

# 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 In 1904, six organizations formally formed PBHA, and by the 1920s all the religious groups had withdrawn from the organization.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