

EXHIBIT 284

**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. 1:14-cv-14176-ADB

DECLARATION OF PETER ARCIDIACONO

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

1. I make this declaration at the request of counsel for Plaintiff Students for Fair Admissions, Inc. (“SFFA”), and if called upon to testify as to the contents of this declaration would testify competently thereto.

2. In my opening report, I included figures showing the share of admits to Harvard by race from the Class of 2000 through the Class of 2019. *See* Arcidiacono Rep. Figures B.1.1-B.1.4. The table below provides the numbers that correspond with those charts:

Table 1: Share of admits by race and year

	Asian American	African American	Hispanic	White
2000	16.4%	8.9%	8.2%	41.6%
2001	17.0%	8.5%	8.6%	40.3%
2002	18.0%	9.8%	8.3%	43.7%
2003	16.4%	9.8%	8.6%	48.2%
2004	15.9%	9.7%	8.7%	46.5%
2005	14.1%	8.8%	8.9%	45.9%
2006	16.5%	8.9%	7.8%	51.1%
2007	16.2%	10.0%	8.6%	50.1%
2008	19.1%	10.0%	9.2%	47.1%
2009	17.6%	10.5%	8.2%	45.5%
2010	17.6%	10.4%	9.7%	42.3%
2011	19.5%	10.5%	9.9%	39.8%
2012	19.1%	10.0%	8.9%	39.2%
2013	17.5%	10.4%	10.6%	38.5%
2014	19.8%	11.1%	8.8%	45.6%
2015	19.3%	11.6%	11.1%	43.1%
2016	20.3%	10.0%	9.3%	41.0%
2017	19.5%	11.4%	10.4%	38.8%
2018	19.1%	11.7%	11.5%	40.3%
2019	20.6%	11.6%	11.6%	36.8%

3. In Professor Card's Rebuttal Report, he presents a chart comparing the average marginal effect of several different characteristics, including being African American, being Hispanic, going from a 3 to a 1 on the academic rating, going from a 3 to a 1 on the extracurricular rating, and going from a 3 to a 1 on the personal rating. *See* Card Rebuttal 72, ¶ 143 & Ex. 23. Professor Card provided me with the model by which he calculated these figures. The table below provides various numbers of applicants in each of these groups from the model Professor Card produced:

Table 2: Number and Share by Characteristic for Professor Card's Estimation Sample

	Number	Share
Personal 1	43	0.03%
Personal 3	112513	78.77%
Academic 1	650	0.46%
Academic 3	58061	40.65%
Extracurricular 1	425	0.30%
Extracurricular 3	102784	71.96%
African American	15303	10.71%
Hispanic	17271	12.09%
Total applicants	142838	

4. According to data produced by Harvard in this matter, Harvard has admitted the following numbers and shares of single-race African-American admits and total domestic admits:

Table 3: Number of single-race African-American and total admits by admission cycle

	Single-Race African-American admits	Total Domestic Admits	Single Race AA Admit Share
2019	176	1853	9.50%
2018	177	1834	9.65%
2017	172	1837	9.36%
2016	147	1860	7.90%
2015	188	1968	9.55%
2014	172	2011	8.55%

5. In advance of the deposition of Professor David Card, counsel for SFFA asked me to pull data showing how the admission rates of certain groups of white and Asian-American applicants vary with the academic rating. Specifically, counsel asked for such data for recruited athletes, applicants from the other special recruiting categories, and all other domestic applicants.

In response to this request, I created the table that is Exhibit 8 to the Card deposition transcript. It reflects an accurate count of domestic applicants in these categories (and their respective admission rates) and is reproduced here:

Table 4: Admissions Rates by ALDC and Academic Rating for Domestic white and Asian-American Applicants

Academic Rating		non-ALDC	Legacy, Dean's director, Children of faculty or staff	Athletes	Total
5 and below	Admit Rate	0.00%	0.00%	50.00%	0.05%
	Number of Admits	0	0	1	1
	Number of Applicants	2182	25	2	2209
4	Admit Rate	0.01%	4.30%	70.63%	1.40%
	Number of Admits	1	11	113	125
	Number of Applicants	8514	256	160	8930
3	Admit Rate	1.05%	15.25%	80.26%	2.94%
	Number of Admits	443	331	549	1323
	Number of Applicants	42196	2170	684	45050
2	Admit Rate	7.87%	42.98%	91.10%	10.14%
	Number of Admits	4145	1267	256	5668
	Number of Applicants	52691	2948	281	55920
1	Admit Rate	63.17%	94.00%	100.00%	65.74%
	Number of Admits	355	47	1	403
	Number of Applicants	562	50	1	613
Total	Admit Rate	4.66%	30.39%	81.56%	6.67%
	Number of Admits	4944	1656	920	7520
	Number of Applicants	106145	5449	1128	112722

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

Executed on this day, July 30, 2018.

/s/ Peter Arcidiacono
Peter Arcidiacono