

EXHIBIT 2

**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 MUKESH PRASAD
(HARVARD ASIAN AMERICAN ALUMNI ALLIANCE)**

Mukesh Prasad, pursuant to 28 U.S.C. Section 1746, declares the following:

1. My name is Mukesh Prasad. I am an Alumnus, earning my bachelor's degree from Harvard College in 1993. I am writing this declaration individually and on behalf of the Harvard Asian American Alumni Alliance ("H4A") in support of race consciousness in Harvard College's admissions policy.

2. I serve on the board and as a Vice President of H4A. I have been given authority by the board to submit this declaration both individually and on behalf of H4A.

3. Founded in 2008, H4A exists to serve Asian American and Asian alumni who graduated from Harvard College or any of Harvard's 11 other degree-granting schools. Currently, we have about 6,000 members, representing all Harvard schools, with graduation years from 1957 to 2018 and ethnic backgrounds from throughout all parts of Asia and the

Pacific Islands. Our members live and work around the world, though primarily in the U.S., and we have chapters in Boston, New York, Washington, D.C., Los Angeles and Northern California.

4. H4A seeks to develop a network and a sense of community and support among Asian American and Asian alumni globally, to provide an outlet for the expression of our shared culture and experience, to support the larger Harvard Asian American and Asian community, including students, faculty and staff, and to represent our concerns at the University and beyond. Our activities include a student Mentoring Program, a new Public Service Fellowship for a student serving the Asian American community, local professional and social events, information-sharing and discussions with our members about relevant issues and a quadrennial Summit on campus that draws hundreds of alumni back to Harvard. A major initiative has been to support the 40+-year campaign for an Asian American Studies program at Harvard, in partnership with the Harvard Ethnic Studies Coalition and other student and alumni affinity groups. Our advocacy has included raising the funds for the first endowed professorship in Ethnic Studies, for ongoing support of visiting faculty in Asian American Studies and for the new Asian American Studies Thesis Research Grants, first awarded this year. Though H4A is recognized as a Shared Interest Group of the Harvard Alumni Association (“HAA”), we receive no funding from Harvard and our activities are entirely led and run by volunteers.

5. First and foremost, however, I am a proud graduate of Harvard College—and First Marshal of the Class of 1993—who directly benefited from the diversity the Harvard community offered me. I grew up in a town of 5,000 people in Northeastern Ohio. The town was predominantly Caucasian Christians. I never felt anything but welcome there. But when I arrived in Cambridge, I was exposed to a range of diversity that I could hardly have previously

imagined, on a multitude of measures: geographic, socioeconomic, sexual orientation, ethnicity, religious belief and yes, race.

6. My own rooming group for four years consisted of 7 young men: myself, an Indian-American Hindu raised in Ohio; a Caucasian Greek Orthodox born and raised in Michigan; a Korean-American Christian raised in Los Angeles; a Persian agnostic from New Jersey; a Caucasian Jew from Atlanta; a Caucasian Irish Catholic from Philadelphia; and a Caucasian Protestant from Dallas.

7. It was spending four years with this group that exposed me to and helped me embrace the different identities and perspectives each member of that rooming community brought with them. The lessons learned through my interaction with the diversity in my rooming group, and throughout the Harvard College experience, supplemented my in-class education and were among the more valuable lessons of my time in Cambridge. They have lasted me a lifetime.

8. While at Harvard I was active in many organizations. One that gave me great comfort and enjoyment was the Harvard South Asian Association ("SAA"). South Asian immigration to the United States began in earnest in the late 1960's. Hence the first children of these immigrant families came of college age in the late 1980's. This was reflected in the Harvard community. While approximately 2.5% of my graduating class in 1993 was South Asian, the numbers exploded from there as the Class of 1996 was approximately 5% South Asian. Minority recruitment efforts by Harvard Admissions in conjunction with initiatives by Asian American students to recruit from underserved and underrepresented Asian communities helped lead to this greater inclusion of Asian Americans at Harvard.

9. It was during that time that Harvard students established the South Asian Association, a group that celebrated South Asian culture. The SAA allowed people who had

typically been the only South Asians in their secondary schools to come together and rejoice in being South Asian, and to share that culture with the Harvard community. We decided to host an annual dance show, Ghungroo, which has continued to this day and brings together members of the entire Harvard community. This exuberant event exemplifies Harvard's dedication to the goal of creating a diverse community that does not simply tolerate people's differences, but truly celebrates them.

10. As a Government concentrator, I learned in the classroom about the historical foundations for global regional disputes, for example studying the historical precedents for the Arab-Israeli and Indo-Pakistani conflicts. But it was sitting down for a meal in the dining hall with people from both sides of any dispute that really taught me to understand the origins of those conflicts. I could not have gained the understanding I did about issues of Black-Korean relations in Los Angeles or the impact of Klan marches in Forsyth County, Georgia, without hearing firsthand the viewpoints from my classmates who lived in those regions and were of different races. For example, having both African-American and Korean-American classmates from Los Angeles helped us all understand both paradigms and also helped both groups understand each other. Those commonalities forged in the dining hall proved to be foundational for several of my classmates who have made their life's work addressing these issues. Notably, using surrogate demographics for race in admitting our class, such as socio-economics and geography, would have failed to achieve the same diversity and impact for us: In the Los Angeles example, the participants on both sides of that debate shared a geographic and socio-economic background but their viewpoints were entirely different according to their individual races. Race was a factor that made all the difference in what I took away from the experience of studying and living alongside them all.

11. The invaluable cross-cultural understanding I gained still serves me today as I deal with patients, faculty, and hospital staff from various cultures in my work in New York City as an Otolaryngologist and Head & Neck Surgeon, and serving as the Chair of the Weill Cornell Medical College's Faculty Council. It has also helped me in treating patients who embrace non-traditional medical approaches and therapies that are unfamiliar to me.

12. My experience at Harvard is not novel. Harvard has long played a role in America's history of convening a student body that brings diverse and wide-ranging paradigms into a common community. In the late 19th century Harvard sought to heal the nation's wounds by bringing together sons of both the North and the South, helping to forge an understanding and appreciation of each other.

13. It is the richness of this community, which exposes students to others who have achieved excellence in a variety of ways—whether on a sports field, in the academic world, in the arts, or by demonstrating leadership in a specific community—that makes Harvard one of the country's leading educational institutions.

14. Still, Harvard's diversity can be lacking in some respects, and its abundance or deficiencies has had other kinds of direct impact on alumni's lives. The President of H4A and my H4A board colleague, Jeannie Park, also grew up in Ohio, where the few Asian Americans she knew were scientists or doctors or small business owners. Serving alongside Jeannie on the H4A board has allowed me to learn about her experience at Harvard and beyond. She entered Harvard intending to be a Government major, as I was, but at the time she started college in 1979, 10 years earlier than I did, she told me she saw so few Asian American students in the department that she walked into her first Government class and walked right back out and settled into a more familiar field, biochemistry, a move she looks back on as unfortunate.

15. The student Asian American Association (“AAA”) gave Jeannie her first taste of another field, journalism. None of the Asian American students she knew worked on Harvard’s major publications, such as *The Crimson*, so she was too intimidated to consider joining those. But AAA’s newsletter, *East Wind*, felt welcoming. Working on it and eventually editing it instilled a taste for words that would eventually lead her finally to abandon science and begin a 22-year career in magazines as a reporter and eventually editor and executive.

16. It was through AAA and the student group Koreans of Harvard-Radcliffe (a precursor to today’s Harvard Korean Association), as well as the sole Asian American Studies course offered then, “Dunster House Seminar 112: Asian American History and Identity,” that she first learned of such injustices as the wrongful murder conviction of Korean American Chol Soo Lee and the racially motivated murder of Chinese American Vincent Chin in 1982, both of which led to national, pan-Asian movements for justice. The Korean American journalist K.W. Lee, whose investigation led to Chol Soo Lee’s release, and the Asian American writer Helen Zia, a leader of the crusade for justice for Vincent Chin, both eventually became Jeannie’s mentors in journalism and advocacy, leading her to found the Asian American Journalists Association chapter in New York and to advocate for the Asian American community and for diversity and inclusion throughout her life.

17. We and our fellow H4A Board members, leaders and volunteers have worked to build not only an extensive and diverse network that serves to support Harvard’s Asian American and Asian community socially, professionally and academically, but to strengthen the voice of that community within Harvard. We urge our members to get involved with the Harvard Alumni Association, creating and supporting a pipeline of leadership within that organization.

18. In October of 2014, H4A learned of an emailed death threat that was sent on Oct. 3rd to more than 400 women at Harvard, almost all undergraduates of Asian descent. Initially, the Harvard administration did not recognize the fear and panic this evoked in some of the students who were left questioning their own safety on campus. In its initial communications the Administration neglected to mention the racial aspect of the threat and even actively censored mention of it from a student communication, effectively obscuring that this was a racial hate crime.

19. In their frustration and fear, students reached out to H4A members for support. The H4A Board and members wrote to President Drew Faust and spoke repeatedly with Harvard College Dean Rakesh Khurana, Harvard University police and lawyers to underscore the seriousness of the threat's impact and the need for assurance and resolution. In this we were supported by Arab, Black, Latino, Muslim, LGBT and Native American alumni and faculty organizations. This episode illustrated the need for organizations like H4A to advocate for our communities and to do it collaboratively with others.

20. As beneficiaries of the diversity that Harvard has so successfully convened, my fellow H4A board members and I believe:

21. Racial discrimination against Asian American applicants or those of any background, to the extent that it may exist in the admissions process at any institution, is unacceptable and we condemn it. The key to addressing any such biases, especially implicit ones, is not the elimination of race consciousness but a heightened awareness and understanding of issues around race and ethnicity when assembling the academic community.

22. The measure of a successful Harvard student has never been having the highest test scores or GPA. No one demographic characteristic or single measure of academic ability

could ever supersede all others in the quest to fill the class. We believe that our classmates were admitted not only because they met the criteria to succeed academically, but also because they brought other kinds of excellence, often unquantifiable, that would contribute to the education of their fellow students.

23. It is the day-to-day interactions of people from different walks of life that make the Harvard experience so special and that help prepare students to embrace working across lines that so often divide our society.

24. Race and ethnicity must be among the many qualities Harvard considers in its goals to assemble the very best the world has to offer, to expose its students to the world's diversity and to convene a class that provides the optimal educational environment. It is this convening power that is one of Harvard's greatest gifts to society. Taking away the ability to consider race as just one element of a holistic admissions process would be detrimental to the educational mission of Harvard and other such institutions of higher learning. The ramifications would be felt beyond universities.


25. An important element of Harvard's mission is to build leaders. This includes leaders of communities that are defined by race and ethnicity. It is incumbent upon Harvard and other such institutions to admit students with the potential to lead diverse communities, which is in itself a valid criterion for admission.

26. The Asian American community is itself diverse, including students whose families come from all the far-flung corners of Asia, with different traditions, languages, politics and practices; students whose ancestors immigrated to the U.S. more than a century ago; students who have multiple-generation Harvard legacies; students who are the first in their families to attend college; students who never speak English at home; students who are of

mixed-race heritage; students who are refugees from oppression in their native lands; students who are crazy rich; students for whom Harvard feels forbidding and uncomfortable; students who are unconsciously and inexorably affected by stereotypes they face; students who do not identify as Asian American. We hope Harvard will become even more race conscious and seek to learn more and more about the many facets of our community and how each of us might contribute to Harvard.

27. It is with pride and privilege that we stand with so many other organizations of Harvard students and alumni in support of Harvard's consideration of race, as one of many factors, in its whole-person, inclusive admissions process, a factor that we know contributed immeasurably to the excellence of our educations.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this day, August 27, 2018.



Mukesh Prasad, MD FACS