EXHIBIT E

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE (HARVARD CORPORATION),

Defendant.

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

DECLARATION OF JOHN DOE

I, pursuant to 28 U.S.C. § 1746, declare the following:

1. I am an individual over eighteen years old and of sound mind, who has never been convicted of a felony, is capable of making this declaration, and is fully competent to declare as to matters stated herein.

2. I work in New York and am the father of one child who is almost six years old. My family lives in the New York area. I hope that as my son applies to schools in the future, he will not be subjected to the same discriminatory standards that Asian Americans face today.

3. I joined Students for Fair Admissions ("SFFA") because I believe that Harvard College and many other colleges and universities wrongly discriminate against Asian-American students. In my view, colleges and universities require Asian-American students to have much higher test scores and grade point averages to gain admission than other students. I view this requirement to be unfair.

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4. I am a member of SFFA, and I actively follow its activities. Last year, I worked with Edward Blum to arrange a meeting with the Long Island Chinese Community. In the past year, I have contributed a total of \$120 to support SFFA's mission.

5. I participate as an SFFA member because I support its work in defeating affirmative action policies that unlawfully discriminate against Asian-American students.

6. I am aware that SFFA advocates positions that are adverse to Harvard and are also disfavored by many people, including some of my professional colleagues.

7. When I joined SFFA, I expected that my identity and involvement in SFFA would remain confidential. The website on which I registered stated that my membership would not be disclosed, which was important to my decision to join. Thus, despite its unpopularity, I felt safe participating in SFFA only because I believed that my identity would remain confidential.

8. I do not want the public to know about my involvement in SFFA. If it becomes public that I am a member of SFFA, I fear that it could damage my reputation and cause colleagues at work to view me in a negative light.

9. I also do not want anyone at Harvard to know that I am a member of SFFA. I hope that my son can someday attend Harvard and fear that if Harvard knew that I opposed its undergraduate admissions policies, then it might later retaliate against me by denying admission to my son.

10. Although I support SFFA's litigation against Harvard, I do not want to have any personal involvement in it. I am making this declaration with the understanding that it will remain anonymous and that my identity will not be disclosed.

11. For these reasons, if my identity as a member of SFFA is disclosed to Harvard and its attorneys in this litigation, then it will deter me from participating in SFFA, contributing

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money to it or paying membership dues, interacting with other members, or communicating with the group's leadership. I would not have joined as a member of SFFA if I knew that my name would be disclosed to Harvard.

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

Executed on this day, April 2, 2016.

John Doe