

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

Leave to file granted on July 31, 2018

**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. Muslim 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