. Too often, Asians and Asian Americans are viewed as the model minority and pitted against other people of color. Thus, it is important to HJS to make clear that we stand with them. While progress can still be made with the current system, we support race conscious admissions at Harvard.

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

Executed on this day, July 27, 2018

A handwritten signature in black ink, appearing to read "Jasmine Parmley", is written over a horizontal line.

Jasmine Parmley

EXHIBIT 9

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF FATIMA SHAHBAZ
(HARVARD SOUTH ASIAN ASSOCIATION)**

Fatima Shahbaz, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Fatima Shahbaz. I am a rising sophomore at Harvard and expect to earn my bachelor's degree in 2021. I am writing this declaration individually and on behalf of the Harvard South Asian Association ("SAA") in support of race consciousness in Harvard College's admissions policy.

2. I serve as co-Academic Political Chair of SAA. After consulting with SAA's board members, I have been given authority to submit this declaration on behalf of SAA.

3. SAA exists to meet the political, cultural, academic, and social needs of students who express interest in the region of South Asia and the South Asian diaspora. South Asia includes but is not limited to the nations of Bangladesh, Bhutan, India, the Maldives, Myanmar, Nepal, Pakistan, and Sri Lanka.

4. SAA is honored to join this amicus brief to help build minority coalitions across Harvard and inspire those same minority coalitions across the country.

5. Although SAA believes that there is much that Harvard can do better in terms of how it deals with race relations on campus, how it deals with the Asian diaspora, and how it deals with Asian American admissions, we do not feel that an end to race-conscious admissions is the solution.

6. Indeed, as a part of SAA's deliberations about whether to join this brief, SAA surveyed its members about the issue. The overwhelming majority of SAA's members support Harvard's ability to consider race as one of many factors in admissions.

7. College is about exposing yourself to things that you weren't exposed to before and thereby broadening your horizons. Diversity requires you to address the unknown and grow from that experience. Every Harvard student benefits from having a diverse student body that forces them to reconcile their lived experience with experiences they didn't have.

8. Harvard's consideration of race in admissions is also important because Harvard is educating future leaders. Future leaders need to learn about others who are not of their same background. It is the conversations you have with your classmates and peers that teach you to be tolerant.

9. Furthermore, having a welcoming community of diverse students of color is essential to ensuring that Harvard's students of color have an adequate support network. SAA's members take solace in being able to find community with others with whom they share many commonalities. For example, many of us grew up with the same emphasis on hospitality, calling friends' parents "auntie" or "uncle." SAA members have found a home in SAA, where we can

find comfort in having people know how to say our names the way our parents intended or in having someone around who knows where to find the best Desi restaurants.

10. In addition, Harvard must consider the whole person during the admissions process. Indeed, students are products of their culture. In the same way that students have been shaped by their upbringing and socioeconomic status from birth, your racial identity plays a role in how others see you and thus how you perceive yourself and make your way through the world. If Harvard were to eliminate race conscious admissions, they would be buying into this notion of a colorblind world, but we don't live in a colorblind world.

11. Harvard can make its admissions process more equitable by reconsidering its legacy admissions program, which disproportionately favors wealthy, mostly white legacy candidates, at the expense of similarly qualified non-legacy candidates, most often including low-income students of color. Instead of pointing out the obvious – that legacy admissions is reducing the number of seats available for promising non-legacy candidates, Edward Blum is using Asian Americans as a political tool in his fight to end the consideration of race in admissions.

12. In doing so, he paints Asian Americans with a broad brush. Often, when people think of Asian Americans, they think of solely those East Asians who have access to the best educational opportunities. However, some Asian American communities, such as many Hmong and Filipino students, do not enjoy the same access to educational opportunities as other groups, like many wealthy East Asian or South Asian students. The Asian American community is a community of diverse perspectives, backgrounds, and privileges, and should not be treated as the monolith that Blum is misrepresenting it to be.

13. In addition, to reduce Asian Americans to their test scores is, quite frankly, offensive because it supports the notion that Asian Americans are just a summation of their test scores, instead of real individuals with personal struggles and triumphs that have shaped their lives.

14. The solution to these challenges is more diversity, not less.

15. SAA is proud to stand with other organizations in support of Harvard's ability to consider race, as one of many factors, in admissions.

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

Executed on this day, July 28, 2018

/s/ Fatima Shahbaz
Fatima Shahbaz

EXHIBIT 10

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF SAHAR OMER
(HARVARD ISLAMIC SOCIETY)**

Sahar Omer, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Sahar Omer. I am a rising junior at Harvard and expect to earn my bachelor's degree in Government in 2020. I am writing this declaration individually and on behalf of the Harvard Islamic Society ("HIS") in support of the consideration of race, as one of many factors, in Harvard's admissions policy.

2. I am the President of the HIS. After consulting with HIS's Board, I have been given authority to submit this declaration on behalf of HIS.

3. HIS is dedicated to providing an Islamic environment for members to practice Islam as a way of life, to assist the broader community at Harvard University with their spiritual, social and intellectual endeavors, and to provide a better understanding of Islam to the University community.

4. HIS was founded in 1956 to serve as an organization that provides a space for Muslim students to interact and support one another, as well as learn about Islam and Islamic values. Since then, HIS has been an organization that has also taken up a political side, where they have advocated for issues that are against Islamic values as well as affect members of the Harvard and the Muslim community worldwide.

5. Muslims are underrepresented in higher education, and bias against Asian-Americans— which make up a large percentage of our population— is something that we believe should be taken seriously and should be addressed. However, eliminating these biases does not mean eliminating race-conscious admissions.

6. As Harvard is an institution dedicated to giving a formative education to the world's next leaders, it has the right to providing an education that is not just centered around academics, but also fosters an environment in which every aspect is a learning experience. Living in a diverse environment is a social good that gives a more well-rounded experience for every single person in the group. As Muslims, we understand the threat that comes with misunderstandings and stereotypes and see the strength that comes with living in communities of diverse backgrounds, experiences, perspectives, and identities.

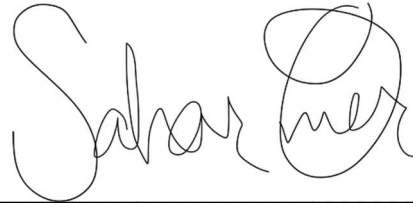
7. Lastly, we stand firmly in support of other underrepresented minority groups that race-conscious admissions policies seek to benefit. We believe that there are persistent, societal inequalities on the basis of race that cannot be corrected for by looking only at other factors, and

that race-conscious admissions are necessary to close that gap. Other measures for admissions are insufficient due to inherent biases and the inability to fully capture the difficulties faced by marginalized groups.

8. We believe that it is important for our voices to be heard in this discussion pertaining to race-conscious admissions. As an organization that has members that have faced discrimination for their faith, we can offer a different perspective on the value of having a diverse community and the positive impact that race-conscious admission can have.

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

Executed on this day, July 27, 2018

A handwritten signature in black ink, appearing to read "Sahar Omer", written over a horizontal line.

Sahar Omer

EXHIBIT 11

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF JESPER KE
(PHILLIPS BROOKS HOUSE ASSOCIATION)**

Jesper Ke, pursuant to 28 U.S.C. § 1746, declares the following:

1. My name is Jesper Ke. I am a rising senior at Harvard and expect to earn my bachelor's degree in Sociology in 2019. I am writing this declaration individually and on behalf of the Phillips Brooks House Association ("PBHA") in support of the consideration of race, as one of many factors, in Harvard's admissions policy.

2. I am the Vice-President of PBHA. After consulting with PBHA's governing body and membership, I have been given authority to submit this declaration on behalf of PBHA.

3. PBHA is a community-based, 501(c)(3) non-profit public service organization that is run by Harvard undergraduates. Founded in 1904, PBHA is Harvard University's largest student-run organization, and its programming is nationally recognized. Though affiliated with Harvard, PBHA is independent. For more than a century, PBHA has worked with community partners to provide services and advocate for structural change in the greater Boston area, where

1,500 PBHA volunteers (predominantly Harvard undergraduates) participate in more than 80 programs to serve 10,000 low-income members of Asian, Black, Latinx, and other communities. PBHA's programs include advocacy, adult education, youth tutoring and mentoring, housing, and summer enrichment. Students help young immigrants in Dorchester build English skills, provide youth jobs and mentoring to at-risk teens, offer shelter and safety to men and women sleeping on the streets, and partner with local labor unions to win fair wages. PBHA's alumni include former U.S. Secretary of Education John King Jr., Massachusetts Governor Deval Patrick, philanthropist and pediatrician Priscilla Chan, as well as a former U.S. president, vice president, associate justice of the Supreme Court, and founder of the American Civil Liberties Union.

4. PBHA was established in 1900 as "Phillips Brooks House" in remembrance of Reverend Phillips Brooks, a preacher at Trinity Church, Harvard graduate, and advocate for social service. In 1904, six organizations formally formed PBHA, and by the 1920s all the religious groups had withdrawn from the organization. The Social Service Committee and several offspring philanthropic groups continued to serve the mission of PBHA in a nonsectarian manner.

5. PBHA builds a supportive environment that shares power with its constituents through strong relationships built on mutual respect across identity lines. Moreover, PBHA fosters a diverse organizational membership that mirrors the representation we believe should exist throughout society at large. This is why it is essential that PBHA's student volunteers come from diverse racial, cultural, linguistic, and socioeconomic backgrounds. We are best equipped to work with and serve in local communities if we have volunteers who can relate to constituents—culture, language, customs, and more—from those communities. In fact, some of PBHA's best curriculum and programming has only been possible because students of color were able to develop it based on their deep knowledge of communities of color and their ability to relate to constituents.

However, recruiting volunteers from diverse racial and cultural backgrounds is only possible with a racially and culturally diverse student body.

6. It is important to have volunteers who can identify with the constituents that we serve in PBHA's programs. For example, it has been a priority for PBHA to recruit mentors for afterschool and mentoring programs from African American and Latinx backgrounds, which is a huge constituency that we serve. This is because for the children in our programs, especially those of color, it is important for them to have role models who share their background, language and culture. It should also be noted that Black and Latinx volunteers make up some of our organization's most outstanding members, so recruiting students of color is not just a question of representation. The elimination of race-conscious admissions would significantly hamper our ability to recruit mentors who come from diverse backgrounds, thereby decreasing the quality of services we are able to offer in local communities.

7. As an example of how diversity tangibly affects members' experiences, one of our mentoring program volunteers, a Latinx student at Harvard, was working with some of the children we serve in a museum when the museum began harassing and racially profiling our predominantly Black and Latinx child participants. Because many of the student volunteers attending the trip had experienced this kind of profiling previously, these volunteers were able to address the incident meaningfully and talk to the children about what they had faced.

8. Racial and cultural diversity is important as well for the student experience in our organization. Although we are not an affinity group, we draw students who come from diverse backgrounds, and who engage with each other through their work as volunteers, student officers, and more in our organization.

9. Our members value the supportive, diverse community that PBHA provides – one in which they are able to share and reflect on cultural and social hardships – and successes – with others. PBHA’s members have learned and observed the importance of listening to those who are different. Learning from those around us, and especially those who come from different backgrounds (in terms of race, culture, religion, sexuality, etc.) has made encountering these differences when volunteering in the field more familiar – something that greatly enriches our members’ experiences in PBHA.

10. My own experience at PBHA reinforces the idea that a diverse student body is essential to our organization’s ability to function well. For example, my experience in the Greater Boston Area teaching English to Chinese adult immigrants differs greatly from my experience teaching English to Latinx adult immigrants. With Latinx students, although I could help teach the students basic grammar and vocabulary, I found it very difficult to answer any questions they had because I could not speak any Spanish. Additionally, I had little shared cultural knowledge with them that would have allowed me to explain grammar and vocabulary concepts in a way that they could more easily grasp. In contrast, I not only can communicate with Chinese student learners in Mandarin, but importantly, I can better relate to the cultural customs they have that may influence how I approach them in the classroom. This is helpful when interacting with some of my older Chinese students (70 years old and up), where I have to navigate the delicate balance between showing deference and respect to my elders—also known as filial piety in Chinese culture— and serving as an authority figure in the classroom as an English teacher.

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

Executed on this day, July 28, 2018

/s/ Jesper Ke
Jesper Ke

EXHIBIT 12

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF REWAN ABDELWAHAB
(HARVARD MINORITY ASSOCIATION OF PRE-MEDICAL STUDENTS)**

Rewan Abdelwahab, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Rewan Abdelwahab. I am a rising junior at Harvard and expect to earn my bachelor's degree in 2020 in biology with minors in Spanish and African American studies. I am writing this declaration individually and on behalf of the Harvard Minority Association of Pre-Medical Students ("MAPS") in support of race consciousness in Harvard College's admissions policy.

2. I serve as the president of MAPS. After consulting with MAPS' board members, I have been given authority to submit this declaration on behalf of MAPS.

3. Founded in 2018, MAPS has 110 members and is committed to providing an inclusive environment for minority pre-medical students in which members are provided with the tools, opportunities, and resources needed to succeed. We hope to educate students about the career, educational, and networking opportunities available to them in the medical field. MAPS

works to provide a space in which the diverse backgrounds and experiences of members can be appreciated, embraced, and valued. People of color are underrepresented in the medical field, and we hope that our members will see that their diverse backgrounds, experiences, and perspectives are valuable in the medical community.

4. Supporting the consideration of race in admissions and condemning racism are not mutually exclusive. Harvard can combat bias while it works to build a diverse class by considering race, as one of many factors, in admissions.

5. MAPS supports the use of race in admissions because people of color are underrepresented in the medical field and there needs to be a diverse pipeline of future medical professionals. In addition, we hope that our members will see that their diverse backgrounds, experiences, and perspectives are valued in the medical community and in undergraduate institutions generally.

6. MAPS would not have as many members as it does if race were no longer considered in admissions. A sharp decline in the number of MAPS members would undermine the purpose of the organization and its work with the Student National Medical Association national network for people of color across the nation. A steep decline in our membership would also greatly hinder our ability to go to high schools and establish pipeline programs for students of color. It would also hinder our ability to achieve our ultimate goal of helping prepare people of color to become culturally sensitive and competent physicians.

7. The quality of discussions in classes would also be negatively impacted were Harvard no longer able to consider race in admissions. For example, I went to a high school where I was often the only person of color in my advanced classes. I served as the de facto spokesperson for all people of color. In contrast, my African American studies classes at Harvard are very

diverse. The discussions in those classes are more robust and nuanced than discussions in my classes that have a less diverse set of students. Rather than always having to educate others, in my African American studies classes, I can relax and *learn* from my classmates' experiences. Rather than always bearing the burden of challenging assumptions alone, in a class with a diverse set of students, there are multiple students who will raise their voices to respond to an unfairly construed study.

8. Given the foregoing, it is MAPS' pleasure to stand with other organizations in support of race-conscious admissions.

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

Executed on this day, July ____28____, 2018

A handwritten signature in black ink, appearing to read 'Rewan Abdelwahab', is written over a horizontal line.

Rewan Abdelwahab

EXHIBIT 13

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION of MARGARET M. CHIN, PhD,
(COALITION FOR A DIVERSE HARVARD)**

Margaret M. Chin, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Margaret M. Chin. I graduated from Harvard College in 1984. I earned my PhD from Columbia University and am now a tenured Associate Professor of Sociology at Hunter College and the CUNY Graduate Center.
2. I am one of the five co-founders and Steering Committee members of the Coalition for a Diverse Harvard (“Diverse Harvard”), an organization with over 1,000 Harvard and Radcliffe alumni, faculty, and student members. We describe ourselves as, “Harvard and Radcliffe alumni and students fighting for diversity, equity, and inclusion at the University and in higher education at large.” I am authorized to submit this declaration individually and on behalf of Diverse Harvard.
3. Harvard played no role in the formation of Diverse Harvard, and we are fully independent of the University.

4. Diverse Harvard was formed in 2016 to (1) oppose a petition slate of five candidates running for the Harvard Board of Overseers, four of whom had written or testified extensively against race-conscious admissions and who publicly agreed with the positions now being taken by the plaintiff in this lawsuit; and (2) advocate for race-conscious and holistic admissions practices that support campus diversity.

5. At present, Diverse Harvard has over 1,000 members of diverse racial and ethnic backgrounds, including approximately 250 Asian American members. Our members have graduation years spanning seven decades.

6. In 2016, the alumni who founded Diverse Harvard endorsed and campaigned for the Overseer candidates who would support the University's race-conscious admissions practices and opposed the petition slate aligned with this lawsuit, marshaling the support of hundreds of Harvard alumni. All five petition candidates, four of whom opposed race-conscious admissions, were defeated.

7. Diverse Harvard also highlighted diversity issues in the 2017 and 2018 elections for Harvard Overseers and for Directors of the Harvard Alumni Association. In 2017, eight of the nine candidates endorsed by Diverse Harvard were elected, and in 2018, nine out of ten candidates endorsed by Diverse Harvard were elected.

8. Since 2016, Diverse Harvard has also devoted significant time and effort to advocacy on various issues related to diversity, ethnic studies, and race consciousness at Harvard University and has sponsored and supported public events to educate Harvard-affiliated individuals and the public at large on diversity in education and holistic college admissions processes.

9. For example, earlier this year, Diverse Harvard supported and helped organize a public panel at Harvard entitled “Students for Fair Admissions v. Harvard - Why Asian Americans?” The panel was attended by current Harvard students who engaged the panelists in discussions about this lawsuit and the role of Asian Americans in Harvard’s admissions process.

10. The founding alumni members of Diverse Harvard incorporated Coalition for a Diverse Harvard, Inc. in 2018 and, with the help of more than 1,000 Harvard alumni and student members, continue to promote campus diversity by supporting the inclusion of race as one factor among hundreds in Harvard’s holistic admissions review process.

11. The vast majority of Diverse Harvard’s members are alumni of one or more schools within Harvard University. Most of the remaining members are current students at the University, primarily undergraduates.

12. The members of Diverse Harvard strongly oppose the plaintiff’s attempt to prohibit the consideration of race in college admissions in this lawsuit. Some members of Diverse Harvard have been advocating for diversity at Harvard for decades.

13. Diverse Harvard also includes alumni who have volunteered as Harvard admissions interviewers. In addition, some members of Diverse Harvard have children applying to, or currently attending, Harvard and want to ensure that their own children benefit from a diverse learning environment.

14. As former and current students of Harvard University, Diverse Harvard members are uniquely qualified to opine on the benefits of Harvard’s race-conscious admissions process. Our members who are current students have a direct interest in continuing to receive the benefits of diversity at Harvard College. Members of Diverse

Harvard who attended Harvard College since the 1970s have benefited from learning in an environment made more diverse by race-conscious admissions. Older members of Diverse Harvard can also attest to the importance of a diverse student body, and how their educational experiences were negatively affected by learning in a Harvard much less diverse than the University of today.

15. Also, Diverse Harvard members who are Asian American (as are the majority of Diverse Harvard's founders and Steering Committee) believe it is essential for Harvard's admissions process to maintain its focus on the "whole person."

Considering the claims made by the plaintiff in this lawsuit, Diverse Harvard believes it is vital for this Court to hear from Asian American students and alumni of Harvard University, and other supporters of the school's race-conscious admissions policy, as it considers this action.

16. I was admitted to Harvard not long after, in response to the demands of student activists, the College began recognizing Asian Americans as a racial minority in admissions in 1976. I have personally benefited from whole-person, race-conscious admissions practices. The diversity I experienced in the Harvard community—both inside the classroom and out—enriched my education and has had a profound impact on my life and my career.

17. I was born in New York City and attended public schools. My parents were Chinese immigrants, my mother a garment worker and my father a waiter. At Stuyvesant High School, I was editor-in-chief of *Kaleidoscope*, the foreign language magazine. As a member of the Red Cross Youth Speak Out Task Force, I helped organize a city-wide conference on the problems of youth. I took an intensive multi-week

computer science honors program for high school students at the NYU Courant Institute of Mathematical Sciences after my sophomore year, and I was invited back to teach a number of courses in the program the following summer, which was rare because the other lecturers were college or graduate students.

18. My parents did not attend college, and it did not cross my mind to apply to Harvard until I attended a college fair in New York's Chinatown in 1979. At the fair, I was recruited by Asian American students from Harvard who were employed by the College's Undergraduate Minority Recruitment Program. The Undergraduate Minority Recruitment Program was one element of Harvard's affirmative action plan. My SAT scores were not outstanding, and I was excited to be admitted to Harvard.

19. Being Asian American and a first-generation college student is a central part of my identity. When I arrived at Harvard, I was intimidated but also happy to be able to learn alongside not only other Asian American students, but also students of all races, ethnicities, religions, socioeconomic backgrounds, regions of the United States, and nationalities. I turned to my multicultural dorm-mates to help lead the way when I had no clue, especially since I had never lived away from home. We clearly had different experiences, values, and perspectives on life while also sharing many commonalities. The lessons that I learned about our differences and shared values during discussions in the classroom, dining hall, and late nights in the dorm transformed me and still shape my work today.

20. For three years, I worked in the Admissions Office for the Undergraduate Minority Recruitment Program as a student recruiter and the Asian American Coordinator. In that capacity, I organized and went on student recruitment trips to high

schools in areas, such as New York City and California, that had significant numbers of Asian Americans.

21. Of course, many urban areas that had high numbers of Asian American students also had high numbers of Black and Latino students. Thus, all the minority recruiters recruited for members of all minority groups. We worked hard to learn about the unique issues facing students of all races, ethnicities, and socioeconomic backgrounds. We also worked to educate admissions officers and administrators about cultural issues, language barriers, and immigration experiences that would impact the education and evaluation of minority applicants.

22. I was a co-President of the Asian American Association (“AAA”). The AAA was the largest pan-Asian student group hosting membership events for Asian American students. Through presentations, films, cultural festivals, and a newsletter, we engaged in ongoing efforts to educate the Harvard community about the experiences of Asian Americans.

23. AAA pressured the University to hire more Asian American professors and offer courses in Asian American studies. At the time, Harvard offered only one course in Asian American studies that I could take. Thirty-five years later, because Harvard lags significantly behind other comparable institutions in the area of Ethnic Studies, I continue to actively campaign for Harvard to improve Ethnic Studies as a member of the Harvard Asian American Alumni Alliance.

24. As an undergraduate, I was also a founding member of the Third World Students’ Alliance. We advocated to get minority events listed alongside other activities in the freshman week calendar to avoid being relegated to second-class status. As a

student activist and leader in both the AAA and the Third World Students' Alliance, I advocated for students of all backgrounds to be given the opportunity to study and share their ancestries on campus. This advocacy often involved protests and adversarial relationships with Harvard administrators.

25. By the time I was a senior, I felt supported as a member of the minority student community at Harvard, and I was able to share my experiences and interests as a person of color at the College. I worked for the Harvard Foundation for Race Relations, coordinating and planning public events aimed to promote cross cultural understanding on campus.

26. My undergraduate life and activities brought me into contact with students from all kinds of backgrounds. Diversity was not an abstract concept at Harvard. My everyday life on campus was richer for all the people with whom I lived, met, and worked over my four years as an undergraduate at Harvard.

27. Outside of Harvard, I was a member of the East Coast Asian Student Union ("ECASU") Joint Admissions Task Force. The member colleges sponsored college fairs in Boston and New York City. We advocated for Asian American students in the article "Admissions Impossible" in 1983, an article that has been misleadingly cited in the plaintiff's complaint in this lawsuit. Our survey of 25 universities indicated that the admissions rate for Asian Americans lagged behind the rate for all other ethnic groups, including white applicants.

28. Instead of demanding the elimination of race as a consideration in admissions, as plaintiff seeks in this lawsuit, we urged colleges to set up minority recruitment programs, to hire Asian American admissions officers, to increase training on

cultural bias, and to become educated on stereotypes that worked against Asian American applicants. We believed it was better for Asian Americans to be recognized than to be unintentionally excluded. We also decried insufficient financial aid and other barriers that kept out applicants who were poor or from inner cities. By that time, Harvard had incorporated Asian Americans into its Minority Recruitment Program (which directly led to me attending Harvard) and was increasing the number of Asian American students from low-income families, but greater efforts were needed.

29. After I graduated from Harvard, I worked at IBM. Then, because I knew from my studies at Harvard that there was a lack of research on working class communities and on Asian Americans in general, I decided to pursue my PhD and conduct research that would broaden perspectives on questions of equality. After concentrating in immigration, the working poor, race, and ethnicity, I earned my PhD with distinction from Columbia University.

30. I am now an Associate Professor of Sociology teaching courses ranging from “The Sociology of the Family” to “Migration and Immigration to New York City.” I have received an American Sociological Association’s Minority Fellows Award, a National Science Foundation dissertation grant, a Social Science Research Council postdoctoral fellowship in international migration, and a Woodrow Wilson Foundation fellowship for junior faculty. I was the Vice President of the Eastern Sociological Society and wrote the book *Sewing Women: Immigrants and the New York City Garment Industry*.

31. Today I continue to study and teach about issues of equity and equality that stem from my experiences as a Harvard undergraduate. I am currently conducting

research for "*The Peer Effect*," a study of Stuyvesant High School and its 1980-2000 graduates, and am writing my next book, "*Playing the Professional Game*," on second-generation Asian Americans in the corporate world. Incidentally, my research shows that Asian American adults benefit when diversity programs include them in the work world.

32. Around 2000, I was asked by a college friend, who subsequently became a Harvard admissions officer, to be an alumni interviewer for the NYC Harvard Schools Committee. After interviewing for over a decade, I served a five-year term as a Schools Committee subcommittee co-chair, coordinating over 50 alumni interviewers and over 125 high school student interviews each admissions season. It was our responsibility to ensure that applicants assigned to our subcommittee received an interview and a fair evaluation.

33. Over the years, I have also met hundreds of student applicants at recruiting events and receptions for admitted students. I have observed that the number of interviewers of color, especially Asian Americans, has increased dramatically in the time period since 2000. I myself have encouraged Asian Americans to volunteer their time on this effort.

34. Every year, we see many highly accomplished applicants get rejected, and that can be heartbreaking. While I am not aware of every aspect of the Harvard interviewing or admissions processes, I have not personally observed the differential treatment of Asian American applicants interviewed by our subcommittee compared to applicants of other races or ethnicities.

35. As an alumna, it was distressing to find that, in October 2014, about 400 members of the Harvard community, most of them Asian American women students,

received an email addressed to “slit-eyes,” with the writer threatening to come to the Harvard campus the following day to “shoot all of you” and “kill you individually.” The source of the death threats continued to contact Asian women students at Harvard throughout October, and in December 2014 a separate threatening email was sent to 80 Asian women students at Harvard.

36. Information about these incidents were reported in the Harvard Crimson, and can be found online at <https://www.thecrimson.com/article/2014/10/8/discussion-criticize-response-threat/>; <https://www.thecrimson.com/article/2015/4/6/email-threats-investigation-ongoing/>.

37. Asian American students and alumni, including myself, banded together to complain to Harvard administrators and the Harvard University Police Department about their lackluster responses to these hate crimes. No perpetrator has been identified to this day. Only after repeated demands by a coalition of alumni and faculty groups of various backgrounds did President Faust address the issue directly at all, despite the fear and trauma that these incidents elicited among Asian American students on Harvard’s campus.

38. It was upsetting that it took so long for this incident to be addressed. One former Asian American female Harvard student expressed the trauma and disappointment of this incident in an op-ed in the Harvard Crimson. That op-ed can be found online at <https://www.thecrimson.com/article/2015/12/1/email-threat-breaking-point/>.

39. My fellow co-founder and colleague on the Steering Committee of Diverse Harvard, Michael Williams, is an African-American graduate of Harvard. He also speaks powerfully about the importance of Harvard having a diverse student body.

The students that he met in college expanded his view of the world and set him on a different career path. He graduated from Harvard with a commitment to do what he could to improve the lives of underrepresented people.

40. Mr. Williams decided to become a lawyer and has spent virtually his entire career working with and representing low-income people in New York City, primarily people of color. He attests that he benefited immensely from Harvard's holistic admissions policy not only when he applied, but also as a student at Harvard in the Class of '81. The diverse group of friends that he made at Harvard literally changed his life for the better.

41. Another co-founder of Diverse Harvard is Kristin Penner, a white woman who graduated from Harvard in 1989. She speaks of the benefits that she gained as a white undergraduate living with, and learning from, students from diverse backgrounds and experiences. Her interactions with students of color in the classrooms and dorms at Harvard made a profound impact on her academic and professional life. Previously interested in gender equality, she broadened her focus to include the role of race in women's lives, which led to her eventually working directly for women and children in her community.

42. As a psychotherapist in community mental health programs, her prior experience with diverse groups made it possible for her to work effectively cross-culturally with Asian American, Latinx, and African American women and children. She can attest that, as a white woman, she too was a beneficiary of a holistic admissions policy, both in her own admission to Harvard and in making personal and academic connections that led to an expanded view of how she could contribute to her community.

43. Based on my experiences as a Harvard student, alumni interviewer, subcommittee chair, and parent, I believe that Harvard has made tremendous strides in admitting applicants of all racial and ethnic backgrounds and students from first-generation and low-income backgrounds. The financial aid program has increased dramatically. In my class, there were 131 Asian students (perhaps including foreign citizens); in the most recent first-year class, there are approximately 350 Asian Americans. In the two most recent first-year classes admitted, over half the students admitted have been students of color. I believe that this campus diversity will better prepare all these students to become leaders who can address the complex issues, including race and inequality, facing the world.

44. In 2016, I read in the New York Times that a number of conservative activists, who had written or testified extensively against race-conscious admissions, were running for the Harvard Board of Overseers on a petition slate. It was clear that they were using Asian Americans as a cover to attack the whole-person admissions process and establish a complete bar against any consideration of race, so I joined with other alumni to form the Coalition for a Diverse Harvard. Diverse Harvard has been a wonderful opportunity to connect with other Harvard graduates, most of whom I have never met before, who are as passionate as I am about the need for a diverse learning environment at Harvard to educate leaders who can work to improve our communities, country, and world.

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

Executed on this day, July 29, 2018.

/s/ Margaret Chin
Margaret Chin

EXHIBIT 14

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF DANIEL LOBO
(FIRST-GENERATION HARVARD ALUMNI)**

Daniel Lobo, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Daniel Lobo and I am the President of the First-Generation Harvard Alumni (“FGHA”).
2. I am submitting this declaration individually and on behalf of FGHA.
3. FGHA is an alumni shared interest group of the Harvard Alumni Association with a global membership of 1000+ volunteers.
4. FGHA was founded in 2012, at a moment when first-generation, low-income students—students whose parents did not graduate from a 4-year college or university—came into focus at colleges and universities across the country. While well-resourced colleges and universities have dramatically improved their recruitment of these students in the past decade, they

have not thought as carefully about how to fully support these students once on campus to maximize their chances of success. FGHA was created to help solve this problem.

5. FGHA was originally founded as a mentorship program that pairs first-generation Harvard alumni with first-generation, first-year students at Harvard College. To date, more than 350 FGHA mentors have provided support and guidance to over 500 first-generation Harvard students.

6. Outside of this flagship program, FGHA has supported the community building and advocacy efforts of the Harvard College First-Generation Student Union (“FSGU”), including Thanksgiving dinner events for students who cannot afford to go home for the holidays and a special graduation ceremony honoring these students and the families who helped them make it to this day.

7. The advocacy efforts of the FSGU have influenced Harvard to commit institutional resources to support the success of this less privileged population, such as the Harvard First-Generation Program and, most recently, a pilot summer orientation program for incoming first-generation, low-income students.

8. The First-Generation Harvard Alumni group is proud to support this student activism, which has made Harvard a more inclusive and more vibrant community for everyone.

9. As the first institutional alumni group of our kind, FGHA feels a responsibility to further advocacy on behalf of first-generation students beyond the walls of Harvard yard. At this year’s Fourth annual conference of the inter-Ivy, first-generation college student network (“1vyG”)—a convening of students, alumni, and administrators from 20+ institutions across the country—FGHA began a broader community organizing effort among first-generation alumni with the help of student activists. We believe that this movement, like its student

counterpart, has the potential to expand the perspective of some of our nation's most influential institutions, which we now occupy as college graduates, during a moment in history when our most fundamental democratic values are being challenged.

10. FGHA has an interest in the *SFFA v. President and Fellows of Harvard College* case because our members are the direct beneficiaries of Harvard's holistic, admissions review process and the resulting diversity that we experienced on campus once admitted. FGHA is an incredibly diverse community: a mosaic of intersecting identities along nationality, race, socioeconomic status, faith, discipline, and occupation. We are leaders in business, in science and technology, in government and diplomacy, in healthcare and medicine, in education and public service, in arts and entertainment, and more. But, in conjunction with this diversity, we all share one unique quality in common: we each have a story of courage and resolve that illustrates an often unrecognized potential to add value to the world. None of us began our journey from a place of leadership or influence. We began as everyday Americans, often from immigrant families and/or the working class, spanning from the streets of the Inland Empire, to the dairy farms of Wisconsin, to Unorganized Territory #60 in Maine. Harvard's holistic admissions process recognized the value in our stories as first-generation students from many backgrounds. That recognition has enabled us to do great things, including supporting the generations that will follow us.

11. For many of our members, their racial and ethnic heritage is intimately entwined with the experiences and challenges that made them who they are. We are, therefore, deeply concerned that if SFFA succeeds, a new generation of stories will go unheard and a new set of solutions to our most pressing problems will remain untapped. We will lose a generation of leaders who are committed to reaching back as they push the world forward. This has negative implications, not just for Harvard, but for the public interest more broadly.

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

Executed on this day, July 21, 2018

/s/Daniel Lobo
Daniel Lobo

EXHIBIT 15

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF EMILY VAN DYKE
(NATIVE AMERICAN ALUMNI OF HARVARD UNIVERSITY)**

Emily Van Dyke, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Emily Van Dyke, and I am a 2003 graduate of Harvard College. I am currently the President of the Native American Alumni of Harvard University (“NAAHU”) and am submitting this declaration individually and on behalf of NAAHU.
2. NAAHU’s Board members have discussed this lawsuit and voted unanimously to participate as amicus curiae in support of Harvard’s race conscious admissions policy. NAAHU’s Board members also authorized me to submit this declaration on behalf of the entire organization.
3. NAAHU was created as an official Special Interest Group at Harvard in 2007 with the purpose of developing a network and sense of community among Harvard Native American, Alaska Native, and Native Hawaiian alumni and encouraging involvement with the current Native American, Alaska Native, and Native Hawaiian communities at the University.

4. NAAHU's stated mission is to maintain, expand, and promote a network of Harvard Native American, Alaska Native, and Native Hawaiian alumni; to develop a sense of community among alumni, faculty, staff and students; to encourage alumni involvement in University affairs that affect Native American, Alaska Native, and Native Hawaiian communities within the University; to increase alumni participation with and investment in undergraduate and graduate Native American, Alaska Native, and Native Hawaiian student communities; and to assist the University in recruitment and retention of Native American, Alaska Native, and Native Hawaiian candidates for undergraduate and graduate programs and faculty and administrative positions.

5. Issues of diversity have particular resonance to Native students and alumni of Harvard given our history with the University and the challenges that Native students face while on campus.

6. Harvard's Charter, dated May 31, 1650, specifically states that the college was established for the "education of the English and Indian youth of this country." Thus, from its very inception, Harvard was meant to be a place of learning for racially diverse students, including Native students.

7. Unfortunately, the number of Native students at Harvard is extremely small. Harvard Admissions reports that Native American student admissions grew marginally for the Class of 2022: 2% up from 1.9%. When I was at Harvard, I was generally the only student in my courses who spoke on behalf of Native issues. Only in my senior year, when I took an indigenous art class taught by a visiting professor, did I have the chance to take a course surrounded by other students who identified as American Indian/Alaska Native (there were four of us from all Harvard schools).

8. Due to our small numbers, Native students are often placed in the position of providing the “Native” perspective to faculty and fellow students. Given that there are 573 federally-recognized Native American tribes, it is impossible to represent all the different histories, experiences, and interests of Native people. However, having some Native American perspective is better than none at all. For example, I once had to ask an Economics professor if he would consider modifying his near-daily use of the term “areas of recent settlement” to refer to the Americas. This can be an exhausting and unfair burden to place on a young Native student at Harvard to try to speak to all those incidences in which indigenous peoples are erased from narratives.

9. Our small numbers can make Harvard a very isolating place to go to school, especially for Native students who have spent their entire lives on a reservation. It is, therefore, tremendously helpful and comforting to have a community of Native students to serve as a network and support system or to commiserate or laugh with when people say ignorant things about Native people.

10. An example of a Native student struggling at Harvard is a good friend of mine, Duane Meat, who was supposed to graduate in 2007. Duane was a member of the Ojibwe tribe, who came to Harvard from the Leech Lake Reservation near Minneapolis. He was a gifted and brilliant student and served as President of the Native Americans of Harvard College (“NAHC”), a student organization for Native American students, and co-chair of the Student Advisory Committee of the Harvard Foundation for Intercultural and Race Relations.

11. Despite Duane’s many leadership roles, however, he was struggling to feel he belonged in the Harvard community. This affected his schoolwork, and he was eventually placed on academic probation. While he was on probation, he was shot and killed in Minneapolis.

12. I often think about what Duane could have become had there been more support for him while he was at Harvard. It would have made a tremendous difference to have more Native Americans around him to help make him feel like he belonged at Harvard. Those of us active in Harvard's Native American community continue to honor his memory at the Harvard Powwow and other events. His story is a stark reminder of the importance of finding and building a support network for Native students during their time at Harvard.

13. What happened to Duane affected me deeply because he welcomed me into Harvard's small Native American community. My maternal grandfather is from the Siksika Nation, which is part of the Blackfoot Confederacy, but he was forcibly removed from his family and traumatized in boarding schools, where he was indoctrinated not to speak about his ancestry or to use the Blackfoot language. As a consequence, we have little official documentation of my family's connection to the Siksika Nation, so Duane's encouragement to become active with NAHC given my heritage and affinity for this group provided me with a home among Native students and support staff at Harvard.

14. In line with its mission, NAAHU is deeply concerned for current and future Native American, Alaska Native, and Native Hawaiian students should Harvard be prevented from considering race in its admissions policy. Harvard provides enormous and thrilling opportunities, yet it can be alienating if absolutely no one else in your class, cohort, or school has experienced life as you have. There are only a few Native students, if any, in any given class. Having even fewer Native students would be devastating.

15. The Harvard University Native American Program ("HUNAP") is an interfaculty initiative created to promote Harvard's academic work and curriculum on Native American issues; to encourage the Harvard community to conduct outreach in Indian Country on issues of pressing

concern; and to help recruit, retain, and graduate more Native American students at Harvard. While HUNAP has been an important focal point for Native students, it only has a staff of 2.5 individuals, and its continued existence can be precarious at times, especially with a widely fluctuating Native student population from year to year. For example, during my senior year at Harvard, the Provost questioned whether HUNAP should continue to exist. I participated in an extensive internal review that demonstrated HUNAP's importance to the university and helped ensure its survival. Yet these issues arise perennially with changes in Harvard leadership. Decreasing the number of Native students could potentially jeopardize HUNAP's existence again.

16. Removing race consciousness from Harvard's admission process would also detrimentally affect Native students' ability to apply to Harvard. If students cannot even discuss their home reservation (since that would likely identify their race), how can they possibly expect to give the Harvard Admissions Office a reasonably full picture of who they are in their admissions essays?

17. As alumni, the members of NAAHU vividly remember the education we respectfully provided to fellow students and, when appropriate, to professors, regarding indigenous history and current affairs. There is a burden and a privilege to being in the position to represent "the Native perspective." All students would lose if these perspectives are no longer represented at Harvard.

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

Executed on this day, July 25, 2018

s/ Emily Van Dyke

Emily Van Dyke

EXHIBIT 16

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF RASHID YASIN
(HARVARD UNIVERSITY MUSLIM ALUMNI)**

Rashid Yasin, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Rashid Yasin, and I am a 2012 graduate of Harvard College. I am currently President of the Harvard University Muslim Alumni (“HUMA”) and am submitting this declaration individually and on behalf of HUMA.

2. HUMA’s board members have discussed this lawsuit and decided to participate as amicus curiae in support of Harvard’s race-conscious admissions policy. HUMA’s board members also authorized me to submit this declaration on behalf of the entire organization.

3. HUMA was founded in 2004 with the mission of connecting Harvard Muslim alumni and faculty and supporting Islam and Muslim students at Harvard and in the surrounding community. HUMA works to accomplish this mission through four pillars: (1) supporting Muslim students at Harvard by providing programming and services

and acting as an advocate on their behalf, (2) hosting alumni networking opportunities, (3) increasing resources on campus for the dissemination of knowledge about Islam (including spiritual, academic, and social issues), and (4) increasing access to Harvard for Muslim students through pipeline initiatives. HUMA has a close relationship with the Harvard Islamic Society, an undergraduate group whose members often join HUMA upon graduation.

4. Muslims are a multiracial community that is majority minority. Similar proportions of American Muslims are Black, Arab, or South Asian, and the community has members from many other racial and ethnic backgrounds. Data suggest that the fastest growing group within the American Muslim community is the Latino Muslim community. This multifaceted identity means that religion and race are deeply intertwined for many Muslims, especially American Muslims, and we take keen interest in issues that affect communities of color.

5. HUMA strongly supports preserving race-conscious admissions at Harvard. Only holistic admissions can take into account the unique, intersectional lived experiences of Muslim applicants, who are often also underrepresented minorities. In addition, based on the values that Islam instills, HUMA feels a moral obligation to fight injustice, including by supporting race-conscious admissions, which, in a small way, help address past and present inequities. Islamic values teach that one does not have to be the best test-taker or a valedictorian to be a leader. Likewise, Harvard's view of excellence is not limited to narrow academic achievements, but also values personal growth, community engagement, and altruism, qualities that HUMA supports. We condemn any bias against Asian American applicants that may exist in the admissions process, but the solution is to address

these biases head on, not to erase all applicants' identities by eliminating race consciousness.

6. Diversity on Harvard's campus is crucial to Muslim students' experiences. Although Muslim students are a small community on campus, the presence of students from other diverse backgrounds helps the environment seem more welcoming to Muslims and facilitates cross-cultural understanding that benefits all students. As the translation of the Quran says, "We have . . . made you nations and tribes that ye may know one another." Quran 49:13. Coming from a diverse community, we understand the strength inherent in communities that have different backgrounds, experiences, perspectives, and identities and support Harvard's commitment to such diversity.

7. HUMA members fondly remember the cross-cultural opportunities available at Harvard that were possible only due to the diversity of its students. Lively iftaars (dinners during the month of Ramadan) with La Raza, BSA, and the Harvard African Students Association, alongside other campus groups, were beloved annual traditions. And the Harvard Islamic Society also coordinated "Know Your Rights" presentations geared toward Black and Muslim communities and collaborated with the fraternity Sigma Chi to coordinate volunteer work at a local homeless shelter. Muslim students also hosted dinners and events open to all students to showcase Muslim food and culture.

8. As Muslims, we also know the threat posed by misunderstanding that is fostered when people have limited exposure to those who are different from them. We are familiar with the recent rise in hate crimes and open hostility against Muslims. Muslims students at Harvard often face misunderstanding, exclusion, microaggressions, and at

times, hostility based on their religion. We often assume the burden—willingly or not—of educating our fellow students about Muslim religion and culture. And we sometimes bear the brunt of outrage sown by political controversy. For example, a member of HUMA recounted a terrifying experience from the early 2000s of being chased down the street as a student because she was wearing a headscarf. In 2006, following the lead of the French newspaper Charlie Hebdo, the Harvard Salient (a student newspaper) published a set of cartoons with inflammatory depictions of the Prophet Muhammad, deeply offending many Muslim students.

9. Furthermore, the Harvard administration is not always responsive to Muslim student needs. In 2008, Muslim female students, along with the Harvard College Women's Center, requested a period of female-only gym hours, which Harvard implemented for six hours a week at one of the smaller, non-centrally located gyms on campus. Harvard backtracked, however, and discontinued the practice after media scrutiny and criticism by other Harvard students.

10. In 2010, Harvard honored Marty Peretz, the former editor-in-chief of the New Republic, at a celebration of the 50th anniversary of the social studies department and also established a fund in his name. Peretz has a history of racist comments against Muslims, Latinos, Arabs, and African Americans, and once wrote "Muslim life is cheap. . . . I wonder whether I need honor these people and pretend they are worthy of the privileges of the First Amendment, which I have in my gut the sense that they will abuse." Although multiple student affinity groups representing Muslim, Latino, Arab, and Black students denounced the decision, Harvard went ahead with the ceremony and has kept the fund in his name.

11. Particularly in the current political climate, HUMA is deeply concerned for the future of Muslim students and the entire Harvard student community should race-conscious admissions come to an end. There would likely be fewer Muslim students, since many are from underrepresented minority backgrounds, and the complex identities of Muslims would be erased in the application process. This result could undercut HUMA efforts to increase access for Muslim students and diminish the experience of students on campus. HUMA alumni recall their Harvard experience as thrilling and illuminating, but at times isolating. Many relied on fellow Muslim students for support, while also relishing engaging with students (including fellow Muslims) from other backgrounds. A Harvard with fewer Muslims and less vibrant diversity would not be Harvard at all.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on this day, July 27, 2018

/s/Rashid Yasin

Rashid Yasin

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS,
INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE (HARVARD
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF THE NATIONAL BOARD OF DIRECTORS OF HARVARD LATINO
ALUMNI ALLIANCE (SIG)**

NATIONAL BOARD OF DIRECTORS OF THE HARVARD LATINO ALUMNI
ALLIANCE (SIG), pursuant to 28 U.S.C. Section 1746, declares the following:

1. We are the National Board of Directors of the Harvard Latino Alumni Alliance. We are writing this declaration in support of the consideration of race, as one of many factors, in Harvard's admissions policy. As representatives of the Latino community, we believe that we offer a unique perspective on the positive impact of race-conscious admissions policies; one rooted in its merit, rather than speculation.
2. The National Board is elected by members of the Harvard Latino Alumni Alliance ("HLAA").

3. The mission of the HLAA is to develop a network and sense of community among current and future Harvard alumni who self-identify as Latino and reside or work in the United States; to increase Latino representation throughout the University; and to encourage Latino alumni involvement in University alumni activities and affairs.

4. HLAA was officially founded in 2015, as a culmination of various efforts over the last 30 years. Founding members saw the need for a formal organization connecting Latino students across the University. The National Board is comprised of alumni from a majority of schools across the Harvard campus whose attendance and graduation dates span nearly 40 years. Over the past three years, HLAA has grown significantly in number of members, hosting events across the country and connecting alumni with students. The HLAA provides its increasing number of community members with opportunities to advance their careers through recruitment, mentoring and networking.

5. Since our founding, we have surveyed our members and held town hall meetings to understand the needs of our community. Many of our members have expressed the need for diversity on campus and have shared their feelings that as Latino students, they lacked support. HLAA student-focused goals include building a pipeline of Latino applicants and making sure admitted Latino students feel welcome and are given the resources they need to succeed at Harvard. We strive to ensure that all Latinos are on a path to success not only at Harvard, but at other academic institutions across the USA.

6. While there has been an increase in Latino acceptance rates on campuses across the United States, we feel that more needs to be done. Removing race-conscious factors from admissions might jeopardize this progress, as well as further hinder academic achievement of Latino students

by eliminating the critical mass that provides vital support to the already underrepresented Latino student base.

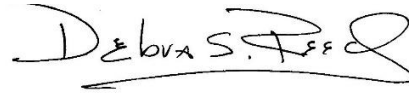
7. Many of our members are first-generation college students and come from socio-economically disadvantaged families. We believe that race-conscious admissions helps these students compete with students educated at better schools and with greater access to opportunities and experiences that enhance the potential for admission and academic success at Harvard. It is our concern that if race-conscious admissions is removed from the process, Latino students will be negatively impacted as they pursue higher education.

8. Many of our alumni have benefited from racially diverse institutions, conversations, organizations, etc. Through our experience both at the university and professionally, we have seen first-hand how diversity improves the sharing of ideas, beliefs, etc. If not for race-conscious admissions policies, we believe that the quality of our education would have been hindered. Future generations should have even more diverse opportunities than we have. It is our hope that our society continues to embrace the benefits of diversity, moving this agenda forward through dialogue and conversation. We believe that admissions policies that are race-conscious assist in this effort.

9. As a diverse body of Latino alumni, spanning decades of history and experiences, as well as representing the experience of various schools on Harvard's campus, our National Board wholeheartedly supports race-conscious admissions.

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

Executed on this day, July 27, 2018.

A handwritten signature in black ink, appearing to read "Debra S. Reed", with a long horizontal flourish extending to the right.

Debra Sanchez Reed
National President
Founding Board Member
Harvard Latino Alumni Alliance