

# 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

**Leave to file granted on July 31, 2018**

**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