

Exhibit 14

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MASSACHUSETTS
3

4 _____
5 STUDENTS FOR FAIR ADMISSIONS, INC.,
6 Plaintiff,

7 v.

No. 1:14-cv-14176

8 PRESIDENT AND FELLOWS OF
9 HARVARD COLLEGE
10 (HARVARD CORPORATION),
11 Defendant.
12 _____

13
14
15
16 VIDEO DEPOSITION of WILLIAM FITZSIMMONS
17 Boston, Massachusetts
18 August 3, 2017
19
20
21
22

23 Reported by:

24 Dana Welch, CSR, RPR, CRR, CRC

25 Job #127104

1 FITZSIMMONS

2 can ask that question after a break. It's been an
3 hour and 20 minutes.

4 THE VIDEOGRAPHER: Time now is 1858.
5 We're off the record.

6 (Proceedings interrupted at 6:58 p.m. and
7 reconvened at 7:13 p.m.)

8 THE VIDEOGRAPHER: Time now is 1913.
9 We're on the record.

10 MR. STRAWBRIDGE:

11 BY MR. STRAWBRIDGE: The question before we broke
12 was: Have you read Jerome Karabel's book The
13 Chosen?

14 MS. ELLSWORTH: Objection.

15 A. Yes.

16 Q. Do you believe that he accurately
17 describes the history of Harvard's admissions
18 process?

19 MS. ELLSWORTH: Objection.

20 A. I read his account carefully. I don't
21 have any independent corroboration of what was in
22 the book.

23 Q. Is it your testimony that you don't have
24 any idea whether or not Harvard's admissions
25 process was abused in order to limit the number of

1 FITZSIMMONS

2 Jewish students on campus?

3 MS. ELLSWORTH: Objection.

4 Q. Last century?

5 MS. ELLSWORTH: Objection.

6 A. What I was saying is that the holistic
7 admissions process of which I have been a part
8 since I arrived in the office, you know, certainly
9 is not like the one you describe.

10 Q. But my question was just is it possible
11 that a holistic admissions process could
12 nonetheless be abused in a discriminatory fashion?

13 MS. ELLSWORTH: Objection.

14 A. Again, I don't know exactly whether what
15 was described in that book or what I've read in
16 other accounts was anything like holistic
17 admissions processes that exist today.

18 Q. Do you think it's impossible for anybody
19 to ever abuse a holistic admissions process?

20 MS. ELLSWORTH: Objection.

21 A. I think it would be impossible to abuse
22 the admissions process that -- that we have.

23 Q. Nothing in this report gave you any
24 concerns?

25 MS. ELLSWORTH: Objection.

1 FITZSIMMONS

2 Q. When you saw it?

3 MS. ELLSWORTH: Are you referring to
4 Exhibit 17?

5 MR. STRAWBRIDGE: Yes.

6 A. The information provided, we certainly
7 looked at the information, and we always like to
8 get new information as we proceed.

9 Q. And what did you do with this information?

10 A. I'm not aware there was specific
11 follow-up.

12 Q. Are you aware of any follow-up?

13 MS. ELLSWORTH: Objection.

14 A. I think the fact that the admission --
15 that this information was presented to us and that
16 it was delivered to us was certainly something in
17 our minds as we proceeded from there.

18 Q. That was -- but you didn't ask for any
19 further research?

20 A. Not that I recall.

21 Q. And you didn't discuss this with anybody
22 else in the admissions office?

23 MS. ELLSWORTH: Objection.

24 A. I think it's possible that were other
25 members of the admissions office present for this.

CERTIFICATE

Commonwealth of Massachusetts
Suffolk, ss.

I, Dana Welch, Registered Professional Reporter, Certified Realtime Reporter and Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that WILLIAM FITZSIMMONS, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by the witness.

I further certify that I am neither related to nor employed by any of the parties in or counsel to this action, nor am I financially interested in the outcome of this action.

In witness whereof, I have hereunto set my hand and seal this 15th day of August, 2017.

Dana Welch

Notary Public

My commission expires:

October 6, 2017