

# EXHIBIT 1

**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 August 31, 2018**

**DECLARATION OF JAMES MATHEW  
(21 COLORFUL CRIMSON)**

James Mathew, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is James Mathew. I am a member of the Harvard College Class of 2021.
2. I am the co-founder and President of 21 Colorful Crimson (“21CC”) and am submitting this Declaration individually and on behalf of 21CC in support of the continued utilization of race-consciousness admissions practices at Harvard College.
3. 21CC was founded in January of 2018 to unite artists from diverse backgrounds through musical collaboration. After witnessing several impromptu musical gatherings among students, I realized that the Harvard community could benefit from a structured artistic collaboration space that brings together a diverse group of singers to connect over their shared love of music, especially at a time when much of our nation was facing extreme division.

4. While the organization operates as a creative incubator, with members creating, recording, and performing original music, 21CC also seeks to break down racial, ethnic, and social divisions at Harvard through art.

5. 21CC operates under three pillars: creativity, inclusion, and love. Through application of these three pillars, 21CC aims to employ art to defy stereotypes, advocate for diversity, overcome the social divisions within the community, and celebrate the multifaceted talents of students at Harvard. In the future, 21CC hopes to expand the ways in which it promotes this mission by organizing campus-wide campaigns and conversations about diversity.

6. The members who comprise 21CC come from a range of backgrounds and represent a variety of racial and ethnic, socioeconomic, cultural, and geographic identities. The diversity of 21CC is integral to the development of our performances, in which we showcase pieces that are a fusion of many genres and styles.

7. 21CC supports the consideration of race in the admissions process at Harvard because there is immense value in creating a diverse student body. Throughout the coverage of this lawsuit, Harvard students' experiences and opinions have been given little consideration, but we have a first-hand understanding of the value of a diverse class. 21CC determined it was imperative to share how diversity of Harvard was a vital component of our college experience and central to the formation of our organization.

8. 21CC realizes that the educational experience at Harvard is not merely limited to course curriculum. The opportunity to engage with peers who come from diverse backgrounds and who hold diverse perspectives has been central to our members' intellectual experiences. This engagement has been a critical part of my Harvard experience, and I feel that I have grown from these discussions and the ability to share my lived experiences with classmates. Diversity is key

to this experience. If students are surrounded by those who have a similar story to them, they miss out on enriching dialogue. There is an immeasurable educational benefit in students being provided the opportunity to trade perspectives, confront biases, and learn from each other's experiences.

9. Being a member of a diverse class at Harvard has also allowed me to engage with all facets of my identity and personality. As an Indian American student, I grew up in a white, racially homogenous neighborhood, where I was often an isolated face of color. Because of my race, my peers would often ascribe stereotypes to me. They would cast me as a "bookworm" or someone whose entire identity was defined by academic achievement. As a result of this stereotyping, I felt pigeon-holed as a specific type of person and unable to express all the parts of my personality.

10. When I came to Harvard, I was able to meet other Asian American students who had similar experiences and feelings of isolation. I also witnessed many students of color defying the stereotypes I had faced growing up by striving for academic excellence while also being engaged with activities outside of the classroom, for example, as poets, athletes, musicians, and activists. This inspired me to create spaces, such as 21CC, where everyone was free to engage with all parts of their identity. At Harvard, I no longer feel an obligation to behave in a way that conforms to stereotypes about Asian American students. Instead, through 21CC, I can express the creative, artistic sides of my personality, defying the labels I felt trapped by during high school.

11. 21CC is also enriched by the interactions it fosters between members from different backgrounds. In speaking with Olivia Owens, co-founder and Director of Operations of 21CC, I learned about her own experience as a Black woman growing up in a white, racially homogenous community. She told me that in her hometown in Vermont, she was often the lone person of color in her community. Similar to my experience, she was subjected to many explicit and implicit

stereotypes by her peers. In school settings, she was often met with assumptions about her intelligence. Her peers assumed that she was not smart and that she was unable to excel academically. As a result of being on the receiving end of this vitriol, she told me that she often doubted her own capabilities and intellect.

12. However, once she arrived at Harvard, she found a community that helped her step into her full self. Being around other people of color who were navigating the same academic and social environment allowed her to realize her own potential. Finding a community of people who were challenging the stereotypes society had previously ascribed them gave her the confidence to reject the low expectations her peers had placed on her, and instead excel both inside and outside the classroom.

13. In addition to understanding the benefits of a diverse class, 21CC recognizes that applicants to Harvard should not be reduced to their test scores. Harvard's admissions policies consider the whole experience of a student and the variety of ways in which they could contribute to the community. 21CC, in particular, benefits from members who are creative, collaborative, and community oriented, traits that are not measured by standardized tests. In solely emphasizing test scores, Students for Fair Admissions reduces Asian American to "model minorities," which reinforces harmful stereotypes about their breadth of interests, talents, and personalities. Furthermore, this lawsuit continues to perpetuate the harmful notion that Asian American students are a monolith. Even amongst Asian American students, there is great diversity that often goes unrecognized to the detriment of students, and maintaining diversity at Harvard encourages diversity of Asian American representation, with students of varying Asian ethnicities, traditions, and personalities.

14. While we are frustrated by the possibility that Harvard admissions officers may have been biased against Asian American applicants, we do not believe that the proper solution is the elimination of race-conscious admissions. Rather, training, policies, and procedures should be put in place to deal with the alleged bias at issue. The answer is not to ignore racial identity but to combat racial bias.

15. 21CC believes that in targeting race-conscious admission policies, this lawsuit seeks to pit minority groups against one another. We recognize, however, that all students benefit from a diverse campus. We see this benefit in the work of 21CC each day.

16. If Harvard were to eliminate race-conscious admissions, we believe students would be harmed by the loss of diversity. Students would lose out on the intellectual and emotional relationships that are formed from engaging with individuals from various backgrounds. Additionally, our campus is home to prominent student organizations that contribute to Harvard's culture in meaningful ways. Eliminating race-conscious admissions would negatively impact the membership of cultural groups and affinity organizations, including 21CC, and the critical role they play in shaping, as well as challenging, campus culture.

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

Executed on this day, August 27, 2018.

/s/ James Mathew  
James Mathew