

EXHIBIT 9

**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 FATIMA SHAHBAZ
(HARVARD SOUTH ASIAN ASSOCIATION)**

Fatima Shahbaz, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Fatima Shahbaz. I am a rising sophomore at Harvard and expect to earn my bachelor's degree in 2021. I am writing this declaration individually and on behalf of the Harvard South Asian Association ("SAA") in support of race consciousness in Harvard College's admissions policy.
2. I serve as co-Academic Political Chair of SAA. After consulting with SAA's board members, I have been given authority to submit this declaration on behalf of SAA.
3. SAA exists to meet the political, cultural, academic, and social needs of students who express interest in the region of South Asia and the South Asian diaspora. South Asia includes but is not limited to the nations of Bangladesh, Bhutan, India, the Maldives, Myanmar, Nepal, Pakistan, and Sri Lanka.

4. SAA is honored to join this amicus brief to help build minority coalitions across Harvard and inspire those same minority coalitions across the country.

5. Although SAA believes that there is much that Harvard can do better in terms of how it deals with race relations on campus, how it deals with the Asian diaspora, and how it deals with Asian American admissions, we do not feel that an end to race-conscious admissions is the solution.

6. Indeed, as a part of SAA's deliberations about whether to join this brief, SAA surveyed its members about the issue. The overwhelming majority of SAA's members support Harvard's ability to consider race as one of many factors in admissions.

7. College is about exposing yourself to things that you weren't exposed to before and thereby broadening your horizons. Diversity requires you to address the unknown and grow from that experience. Every Harvard student benefits from having a diverse student body that forces them to reconcile their lived experience with experiences they didn't have.

8. Harvard's consideration of race in admissions is also important because Harvard is educating future leaders. Future leaders need to learn about others who are not of their same background. It is the conversations you have with your classmates and peers that teach you to be tolerant.

9. Furthermore, having a welcoming community of diverse students of color is essential to ensuring that Harvard's students of color have an adequate support network. SAA's members take solace in being able to find community with others with whom they share many commonalities. For example, many of us grew up with the same emphasis on hospitality, calling friends' parents "auntie" or "uncle." SAA members have found a home in SAA, where we can

find comfort in having people know how to say our names the way our parents intended or in having someone around who knows where to find the best Desi restaurants.

10. In addition, Harvard must consider the whole person during the admissions process. Indeed, students are products of their culture. In the same way that students have been shaped by their upbringing and socioeconomic status from birth, your racial identity plays a role in how others see you and thus how you perceive yourself and make your way through the world. If Harvard were to eliminate race conscious admissions, they would be buying into this notion of a colorblind world, but we don't live in a colorblind world.

11. Harvard can make its admissions process more equitable by reconsidering its legacy admissions program, which disproportionately favors wealthy, mostly white legacy candidates, at the expense of similarly qualified non-legacy candidates, most often including low-income students of color. Instead of pointing out the obvious – that legacy admissions is reducing the number of seats available for promising non-legacy candidates, Edward Blum is using Asian Americans as a political tool in his fight to end the consideration of race in admissions.

12. In doing so, he paints Asian Americans with a broad brush. Often, when people think of Asian Americans, they think of solely those East Asians who have access to the best educational opportunities. However, some Asian American communities, such as many Hmong and Filipino students, do not enjoy the same access to educational opportunities as other groups, like many wealthy East Asian or South Asian students. The Asian American community is a community of diverse perspectives, backgrounds, and privileges, and should not be treated as the monolith that Blum is misrepresenting it to be.

13. In addition, to reduce Asian Americans to their test scores is, quite frankly, offensive because it supports the notion that Asian Americans are just a summation of their test scores, instead of real individuals with personal struggles and triumphs that have shaped their lives.

14. The solution to these challenges is more diversity, not less.

15. SAA is proud to stand with other organizations in support of Harvard's ability to consider race, as one of many factors, in admissions.

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

Executed on this day, July 28, 2018

/s/ Fatima Shahbaz
Fatima Shahbaz